

Modern Day Slavery Policy

Different Minds (ADHD-ASD Norfolk) Ltd

1. Introduction

Different Minds (ADHD-ASD Norfolk) Ltd is committed to ensuring that modern-day slavery and human trafficking have no place in our operations or supply chains. This policy sets out our approach to preventing modern-day slavery and human trafficking in all forms, in compliance with the Modern Slavery Act 2015, and aligns with our ethical values of respect, dignity, and fairness for all individuals.

We are committed to promoting transparency, integrity, and accountability within our organisation and expect the same high standards from all our contractors, suppliers, and other business partners. This policy applies to all staff, suppliers, contractors, and volunteers engaged by Different Minds (ADHD-ASD Norfolk) Ltd.

2. Definition of Modern-Day Slavery

Modern-day slavery is an umbrella term that covers various forms of exploitation, including but not limited to:

- **Slavery:** The condition in which individuals are owned, controlled, or forced to work against their will.
- **Servitude:** The condition where individuals are forced to work for little or no pay, under duress, and for excessive hours.
- **Forced or Compulsory Labour:** Work performed involuntarily, under the threat of punishment or harm.
- **Human Trafficking:** The illegal trade and exploitation of people through coercion, deception, or force for purposes such as sexual exploitation or forced labour.

3. Our Commitment

Different Minds (ADHD-ASD Norfolk) Ltd is fully committed to:

- **Zero Tolerance:** Adopting a zero-tolerance approach to modern-day slavery, ensuring that no individual involved in our operations is subjected to any form of exploitation.
- **Due Diligence:** Carrying out appropriate due diligence processes to identify, assess, and manage the risks of modern-day slavery in our supply chains and business relationships.
- **Training & Awareness:** Providing training to all employees, ensuring that they are aware of the risks of modern-day slavery and human trafficking, and how to report any concerns.
- **Reporting & Whistleblowing:** Encouraging and protecting individuals who report any suspected instances of modern-day slavery or trafficking. We will investigate any concerns raised and take appropriate action, in line with our whistleblowing policy.

4. Responsibilities

- **Management Responsibility:** Senior management is responsible for ensuring that this policy is implemented across the organisation, conducting risk assessments, and overseeing appropriate due diligence measures.
- **Employee Responsibility:** Employees are responsible for adhering to this policy, raising concerns when they suspect modern-day slavery or human trafficking, and engaging with training on this issue.
- **Suppliers and Contractors:** We expect all our suppliers, contractors, and business partners to share our commitment to ethical practices, ensuring that they operate in a manner that is consistent with our values and this policy.

5. Risk Assessment

We are committed to conducting regular assessments to identify and evaluate the potential risks of modern-day slavery and human trafficking within our business and supply chains. This process will be reviewed regularly to ensure its effectiveness and to reflect any changes in our operations or external environment.

6. Supply Chain & Supplier Expectations

We recognise that modern-day slavery may be present in the supply chains of some businesses, particularly in industries such as construction, agriculture, and manufacturing. As such, Different Minds (ADHD-ASD Norfolk) Ltd is committed to taking the following steps with suppliers:

- **Supplier Code of Conduct:** We require all suppliers to adhere to a code of conduct that aligns with our values, promoting ethical labour practices and condemning modern-day slavery.
- **Due Diligence:** We will assess and monitor suppliers to ensure compliance with our anti-slavery expectations. Any suppliers that do not meet our standards will be required to take corrective actions, and failure to do so may result in termination of the business relationship.
- **Transparency:** We require transparency from our suppliers, including clear documentation regarding their own supply chain and labour practices.

7. Training and Awareness

Different Minds (ADHD-ASD Norfolk) Ltd provides regular training to staff, particularly those who are involved in recruitment, procurement, and supply chain management, to help them understand the risks of modern-day slavery and human trafficking. The training covers:

- How to spot the signs of modern-day slavery.

- How to report concerns or suspicions.
- The legal obligations under the Modern Slavery Act 2015.

8. Reporting Concerns

If any employee, contractor, supplier, or volunteer suspects that modern-day slavery or human trafficking is occurring within our organisation or supply chains, we encourage them to report their concerns through the following channels:

- **Whistleblowing Policy:** Any individual who suspects modern-day slavery should report it using our whistleblowing procedures, which ensure confidentiality and protection from retaliation.
- **Direct Reporting to Management:** Alternatively, concerns can be reported directly to a member of senior management, who will investigate the issue.

We are committed to handling all reports with the utmost seriousness, conducting thorough investigations and taking appropriate action as necessary.

9. Conclusion

Different Minds (ADHD-ASD Norfolk) Ltd is fully committed to eradicating modern-day slavery and human trafficking from our operations, supply chains, and business relationships. We expect all our employees, suppliers, and partners to align with our values, comply with this policy, and work together to eliminate exploitation in any form.

This policy will be reviewed annually and updated as necessary to ensure that it remains effective and aligned with legal and best practice standards.

Approved by:

Graham Boulter MSc

Director

Different Minds (ADHD-ASD Norfolk) Ltd

3/4/25 to be reviewed 3/4/26