

# Modern Slavery and Human Trafficking

## Statement for the financial year ending 31 March 2026

### About us

The Financial Ombudsman Service ('FOS') was set up under the Financial Services and Markets Act 2000 to resolve individual disputes between regulated firms and eligible complainants quickly and with minimum formality.

FOS is a company limited by guarantee; it has no share capital and no shareholders.

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

### Areas of risk

Due to the nature of FOS's business, the inherent risk of modern slavery and human trafficking occurring in the business is regarded by FOS as low. Nonetheless, FOS takes its responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

FOS therefore has an effective safeguarding reporting mechanism, which allows its people to report concerns confidentially to HR about colleagues or customers so that appropriate action can be taken, such as informing the appropriate authorities or signposting vulnerable people to organisations who can offer advice, assistance, and support.

### Our people and suppliers

FOS is classed as a "Contracting Authority" for the purposes of the Public Contracts Regulations 2015 and the Procurement Act 2023. FOS is bound to follow this legislation and, where appropriate, it uses public sector frameworks, such as those set up by the Crown Commercial Service and other reputable purchasing bodies.

Approximately 80% of FOS expenditure relates to staff costs (including those relating to FOS's property), with most of the remaining spend utilised via an appropriate competitive procurement process.

Where appropriate, FOS uses its own standard contract templates, which include a Modern Slavery Act clause.

In addition to the scrutiny and support provided through these routes to market, FOS's procurement policy sets out how it keeps its suppliers who fall within the remit of the Act under review to ensure their Modern Slavery Act statements are up to date and published on their websites.

### Our policies

FOS has several internal staff policies which are designed to reduce the risk of modern slavery and facilitate reporting of any potential slavery instances. For example:

- The FOS pay policy ensures all FOS staff, including any apprentices, are paid at least the Real Living Wage rates, we have robust controls in place to ensure that colleagues do not fall below the National Living Wage as a result of any salary sacrifice benefits and also have policies and processes to mitigate against the risk of excessive overtime.

- FOS also makes sure that staff used through suppliers are paid at least the Real Living Wage rate.
- FOS has a “speak up” policy which encourages people to report any aspect of dishonesty or unfairness; and FOS uses an external whistleblowing provider, Safecall, to facilitate confidential and independent reporting.
- FOS is committed to diversity and inclusion, a workplace where everyone feels safe and supported regardless of protected characteristics, and where bullying or harassment is not tolerated.
- FOS has an unreasonable behaviour policy in case customers discriminate against staff or treat them without appropriate respect and courtesy (taking account of the nature of FOS’s work in handling contentious disputes).
- FOS’s social responsibility and sustainability policy brings together a broad range of relevant commitments and practices – including in relation to its people, procurement, the environment, its carbon footprint, and the community.

## **Supply Chain Management**

FOS’s supply chains include suppliers of goods and services necessary for its daily operations. FOS is committed to working with suppliers who share its values and adhere to its high standards of ethical conduct. FOS’s supplier management process includes:

- Utilising reputable public sector frameworks where available that align with the National Procurement Policy Statement, such as those set up by the Crown Commercial Service and other reputable purchasing bodies.
- Screening potential suppliers for their commitment to combatting modern slavery and human trafficking.
- Regular reviews of existing suppliers to ensure ongoing compliance.
- Clear communication of FOS’s expectations regarding modern slavery to all suppliers.
- Collaborating with suppliers to address any identified risks or issues.

## **Training and awareness**

On an ongoing basis, FOS will continue to brief and train its 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. Across the organisation more generally, FOS will continue to make sure that staff are aware of its commitment to preventing acts of modern slavery and human trafficking, and the ways in which they can raise any issues of concern. FOS will do this through all appropriate channels, including staff induction and training.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes FOS’s modern slavery and human trafficking statement for the financial year ending 31 March 2026. It was approved by the FOS Board on 23 March 2025, who review and update it annually.

Signature:



**Liam Coleman**  
**Chairman of the Board**

Date: 1 May 2026