

# OnCue Modern Day Slavery Act Statement

## Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. Modern Slavery is a serious high-harm crime which is also hidden and hard to detect. Consumers, investors, and others are usually unaware as to whether this crime has taken place in the supply chains of a business which operates or trades within the UK.

It is intended that this declaration will aid the detection and elimination of modern slavery in supply chains of businesses. All companies with a turnover of £36m or above (defined as a large company under the Companies Act 2006) are subject to implementing the transparency in supply chain provision, providing fair competition and significant social and economic benefit.

Our statement sets out the steps that OnCue Transport Limited has taken, and continues to take, to provide assurance that modern slavery and human trafficking is not taking place within our business or through our supply chain.

## OnCue Policy

OnCue Transport Limited has a zero-tolerance approach to any form of modern slavery; slavery, human trafficking and forced labour/servitude. We are committed to working ethically, with integrity and transparency and to safeguard against any forms of slavery taking place within our business or through our supply chains.

OnCue has a responsibility to stakeholders, service users, employees, and our local communities to ensure that there are no incidents of modern slavery or human trafficking taking place within our supply chains or through any part of our business.

Our policies enforce our commitment to working ethically, and with integrity.

### Recruitment Policy

We operate a robust recruitment policy which includes conducting eligibility to work in the UK checks for all directly employed personnel. Pre-employment checks are completed on all staff to safeguard against human trafficking, and to prevent individuals being forced to work against their will.

### Equal Opportunities

OnCue has a range of controls in place to protect individuals from poor treatment and/or exploitation. Employees are provided with a contract of employment, which complies with all respective laws and regulations.

### Social Value Pledge

Sets out to explain the way we behave as an organisation and how we expect our employees and suppliers to behave.

### Safeguarding

We adhere to the principles of our Safeguarding Children and Vulnerable Adults policies. Our policies comply with the local Safeguarding Boards and multiagency agreements and are approved by our Commissioning Boards.

### Whistleblowing

We endorse awareness and openness through our whistleblowing policy. Our staff are empowered to raise concerns about how colleagues or people receiving our services are being treated without fear of reprisal.

## **Our Approach to Procurement**

Our suppliers are carefully selected through a robust supplier selection process and must provide details of any sub-contractor engaged by them in providing a service to OnCue. Any company that does not pass the credential checks is not listed as one of our approved suppliers and will not undertake any work for OnCue.

Suppliers must adhere to OnCue's zero tolerance on modern slavery and human trafficking.

All company agreements with our suppliers contain information on human rights issues. Our agreement stipulates that any breach in human rights must be reported straight away to OnCue. A clause has been written allowing OnCue the right to terminate any agreement where suppliers have failed to adhere to labour laws.

OnCue staff will work with the finance team when introducing potential new suppliers. Staff must engage companies from the approved list of suppliers.

## **Training**

Training in the identification of modern slavery and trafficking is included as part of our compulsory induction programme and continues through our Safeguarding training. Advice and guidance for employees is provided through our appointed Safeguarding Leads who are level 4 trained. We adopt a discreet "Open Door" policy between management and staff to ensure that appropriate feedback and reporting mechanisms are in place so that any potential breaches can be escalated through the right channels and addressed in a timely manner.

Modern slavery can take different forms, some may not be obvious to the casual observer.

It can range from commonly highlighted abuse such as forced labour, human trafficking, and sexual exploitation to less well-recognised forms such as withholding of passports, debt bondage and excessive charges around housing.

Risks can be anywhere around the business functions, we understand what our supply chain looks like, and consider where vulnerabilities may exist. Regular reviews of the associated risks allow us to direct resources to mitigate risks. We review existing processes and expand them as appropriate to reflect insights gained. The rigour of the company's due diligence process is commensurate with the levels of risk across the business.

## Executive Board Responsibility

The Executive Board has commissioned this document and has oversight of the due diligence process through regular reports presented to the Board. The Board, as part of the strategic plan discussions, considers the risks associated with modern slavery.

## Measuring our performance

The effectiveness of our process is measured by the number of incidents reported by our employees, our stakeholders, the public and law enforcement agencies.

To date no reports have been received on behalf of OnCue Transport Limited or in relation to anyone within our supply chain to identify any areas of concern relating to modern-day slavery.



Torsten Brose  
Chief Executive Officer  
OnCue Transport Ltd