



## **ONGO's**

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

**1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2020**

<b>Led by:</b>	Jo Sugden, Director of Corporate & Compliance Services
<b>Written by:</b>	Jo Sugden
<b>Agreed on:</b>	Health Check – 30 March 2017 Annual Check – 29 March 2018 Annual Check
<b>Agreed by:</b>	Ongo Partnership Board
<b>To be reviewed:</b>	March 2020

## 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.

### All about Ongo

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

With 9,768 homes to rent and a workforce of 360, we are currently the largest landlord in North Lincolnshire, providing homes to over 25,000 people.

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

### Our structure

**Ongo Partnership** consists of the following subsidiaries:

- **Ongo Homes:** a social housing provider regulated by the Regulator for Social Housing, we provide around 10,000 for rent in North Lincolnshire and neighbouring counties. Ongo Homes is a community benefit society operating not for profit.
- **Ongo Commercial:** this includes our commercial businesses which operate for profit, including Ashbridge Roofing and Hales & Coultas Heating and Plumbing.
- **Ongo Communities:** a charity which delivers a range of projects aimed at improving the lives of tenants and wider communities. This includes Ongo Recruitment, which is a social enterprise recruitment agency.
- **Ongo Home Sales:** a sales and marketing company for new properties built for direct sale.
- **Ongo Developments:** a development company for the building of new properties for direct sale.

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 tenants, 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.

It also means the continued investment 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.

## **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 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, 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.

## 8. Our Effectiveness in Combating Slavery and Human Trafficking

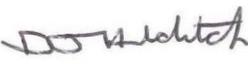
Our Group internal auditors will conduct an annual review to assess how effective we are in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

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 2020.



Signed: Steve Hepworth CEO



Signed: David Hilditch, Chair of Ongo Partnership

Date: 28<sup>th</sup> March 2019