



APM Modern Slavery Statement 2015/16

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by APM UK LTD during year ending 30th June 2016 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

APM (Advanced Personnel Management) is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out APM's actions to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

As part of an international human resources business, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Organisational structure and supply chains

APM is an international human services organisation, specialising in vocational rehabilitation.

Founded by four female occupational therapists in 1994, APM employs more than 1,200 staff at 400 sites in UK, Australia and New Zealand.

APM UK delivers a diverse portfolio of employability, skills, youth and justice contracts on behalf of the UK Government and also holds a number of sub-contracts with prime providers. It is currently a prime provider for the delivery of multi-million pound contracts including Work Programme, Working Capital, SFA NEETS, National Citizen Service and National Offender Management Service.

Australia's leading provider of government vocational rehabilitation services, the business brings a genuine health context to the task of helping people return to employment, with healthcare professionals collocated within APM sites.

APM has a proven track record of high performance, through multiple contracts, geographies and funding agencies, guided by its ICREATE values and an embedded culture of listening, learning and delivering. It assists more than 70,000 people worldwide each year and has a mission to improve the lives of one million people by 2020.

APM supply chain and supplier due diligence

APM's approved supplier due diligence process includes an evaluation of every new partner prior to engagement with any APM delivery/services. Potential supply chain partners are required to complete a Supply Chain Management Application in order to become a pre-approved supplier. This process encompasses questions on the following: supplier recruitment and selection processes and vetting requirements; equality and diversity policies and actions; safeguarding procedures and arrangements; information security processes; quality systems; and staff competencies and qualifications. From December 2016 prospective supply chain partners are asked to confirm that modern slavery is not taking place anywhere in their business and that the necessary requirements are present in line with the Modern Slavery Act 2015.

APM will also uphold best practice and professional codes of conduct relating to procurement and supply chain, in line with the Chartered Institute of Procurement and Supply (CIPS).

APM and its partners are committed to following and promoting the Merlin Standard for supply chain management, championing positive behaviours and relationships in the delivery of provision. The organisation adheres to Merlin best practice for developing, managing and supporting high-performing supply chains that integrate the public, private, and community and voluntary sectors.

Regular reviews of existing supply chains are undertaken as part of APM's supplier relationship management activities, including appraisals with key suppliers and assessment of compliance with modern slavery legislation.

APM prompts its supply chain partners to update the information submitted as part of their original application on an annual basis. It includes the supply of any updated policy or due diligence documentation and confirmation of no change to the organisation's status, with regard to the declarations that were made. Should any information expire or fail to be provided upon request, the supplier will be removed from the Pre-Approved Suppliers List.

To date APM is not aware of any reports of slavery or human trafficking within its supply chains. If any were identified then it would act to ensure compliance with legislation and its own policies to prevent further abuse.

APM will assess any instances of non-compliance with its modern slavery and human trafficking commitments on a case-by-case basis and will tailor remedial action appropriately.

APM policies on slavery and human trafficking

APM is fully aware of the responsibilities it has towards its clients, participants, employees, communities and all stakeholders. The organisation is guided by a strict set of ethical values in all of its business dealings and expects its suppliers and supply chain to adhere to these same principles. APM has a zero tolerance towards slavery and human trafficking. All employees are expected to report concerns about slavery and modern trafficking, whilst

management is expected to act upon them in accordance with business policy and procedure.

To continue to identify and mitigate the risk of modern slavery and human trafficking in its own business and our supply chain, APM is committed to the following for 2017:

- A review of the effectiveness of Modern Slavery briefings and to develop further awareness sessions, sharing any relevant actions with supply chains. This will include the following:
 - ✓ the basic principles of the Modern Slavery Act 2015;
 - ✓ how employers can identify and prevent slavery and human trafficking;
 - ✓ what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
 - ✓ what external help is available, for example through the Modern Slavery Helpline.

- Relevant actions to be implemented to strengthen supply chain auditing and compliance, including a review of procurement and supply chain procedures and template documentation, introducing new or revised procedures as part of the procurement and Pre-Approved Supplier process.
- Ensure recruitment and induction procedures are robust and inform new staff of the processes and procedures within APM to prevent modern slavery.
- A review of existing supply chains as part of supplier relationship management activities, to ensure compliance with modern slavery legislation.
- A review of APM Safeguarding Children's and Vulnerable Adults policy to incorporate any guidance relevant to the legislation and best practice guidance.

This statement has been approved by APM's Board of Directors, who will review and update it on an annual basis.

This statement is also made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the organisation's slavery and human trafficking statement for the financial year ending 30th June 2016.

Signed:

A handwritten signature in black ink, appearing to read 'Alan Case', with a horizontal line underneath it.

Chief Executive Officer, APM UK

Date: December 2016

