

POLICY & PROCEDURE

LSDN Modern Slavery Policy	
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Management Area:	HR
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LSDN MISSION STATEMENT

LSDN's mission is to enhance the life chances, economic independence and social mobility opportunities of its service users by helping individuals to develop vocational, academic and life skills using a supportive and individualistic approach so service users can realise their fullest potential at home, in the workplace and in the community. LSDN works in partnership with its clients and local community to bring about the best possible results for each individual and their families.

Purpose	This document sets out the policy and procedure to confirm LSDN has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
Scope	This policy applies to all persons working for LSDN or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, apprentices, agents, contractors, external consultants, third-party representatives and business partners.

	This policy does not form part of any employee's contract of employment and LSDN may amend it at any time.
Management Responsibility	Chief Executive Director and Senior management have day to day responsibility to ensure compliance with our legal and ethical obligation. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
Policy Headings	
Introduction	Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
Statement	LSDN is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
Compliance	All staff must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under

	our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or you may report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. LSDN is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure from the HR department.
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Communication, Awareness and Breaches	Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. LSDN may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. Access to Policy – The policy will be available on LSDN’s website, Intranet and in printed form upon request.
Links to other policies	Safeguarding Policy LSDN Privacy Policy Internet and Intranet Use Policy Staying Safe Online Policy E-Safety Policy Document Control Policy Whistleblowing Policy Staff Code of Conduct
Policy monitoring and review arrangements	The policy will be promoted and implemented throughout the Organisation. This policy will be reviewed every two years.