

Modern Slavery and Human Trafficking Policy

1.0 Introduction

t2 group Ltd is committed to preventing modern slavery and human trafficking in all areas of its business and supply chains. We expect all employees, workers, contractors, suppliers, partners and other organisations with whom we work to act ethically, lawfully and with integrity. We will take proportionate steps to identify, prevent, mitigate and respond to modern slavery risks, and will support anyone who may be affected.

2.0 Purpose and Scope

This policy sets out t2 group Ltd's approach to preventing modern slavery and human trafficking, identifying concerns and managing associated risks. It applies to:

- all employees and workers of t2 group Ltd;
- contractors, consultants, agency workers and other people working on behalf of t2;
- learners and employers where concerns arise through t2's safeguarding responsibilities; and
- suppliers, service providers and other organisations within our business and supply chains.

This policy should be read in conjunction with:

- Safeguarding Policy
- Positive Working Environment (Anti-Harassment) Policy
- Public Disclosure (Whistleblowing) Policy
- Relevant recruitment, procurement and people procedures

3.0 Our commitment and principles

We will not tolerate slavery, servitude, forced or compulsory labour, human trafficking or other forms of exploitation.

We will act proportionately to the modern slavery risks relevant to our organisation, workforce, learners, employers and supply chains.

We will encourage people to raise concerns without fear of retaliation and will protect whistle-blowers in accordance with our Whistleblowing Policy.

Where a potential victim is identified, our response will be victim-centred, safeguarding-led and focused on safety and appropriate support.

We will not require an individual to prove that modern slavery has occurred before a concern is escalated.

4.0 Understanding modern slavery

Modern slavery is an umbrella term covering a range of serious forms of exploitation. In England and Wales, the statutory framework includes slavery, servitude, forced or compulsory labour and human trafficking. Exploitation can take many forms and may involve coercion, deception, threats, abuse of vulnerability or restriction of freedom.

4.1 Examples of exploitation

- forced or compulsory labour
- slavery or servitude
- debt bondage or other exploitation linked to debt
- human trafficking for the purpose of exploitation
- child trafficking and exploitation
- forced or servile marriage
- domestic servitude
- sexual or criminal exploitation
- withholding wages, identity documents or freedom of movement where these form part of an exploitative situation

The presence of one indicator does not necessarily mean that modern slavery is taking place. Concerns should be considered in context and escalated where there is a reasonable concern for someone's safety or welfare.

5.0 Recognising potential indicators

Indicators can include, but are not limited to:

- someone appearing fearful, controlled, intimidated or unusually reluctant to speak;
- someone being accompanied by another person who appears to control what they say or do;
- evidence that a person cannot leave work, accommodation or another situation freely;

- unusual restrictions on movement, communication, access to money or personal documents;
- working or living conditions that appear unsafe, overcrowded or exploitative;
- unexplained deductions, excessive debt, recruitment fees or wages being withheld;
- signs of physical injury, exhaustion, malnutrition, neglect or significant distress;
- a child or vulnerable person appearing to be exploited for another person's benefit.

6.0 What to do if you have a concern

Do not confront a suspected perpetrator, investigate the concern yourself or put yourself or the potential victim at risk.

A person experiencing exploitation may be frightened, controlled or unaware that they are being exploited. Avoid actions that could increase the risk of harm.

6.1 Internal escalation

Any concern involving a t2 employee, learner, employer, contractor, supplier or other person connected to t2 must be raised promptly through the appropriate internal route. Concerns involving learners, employers or internal employees must be made known to the Safeguarding Team.

- If there is an immediate risk of serious harm or danger, contact the emergency services on 999.
- For non-emergency police concerns, contact the police on 101.
- Where appropriate, contact the Modern Slavery Helpline on 08000 121 700 or use its online reporting service.
- Concerns about labour exploitation may also be reported to the Gangmasters and Labour Abuse Authority (GLAA) through its current reporting channels.
- Concerns may also be raised through the Public Disclosure (Whistleblowing) Policy where appropriate.

Contact details and reporting routes should be checked regularly by the People and Safeguarding & Wellbeing Teams so that this policy does not rely on outdated contact information.

6.2 Safeguarding and victim support

When faced with a disclosure, it's important to:

- Treat the person with dignity and respect and avoid judgemental language.
- Listen without promising a particular outcome or confidentiality that cannot be guaranteed.
- Record factual information promptly and securely, distinguishing what was observed, what was disclosed and what action was taken.
- Report to the Safeguarding and Wellbeing Team at the earliest opportunity. Share information only with those who need it to safeguard the person or manage the concern, in line with safeguarding, data protection and information-sharing requirements.
- Where appropriate, the Safeguarding & Wellbeing Team may ask you to support referral to the relevant statutory or specialist service. In England and Wales, potential adult victims may be considered for referral through the National Referral Mechanism (NRM) in accordance with current Home Office guidance.

7.0 Roles and responsibilities

7.1 Board/Senior Leadership

- provide appropriate oversight of modern slavery risks and the organisation's response;
- support a culture in which concerns can be raised and acted upon;
- ensure appropriate resources are available to manage identified risks.

7.2 People and Safeguarding & Wellbeing Teams

- maintain this policy and related guidance;
- provide or coordinate advice, training and support;
- ensure safeguarding concerns are managed through the appropriate safeguarding process;
- monitor themes, concerns and learning and recommend improvements where required.

7.3 Managers

- remain alert to potential indicators within their teams and areas of responsibility;
- respond promptly to concerns and escalate them through the appropriate route;
- support a safe working environment and ensure concerns are not dismissed or ignored.

7.4 Procurement/Managers responsible for suppliers

- consider modern slavery risk when appointing and reviewing suppliers;
- use proportionate due diligence based on the nature, location and risk of the service or supply chain;
- raise concerns where a supplier's practices, labour arrangements or responses to due diligence are unsatisfactory;
- retain appropriate evidence of due diligence and actions taken.

7.5 All employees and workers

- read and comply with this policy and complete required training;
- remain alert to potential indicators;
- raise concerns promptly;
- never knowingly facilitate, ignore or conceal modern slavery or exploitation.

8.0 Managing supply-chain risk and due diligence

Modern slavery risks can arise through suppliers, contractors, labour providers and other third parties. t2 will use a proportionate, risk-based approach when assessing and managing these risks.

We will:

- Identify potential modern slavery risks when considering a new supplier or material change to an existing arrangement.
- Consider relevant factors such as the type of service, use of agency or migrant labour, recruitment practices, geographic exposure and the complexity of the supply chain.
- Where proportionate, include modern slavery expectations and contractual requirements within supplier arrangements.
- Review existing suppliers periodically and consider enhanced checks, re-auditing or spot checks where risk indicates they are appropriate.
- Take appropriate action where concerns are identified, which may include requiring corrective action, escalating the matter, suspending activity or ending a relationship where appropriate and lawful.
- Maintain records of significant due diligence, concerns and actions taken.

9.0 Recruitment and employment practices

t2 will seek to ensure that its own recruitment and employment practices do not create or contribute to conditions associated with exploitation. This includes using lawful recruitment processes, appropriate right-to-work checks, clear employment terms and appropriate controls over recruitment agencies and labour providers. Any concern that an individual has been recruited or employed through coercion, deception, debt or other exploitative practices must be escalated promptly.

10.0 Training, awareness and communication

Relevant employees will receive appropriate information or training to help them understand modern slavery, recognise potential indicators and know how to raise concerns. Additional training will be provided where the nature of a role creates a higher level of exposure, such as safeguarding, people management, procurement or supplier management.

11.0 Monitoring, review and continuous improvement

The People Team will review this policy at least annually, or sooner where there is a material legal, regulatory, organisational or safeguarding change.

The organisation will review relevant concerns, incidents, supplier risks, training and assurance activity to identify learning and improvement opportunities. Where applicable, t2 will ensure that its approach is reflected in any annual Modern Slavery Statement required or voluntarily produced under the Modern Slavery Act 2015.

The effectiveness of controls will be considered when reviewing significant concerns and supplier arrangements.

For organisations within scope of section 54 of the Modern Slavery Act 2015, the Home Office guidance states that an annual modern slavery statement should describe the steps taken to manage modern slavery risks in the organisation's business and supply chains. The current statutory threshold is £36 million annual turnover for qualifying commercial organisations. Where section 54 applies, t2 will meet the applicable publication and approval requirements.

12.0 Related guidance and legislation

- Modern Slavery Act 2015
- Home Office: Modern slavery statutory guidance for England and Wales
- Home Office: Transparency in supply chains guidance
- National Referral Mechanism guidance
- Safeguarding Policy
- Public Disclosure (Whistleblowing) Policy
- Positive Working Environment (Anti-Harassment) Policy

13.0 Advice and guidance

For internal advice and guidance, contact the People Team or Safeguarding and Wellbeing Team.