



# **MODERN SLAVERY ACT 2015**

## **SLAVERY AND HUMAN TRAFFICKING**

### **STATEMENT**

**1<sup>st</sup> April 2023 – 31<sup>st</sup> March 2024**

**Lead Officer: Head of Governance and Corporate Services**

<b><u>Version No.</u></b>	<b><u>Purpose/Changes</u></b>	<b><u>Approval Date</u></b>	<b><u>Approved By</u></b>	<b><u>Suggested Review Date</u></b>
<b>V8.0</b>	<b>Annual review</b>	<b>28/03/2023</b>	<b>Group Common Board</b>	<b>March 2024</b>
V7.0	Annual review	29/03/2022	Group Common Board	March 2023
V6.0	Annual review	25/03/2021	Group Common Board	March 2022
V5.0	Annual review	08/04/2020	Group Common Board	March 2021
V4.0	Annual review	28/03/2019	Ongo Partnership Board	March 2020
V3.0	Annual review	29/03/2018	Ongo Partnership Board	March 2019
V2.0	Annual review	30/03/2017	Ongo Partnership Board	March 2018
V1.0	New Statement	30/06/2016	Ongo Partnership Board	March 2017

## 1. Introduction

At Ongo we are committed to ensuring excellent practices to combat slavery and human trafficking. It is important to us that we employ ethical business practices that are aligned with our ethos of a business for social purpose to deliver our vision. As an employer we are committed to paying the minimum of the Living Wage. We regularly review all our terms of employment to ensure that they comply with all relevant legislation.

### All about Ongo

Ongo is a regional housing and community investment group based in Scunthorpe, North Lincolnshire with ambitions to build more homes and help even more people.

With over 10,000 homes to rent and a workforce of over 350, we are currently the largest landlord in North Lincolnshire, providing homes to over 25,000 people in and outside of the North Lincolnshire area.

We have a strong track record in delivering excellent customer service and putting tenants at the heart of our decision making.

The Ongo Group comprises of the following subsidiaries:

- **Ongo Partnership** – Ongo Partnership Ltd is the parent company which sets the corporate strategy and oversees the vision and direction of the Group as a whole. Ongo Partnership is responsible for providing a range of corporate services to the Group
- **Ongo Homes** – Ongo Homes is the registered housing provider and is a Community Benefit Society. Ongo Homes is responsible for providing homes and services to approximately 10,000 homes in North Lincolnshire and the surrounding area. Ongo Homes has two subsidiaries, **Ongo Home Sales Ltd** and **Ongo Developments Ltd**, to facilitate the building of new homes over a range of tenures
- **Ongo Commercial** – Ongo Commercial delivers maintenance services internally within the Group and externally to a range of both corporate and individual customers. **Ongo Roofing** (trading as Ashbridge Roofing) and **Ongo Heating & Plumbing Ltd** (trading as Hales & Coultas Heating and Plumbing) deliver roofing and plumbing & heating services respectively
- **Ongo Communities** – is a registered charity to provide people with opportunities to develop skills, enhance their lifestyles and gain employment. Ongo Communities has two subsidiaries, **Ongo Recruitment Ltd** and **Crosby Brokerage Ltd**

All profits generated by the subsidiaries are reinvested into the group to deliver new homes and community projects.

## **What it means to be Ongo**

Underpinning everything we do are our values. These guide the way we work;

### **Partnership**

Being a great partner is really important to us. Partnership is about valuing relationships, with all our stakeholders. It is about listening and learning and having a positive approach to problem-solving together. No-one knows what we do better than our customers, so their voices drive what we do and always will.

### **Drive**

We have the passion and commitment to make a lasting change and a belief that we can make a positive difference to people's lives. We learn from what we do and will always look for new and better ways of doing things. All our objectives have key performance indicators attached to them to clearly show whether we have achieved what we set out to achieve.

### **Responsibility**

We are responsible for making sure our tenants are safe in their homes and that the information we hold is secure. We can be trusted. We promise to offer tenants the best possible value for the rent they pay so we continually look for more efficient ways of doing things. We also continue to invest in our commercial businesses and build-for-sale programmes to generate as much profit as possible to reinvest.

We are committed to ensuring we meet the regulatory standards required by The Regulator of Social Housing including making sure we manage the risks of our business appropriately.

## **2. Our policy on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of the business. Our Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **3. Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk we take the following steps:

- All new employees are requested to complete Right to Work checks as laid down by the Home Office
- Require new suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Provisions in our template contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle-blowers

#### **4. Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a rigorous supply chain compliance programme. This consists of:

- Asking our suppliers to declare that they and all their suppliers are compliant with the Modern Slavery Act 2015
- Asking our suppliers to declare whether they or any of their suppliers have been subject to prosecution under the Modern Slavery Act 2015
- Ensuring all contractual agreements mention the adherence to the Modern Slavery Act 2015
- Ensuring that our contract managers carry out due diligence checks annually to establish whether any of our suppliers have been subject to prosecution
- Asking our key suppliers to take part in our e-learning training
- Ensuring that our suppliers pay the living wage
- Asking if our suppliers have an Anti-Slavery and Human Trafficking Policy and if not that they must sign up to ours

#### **5. Compliance**

We have dedicated people who ensure compliance from the following departments:

- Audit & Risk
- Tenancy Services
- Human resources
- Legal
- Procurement

#### **6. Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff are expected to read the policy and complete a declaration at induction.

The Policy and Statement is communicated to staff annually to ensure understanding and awareness of the subject.

#### **7. Our Effectiveness in Combating Slavery and Human Trafficking**

Our Group internal auditors will conduct a review when required to assess how effective we are in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

Following a review we will take whatever steps they recommend (if any), to ensure that there is no slavery or human trafficking in our supply chains or business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial year ending 31 March 2024.

**Signed:**

S. C. Hepworth

Steve Hepworth, CEO

**Signed:**

R. Walder

Bob Walder, Chair of Ongo Group Common Board

**Date:** 28/03/2023