



# Modern Slavery Policy

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## 1 Introduction and Context

- 1.1 The Modern Slavery Act (2015) recognises the important part businesses can, and should play, in tackling slavery and encourages them to do more.
- 1.2 We cannot, and should not, accept that modern slavery is for others to deal with, we must do what we can to raise awareness of the issues, make and uphold commitments to combat slavery and recognise that we all have a role to play.
- 1.3 LSTM is committed to the highest standards of ethical conduct and integrity in its activities in the UK and overseas. This policy outlines the LSTM approach to countering modern slavery and upholding the relevant laws, and should be read in conjunction with other relevant policies and statements, particularly:
  - Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
  - LSTM's transparency statement on Modern Slavery <https://www.lstmed.ac.uk/lstm-group-modern-slavery-act-transparency-statement-2019>
  - Protecting Children and Vulnerable Adults Policy & Procedure <https://lstmed.sharepoint.com/policies/PoliciesProcedures/Protecting%20Children%20and%20Vulnerable%20Adults%20Policy%20and%20Procedure.pdf>

## 2 Equality and Diversity

- 2.1 LSTM is committed to promoting equality of opportunity, combatting unlawful discrimination and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equality policy.

## 3 Safeguarding

- 3.1 In line with our Safeguarding policy and procedures, LSTM's processes reflect our organisational commitment to keeping children and vulnerable adults safe. Modern Slavery is included as a potential safeguarding risk within our safeguarding policies and processes. For more information see the Protecting Children and Vulnerable Adults Policy & Procedure <https://lstmed.sharepoint.com/policies/PoliciesProcedures/Protecting%20Children%20and%20Vulnerable%20Adults%20Policy%20and%20Procedure.pdf>

## 4 What is modern slavery?

- 4.1 Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced or compulsory labour, bonded and child 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.
- 4.2 Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. There is no typical victim and some victims do not understand they have been exploited. Some key signs that could indicate someone may be a slavery or trafficking victim:
  - The person is not in possession of their own passport, identification or travel documents
  - The person is acting as though they are being instructed or coached by someone else

- They allow others to speak for them when spoken to directly
  - They are dropped off and collected from work
  - The person is withdrawn, or they appear frightened
  - The person does not seem to be able to contact friends or family freely
  - The person has limited social interaction or contact with people outside their immediate environment
- 4.3 A person may display a number of the above indicators, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.
- 4.4 The Modern Slavery Act (2015) gives specific definitions to help guide in their identification:
- **Slavery:** exercising powers of ownership over a person
  - **Servitude:** the obligation to provide services is imposed by the use of coercion
  - **Forced or compulsory labour:** work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
  - **Human trafficking:** arranging or facilitating the travel of another person with a view to their exploitation

## 5 Policy Statement

- 5.1 LSTM will not tolerate slavery in any form 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, in our partner institutions or in any of our supply chains.
- 5.2 LSTM requires all individuals acting on its behalf to conduct business honestly, fairly and professionally and recognise that it is the responsibility of everyone associated with LSTM to uphold these values.
- 5.3 This policy and its associated procedures apply to all employees, officers, temporary workers, consultants, contractors, agents, subsidiaries, trustees and volunteers acting for, or on behalf of, LSTM in the UK and overseas. This also extends to suppliers and partner institutions and their employees who are engaged in delivering LSTM grant/contract awards under a sub contract, collaboration or other contract, unless LSTM has agreed that the supplier/partner's policies will apply instead. It also applies to students when they are acting on behalf of LSTM, either paid or voluntary.
- 5.4 LSTM employees or associated persons working on behalf of LSTM must not:
- Engage in or facilitate any activity that might lead to, or suggest, a breach of this policy
  - Fail to report any activity that they are aware of that might lead to, or suggest, a breach of this policy
- 5.5 LSTM employees or associated persons working on behalf of LSTM are expected to uphold the following measures to safeguard against modern slavery:
- Actively promote and publicise the LSTM zero tolerance approach to modern slavery
  - Uphold the values of the prevention, detection and reporting of modern slavery in any part of our organisation or supply chain
  - Commit to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
  - Be aware that "turning a blind eye" is not acceptable

## **6 Breaching the policy**

- 6.1 Any allegation that an employee has acted in a manner that is illegal or inconsistent with this policy and its associated procedures is likely to constitute a serious disciplinary, contractual or criminal matter for the individual concerned and may cause serious damage to the reputation and standing of LSTM. In this respect LSTM reserves the right to refer alleged instances to the relevant employee disciplinary procedures or the police authorities.
- 6.2 LSTM may face criminal liability for unlawful actions taken by its employees or associated person under the Modern Slavery Act 2015.
- 6.3 LSTM reserves the right to terminate its contractual arrangements with any associated person(s) or organisations providing services for, or on behalf, of LSTM where there is reasonable evidence that they or their staff have committed an act in breach of this policy.
- 6.4 In addition to any internal procedures, LSTM will report suspected cases to the relevant authorities.
- 6.5 LSTM reserves the right to seek redress via civil proceedings against employees or associated persons whose acts or omissions have resulted in financial loss. This is regardless of whether the employee or associated persons were prosecuted.

## **7 Reporting suspected incidents**

- 7.1 If you suspect that someone may be a victim of slavery you need to take action.
- 7.2 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 7.3 If you think someone is in immediate danger, dial 999
- 7.4 Discuss your concerns with your line manager or HR, they will help to decide on the next course of action if the person is not in immediate danger
- 7.5 LSTM encourages anybody who may be concerned about modern slavery to report it. You can use the procedures as laid out in the Whistleblowing Policy or use the Freedom to Speak Up system to raise an issue quickly.
- 7.6 LSTM will support anyone who acts in good faith.
- 7.7 Not all victims may want to be helped and there may be instances where reporting a suspected case puts the potential victim at risk, so it is important that in the absence of immediate danger, discuss your concerns with HR.