



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery and Human Trafficking Statement

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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, or exploited to provide work or services. It is a criminal offence and a violation of fundamental human rights. Recognised as one of the world's most profitable illegal activities, modern slavery persists globally. Human trafficking involves the facilitation of a person's travel for the purpose of exploitation.

Oxford Direct Services Limited and Oxford Direct Services Trading Limited (**ODS**) has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically, with integrity and transparency in all its business dealings and relationships.

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 Oxford Direct Services Trading Limited were established in 2017 and are wholly owned by Oxford City Council.

We deliver a range of public services including 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.

Our supply chains include providers of temporary labour, materials, goods, and services that are often reliant on the use of labour for successful delivery. We recognise that some parts of these supply chains operate in sectors where there is a high risk of labour exploitation.

3. Assessing and Managing Risk

ODS recognises that areas of potential modern slavery risk within its operations are likely to arise through use of subcontractors and agency workers. We therefore adopt a proportionate and risk-based approach to identify, assess, and manage modern slavery risks in these areas.

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 are required to carry out regular audits of their recruitment practices to ensure that pre-employment checks and right to work and remain in the UK are completed.
- Structured pay rates are in place based on skills and responsibilities required to carry out the role and no employee or temporary worker is paid less than the Oxford Living Wage.
- Modern slavery training is rolled out to all staff annually.

- Goods and services are procured from reputable suppliers.
- 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.
- A confidential reporting mechanism is in place to enable colleagues to report any concerns they may have about modern slavery without fear of detriment.
- In addition to managing risks within our operations and supply chains, employees have a safeguarding responsibility and are encouraged to recognise, and report concerns where they suspect exploitation, abuse, neglect or indicators of modern slavery during the course of their work whilst delivering services in customers' homes, workplaces or other public spaces. Any concerns are reported through established safeguarding procedures and the appropriate channels.

4. Measuring Effectiveness

ODS monitors the effectiveness of its modern slavery controls through the following governance and assurance mechanisms, including:

- **Regular policy and procedure reviews**
To ensure controls remain effective, proportionate, and aligned with the organisation's risk profile as well as meeting all legal and regulatory requirements. The reviews are completed by the policy owner and reviewed by the appropriate senior sign off. Policies are reviewed on a formal cyclical basis or following legislation and/or business change if outside the formal review period. For the year 2025-2026, 41 policies were reviewed.
- **Risk assessments**
Ongoing assessment of modern slavery risks within operations and the supply chain, with particular focus on high-risk areas.
- **Internal audits and compliance checks**
Periodic audits to test whether policies and procedures are being followed in practice.
- **Supplier due diligence and monitoring**
Including supplier questionnaires, contract clauses, audits, and performance reviews to ensure compliance with ethical standards.
- **Key performance indicators (KPIs)**
Tracking metrics such as training completion rates (currently at 92.2% completion rate), supplier compliance levels, reported concerns (zero for 2025-2026), and audit outcomes.
- **Training and awareness monitoring**
Reviewing the uptake and effectiveness of staff training on modern slavery and ethical practices.
- **Whistleblowing (Speak Up) reports**
Monitoring concerns raised through whistleblowing channels and how effectively they are investigated and resolved.
- **Incident and issue tracking**
Reviewing any reported cases, near misses, or concerns to identify trends and areas for improvement.
- **Management and governance oversight**
Reporting to senior management or boards on risks, issues, and performance to ensure accountability through the risk framework as and when required through the appropriate policies and reporting channels.

- **Stakeholder feedback**
Gathering input from employees, suppliers, customers, and partners to identify gaps or improvement opportunities.
- **External benchmarking and best practice**
Comparing ODS' approach against industry standards, guidance, and peer organisations.
- **Reviewing modern slavery risks** following significant organisational or operational changes that may affect exposure to modern slavery.

5. 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 and related ODS policies prior to any appointments, and for conducting regular compliance checks in conjunction with contract managers. The Procurement Team also reviews specifications and KPIs to ensure that proportionate measures to identify and prevent modern slavery have been included.

6. Reporting Modern Slavery

Employees must notify their line managers, Executive Director, or appropriate reporting channel 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, or within its supply chain, this should be notified to the Managing Director.

Employees should also report any safeguarding concerns or indicators of exploitation, abuse or modern slavery that they encounter whilst delivering services in customers' homes, workplaces or other public locations, in accordance with ODS' safeguarding procedures.

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 they have reported a genuine concern or 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.

Where ODS becomes aware that a supplier, contractor or other third party has breached any of our policies or the Act, ODS will take appropriate action,

which may include termination of contractual relationship or suspension of work with such individuals or organisations until such time that full compliance with the Act or ODS Policies can be evidenced.

7. Linked Policies

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

8. Review

This statement will be reviewed annually and updated where necessary to reflect changes in legislation or identified risks.

This statement is made pursuant to section 54(1) of the Act and constitutes Oxford Direct Services Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

This statement was approved by the Board of Oxford Direct Services Limited and Oxford Direct Services Trading Limited on 29 July 2026.

Signed on behalf of the Board of Oxford Direct Services Limited and Oxford Direct Services Trading Limited:



Simon Howick
Managing Director
31 July 2026