

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

April 2019 - March 2020

We are pleased to be publishing Onward's fourth Modern Slavery and Human Trafficking Statement covering April 2019 – March 2020.

Onward is committed to preventing slavery and human trafficking within our business and our neighbourhoods. This Statement sets out the steps we take to prevent modern slavery and human trafficking in our business, and the actions we intend to take in the coming year to prevent modern slavery from occurring.

Structure, Business and Supply Chains

Onward is a leading provider of quality, affordable homes for rent and sale in the North West of England. We own and manage over 30,000 homes across the region. But we do more than just provide a roof over our customers' heads. Our vision is to make a positive difference in the communities we serve. We offer help and support to vulnerable people facing a range of challenges and create strong and vibrant communities that our customers can be proud to be a part of.

Actions we deliver every year:

- Our Procurement Policy sets out our expectation that all organisations we work with are committed to preventing slavery and human trafficking.
- We include a question about compliance with the Modern Slavery Act within our tender and quotation opportunities which is an automatic fail if the organisation bidding cannot demonstrate compliance.
- We raise awareness of Modern Slavery with our procurement consortia and contractors.
- Modern Slavery is championed by our internal Safeguarding forum and we monitor and report safeguarding cases to the Board, including reports of suspected modern slavery within our communities.
- All colleagues are required to complete Modern Slavery e-learning training and at the time of writing this statement, 92% of colleagues had completed the training. Reminders are sent to those who have not completed the training and their manager is informed that they are not compliant.
- We have a Vigilance guide for colleagues to help keep our tenants safe, which sets out standards expected in relation to identifying and acting on safeguarding, domestic abuse and modern slavery concerns.
- We continue to hold the Living Wage Foundation accreditation, ensuring that contractors we work with comply with the requirements of the Foundation.
- Our Modern Slavery Statement is accessible on our electronic tendering platform for potential suppliers to view.

Over the past year we have also:

- Raised colleague and customer awareness by writing a blog and putting articles on our internal and external websites.

- Required colleagues to complete an annual refresh of the modern slavery e-learning training.
- Looked at how we can improve our interactions with existing suppliers so that we check what they are doing about modern slavery on an ongoing basis, not just when we appoint them.

In the coming year we will:

- Continue to raise awareness amongst colleagues and customers of slavery and human trafficking issues.
- Introduce new ongoing assessments with our key suppliers which will include what they are doing to reduce the risk of modern slavery in their supply chains.

Related Policies and Procedures

Onward operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** Onward encourages all of its workers, customers and other partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Onward's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Code of Conduct** Onward's Code makes clear to employees the actions and behaviour expected of them when representing the organisation. Onward strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Procurement policy** Onward is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment policy** Onward uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Training policy** Onward is committed to ensure its employees are aware of our obligations under the modern slavery and human trafficking act and our internal processes to manage risks and preventative steps.

This statement was approved by Onward's Board in September 2020.

Onward's Chair: Dr. Neil Goodwin

Signed:



Date: 16 September 2020