Anti-Slavery and Human Trafficking Transparency Statement 2024

Introduction
This statement has been published in accordance with the UK Modern Slavery Act, which requires organisations to disclose the steps they are taking to tackle slavery, servitude and forced or compulsory labour and human trafficking (together known as modern slavery). It covers the six areas outlined in the Home Office guidance:

I. **Organisation structure and supply chains.**
II. **Policies in relation to slavery and human trafficking.**
III. **Risk assessment and management.**
IV. **Due diligence processes.**
V. **Key performance indicators to measure the effectiveness of steps being taken.**
VI. **Training on modern slavery and trafficking.**

Overall accountability for the Anti-Slavery and Human Trafficking Transparency Statement and risk assessment process is held by the Executive Leadership Team. The statement is also reviewed by the People and Governance Committee for content, the Audit and Risk Committee for internal controls, and ultimately approved by the Board. The Audit and Risk Committee is responsible for overseeing the implementation of One Manchester's anti-modern slavery activities.

This statement sets out the steps taken by The One Manchester Group, to prevent modern slavery in its own business and supply chain. This statement applies to the financial year 1 April 2023 to 31 March 2024.

At One Manchester, we value our own people, but also those whom we serve and work with; our beneficiaries and their communities. We must be vigilant in our recruitment, partnership arrangements and supply chains.

Our response to modern day slavery embodies our HEART values. Our values capture who we are, what we believe in, and what we stand for as an organisation.

- **Honest:** We are transparent, truthful, and act with integrity.

We raise awareness and understanding throughout the organisation to support and encourage the reporting of any concerns about our supply chain activities. We ensure our employment and remuneration practices are fair and transparent and we expect the same standards from our supply chain partners.

- **Enterprising:** We are resourceful and work in partnership to maximise opportunities for customers and communities.

We understand our exposure to modern slavery risks and have put in place appropriate controls.

- **Accountable:** We do what we say we will.

We promote and enforce ethical standards with our suppliers and remain vigilant that suppliers do not engage in any practice that could undermine any aspect of human rights.

- **Respectful:** We are inclusive and value the views, feelings, and wishes of others.

At One Manchester, we are committed to respecting and upholding the human rights of every individual influenced by our activities including our customers, employees, supply chain, and local communities. We do not tolerate any form of modern slavery in our business or supply chains.

- **Trustworthy:** We are reliable, consistent, and deliver on our commitments.

Our commitment to addressing modern slavery risks starts at Board level and is embedded into our key business processes.

Tackling modern slavery and human rights impacts in our supply chain is complex and we want to learn from experts to make sure our actions have the maximum positive impact. We have been working with Slave-Free Alliance (SFA), a social enterprise initiated by anti-slavery charity Hope for Justice, for two years. They have helped us to identify areas of best practice and areas for improvement within our own operations as well as our external supply chain. This work has enabled One Manchester to produce an action plan roadmap for 2024-2026 to address modern slavery and exploitation as part of our "more than just a landlord'' approach to business. An anti-slavery working group has been established to advise on the development, implementation, monitoring, and review of the organisation's anti-slavery action plan.

Our Organisation Structure

One Manchester owns and manages over 12,000 homes in central, south, and east Manchester. Our purpose is to provide good quality homes, great services and real opportunities for our customers and communities. We focus on improving our communities by offering a range of services, including employment opportunities, building new developments, and ensuring our customers have safe homes to live in. Equality, diversity, and inclusion are fundamental to our work, purpose, and values. We are building inclusive communities where everyone feels included and supported to be themselves, with leaders who drive progress through listening and acting.

The One Manchester Group comprises of the Group parent company (One Manchester Limited) and three subsidiaries: One Manchester Treasury Limited, One Manchester Property Limited, and One Manchester Developments Limited. One Manchester Limited is a Charitable Community Benefit Society (registration number RS007018) and a Registered Social Housing Provider with the Regulator of Social Housing (registration number 4808).

Our Supply Chain

One Manchester's supply chain includes but is not limited to, goods and services for:

- Asset repair and maintenance
- New build construction and renewable energy solutions
- Vehicles
- Uniforms and PPE
- Offices, such as IT hardware, software products and soft furnishings
- Cleaning services
- Catering services
- Security services
- Recruitment
- Health and Wellbeing

We house customers in over 12,000 properties and partner with local businesses and suppliers to deliver on our social value obligations, which are a cornerstone of our community development initiatives and employment and skills service.

Our Policies

Our policy framework sets out clear standards in relation to human rights and modern slavery for our business, and our suppliers and partners. These policies directly influence our internal business and indirectly set standards and provide guidance to external stakeholders for mitigating modern slavery risks.

Policies are reviewed between 1 and 3 years and updates are made where necessary. All policies have been reviewed and approved by members of the Executive Leadership Team and/or Board. We have several policies that help us to implement our commitment to human rights.

These include:

- **Anti-Slavery and Human Trafficking Policy:** Sets out the approach adopted by One Manchester to address issues of modern slavery and human trafficking.
- **Code of Conduct**: Sets out personal and shared responsibilities for meeting high ethical standards in accordance with One Manchester's values and behaviours.

- **Whistleblowing Policy and Procedure:** We have a confidential reporting system in place to enable stakeholders to report any ethical concerns, including about modern slavery, securely and without fear of recrimination.
- **Procurement Policy and Procedural Guidance:** Sets out clear guidelines and methods by which One Manchester procure contracts, services, and suppliers.
- **Safeguarding Adults Policy:** Sets out the approach to Safeguarding in relation to adults. This includes protecting an adult's right to live in safety, free from abuse and exploitation. The policy outlines how we will work together to support people to make decisions about the risks they face in their own lives and protect those who lack the capacity to make these decisions.
- **Safeguarding Children and Young People Policy:** Sets out the approach to Safeguarding in relation to children and young people. Ensuring that all necessary steps are taken to protect children and young people from the risk of harm and abuse and promote their welfare.
- **Anti-Bribery, Fraud and Corruption Policy:** Sets out the approach towards eliminating bribery, fraud and corruption and achieving the highest standards of good governance in all its activities.
- **Recruitment Policy:** Sets out the approach to ensure that we employ, promote, and retain high calibre colleagues through a fair and transparent process in line with our commitment to providing equality of opportunity for all.
- **Pay Policy:** Sets out the organisation's position on determining pay and outlines the benefits we offer.

The Whistleblowing Policy has been further developed this year so that modern slavery, exploitation, and other serious concerns do not go unreported. Implementing these improvements will support more people to raise their concerns with One Manchester and thus enable us to assess and respond to them appropriately.

We continually review and develop our policies with input from external experts and stakeholders. This suite of policies serves to assess, prevent, and mitigate the risk of modern slavery.

Risk Assessment and Management
One Manchester continuously assesses the potential risk of worker exploitation and modern slavery across the organisation through our risk assessment process which considers external, internal, and emerging risks and how these are mitigated.

One Manchester has several teams that conduct wellbeing and asset due diligence in homes by observing and checking the welfare of our customers and the ''See it, Say it'' campaign makes all employees responsible for reporting their concerns. These teams include neighbourhoods, assets and repairs, health and safety, and customers can report their own concerns to the customer insights team. In addition, One Manchester holds resident meetings as well as other customer voice initiatives. We have implemented the annual 'Behind Every Door' initiative where One Manchester representatives visit every home to check the condition of homes and the well-being of customers. These are great opportunities to proactively check for signs of slavery and exploitation.

Due Diligence Processes
One Manchester is a charitable organisation with a social purpose. In implementing our due diligence and risk assessment processes, we seek to ensure we are working with ethical businesses who are committed to the highest standards of worker welfare and human rights.

Along with suppliers of goods and services, One Manchester also partners with local businesses that can support our customers to develop workplace skills and opportunities for employment. A new Supplier Code of conduct and onboarding process was implemented from Q1, 2024 ensuring a multiple stage process for onboarding of suppliers including elements of modern slavery and Equality, Diversity & Inclusion.

One Manchester has in place a robust process to ensure that the checks required for all new employees, Board members and consultants are carried out, before they engage with us. Key elements of this include reference checks, disclosure and barring checks, identity and right to work checks.

One Manchester recognises the risks posed by third-party contractors and we actively address this by:

- Requiring compliance with the Modern Slavery Act in our Procurement Procedural Guidance.
- Conducting supplier surveys to assess their policies and systems for tracking modern slavery.
- Appointing a specialist Procurement Manager to uphold best practices in purchasing and procurement.

We remain committed to enhancing our procurement practices concerning tenders and contracts to ensure they align with best practices, legislative requirements, and prioritising modern slavery considerations in all procurement activities.

Key performance indicators

As part of One Manchester's anti-slavery action plan, in 2024-25 we are reviewing the development of behaviour-based KPIs (Key Performance Indicators) to enable efficient oversight and ensure that we take a targeted steps to address risks and issues. This will increase stakeholder confidence in our approach.

Training and Awareness

We include safeguarding and anti-slavery training in our induction process to raise awareness among employees. The majority of employee training is delivered through toolbox talks and online videos and some is carried out in person.

One Manchester's executives recognise that the anti-slavery and exploitation agenda has clear synergies with its landlord responsibilities and customer and community advice service offerings. In 2024-24, the SFA will deliver an executive briefing session to equip executives with the contextual and practical knowledge to provide strong governance and aid decision-making in this workstream, enabling One Manchester's anti-slavery agenda to progress and be tailored to the business.

Next Steps

As we acknowledged at the beginning of the Statement, we have established an action plan roadmap for 2024-26 with support from the SFA. Work is underway to strengthen our approach, and we will report against these activities in our Statement next year.

Ongoing commitment	**Activity planned for 2024-25**
Organisation Structure	To embed ownership, monitoring, reporting and governance of the anti-slavery and exploitation agenda into One Manchester's governance structures, including: ➢ Oversight of One Manchester's anti-modern slavery activities by the Audit and Risk Committee. ➢ Establishment of an Anti-Slavery Working Group to advise on the development, implementation, monitoring, and review of the organisation's anti-slavery action plan.
Our Policies	Review of One Manchester's Anti-Slavery and Human Trafficking Policy to ensure inclusion of One Manchester's position on the issue; the expected behaviours and actions of all stakeholders and the reporting channels for raising risks and issues.
Risk Assessment and Management	To create a risk assessment checklist for resettlement scenarios to ensure that One Manchester and customers can gain the reassurance that a resettlement proposal will not increase the risk of exploitation. To conduct a high-level risk assessment of supplier categories and customer demographics to inform enhanced due diligence and develop a clear escalation process to manage and investigate exploitation concerns. This approach will ensure One Manchester continues to

	strengthen its risk assessment to identify risks of modern slavery in our supply chains or where mitigations may be needed in areas of new development.
Due Diligence Processes	To implement changes to One Manchester's recruitment processes to mitigate the risk of imposter switching and conducting regular due diligence activity across the whole employee base to enable the detection of indicators of slavery and exploitation. To introduce a modern slavery and exploitation checklist to enable proactive detection of modern slavery and exploitation indicators amongst customers through the ''Behind Every Door'' programme and under the ''See it, Say it'' policy. This will ensure modern slavery and exploitation cases are identified and supports monitoring of evolving trends so that One Manchester can adapt its risk management methods when necessary.
Key Performance Indicators	To review the development of behaviour-based KPIs to enable efficient oversight, ensuring One Manchester takes targeted steps to address risks and issues, and thus increase stakeholder confidence with our approach.
Training and Awareness	SFA to deliver an executive training session to equip executives with contextual and practical knowledge to provide strong governance and aid decision-making in this workstream, enabling One Manchester's anti-slavery agenda to progress and be tailored to the business. To review our learning strategy for increasing anti-slavery and exploitation skills and knowledge to ensure: ➢ Modern slavery and relevant reporting channels are clearly explained. ➢ Enhanced role-specific training for teams who operate in high-risk areas to boost corporate due diligence and risk management. ➢ Learning solutions consider team dynamics, such as remote working. These approaches will ensure that all employees are engaged on the agenda and receive proportionate training to carry out their anti-slavery and exploitation responsibilities effectively.

This statement is made in compliance with section 54(1) of the Modern Slavery Act 2015 and constitutes One Manchester's Anti-Slavery and Human Trafficking Statement for the financial year 1 April 2023 to 31 March 2024.

It has been approved by One Manchester's Board, which will conduct an annual review and update as necessary to reflect our ongoing commitment to combating modern slavery and human trafficking.

Yashar Turgut, Chair
25 September 2024