



# **Modern Slavery Policy and Statement**

**Approved by Board of Trustees on July 1<sup>st</sup> 2026**

**To be reviewed every two years. Next review 2028**

**Lead Staff Member: Jackie Rosenberg**

**Lead Trustee: Tim Todhunter**

## **Statement**

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.

PDT has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our 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 our supply chain.

We are also committed to ensuring there is transparency in our own operations and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business and charity 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 and we expect that our suppliers will hold their own suppliers to the same high standards.

PDT will undertake proportionate due diligence when engaging suppliers, contractors and other business partners to assess and manage the risk of modern slavery within its operations and supply chains. The level of due diligence undertaken will be proportionate to the nature of the goods or services being procured and the level of identified risk.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, trustees, volunteers, contractors, external consultants, third-party representatives and business or charity partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **Responsibility for the Policy**

The PDT Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our influence comply with it.

The Chief Executive and Senior Management Team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

The Chief Executive will provide the Board of Trustees with periodic assurance regarding the implementation and effectiveness of this policy, including any significant modern slavery risks, incidents, supplier due diligence activities, and actions taken to mitigate identified risks and address concerns.

## **Compliance with the Policy**

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.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your senior manager OR the PDT CEO 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 of suspicion of modern slavery in any parts of our business or the 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 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 chain constitutes any of the various forms of modern slavery, raise it with your line 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. We are 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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

## **Communication and Awareness of the Policy**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business or charity partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

- PDT commits to providing guidance and support to staff involved in procurement and contracts.
- PDT will also review our existing policies and documentation regarding recruitment, procurement, whistleblowing etc to ensure they include references to modern slavery.
- PDT will provide training for staff and volunteers in Modern Slavery as required.

## **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy and we commit to reporting any incidences to the police as required under law.