

Modern Slavery & Human Trafficking Policy

March 2026

Owner: Head of People and Culture

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V10.0	Annual review	25/03/2026	Ongo Homes Board	March 2027
V9.0	Annual review	26/03/2024	Ongo Homes Board	March 2025
V8.0	Annual review	28/03/2023	Group Common Board	March 2024
V7.0	Annual review	29/03/2022	Group Common Board	March 2023
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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

Contents

		Page
1.	Our policy is...	2
2.	It applies to...	3
3.	Because we want to...	3
4.	We will...	3
5.	Making sure we do what we say...	4
6.	Other things to bear in mind...	5
7.	We'll look at this again...	5

1. Our policy is...

- 1.1 Modern slavery is an umbrella term for activities where one person obtains or holds another in compelled service. This includes slavery, servitude, forced labour, and human trafficking.
- 1.2 At Onco, we operate a zero-tolerance approach to modern slavery, treating it as a crime and a violation of fundamental human rights.
- 1.3 Modern slavery and human trafficking can take many forms. The following examples illustrate situations that may occur in the UK and within housing-related contexts:

Modern Slavery

- **Forced Labour**
Individuals compelled to work under threat or coercion, often without pay or freedom of movement.
- **Debt Bondage**
Victims required to work to repay inflated debts, making repayment impossible.
- **Domestic Servitude**
Individuals kept in private homes, working long hours without pay, often isolated and unable to leave.
- **Child Labour in Exploitative Conditions**
Children forced to work in hazardous environments or trafficked for labour.

Human Trafficking

- **Sexual Exploitation**
Victims coerced or deceived into prostitution or other forms of sexual exploitation.
 - **Labour Exploitation via Recruitment**
Victims recruited and transported across borders or within the UK for exploitative work.
 - **Criminal Exploitation**
Victims forced to commit crimes such as drug trafficking or theft under threat of harm.
- 1.4 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.5 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. It applies to...

2.1 The policy applies to all persons working for Ongo Homes including Ongo Communities and our Commercial businesses – Ongo Roofing Ltd. (trading as Ashbridge Roofing Solutions) and Ongo Heating & Plumbing Ltd. (trading as Hales & Coultas) and Trent Valley Electrical Services (TVES). It also applies to anyone working on our behalf in any capacity, Board/Committee Members (including Board Trainees), officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Because we want to...

- Be clear on our approach to modern slavery and human trafficking.
- Ensure compliance with the requirements of the Modern Slavery Act 2015
- Protect individuals that may find themselves in a vulnerable position whereby they are forced into a position of slavery or human trafficking.

4. We will...

4.1 We are committed to embedding a culture of vigilance and accountability across our organisation. To achieve this, we will do everything we can to ensure compliance with this policy.

4.1.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working with or for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.1.2 A designated Safeguarding Lead provides advice and support to colleagues on potential safeguarding matters, including concerns related to modern slavery or human trafficking.

4.1.3 We recognise that individuals living in social housing or experiencing homelessness may be particularly vulnerable to exploitation. Our teams will

always remain vigilant to identify and report any signs of modern slavery human trafficking.

4.1.4 We will liaise with relevant partners such as local safeguarding boards, police, and specialist organisations to identify and report modern slavery and or human trafficking and ensure victims receive appropriate support and protection.

4.1.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify Ongo's Safeguarding Lead or report it in accordance with our Whistleblowing Policy as soon as possible.

4.1.6 With the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

4.1.7 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Ongo Safeguarding Lead.

4.1.8 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

4.1.9 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a member of the People & Culture Team immediately. If the matter is not remedied, and you are a colleague, you should raise it formally using our Grievance Procedure.

4.2 **Communicate and raise awareness of this policy**

4.2.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us and refresher training is undertaken on a three yearly cycle.

4.2.2 This training ensures that colleagues recognise indicators of exploitation, including those affecting vulnerable customers, colleagues, or others we work with. Managers must ensure team compliance and completion of mandatory training.

- 4.2.3 The Policy and Statement is communicated to all colleagues annually to ensure understanding and awareness of modern slavery and human trafficking.
- 4.2.4 Our zero-tolerance approach to modern slavery and human trafficking is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4.3 Breaches of this policy

- 4.3.1 Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.3.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5. Making sure we do what we say...

- 5.1 The Ongo Homes Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those who work for or with us comply with it.
- 5.2 We will report on how many cases of Modern Slavery and Human Trafficking we have had notified to the Board annually.

The Ongo Safeguarding Lead has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

- 5.3 Managers are responsible for ensuring that their teams understand and comply with this policy and that all mandatory training is undertaken.
- 5.4 This policy also links to our:
- Safeguarding Policy & Procedures
 - Procurement Policy and Procedures
 - Ongo's Recruitment and Retention Policy and Guidance
 - Whistleblowing Policy
 - ASB Policy and Procedure
- 5.5 The main piece of legislation and regulation relevant to this policy is the Modern Slavery Act 2015.
- 5.6 We will consider the Humber Modern Slavery Partnership Strategy in our management of reports and cases of Modern Slavery and Human Trafficking.

6 We'll look at this again...

- 6.5 Each March along with the Modern Slavery & Human Trafficking Statement as it is a legal requirement to review, update and approve for each financial year.