



# The PSC

## **QMS 11 – Modern Slavery Act 2015: Statement**

Date – 28 September 2023

Version – v1a

# Modern Slavery Act 2015: Statement

## Introduction

The PSC is a mission-driven organisation which exists to make public services brilliant:

**Since our foundation in 2006 we've worked with some of the biggest public service organisations in the UK, collaborating with leaders and teams to make lasting change happen, fast. We believe that good public services are the key to a stronger society.**

**We are privileged to support the people who lead our public services when they are finding things difficult, taking a big risk or making a tough decision.**

**Public services are there for the most important moments in people's lives. When children come into the world, as they learn and grow, when individuals pursue new goals and qualifications, and when people fall ill, or need help managing day-to-day life.**

**Through our work, we make a difference to those experiences.**

**That's why we do what we do.**

Underpinning this mission is a commitment to fair and equal treatment of everyone involved in our work, internally including staff and contractors, and externally including clients, suppliers and wider supply chain.

We have a commitment to delivering social value, both through specific contracts (such as offering to upskill staff of client organisations), charitable work (such as working with upReach, a charity which works to create the conditions for undergraduates from less-advantaged backgrounds to access and sustain top graduate jobs), and pro-bono work (many of our staff hold roles such as school governors, charity board members, vaccination volunteers).

The PSC is committed to combatting modern slavery and human trafficking in all its forms. We recognise that modern slavery is a grave violation of human rights and a global issue that requires collective action. As a public services consultancy, we are determined to play our part in eradicating modern slavery from our operations and supply chains. This Modern Slavery Statement outlines our approach, policies, and actions to prevent modern slavery and ensure ethical practices throughout our business.

Given the nature of the services we provide and the professional workforce we employ, we assess the risk of modern slavery or human trafficking within our own organisation and its supply chains to be very low. Through our ISO9001-certified Quality Management System, we manage the risk of modern slavery and human trafficking through our supply chain.

## Organisational Structure and Activities

The PSC is a specialist consultancy specialising in transformation, strategy and digital offerings in public services, with our office based in London, England. We are a [medium sized business](#) that works with a diverse range of clients and suppliers, maintaining strong relationships throughout the supply chain.

## Our Commitment

We are committed to acting ethically, responsibly, and transparently in all aspects of our business. Our commitment to preventing modern slavery and human trafficking includes:

### Approach and Controls

1. We have developed and implemented this Modern Slavery Statement that sets out our zero-tolerance stance against modern slavery and human trafficking. This statement applies to all our employees, contractors, suppliers, and business partners.
2. We have a number of policies which support the management of the risk of modern slavery and human trafficking (see table below).
3. We regularly review and update our policies and controls to ensure compliance with applicable laws and regulations relating to modern slavery and human trafficking.

Our policies which illustrate The PSC's commitment to ethical conduct in every aspect of its business and support the management of the risk of modern slavery include:

Area	Policies
Client contracts	<b>Ethical review of potential client contracts:</b> ensures that all client contracts are aligned with our company values and ethical requirements.
Staff and contractor recruitment	<b>Fair recruitment process:</b> ensures the same assessment process is adhered to for all candidates to provide a fair and transparent recruitment process across applications made directly through our website and applications through an agency; ensures that all prospective employees are legally entitled to work in the UK
Supplier management	<b>Supplier Control Procedure:</b> ensures we manage our supply chain carefully. Please see more details in 'Supplier Due Diligence' below.
Conduct	<b>Anti-Bribery and Corruption policy:</b> states the PSC's position and ethical conduct expected from The PSC employees and any third parties that we engage with <b>Personal Harassment Policy and Procedure:</b> ensures staff can raise any concerns relating to conduct <b>Whistle Blowers Policy:</b> ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal <b>Prevention of Bribery and Corruption Policy:</b> promoting and maintaining the highest level of ethical standards in relation to all its business activities

Health and Safety	<b>Health and Safety policy:</b> sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.
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## Supplier Due Diligence

Our ISO9001-certified Quality Management System includes a Supplier Management Process which guides the selection of suppliers. Our supply chain comprises primarily of services, including professional advisory services, IT services and serviced office and office supplies. The review of our supply chain through our Supplier Management Process show that our overall risk of modern slavery is low, owing to:

- The nature of goods and services we procure (mostly services, mostly skilled professions); we don't have any significant suppliers from industries typically known for modern slavery.
- The organisations we procure from: For large companies, we expect them to adhere to the principles outlined in the Modern Slavery Act and to have their own policies and processes in place to prevent modern slavery. For smaller businesses we choose those based locally to us where we can meet their staff in person.
- The locations from which we procure them (mostly in the UK, US or other developed markets).
- Our procurement practices (e.g., agreement of terms and ensuring timely payment).

We understand that there may be higher risks in services such as catering or goods such as office supplies: we minimise these risks by where possible purchasing from large, established companies.

We conduct due diligence on all material suppliers assessed by us as critical and/or major to the business before allowing them to become our suppliers. We identify material suppliers by assessing whether there will be a large spend with the supplier, whether the supplier is critical to the business, and whether the company is likely to use the supplier often/consistently. We have implemented a robust supplier selection and due diligence process for those suppliers identified as material, assessing potential suppliers for adherence to the Modern Slavery Act.

## Risk Assessment and Management

1. We conduct risk assessments to identify and evaluate potential modern slavery risks within our operations and supply chains for all new material suppliers.
2. We incorporate anti-slavery and human trafficking obligations into procurement agreements and subcontracting arrangements on a risk assessed basis.
3. If existing material suppliers do not have a Modern Slavery Statement available online, then we notify them of our expectations and their obligations in relation to the prohibition of modern slavery.
4. We prioritise high-risk areas and take appropriate measures to address and mitigate these risks.

## **Training and Awareness**

1. We provide training and awareness programs to employees involved in procurement decisions to ensure they understand the signs of modern slavery, how to report concerns, and the actions to take.
2. We encourage our employees to maintain an open and supportive environment, where concerns can be raised without fear of retaliation.

## **Reporting and Investigation**

1. We encourage the reporting of any suspicions or concerns related to modern slavery or human trafficking within our organisation or supply chains.
2. We have established appropriate procedures to investigate reports thoroughly and take prompt remedial action where necessary. These procedures follow our ISO9001-certified Quality Management System incident management process.

## **Continuous Improvement:**

1. We are committed to continuously reviewing and improving our processes and practices to enhance our approach to preventing modern slavery.

## **Conclusion**

The PSC is dedicated to eliminating modern slavery and human trafficking from our operations and supply chains. We will remain vigilant, take necessary actions, and promote responsible business practices within our sphere of influence. This Modern Slavery Statement will be reviewed and updated annually to reflect our ongoing commitment and progress in combating modern slavery.

Catherine Mulcahy, Chief Operating Officer and Director

This Statement is approved by The PSC's Audit Committee, on behalf of the Board of Directors

Date: 28 September 2023