

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 April 2020 - 31 March 2021

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.

### Risk Assessment and Management

Managing the risk of modern slavery within our business is key to upholding our values. Our risk assessment and management activities focus on:

- Assessing our supply chain and ensuring our suppliers have robust processes in place to manage the risk of modern slavery.
- Ensuring our HR processes confirm that our colleagues have the right to work in the UK. In addition, we assess our gender pay gap and as a business we are committed to paying the living wage.
- Training our colleagues to ensure they have the skills to identify any examples of modern slavery within the communities in which we work.

### 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.
- As part of our due diligence, we include a question about compliance with the Modern Slavery Act within our procurement 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.
- Our Modern Slavery Statement is accessible on our electronic tendering platform for potential suppliers to view.
- Modern Slavery awareness is supported by our safeguarding HUB, who monitor and report all safeguarding referrals to board Bi-annually. It is included in our internal safeguarding policy and our Be Vigilant procedures for all Onward contractors which set out standards expected in relation to identifying and acting on safeguarding, domestic abuse and modern slavery concerns.
- All colleagues are required to complete Modern Slavery e-learning training.

### How we measure success:

- Awareness of safeguarding issues such as modern slavery is improving within our business, evidenced by the increasing number of cases our colleagues are reporting.
- We monitor how many colleagues have completed the annual modern slavery e-learning training. Reminders are sent to those who have not completed the training and their manager is informed that they are not compliant.
- We continue to hold the Living Wage Foundation accreditation, ensuring that contractors we work with comply with the requirements of the Foundation.

### Over the past year we have also:

- Refreshed our modern slavery e-learning training to ensure it is up to date.
- Improved 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.
- Released HR Essentials for line manager training, which includes various people management modules, which includes but not limited to, recruitment and selection; grievance mechanisms, to support and embed ongoing effective workplace people practices.
- Adopted employment right to work checks in line with government guidance under Covid-19 to ensure ongoing compliance with new employment appointments to Onward.

### In the coming year we will:

- Provide comprehensive equality, diversity and inclusion training with all colleagues to ensure ongoing effective people practices, contributing to the Diversity and Inclusion Strategy.
- Align and adapt people practices as appropriate and in line with government guidance under Covid -19, ensure appropriate safe systems of work are in place. This includes the right to work checks for employment.
- Introduce annual assessments of our suppliers following the roll-out of Onward's new risk management software.

### 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 on 22 September 2021.

**Onward's Chair: Dr. Neil Goodwin**



**Date:** 22 September 2021