

## Modern Slavery Act Statement 2018

This statement sets out OH Assist Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

OH Assist is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

OH Assist Ltd is a UK based occupational health services provider, focused on helping our clients deliver Healthy High Performance<sup>™</sup>. This means working in partnership with our clients to create a workplace culture that recognises employee wellbeing as being at the heart of business success. We deliver a comprehensive range of services via a nationwide network of practitioners (supported by two key operational service centres) including absence management, fitness for task assessments, health surveillance, vocational rehabilitation and wellness programmes.

Applying multidisciplinary expertise and deep industry knowledge, our OH Assist specialists work with predominantly UK clients from many market sectors, including central and local government, financial services, media, transport and logistics.

As a people based service the majority of our suppliers are those providing clinical and professional expert resource or the supplier of medical consumables.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

OH Assist Ltd operates a supplier policy and undertakes due diligence on all our suppliers. The due diligence includes a statement that each supplier is required to complete to show that the organisation –

- Complies with the Modern Slavery Act
- Takes steps to eradicate modern slavery from their business
- Holds their own suppliers to account over modern slavery
- Ensures their workers receive the minimum wage and undertake robust immigration checks

We may terminate the contract at any time should any instances of modern slavery come to light.

OH Assist does not consider it operates in high risk sectors or locations as we only operate within the UK and utilise predominantly professional clinical employees

### Relevant Policies

- **Supplier/Procurement:** OH Assist has a documented process for the sourcing and approval of third party suppliers to the organisation and has a n Approved Supplier Register which documents all third party suppliers to the business. Suppliers are asked to complete an annual compliance statement to confirm their standards and compliance in quality, environmental aspects, health and safety, Modern Slavery Act, information security, equal opportunities and recruitment.

- **Recruitment:** OH Assist follows a documented Recruitment Policy and Procedure and have strict Security Guidelines in place to support the recruitment process. The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Grievances:** OH Assist has a documented Grievance Procedure for the reporting of unlawful discrimination in any form.
- **Learning and Development:** OH Assist has a Learning and Development Policy to ensure the required development of staff through communication and training opportunity.
- **Whistleblowing policy** The organisation encourages all its workers 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 whistle blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Anti slavery policy** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where to go for help.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct.

## Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier ;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring Supply chain managers, Procurement Managers, Recruitment and HR professionals to have completed training on modern slavery by end of March 2017;
- developing a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the organisation evaluates all existing suppliers.

## Training

The organisation requires Supply Chain managers, Procurement Managers, recruitment and HR professionals within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Awareness-raising programme**

As well as training 'key' staff, the organisation has raised awareness of modern slavery issues by cascading and circulating in our employee newsletter known as Informed.

- the basic principles of the Modern Slavery Act 2015;
- how employees can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

### **Chief Client Officer Approval**

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

Signed: 

Lisa Allan, Chief Client Officer

OH Assist Limited

Date:- 3/1/18