



Modern Slavery and Human Trafficking Statement

March 2024

Oxford Policy Management Limited, its subsidiaries and branch offices (together being “OPM”) have a zero-tolerance approach to any form of modern slavery and have safeguards and controls in place to ensure that modern slavery or human trafficking does not take place within its business or supply chain.

We are committed to complying with modern slavery legislation in the jurisdictions in which we operate including the Modern Slavery Act 2015 and the Australian Slavery Act 2018. This statement is submitted on behalf of Oxford Policy Management Limited to meet its disclosure obligations as set out in the Modern Slavery Act 2015 and on voluntary basis for Oxford Policy Management Australia Pty Limited in line with our zero-tolerance approach to modern slavery.

Our organisational structure, business and supply chains

OPM is an international development consultancy committed to improving lives through sustainable policy change in low- and middle-income countries. OPM has more than 40 years’ experience in the sector working in over 120 countries and with offices in 11 countries.

Our supply chain comprises:

- partner organisations and self-employed consultants located globally, who work with us to provide services across the policy development cycle; and
- corporate/operational support suppliers located globally, who provide goods and services to the business at corporate and project level.

We contractually require all of our suppliers and business partners to conduct their business in a lawful and ethical manner, which includes adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place within their supply chains.

Across our global operations, we endeavour to ensure that all services provided are free of modern slavery.

Risk Assessment

OPM has undertaken a modern slavery risk assessment. This risk assessment includes a high-level review of our supply chain looking at their geographic, product, services, and procurement risks.

Whilst we operate in a number of high-risk jurisdictions, as a professional services consultancy, our risk associated with slavery and human trafficking is generally low. Our key areas of risk are:

- low wage jobs such as drivers, office cleaners and support staff particularly in our offices in emerging markets; and

- workers in our corporate/operational supply chain.

Our level of risk is mitigated by our:

- policies and procedures;
- extensive due diligence processes;
- risk management framework; and
- company-wide training.

Our policies

Our organisational values are embedded in our policies to ensure that at all times we are conducting business ethically and with integrity. These policies are reviewed and updated regularly (ordinarily every two years). These include our policies on equality, diversity and inclusion, recruitment, procurement and social responsibility as follows:

- Anti-Slavery and Human Trafficking Policy;
- Whistleblowing Policy and Procedure;
- Codes of Conduct (for employees and suppliers);
- Equalities, Diversity and Inclusion Policy;
- Recruitment Policy;
- Safeguarding Policy;
- Procurement Policy; and
- Corporate Social Responsibility Policy.

OPM's Anti-Slavery and Human Trafficking Policy commits OPM to upholding all laws and regulations regarding modern Slavery and human trafficking in all jurisdictions where OPM works, we well as detailing requirements regarding employment standards at OPM to protect our staff and supply chain.

OPM's Safeguarding Policy prohibits the procurement of commercial sex acts irrespective of the laws and customs of the countries we work in.

OPM's standard terms and conditions of engagement require our suppliers to meet OPM's standards and policies regarding Modern Slavery.

Due diligence, risk and mitigation

To minimise the risk of slavery and human trafficking in our operations and supply chain, we:

- Evaluate and assess suppliers using standardized due diligence questionnaires for individuals and organisations to assess capacity and standing, capability, systems, policies and processes and ensure adherence to OPM's policies and values including in relation to modern slavery and human trafficking risks. All supplies to our programmes are screened through third-party software to check for inclusion on national and international watchlists or adverse media articles, upon contracting and every two years thereafter.
- Have a safeguarding programme to protect those vulnerable people we may come into contact with;

- Provide training on modern slavery to all OPM employees at induction and on a biennial basis thereafter; and
- Have an Enterprise Risk Management Framework which establishes risk registers across OPM. The Enterprise Risk Management Framework is reviewed and updated regularly (most recently in September 2021) in line with OPM’s Policy Management Framework.

Reporting concerns

We require our employees and suppliers to raise concerns about slavery and other risks without fear of reprisal. EthicsPoint, our externally hosted whistleblowing service, provided by Navex Global, provides all staff, suppliers and business partners with a confidential channel for reporting any concerns.

The EthicsPoint hotline number for the UK is 0800 890 011 (international freephone numbers are available for other locations including Australia, see OPML website for full list: <https://www.opml.co.uk/about-us/organisational-policies-reporting/report-concern-whistleblowing>). Alternatively, concerns may be reported by filling in the web reporting form at opml.ethicspoint.com.

Suspensions or allegations of corrupt practice in relation to programmes funded by the Foreign, Commonwealth and Development Office may be reported to the Internal Audit Department’s Internal Audit Investigations Section via reportingconcerns@fcdo.gov.uk or on +44(0)1355843747.

Effectiveness of our approach

Our approach to mitigation is risk-based and, given the size and complexity of our business and that the risk of slavery and human trafficking in our business is considered to be low, we are of the view that these risks are adequately mitigated. However, we recognise that we operate in high-risk environments, as do our supply chains. Low-skilled employees of our suppliers e.g. cleaners, security and staff drivers can be at risk of labour exploitation. We therefore continue to enhance our controls to ensure that the services we are providing to our clients are slavery-free.

We manage slavery risks through our recruitment and procurement practices and procedures, having a robust suite of conduct policies, strong due diligence procedures and an enabling culture of openness, trust, accountability and compliance.

During the year in review, we have:

- had no reported incidents relating to modern slavery and human trafficking; and
- embarked upon or completed the following initiatives within our Anti-Slavery Programme:
 - (a) updated our online training to reflect updates to our Anti-Slavery and Human Trafficking Policy;
 - (b) updated our Code of Conduct for both staff and suppliers reflecting our zero -tolerance approach to modern slavery;
 - (c) updated our Risk Appetite Satatement ensuring it remains current and effective, and we continue to ensure that all OPM entities, and all OPM’s major projects maintain a risk register;
 - (d) continued our participation in the United Nations Global Compact’s global corporate citizenship initiative;

- (e) screened all our suppliers and key staff through our third-party screening service;
- (f) continued monitoring against the KPIs set by OPM’s Board in early 2021.

Looking forward

We will:

- Re-run our modern slavery risk assessment every 3 years;
- continue to monitor performance against our KPIs as agreed by the OPM board (see below); and
- ensure that there are effective reporting channels in place between OPM’s group entities on issues relating to Modern Slavery.

Tracking Effectiveness

The OPM Board agreed the following KPIs, which we report on below:

1. The number of modern slavery concerns raised to OPM regarding our staff or suppliers – None.
2. The number of modern slavery concerns responded to and whether they have been: (a) reported to the authorities, (b) reported to a local NGO, or (c) required no further action – None.
3. The percentage of OPM staff that have completed their modern slavery training via our online training portal is 76% (at 01.02.2024).

Consultation process

This statement has been prepared by Oxford Policy Management Limited in consultation with its Australian subsidiary, Oxford Policy Management Australia Pty Limited.

Approval of this statement

This statement was considered and approved by the Board of Directors of Oxford Policy Management Limited on and has been signed by the Chief Executive Officer.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and section 6 of the Australian Slavery Act 2018. It constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024 and covers Oxford Policy Management Limited, our international subsidiaries and our branch offices.



Mark Henstridge
Chief Executive Officer
Oxford Policy Management Limited, 2024