



ONGO's

**MODERN SLAVERY ACT 2015 – SLAVERY AND
HUMAN TRAFFICKING STATEMENT**

March 2017

Led by:	Jo Sugden, Head of HR & OD
Written by:	Jo Sugden, Head of HR & OD
Agreed on:	Health Check – 30 March 2017
Agreed by:	Ongo Partnership Board
To be reviewed:	March 2018

1. Introduction

We are committed to improving our 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.

2. All about Ongo

2.1 Our structure

Ongo is a partnership set up by the people of Ongo Homes to give something back to communities. Its purpose is to look for new business opportunities, whilst also creating new initiatives to help the people of North Lincolnshire. All profit made through the partnership will be reinvested directly into Ongo Homes. That is guaranteed.

2.2 Why was Ongo set up?

In 2012 we contacted our 10,000 tenants and people we work with to talk about how we wanted to do more to invest in the communities of North Lincolnshire.

On hearing our plans, Tenant Ordinary Members voted in favour of us setting up a new group. So we set up the partnership of companies, recruited new board members, started to promote the partnership and Ongo was created. This is with the full knowledge and approval of the Homes and Communities Agency, which regulates Ongo Homes as a social housing provider.

2.3 What does Ongo mean?

Ongo comes from the partnership's ongoing commitment to reinvesting into homes and communities in North Lincolnshire.

Its purpose is to create income to reinvest into building new homes for Ongo Homes, and to develop new opportunities for tenants and others, whether it be through training and employment or even healthy living – in fact anything that might improve the lives and homes of local people.

2.4 Who is in Ongo?

Not only does Ongo include Ongo Homes, but in 2014 Crosby Employment Bureau became a partner too. Ongo also has a commercial arm to sell services for profit (such as our Locksmiths Service), and a charities arm, to look at setting up new social enterprises to help local people.

Ongo has one simple promise, which every member of the partnership will live by. That is: 'everything we do is put back into local communities'.

3. 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 [Anti-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.

4. 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
- Requiring 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

5. 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

6. Compliance

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

- Human resources
- Legal
- Procurement

7. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff, including training from an employment law firm for managers and an e-learning programme for other staff.

8. Our Effectiveness in Combating Slavery and Human Trafficking

Our Group internal auditors will conduct an annual review 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 their 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 2018.



Signed: Andrew Orrey, CEO



Signed: David Hilditch, Chair of Ongo Partnership

Date: 30 March 2017