

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 APRIL 2023 - 31 MARCH 2024

The Modern Slavery Act (2015) requires all organisations supplying goods or services with a turnover of £36 million or more to publish an Annual Modern Slavery statement. We are pleased to be publishing Onward's seventh Modern Slavery and Human Trafficking Statement, which sets out the steps taken by the organisation to prevent and tackle modern slavery between April 2023 and March 2024.

STRUCTURE AND VISION

Onward is a leading registered 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 enable customers to be their best, in a home they love, and a place they are proud of. 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, both during application and once a candidate has been successful. In addition, we assess our gender pay gap and as a business we are committed and accredited to paying the Real 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.
- Ensuring appropriate systems are in place for colleagues to escalate any concerns as needed.

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.
- An annual assessment of suppliers to confirm they still meet our requirements.
- Modern Slavery awareness is supported by our safeguarding arrangements, and all safeguarding referrals are reported to Board annually. It is included in our internal Safeguarding Policies, our Be Vigilant procedures and Onward contractors handbook which set out standards expected in

relation to identifying and acting on safeguarding, domestic abuse and modern slavery concerns. This information is communicated to all operatives on behalf of Onward to ensure increased awareness.

- During 2023/24 we launched Onward Plus training which is delivered to all colleagues and seeks to raise, amongst other things, awareness of potential customer vulnerabilities and the risk of safeguarding.
- All colleagues are required to complete Modern Slavery e-learning training and comprehensive equality, diversity and inclusion training to ensure ongoing effective people practices, contributing to the Diversity and Inclusion Strategy.

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 to reinforce completion of this mandatory module.
- We continue to hold the Real Living Wage accreditation, ensuring that contractors we work with comply with the requirements of this accreditation.

OVER THE PAST YEAR WE HAVE ALSO:

- Marked Anti-Slavery Day and promoted the 'unseen' app to raise colleagues' and customers' awareness of the issue.
- Embedded Onward's 'Don't Walk By' initiative to encourage colleagues to be aware of and report any issues within our communities.

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:

- **Speak Up Policy** - Onward encourages colleagues 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 Speak Up procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation.
- **Code of Conduct** - Onward's Code makes clear to colleagues 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 & Selection Policy** - All recruitment to Onward is undertaken with a fair, transparent and robust recruitment process. Onward uses only specified, reputable employment agencies to support any source of labour and always verifies the practices of any new agency as part of our due diligence arrangements. All new starters to Onward are checked to ensure compliance with the latest government right to work checks.
- **Safeguarding Policies** (Adult and Child) - Onward is committed to reporting safeguarding concerns to Local Authorities and Police to help prevent serious crimes such as slavery and human trafficking to ensure proportionate, timely, professional and ethical responses to keep customers and tenants safe from harm and prevent abuse or neglect.

This statement was approved by Onward's Board on 4 September 2024.

Onward's Chair: Tim Johnston

Signed:



Date: 10 September 2024