



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery and Human Trafficking Statement

This Statement is split into the following sections:

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4. Responsibility
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1. Introduction

Modern slavery encompasses various forms of exploitation, including slavery, servitude, forced labour, bonded labour, child labour and human trafficking. Victims are coerced, deceived and forced against their will to provide work or services. It is a criminal offence and a violation of fundamental human rights. Recognised as one of the worlds' most profitable illegal activities, modern slavery persists globally. Human trafficking involves the facilitation of a person's travel for the purpose of exploitation.

At ODS we are committed to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chains. This statement sets out the actions and systems in place to identify and mitigate any risk of human trafficking and modern slavery in our business and supply chains.

2. ODS Structure

Oxford Direct Services Limited and its sister company Oxford Direct Services Trading Limited (**ODS**) were established in 2017 and wholly owned by Oxford City Council.

We deliver property maintenance; public space management; street cleaning; highways and engineering works, and waste and recycling services across Oxfordshire and beyond. At ODS "doing good" is at the very heart of what we do and it is one of the key drivers for change and continuous improvement across the business.

3. Assessing and Managing Risk

We undertake the following activities to ensure compliance with the Modern Slavery Act 2015 (**Act**) to protect staff, agency workers and workers in our supply chains from human trafficking or 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 for 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 are asked to confirm each year that they have complied with the Act in all parts of their businesses.
- 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.
- All Purchase Orders and new contracts include specific contract terms requiring all suppliers to comply with the Act.
- Where possible we 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 or modern slavery.

4. Responsibility

ODS Board is responsible for ensuring ODS has suitable policies in place to identify and prevent human trafficking and slavery in the business and supply chains. The Executive Team is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with the policies. Managers are given adequate and regular training on relevant policies and the issue of modern slavery.

The Procurement Team is responsible for checking suppliers comply with the Act prior to any appointments and for conducting annual compliance checks.

5. Reporting Modern Slavery

Employees must notify their line managers 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 statement.

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. We will ensure that no one suffers any detrimental treatment because of reporting a suspicion that modern slavery may be taking place in any part of the business or supply chains.

Any employee who breaches our policies will be subject to appropriate disciplinary action.

We will terminate our relationship with individuals and organisations working on our behalf if they breach the Act.

6. Linked Policies

- Anti-Bribery, Fraud and Corruption Policy
- Anti-Money Laundering Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Whistle Blowing Policy

This statement is made pursuant to section 54(1) of the Act and constitute our modern slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the ODS Board on 30 July 2025 and signed by:



Simon Howick
Managing Director
Date: 30/07/25