

Introduction

This policy statement sets out the principles and priorities that govern O.S.A.T Ltd., (OSAT) response to protecting vulnerable individuals from Modern Slavery and Trafficking within our own organisation or those with whom we interface with as part of supply chain activity. OSAT is for the purposes of this legislation deemed to be a SME business.

This document is intended to provide guidance to our staff, agencies and stakeholders (including employers) to understand all potential risks related to OSAT business and to ensure steps are maintained to prevent slavery and human trafficking. These guidelines will form part of staff induction and are applicable to all OSAT business areas. It is owned by the OSAT executive team for implementation by all staff. As well as outlining OSAT duty to comply, these guidelines seek to educate everyone on identifying risks and subsequently reporting them.

OSAT has a zero-tolerance approach to modern slavery and human trafficking and are fully committed to preventing slavery and human trafficking, ensuring there is transparency within OSAT and supply chains.

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies which serve to address the requirements of the Modern Slavery Act 2015.

This statement governs our responsibilities within the organisation and ensures that all partners, sub-contractors and suppliers will promote these guidelines in line with our statement and legal requirements.

[Our Policies](#)

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance. These include:

[Our Due Diligence Policy](#)

OSAT conducts due diligence on all potential partners and suppliers before entering into business relationships. Our due diligence policy reflects the fact that many of our operating environments (Skills and Employment) are high risk for modern slavery and human trafficking. All information gathered from our due diligence is updated annually and recorded in our internal risk register. We are also committed to carrying out spot-checks and 'deep dives' to gather further information about a supplier and their practices. Additionally, we check Government websites to ensure that we do not inadvertently fund organisations registered as supporting slavery, trafficking or radicalisation.

As part of the due diligence process OSAT promotes our own policy in these areas and encourages all suppliers to have a Modern Slavery Policy or Guideline within their business as well as a Code of Conduct, which will be presented to OSAT contracting / purchasing

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team prior to any funding relationship. We are also committed to capacity building across our supply chains and working with suppliers to develop modern slavery policies where none exist and/or to strengthen policies as required. We do not engage with businesses that do not share our commitment to eradicating slavery / radicalisation / trafficking.

The following modern slavery and human trafficking questions are asked of all organisations:

1. Does the organisation have a statement / policy on modern slavery and human trafficking?
2. Please supply the following –
 - Details of any training undertaken for all staff
 - Details of procedures for dealing with cases
 - Details of practices/process of implementing the above, if none exist
3. How does the organisation flow down its statement / policy to all staff and supply chain and what checks are undertaken to ensure implementation?
4. What is the organisation's website address for details of the Modern Slavery Statement?
5. Have any of the organisation's employees being investigated under the Modern Slavery Act 2015?
 - Please provide accurate details including any convictions
6. Has the organisation dealt with any incidents related to modern slavery or human trafficking in the past?
 - If yes, please provide accurate details with follow up actions.

[Code of Conduct](#)

Our code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

[Whistle blowing Policy](#)

OSAT embeds our modern slavery / trafficking stance at induction and encourages all its workers, service users, customers and business 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. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, service users, customers or others who have concerns can use our confidential escalation process as detailed in the policy.

[Recruitment Policy](#)

OSAT will only work with organisations that are fully approved and use 'safer recruitment practices.

[Safeguarding Policy](#)

Our Safeguarding (including Prevent) policy sets out the legislative requirements to provide a duty of care, promote positive well-being and provide a clear process for escalating concerns to protect the welfare of individuals. This is available on the OSAT website or by request in hard copy.

[Equality, Diversity and Inclusion Policy](#)

Our Equality, Diversity and Inclusion policy is in place to ensure that we treat people fairly and with respect. OSAT is committed to being an organisation representative of the communities that we deliver services in and strive to create and implement our Equality, Diversity and Inclusion strategy.

[Our supply chains and supplier adherence to our values](#)

We expect the highest standards of conduct and probity throughout our supply chain, requiring all of our people to act with integrity and honesty. Our procurement processes include standard enquiries about modern slavery and trafficking, and we examine our supply chain using our dedicated quality assurance functions including audit, supply chain management, legal and risk.

OSAT will continue to work with suppliers to ensure that they meet these standards and comply with the requirements of The Modern Slavery Act 2015.

[What we will do](#)

As part of our commitment to eradicating modern slavery and human trafficking we will:

1. Introduce online training on the Modern Slavery Act which will be made compulsory at induction for all staff who will have a requirement to complete mandatory training on the act, including how to identify and escalate any concerns.
2. Continue to review and develop the policies, processes and controls in place to support our commitment to mitigate risks of modern slavery across our organisation in line with best practice and legislation changes.
3. OSAT will review and update this statement to meet the requirements of the Modern Slavery Act on an annual basis.

[Approval](#)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, is approved by Ian Tarry, Managing Director and constitutes our slavery and human trafficking statement.

Signed:

Ian Tarry
Managing Director