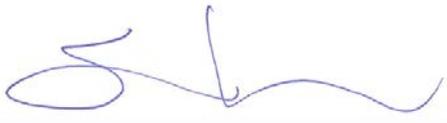




MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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Managing Director Signature:	 Simon Howick

Modern Slavery and Human Trafficking Policy

This Policy is split into the following sections.

1. Introduction
2. Policy Application
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4. Reporting Modern Slavery
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1. Introduction

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern slavery is a crime and a violation of fundamental human rights.

Modern Slavery is estimated to be one of the worlds' most profitable criminal activities.

- A Home Office report in 2014 estimated that there were between 10,000 and 13,000 victims in the UK.
- In 2016, 3,805 potential victims were identified and referred in the UK.
- In the year to March 2017 the police in England and Wales recorded 2,255 modern slavery crimes.

Many victims go undetected.

The Modern Slavery Act 2015 provides the law enforcement agencies with the powers to pursue and bring to justice criminal activity related to human trafficking, slavery, servitude and forced labour.

The Act has also introduced new measures to protect victims through the appointment of a new independent Anti- slavery Commissioner with responsibility for encouraging good practice in the prevention, detection and protection of victims through raising awareness of the problem.

The Act requires organisations with a turnover in excess of £36 million a year to provide a statement of the processes and due diligence undertaken to ensure that they and their supply chains comply with the Act.

At ODS we are committed to ensuring that modern slavery and human trafficking does not take place in any part of our business or supply chains.

This policy statement sets out the actions and systems in place to mitigate any risk of human trafficking and modern slavery.

2. Policy Application

ODS undertakes the following activities to ensure it fully complies with the Act to protect staff, agency workers and supply chains from human trafficking and slavery.

- Pre-employment checks are carried out for all directly employed staff and approved staffing agencies.

- Temporary worker providers carry out audits of their agency providers to ensure that pre-employment checks are carried out of all agency workers along with their right to work and remain in the UK.
- Structured pay rates are in place based on skills and responsibilities required to carry out the role and no employee, temporary worker or sub-contractor is paid less than the Oxford Living Wage.
- Fair access to training and development opportunities for all.
- Key suppliers will be asked to confirm each year that they have complied with the Act in all parts of their business.
- Goods and services are purchased from UK or EU based companies who are required to comply with the Act and / or similar legislation in the EU states.
- All Purchase Orders and new contracts include specific contract terms requiring all suppliers to comply with the UK Modern Slavery Act 2015.
- Where possible we will seek to build long term professional relationships with suppliers and their supply chains.
- Staff are made aware of their responsibilities to report any concerns in their professional and personal life regarding human trafficking and modern slavery.

3. Responsibility for the Policy

The Executive Team are responsible for this policy and are committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers are given adequate and regular training on the policy and the issue of modern slavery in supply chains.

The Procurement Team are responsible for checking suppliers comply with the legislation prior to appointment and carry out annual compliance checks.

4. Reporting Modern Slavery

Employees must notify their line manager or Executive Director in accordance with the Whistleblowing policy as soon as possible if they have any reason to believe that modern slavery of any form may exist within the organisation or supply chain, or have concerns relating to compliance with this policy.

If a person, other than an employee, has any reason to believe that modern slavery may exist within the organisation, supply chain, or may occur in the future, this should be notified to the Managing Director.

ODS operates on a principle of openness and will support anyone who raises genuine concerns in good faith under this policy. We will ensure that no one suffers any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery may be taking place in any part of the business or supply chains.

Any employee who breaches this policy will be subject to appropriate disciplinary action.

ODS will terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

5. Linked Policies

- Whistle Blowing Policy