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**Modern Slavery Policy**

**Executed by:** Andy James, Chief Financial Officer

**Date:** 20th April 2021

**Review Date:** March 2023

1. **Introduction**

This Policy sets out the steps Leonard Cheshire will take to comply with the Modern Slavery Act 2015 and our commitment to acting ethically and with integrity in our organisations relationships across the UK and internationally. In addition, we are implementing processes to ensure that our systems and controls are effective in ensuring that slavery is not taking place in our supply chains.

This document sets out the policy of Leonard Cheshire with the aim of the prevention of

opportunities for modern slavery to occur within the organisation or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). The Act is designed to tackle [slavery](https://en.wikipedia.org/wiki/Slavery) in the UK and consolidates previous offences relating to [trafficking](https://en.wikipedia.org/wiki/Human_trafficking) and slavery. Modern slavery can occur in various forms, including servitude, forced or 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.

From 29 October 2015, the Transparency in Supply Chain Provisions (source: Modern Slavery Act, 2015, Section 54(1), requires businesses to ‘publish an annual statement if they have an annual turnover above a threshold of £36 million’.

Leonard Cheshire statement is made in relation to this legislative requirement and confirms the steps taken to ensure that slavery and human trafficking are not taking place in the organisation (or in any supply chain).

The statement is published and reviewed annually on our website: <https://www.leonardcheshire.org/modern-slavery-statement>

We operate a number of policies which reflect our commitment to acting properly in all of our organisational relationships and to implementing and enforcing effective systems and controls. Our policies which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include our:

* Recruitment policy
* Whistleblowing policy
* Safeguarding policy
* Confidentiality policy

We will continue to review our policies to ensure that they are effective and appropriate. Subject to changes in legislation, this Policy will be reviewed and updated accordingly.

Slavery can take many forms. These include:

* Child trafficking
* Forced labour
* Forced marriage
* Sexual exploitation
* Criminal exploitation
* Domestic servitude
* Labour exploitation
* Organ harvesting

Leonard Cheshire will not tolerate slavery in any aspect of our organisation. We hold our supply chains and ourselves accountable and we will ensure compliance with the provisions of the Modern Slavery Act 2015 in relevant aspects of our work.

1. **Policy Outline**

This policy document provides an overview of our zero-tolerance approach to modern slavery. We assess risks across supply chains and have amended our procedures to ensure that our contractors, consultants, suppliers and downstream partners (who directly implement our projects), in areas where a potential risk may occur, actively work towards eradicating modern slavery. We have determined that the main areas of risk for the organisation are:

* Workforce sourcing for delivering Care and Support Services (both in the UK and Internationally)
* Construction contractors and sub-contractors
* Food sourcing

We will provide guidance to colleagues on modern slavery by:

* Providing training through the company Learning management system (refer to section 6)
* Running Modern Slavery awareness using our internal communication channels (including Workplace and Intranet) to mark Anti-Slavery Day 18th October (created by Act of Parliament to raise awareness of modern slavery)
* Updating the Procurement Intranet page with Modern Slavery information and links to useful websites, organisations and materials, including Anti-slavery International; Unseen UK and the UK government.

1. **Our Supply Chains**

Our annual third-party expenditure is circa £50m. Due to the nature and geographical reach of our organisation, procurement across the organisation is a hybrid structure of central and decentralised procurement activity.

The Procurement strategy and high value and high-risk opportunities are facilitated centrally by the Head of Procurement, with the remainder carried out by operational and international colleagues.

1. **Our Approach**

To mitigate risk within our supply chains, we have implemented and communicated the following systems and controls:

4.1 United Kingdom Operations will:

* Identify and assess potential risk areas in our UK supply chains by conducting an organisation wide spend and risk analysis
* Mitigate the risk of slavery in our supply chains by being open with suppliers on how we work together
* Ask third party providers for a copy of their Modern Slavery policy or statement. Where this is not available, we will ask third party providers to read and comply with the Leonard Cheshire Modern Slavery policy. This is carried out at the onboarding stage of all new suppliers.
* Include Leonard Cheshire Modern Slavery clause in all Contracts

4.2 The International Department will:

* Share the Modern Slavery Policy with our partners and suppliers
* Create guidance with our regional teams and partners on how to assess potential risks in our supply chains and contractors
* Include cross-checking mechanisms when Leonard Cheshire staff interact with suppliers.

1. **Risk Management**

As Leonard Cheshire operates in the UK and internationally, we have identified that we do have a potential exposure to risk. However, our Modern Slavery Policy and policies around recruitment, safeguarding and procurement ensures that we have effective controls in place. Staff are encouraged to ‘speak up’ through our whistleblowing and confidentiality policies.

To manage this risk, we will work with suppliers and contractors to acknowledge our commitment to combat slavery by inserting relevant clauses into our contracts and agreements.

1. **Training and Awareness Raising**

To ensure a high level of understanding of the risks of modern slavery, we annually review awareness and training and have previously carried out a 5-day internal awareness campaign. Leonard Cheshire’s Safeguarding Training includes the modern slavery policy and is available through the company Learning management system. The training will be made available to all staff in 2021. This is aimed at helping colleagues to better understand the risks and how we as an organisation are working to manage this and mitigate Modern Slavery.

1. **How to Report Modern Slavery Concerns**

Colleagues who suspect incidents or signs of modern slavery in the UK should:

* In the first instance, all modern slavery crimes should be reported to the local police by dialling 999.
* If colleagues hold information that could lead to the identification, discovery and recovery of victims in the UK, they should contact the Modern Slavery Helpline 0800 0121 700.
* For more information, colleagues are advised to visit: [www.unseenuk.org](http://www.unseenuk.org/)
* Alternatively, colleagues can make calls anonymously to Crimestoppers on 0800 555 111.

Colleagues who suspect incidents or signs of modern slavery internationally should:

* Contact [Anti-Slavery International](https://www.antislavery.org/contact-us/) at: <https://www.antislavery.org/contact-us/> or other [specialist anti-slavery organisations](https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/modern-slavery/list-of-anti-slavery-charities-and-non-governmental-organisations/).
* Search online for the relevant helpline in their country. If colleagues are abroad and think a person may be being exploited or have been trafficked, they should contact the embassy or consulate in the first instance for support.

1. **Monitoring, Review and Performance Information**

The monitoring and effectiveness of this policy will be managed by the Head of Procurement which includes:

* Recording and monitoring any incidents or reports made to us which conflict with our values.
* Treating all reports and incidents in line with our confidentiality policy.
* Reviewing and strengthening our centralised procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.