

## **Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2020**

### ***About us***

The Financial Ombudsman Service was set up under the Financial Services and Markets Act 2000 to resolve individual disputes between consumers and financial businesses – fairly, reasonably, quickly and informally. On 1 April 2019, our remit was extended to cover complaints from larger small and medium sized businesses and against claims management companies.

The service, based in Tower Hamlets, London resolved close to 300,000 complaints during the 2019/2020 financial year.

The Financial Ombudsman Service is a company limited by guarantee; we have no share capital and no shareholders.

As a values-led organisation guided by a strong sense of fairness, we're fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain in line with the requirements of the Modern Slavery Act 2015 (the Act).

### ***Areas of risk***

Due to the nature of our business, we consider the inherent risk of modern slavery and human trafficking occurring in our business to be low. But nonetheless we take our responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

### ***Our people and suppliers***

The service is classed as a "contracting authority" for the purposes of the Public Contracts Regulations 2015 and is therefore bound by them. As such we often make use of government frameworks such as those set up by the Crown Commercial Service.

Approximately 83% of our spend relates to people costs (including those relating to our property), with the majority of the remaining spend procured either via an EU tender process or a compliant framework. In addition to the scrutiny and support provided within these frameworks, our procurement policy sets out how we keep our key suppliers under review to identify those with the greatest potential exposure to slavery. For these suppliers, we review their Modern Slavery Act statements and where these are unavailable, contact them to ensure compliance. Our template contracts include a clause that covers the Act and we verify our suppliers' commitment to the Act on an annual basis as part of our standard contract management practice.

### ***Our policies***

We have a number of internal staff policies which are designed to reduce the risk of modern slavery and facilitate reporting of any potential slavery instances. For example:

- Our pay policy ensures all our staff, including our apprentices, are paid at least the Real Living Wage rates.
- We also make sure that the staff we use through suppliers are paid at least the Real Living Wage rate.
- We have a “speak up” policy which encourages people to report any aspect of dishonesty or unfairness and we use an external whistleblowing provider, Safecall, to facilitate confidential and independent reporting.
- We have a strong commitment to diversity and inclusion and in late 2019 we developed a new overarching social responsibility and sustainability policy, bringing together a broad range of relevant commitments and practices including in relation to our people, procurement, the environment and the community.
- Towards the end of 2019/2020, in response to the Covid-19 pandemic, we agreed that we would continue to pay our key third party suppliers during ‘lockdown’ while they were unable to undertake their full services in our building, including cleaners, security and catering staff.

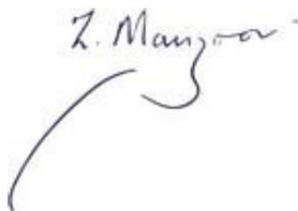
### ***Training and our ongoing commitment***

We will continue to embed the importance of the Act into our procurement practices, checking that relevant suppliers and contractors understand their obligations under the Act and are committed to complying with the requirements it places on them. We will include these checks as part of our security auditing process.

Specific activities undertaken during 2019/2020 included ongoing briefing sessions undertaken by one of our staff networks on modern slavery and human trafficking and the role we can all play to help bring slavery to an end and a continuous professional development presentation with our board and executive team.

On an ongoing basis, we will continue to brief our procurement and resourcing teams on the importance of modern slavery and how to identify and respond to suspected incidents of modern slavery and human trafficking. And across the service more generally, we will continue to make sure that staff are aware of our commitment to preventing acts of modern slavery and human trafficking and the ways in which they can raise any issues of concern. We’ll do this, and issue periodic reminders, through all appropriate channels, including staff induction, training and staff newsletters.

Signature:

A handwritten signature in blue ink that reads "Z. Manjoo". The signature is written in a cursive style with a long, sweeping underline that curves back under the name.

**Chairman of the Board**

Date: 14 July 2020