

Anti-Slavery and Human Trafficking Policy

June 2020

Table of Definitions

In this policy the following words and phrases shall have the following meaning:

Term	Definition
Board	The Board of Directors of Oxford Policy Management Limited.
Child, Children	Persons who have not attained 18 years of age.
Child Labour	Children below 12 years of age working in any economic activities, those aged 12 – 14 of age engaged in more than light work, and all children engaged in the Worst Forms of Child Labour. Whether forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, and the conditions under which it is performed. Children can be vulnerable to exploitation, but child labour will not always constitute modern slavery.
Coercion	(A) Threats of serious harm to or physical restraint against any person; (B) Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (C) The abuse or threatened abuse of the legal process.
Commercial Sex Act	Any sex act on account of which anything of value is given to or received by any person.
Contracting Officer	The sole US Government signatory to any contract entered into with the US Government
Debt Bondage	The status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
Forced or Compulsory Labour	Knowingly providing or obtaining the labour or services of a person: (A) by threats of serious harm to, or physical restraint against, that person or another person; (B) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labour or services, that person or another person would suffer serious harm or physical restraint; or (C) by means of the abuse or threatened abuse of law or the legal process.
Human Trafficking for Exploitation or Prostitution	When a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a Child who is influenced to travel by an adult.

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Involuntary Servitude	A condition of Servitude induced by means of: (A) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (B) the abuse or threatened abuse of the legal process.
OPM, the Organisation or us, we, our	Oxford Policy Management Limited, Oxford Policy Management Limited's subsidiaries and branch and representative offices wherever located and Oxford Policy Management Limited's subsidiary's branch and representative offices wherever located.
Recruitment Fees	Fees of any type, including charges, costs, assessments, or other financial obligations, that are associated with the recruiting process, regardless of the time, manner, or location of imposition or collection of the fee.
Representative	Staff, Suppliers or anyone representing OPM for the performance of OPM's work
Servitude	The obligation to provide services that is imposed by the use of Coercion and may include the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition
Slavery	Behaviour on the part of the offender as if he/ she owned the person, which deprives the victim of their freedom
Staff	Employees at all levels, directors, officers, agency employees, seconded employees, volunteers, interns, agents
Suppliers	All individuals and organisations providing goods and/or services to OPM in connection with our business and/or any of our projects.
The Act	UK Modern Slavery Act 2015
Worst Forms of Child Labour (as defined by article 3 of ILO Convention No. 182)	These are all forms of Child Labour and are very likely to constitute modern Slavery, they include: (A) all forms of Slavery or practices similar to Slavery, such as the sale and trafficking of Children, debt bondage and serfdom and Forced or Compulsory Labour, including forced or compulsory recruitment of Children for use in armed conflict; (B) the use, procuring or offering of a Child for prostitution, for the production of pornography or for pornographic performances; (C) the use, procuring or offering of a Child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; (D) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of Children.

1. Introduction

- 1.1. Modern Slavery is a serious crime and tackling it is a top priority for many of OPM's donors. All businesses including OPM have a vital role to play. Modern Slavery is an unconscionable way of maximising profits, by producing goods and services at ever lower costs with scant regard for the terrible impact this has on individuals. Businesses must not be complicit in this crime whether located in the UK or elsewhere. The challenge for businesses is to take serious and effective steps to identify and root out contemporary Slavery which can exist in any supply chain and in any industry. All businesses must be vigilant and aim to continuously improve.
- 1.2. **"Slavery and human trafficking"** is conduct that constitutes any of the following:
- Slavery;
 - Servitude;
 - Forced or Compulsory Labour;
 - Human Trafficking For Exploitation or Prostitution;
 - Involuntary Servitude; and/or
 - Child Labour.

Each term as defined in the table of definitions.

A full definition of modern slavery under the Act is included at Annex A.

2. Policy Statement

- 2.1 Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as Slavery, Servitude, Forced or Compulsory Labour and human trafficking, all of which have in common the deprivation or restriction of a person's liberty by another in order to exploit them for personal or commercial gain.
- 2.2 OPM has a zero-tolerance approach to modern Slavery and human trafficking. OPM is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to fulfil our legal and ethical obligations. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 2.3 No person falling within the scope of this policy (as outlined in paragraph 3.1) shall:
- engage in acts that constitute modern Slavery or human trafficking, including Forced or Compulsory Labour;
 - procure Commercial Sex Acts; or
 - destroy, conceal, confiscate, or otherwise deny an employee access to their own identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- 2.4 We are committed to upholding all laws and regulations regarding modern Slavery and human trafficking in all jurisdictions where OPM works. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern Slavery throughout our supply chain, anywhere in the world and consistent with our disclosure obligations under:

- the Act which requires us to produce an annual statement setting out the steps we have taken to prevent modern Slavery in our business and supply chain. Our statement is published on our website and is updated each year.
 - US FAR 52.222-50 (Combating Trafficking in Persons) which requires us to notify our US Government Contracting Officer immediately of any information we receive from any source (including host country law enforcement) that alleges an Representative has engaged in conduct that violates US Government Policy on Combating Trafficking in Persons; and furthermore any actions taken against Representatives pursuant to FAR52.222-50.
- 2.5 We require the same high standards from all of our Suppliers, business partners and other persons associated with us, and, as part of our contracting processes, we include specific prohibitions against the use of Forced or Compulsory Labour or trafficked labour, or anyone held in Slavery or Servitude, whether adults or Children, and we expect that our Suppliers and business partners will hold their own suppliers to the same high standards.

3. Scope

- 3.1 This policy applies to all persons working for OPM or on our behalf in any capacity, including Staff, Suppliers (including external consultants), third-party representatives, business partners and any other person associated with us, wherever located.
- 3.2 OPM strives to do business with others who commit to doing business with integrity and accordingly OPM will only contract with a Supplier who has a similar policy, procedures and controls in place to ensure the conduct of business with integrity or, otherwise agrees to comply with our policy and fraud, bribery and corruption procedures and controls. OPM has an established due diligence process by which we check and audit our Suppliers against Slavery and other risks.
- 3.3 This policy does not form part of Staff contracts of employment. Notwithstanding, all Staff and Suppliers are subject to a general contractual obligation to comply with all relevant OPM policies including this policy, as amended from time to time.

4. Responsibilities for the Policy

- 4.1 The Board is ultimately responsible for ensuring that OPM operates in accordance with the law and is the owner of this policy. The Head of Legal has overall responsibility for ensuring the implementation of this policy.
- 4.2 The Governance Risk & Compliance Officer (**GRCO**) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and monitoring internal control systems and procedures to ensure they are effective in countering modern Slavery
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern Slavery in supply chains.

5. Risk Assessment

5.1 The principal areas of risk we face in relation to Slavery and human trafficking are reviewed periodically by the GRCO as part of our annual disclosure obligations under the Act.

5.2 OPM’s overall rating for Slavery risk is low on the basis of the following risk factors:

Country Risk - OPM operates in “high risk” countries in terms of employees’ rights and Slavery risks. The chart below demonstrates on a country-by-country basis, those which are rated by the International Trade Union Confederation’s 2019 global index as the worst offenders:

INTERNATIONAL TRADE UNION CONFEDERATION RATING	COUNTRIES WHICH HAVE AN OPM PRESENCE
Rating 5+ No guarantee of rights due to the breakdown of the law	None
Rating 5 No guarantee of rights	Bangladesh, India, Indonesia
Rating 4 Systematic violations of rights	Kenya, Lebanon, Myanmar, Nigeria, Pakistan, Tanzania, USA
Rating 3 Regular violations of rights	Australia, Ghana, Mozambique, Nepal, United Kingdom
Rating 2 Repeated violations of rights	Belgium, South Africa
Rating 1 Sporadic violations of rights	Germany

Sectoral risk – as a consultancy firm, we operate in a sector that typically is not deemed to be high risk in comparison for example, to agriculture or manufacturing where the prevalence of migrant, seasonal and casual labour increases the risk of exploitation;

Business opportunity risk – we implement numerous projects ranging in value sometimes involving multiple sub-contractors or intermediaries. Our use of multiple sub-contractors impacts our exposure to Slavery risks in our supply chain; and

Business partnership risk - partnering with multiple organisations to bid for and execute contracts also increases delivery chain risks of Slavery and exploitation.

5.1. Though OPM operates in high risk countries, our sector risk is low and combined with other risk factors, reduces our overall risk rating.

6. Our Modern Slavery Principles

6.1. To the extent applicable, the following guiding principles are relevant to our business operations and decision-making worldwide:

Employment

- 6.2. All employees, irrespective of their legal status, shall be treated fairly, and measures shall be taken to prevent abusive conditions and fraudulent practices that may lead to Coercion and trafficking for labour exploitation.
- 6.3. All employees shall enjoy freedom of movement, freedom of association and employee representation: OPM recognises the right of its employees to join organisations of their choosing provided that membership of a group does not contravene OPM's Code of Conduct or Conflict of Interest Policy. OPM actively seeks the views of employees through the Staff Consultative Committee, respects employee's rights to belong to trade unions, and complies with all statutory regulations to inform and consult employees as appropriate.
- 6.4. Each employee shall benefit from conditions of work no less favourable than those available to all employees, and shall have the right to enter into and terminate employment (with reasonable notice in accordance with national law or collective agreement) voluntarily and freely, without the threat of a penalty.
- 6.5. No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to an employee. If an exception is made, it should be in the interest of the employees concerned, and after consulting the most representative organisation of employers and employees.
- 6.6. We shall not use misleading or fraudulent practices during the recruitment of or offering of employment, and written contracts of employment must be provided that:
- are in a language that employees can easily understand;
 - clearly indicate their rights and responsibilities with regards to payment of wages, working hours, location of work, living conditions, housing and associated costs, grievance process, valid grounds for termination, and other issues related to preventing Forced or Compulsory Labour, and the content of applicable laws and regulations that prohibit trafficking in persons; and
- Employees shall receive their contract at least 5 days prior to any relocation.

Document Retention

6.7. Practices such as confiscating or withholding employee identity documents or other valuable items (e.g. work permits and travel documentation) are prohibited. However, if requested by employees, secure storage for such documents may be provided. Employees must then be free to access them at any time upon request. Personal documents shall not be retained for the purpose of binding employees to employment.

Use of Employment Agencies

- 6.8. When engaging the services of private employment agencies, best endeavours shall be taken to:
- (a) ensure that recruiters comply with the local labour laws of the country in which the recruiting takes place;

- (b) ensure that such agencies do not engage in fraudulent practices that place employees at risk of Forced or Compulsory Labour and trafficking for labour exploitation;
- (b) prevent the abuse of employees contracted by such agencies, for example, by ensuring that such employees receive adequate protection in relation to wage-related matters, working hours, overtime and other working conditions;
- (c) ensure that fees or costs related to recruitment are not borne by employees, but by the contracting company;
- (d) use only those recruitment agencies that are licensed or certified by the competent authority, if any.

Child Labour

- 6.9. OPM has a 'zero tolerance' approach to Child abuse, exploitation, or neglect: see our Safeguarding Policy, and Child Safeguarding Statement.
- 6.10. Immediate and effective measures must be taken to prevent and eliminate the engagement of Children in the Worst Forms of Child Labour, including Debt Bondage, Servitude, Forced or Compulsory Labour, and all forms of Slavery and practices similar to Slavery, such as the sale and trafficking of Children.

Coercion

- 6.11. All employees shall have the right to enter into employment voluntarily and freely, without threat of a penalty.
- 6.12. All employees shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with national law or collective agreement) at any time without penalty. Employees on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. Employers shall not use means to restrict employee's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of Recruitment Fees.
- 6.13. No employer shall exact work or service from any person under the menace of any penalty. This includes the use or threat of physical or sexual violence or harassment.

Wages/Salaries

- 6.14. Wages shall be paid regularly and methods of payment are prohibited that deprive employees of the genuine possibility of terminating employment. Wage payments shall not knowingly be delayed or deferred such that wage arrears accumulate.
- 6.15. Wages shall be paid directly to employees and should be paid in legal tender, or by cheque or money order where permitted by law, collective agreement or with the consent of the employee. Payment in the form of vouchers, coupons, or promissory notes is prohibited. However, OPM does permit approved salary sacrifice agreements.
- 6.16. Payments "in-kind" in the form of goods or services shall not be used to create a state of dependency of the employee on the employer. "In-kind" payments should only be partial to ensure that the employee is not totally deprived of cash

remuneration and are permitted only if authorised by national law, regulation or collective agreement.

- 6.17. Employees that earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.
- 6.18. Employees shall not be held in Debt Bondage or forced to work for any employer in order to pay off an actually incurred or inherited debt.
- 6.19. Wage advance, and loans to employees shall not be used as a means to bind employees to employment. Advances and loans, and deductions from wages made for their repayment, shall not exceed the limits prescribed by national law. Employees shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans.
- 6.20. No deductions from wages shall be made with the aim of indebting an employee and binding him or her to employment, and measures should be taken to limit wage deductions to prevent such conditions. Employees shall be informed of the conditions and extent of wage deductions, and only deductions authorised by national law (including claw back arrangements if any), collective agreement or arbitration award shall be made.

Disciplinary Measures

- 6.21. Disciplinary measures should not include sanctions that result in an obligation to work.
- 6.22. Compulsory labour shall not be used to discipline employees or as punishment for participation in a strike.

Overtime

- 6.23. Employees shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.
- 6.24. Work or service outside normal daily working hours shall not be imposed by exploiting an employee's vulnerability under the menace of a penalty. For example, performance targets shall not be set that result in an obligation to work beyond normal working hours because of the employee's need to be able to earn minimum wage.

Transportation

- 6.25. OPM will provide return transportation or pay for the cost of return transportation upon the end of employment -
- (A) For an employee who is not a national of the country in which the work for or on behalf of OPM is taking place and who was brought into that country for the purpose of working on an OPM contract or subcontract; or
 - (B) For an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programmes or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States); except under permitted exceptions under US Government's FAR 52.222-50

Recruitment Fees

- 6.26. OPM will not charge Recruitment Fees to its employment candidates. Recruitment fees include but are not limited to the following fees (when they are associated with the recruiting process) for -
- a) Soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, training, providing orientation to, skills testing, recommending, or placing employees or potential employees;
 - b) Advertising;
 - c) Obtaining permanent or temporary labor certification, including any associated fees;
 - d) Processing applications and petitions;
 - e) Acquiring visas, including any associated fees;
 - f) Acquiring photographs and identity or immigration documents, such as passports, including any associated fees;
 - g) Accessing the job opportunity, including required medical examinations and immunizations; background, reference, and security clearance checks and examinations; and additional certifications;
 - h) An employer's recruiters, agents or attorneys, or other notary or legal fees;
 - i) Language interpretation or translation, arranging for or accompanying on travel, or providing other advice to employees or potential employees;
 - j) Government-mandated fees, such as border crossing fees, levies, or worker welfare funds;
 - k) Transportation and subsistence costs;
 - l) Security deposits, bonds, and insurance; and
 - m) Equipment charges.
- 6.27. A Recruitment Fee, as described above is a Recruitment Fee, regardless of whether the payment is -
- a) Paid in property or money;
 - b) Deducted from wages;
 - c) Paid back in wage or benefit concessions;
 - d) Paid back as a kickback, bribe, in-kind payment, free labor, tip, or tribute; or
 - e) Collected by an employer or a third party, whether licensed or unlicensed.

7. Identifying Slavery

- 7.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 7.2 However, the following key signs could indicate that someone may be a Slavery or trafficking victim. This list is not exhaustive, the person:
- (a) is not in possession of their own passport, identification or travel documents;

- (b) is acting as though they are being instructed or coached by someone else;
 - (c) allows others to speak for them when spoken to directly;
 - (d) is dropped off and collected from work;
 - (e) is withdrawn or they appear frightened;
 - (f) does not seem to be able to contact friends or family freely; and/or
 - (g) has limited social interaction or contact with people outside their immediate environment.
- 7.3 A person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of Slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 7.4 If you require more information, help or guidance on modern Slavery and you are in the UK, you can call the Modern Slavery Helpline on 0800 0121 700.

8. Reporting Concerns

- 8.1 If you have identified or have a suspicion of modern Slavery in any part of our business or in our supply chain or if you are or believe that you are a victim of modern Slavery:
- You should in the first instance report it to your line manager or, OPM lead contact or if this is not appropriate:
 - You may make a verbal or written report to, the Head of Legal or otherwise the Head of Human Resources; or
 - If you would prefer, you may report your suspicions using our whistleblowing international hotline number +44 1249 661808 or call your local whistleblowing hotline number by checking [here](#) or use our external web reporting system at <https://wrs.expolink.co.uk/opml> in each case in accordance with our Whistleblowing Policy; or
 - If you are in the UK, you may, if appropriate, report the incident to the police on 101 and if you are in immediate danger, you should call 999. If you are outside of the UK you should contact your local law enforcement body or otherwise, if this not appropriate and you cannot speak to anyone in OPM, you may contact the local office if any, of the relevant OPM client in country, for example, DFID or otherwise email DFID on reportingconcerns@dfid.gov.uk or other local NGO, trade union or support organisation.
- 8.2 You should always consider which approach would produce the safest outcome for the potential victim(s).
- 8.3 Where a concern regarding modern Slavery is identified as part of our supply chain:
- (a) OPM will respond to the reporter within 2 working days to agree an approach to investigations in line with OPM's 'Issues / Concerns, Reporting and Management Policy';

- (b) The GRCO shall complete the Ethical Trade and Human Rights Remedy Tool and Staff will be required to provide information and support to the GRCO in a timely manner to facilitate this;
- (c) We will work with our Supplier to address concerns relating to the issue reported and provide reasonable support, guidance and incentives to tackle the issue and if the Supplier appears unable or unwilling to tackle the issues seriously, we shall reconsider our relationship with the Supplier.
- 8.4 OPM shall report the instance to the relevant funder of the work we are contracted for within the requirements of the funder's terms and conditions. We will furthermore give full cooperation to the funder, and work with them to ensure that any required remedies are performed to the funder's satisfaction.
- 8.5 OPM shall reasonably provide for and or cooperate in victims' remediation through legitimate processes where OPM identifies that it has directly caused or contributed to adverse impacts. Remedial measures may include:
- Restitution: Judicial or other methods to restore the victim to the original situation before the abuses occurred. This may include: following due legal processes to prosecute those responsible for the abuses; restoration of employment; payment of unpaid wages or, repatriation, if desired by the employee.
 - Compensation: Providing financial or non-financial compensation that is appropriate and proportionate to the gravity of the violation, including physical and mental harm, and consideration of lost opportunities, such as employment (loss of earnings) and benefits, if relevant.

9. Compliance with the Policy

- 9.1 You must ensure that you read, understand and comply with this policy. The most recent version of this policy is available on OPM's website at: <https://www.opml.co.uk/about-us/organisational-policies-reporting/working-with-our-suppliers#modern-slavery-and-human-trafficking>
- 9.2 We record certification of understanding and agreement with this policy from all staff through our online training platform annually.
- 9.3 We require agreement to this policy by our suppliers as part of our due diligence process and record that agreement within our engagement contracts.
- 9.4 The prevention, detection and reporting of modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our direct control. You are required to avoid any activity that might lead to a breach of this policy.
- 9.5 If you believe or suspect that a breach or conflict with this policy has occurred, or may occur in the future you should report your suspicions in the manner set out in section 8 above.
- 9.6 You are encouraged to raise concerns about any issue or suspicion of modern Slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 9.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed

to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Compliance and Risk immediately. If the matter is not remedied, and you are a member of Staff, you should raise it formally using our Grievance Procedure, which can be found on our intranet.

10. Communication and Awareness of this Policy

- 10.1 A copy of this policy alongside our annual 'Modern Slavery and Human Trafficking Statement' is made available on our website, here: <https://www.opml.co.uk/about-us/organisational-policies-reporting/working-with-our-suppliers#modern-slavery-and-human-trafficking>
- 10.2 Training on this policy, and on the risk our business faces from modern Slavery in its supply chains, will be provided to staff upon induction, and mandatory annual refresher training will be provided. Training to OPM suppliers will be provided as necessary.
- 10.2 Our zero-tolerance approach to modern Slavery is communicated to all Suppliers and business partners at the outset of our business relationship with them through our due diligence process, and contractual terms and conditions. It is reinforced as appropriate thereafter.

11. Breaches of this Policy

- 11.1 Any member of Staff who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 11.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy, and further bar all OPM subsidiaries from working with that individual or organization for a fixed or indeterminate period.

Annex A – Modern Slavery Definition in the UK Modern Slavery Act 2015

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:

<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>
<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

Definition of Slavery and Servitude Slavery

Definition of Slavery and Servitude Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.

Definition of Child Labour

Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions

under which it is performed and the objectives pursued by individual countries.

Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.

Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

The Worst Forms of Child Labour

The worst forms of child labour are very likely to constitute modern slavery.

The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as:

- a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that employees are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived.

Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.

Anti-Slavery and Human Trafficking Policy

Document Purpose:

To set out our commitment to the elimination of all forms of slavery in our business and supply chain.

Policy Overview			
Policy Owner	Head of Legal		
Applies to	All employees, Directors and anyone working for or on behalf of OPM		
Global or local scope	Global		
Version Number	4.0	Effective from	08 July 2020
Approvals (Dates)	Board		26 June 2020
	Policy Authorisation Committee		09 June 2020
	Other (please state)		N/A