



Company Name: Osborne Appointments (“the Company”)

Policy Name: Modern Slavery Policy

Date: September 2020

Version: 1.2

Modern Slavery Policy

1. Osborne Appointments is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Osborne Appointments is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Employees may encounter individuals who are in slavery in the duration of their employment. There are no distinctive characteristics of those who are in slavery and they might appear ordinary, but it is important that employees are aware of signs to look out for. These are (but are not limited to):
 - Somebody who appears to be under the control of someone else and reluctant to interact with others;
 - An individual who does not have personal identification on them;
 - Individuals with few personal belongings, who wear the same clothes every day or wears unsuitable clothes for work;
 - Somebody who may not be able to move around freely;
 - Individuals who may be reluctant to talk to strangers or the authorities;
 - Those who appear frightened, withdrawn, or show signs of physical or psychological abuse;
 - Individuals that are dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

Any staff, workers or other parties that suspect that someone is in slavery are strongly encouraged to report any concerns or suspicions that they might have to the Training and Compliance Officer or alternatively to contact the [Modern Slavery Helpline](#) on **08000 121 700**.

4. Reports surrounding these issues are taken extremely seriously by our Senior Leadership team who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal



any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
5. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
- The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
 - The percentage of candidates supplied from audited businesses / our preferred supplier list,
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
6. We would also recommend reading this in conjunction with our other policies, including our:
- Corporate social responsibility policy;
 - Anti-bribery / corruption policy;
 - Whistle-blowing policy;
 - Equal Opportunities & Diversity Policy;
 - Data Protection Policy.

This policy was updated in September 2020 after being agreed by our Company Director, Michelle Bacon, and our Senior Leadership Team.