



Slavery and Human Trafficking Policy 2019

In this document, Omega Security Systems Limited will be referred to by OSS.

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Purpose

This document sets out OSS standards, processes and parameters in relation to the anti-slavery stance of the company.

The policy will cover the Company's guidelines for any individual with the belief that human trafficking may be taking place.

The aim of this policy is to protect all staff and stakeholders from criminal activity and improve the safety of the working environment at OSS.

OSS's stance on slavery is unwavering as we strictly prohibit the use of modern slavery and will obstruct any human trafficking practices by reporting illegal activity to the police as we stay committed to implement systems to ensure that modern slavery is not taking place within our organisation.

This document makes reference to and is in support of Modern Slavery Act 2015. Section 54 of this Act is contained in Appendix A.

Scope

This policy applies to all of the organisation's activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

Definitions

OSS considers that modern slavery encompasses:

1. Human trafficking;
2. Forced work, through mental or physical threats;
3. Being owner or controlled by an employer through mental or physical abuse or the threat of abuse;
4. Being dehumanised, treated as a commodity or being bought or sold as property, and;
5. Being physically constrained, or to have restriction on an individual's freedom of movement.

Modern slavery is a crime as it violates a person's fundamental human right to freedom.

Commitment

1. OSS acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. The Company understand that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.
2. OSS has a zero tolerance policy towards modern slavery. It will refrain from entering into business, and/ or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
3. The labour supplied to OSS in pursuance of the services it provides is carried out wholly in the countries where those services are provided i.e. United Kingdom and Australia as appropriate.
4. No labour provided to OSS in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. OSS strictly adheres to minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Potential Exposure

OSS considers its exposure to modern slavery to be minimal. Nonetheless, it has taken steps to ensure that such practices do not take place inside the business and are not present in other organisations that supplies goods and/or services to OSS.

Steps to Prevent Slavery

1. OSS carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains.
2. OSS will continue to not conduct any business with another organisation which has been found to have been involved with slavery and/or human trafficking.
3. In accordance with section 54(4) of the Modern Slavery Act 2015, OSS has contacted (or attempted to contact) all first tier suppliers to set out our zero tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
4. OSS has taken action to monitor reports of modern slavery and will cross reference such reports with our first tier supply chain. The Company will seek to discontinue business with any first tier supplier found by the enforcement authorities to be involved in modern slavery.
5. OSS encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

Assessment of Effectiveness in Combatting Modern Slavery

To ensure effectiveness in combatting modern slavery, the Company maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.

Collaborative Policies

Omega Security Systems also has a Corporate Social Responsibility Policy which further defines our stance on modern slavery. In addition, a Whistleblowing policy is in place which encourages the reporting of any wrongdoing to support public interest and to truly understand all the operations of the company.

Review

This policy is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and applies to all companies within and associated to Omega Systems Systems Ltd. It will be reviewed after each financial year.

Policy Approval

This statement relates to the 2019/2020 financial year and is approved by:

Sherridan Ward, Director

Appendix A

Section 54 of the Anti Slavery Act 2015

Transparency in supply chains etc

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(1)

A commercial organisation within subsection (2) must prepare a slavery and human trafficking statement for each financial year of the organisation.

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(2)

A commercial organisation is within this subsection if it—

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(a)

supplies goods or services, and

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(b)

has a total turnover of not less than an amount prescribed by regulations made by the Secretary of State.

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(3)

For the purposes of subsection (2)(b), an organisation's total turnover is to be determined in accordance with regulations made by the Secretary of State.

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(4)

A slavery and human trafficking statement for a financial year is—

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(a)

a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place—

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(i)

in any of its supply chains, and

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(ii)

in any part of its own business, or

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(b)

a statement that the organisation has taken no such steps.

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(5)

An organisation's slavery and human trafficking statement may include information about—

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(a)

the organisation's structure, its business and its supply chains;

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(b)

its policies in relation to slavery and human trafficking;

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(c)

its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

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(d)

the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

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(e)

its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;

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(f)

the training about slavery and human trafficking available to its staff.

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(6)

A slavery and human trafficking statement—

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(a)

if the organisation is a body corporate other than a limited liability partnership, must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent);

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(b)

if the organisation is a limited liability partnership, must be approved by the members and signed by a designated member;

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(c)

if the organisation is a limited partnership registered under the Limited Partnerships Act 1907, must be signed by a general partner;

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(d)

if the organisation is any other kind of partnership, must be signed by a partner.

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(7)

If the organisation has a website, it must—

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(a)

publish the slavery and human trafficking statement on that website, and

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(b)

include a link to the slavery and human trafficking statement in a prominent place on that website's homepage.

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(8)

If the organisation does not have a website, it must provide a copy of the slavery and human trafficking statement to anyone who makes a written request for one, and must do so before the end of the period of 30 days beginning with the day on which the request is received.

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(9)

The Secretary of State—

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(a)

may issue guidance about the duties imposed on commercial organisations by this section;

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(b)

must publish any such guidance in a way the Secretary of State considers appropriate.

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(10)

The guidance may in particular include further provision about the kind of information which may be included in a slavery and human trafficking statement.

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(11)

The duties imposed on commercial organisations by this section are enforceable by the Secretary of State bringing civil proceedings in the High Court for an injunction or, in Scotland, for specific performance of a statutory duty under section 45 of the Court of Session Act 1988.

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(12)

For the purposes of this section—

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“commercial organisation” means—

(a)

a body corporate (wherever incorporated) which carries on a business, or part of a business, in any part of the United Kingdom, or

(b)

a partnership (wherever formed) which carries on a business, or part of a business, in any part of the United Kingdom, and for this purpose “business” includes a trade or profession;
“partnership” means—

(a)

a partnership within the Partnership Act 1890,

(b)

a limited partnership registered under the Limited Partnerships Act 1907, or

(c)

a firm, or an entity of a similar character, formed under the law of a country outside the United Kingdom;
“slavery and human trafficking” means—

(a)

conduct which constitutes an offence under any of the following—

(i)

section 1, 2 or 4 of this Act,

(ii)

section 1, 2 or 4 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (c. 2 (N.I.)) (equivalent offences in Northern Ireland),

(iii)

section 22 of the Criminal Justice (Scotland) Act 2003 (asp 7) (traffic in prostitution etc),

(iv)

section 4 of the Asylum and Immigration (Treatment of Claimants, etc.) Act 2004 (trafficking for exploitation),

(v)

section 47 of the Criminal Justice and Licensing (Scotland) Act 2010 (asp 13) (slavery, servitude and forced or compulsory labour), or

(b)

conduct which would constitute an offence in a part of the United Kingdom under any of those provisions if the conduct took place in that part of the United Kingdom.