

# Modern Slavery and Human Trafficking Policy

Issue	Date	Sections Affected	Description of Change / Change Request Reference / Remarks	Amended or reviewed by
5	13/09/2024	All	Changed policy name and updated all areas.	RRD/SB

## 1. Policy

Training Works NW Ltd maintains relationships with many different organisations, as well as those in our employment. In the light of the general law on employment, Human Rights Act 1998 and, more specifically, the Modern Slavery Act 2015, we regularly review our compliance and risk management processes to determine which existing measures are in place and the further measures that may be required to prevent slavery and human trafficking taking place in any part of our business.

The Policy below underpins our approach and will be used to inform our Statement on Slavery and Human Trafficking.

TWNW Ltd expects all who have or seek, a business relationship with TWNNW LTD to familiarise themselves with our anti-slavery statement and to act in accordance with its contents at all times.

TWNW Ltd is committed to opposing modern slavery in all its forms and preventing its occurrence by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is that of zero tolerance.

## 2. Aims

Modern slavery is a criminal offence under the Modern Slavery Act 2015. 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.

# Modern Slavery and Human Trafficking Policy

This document sets out the policy of TWNW LTD with the aim of the prevention of opportunities for modern slavery to occur within its businesses. This Policy's use of the term 'Modern Slavery' has the meaning given in the Modern Slavery Act 2015.

TWNW LTD has a zero-tolerance approach to modern slavery. 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 or those of our suppliers.

## 3. Scope

TWNW LTD is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our business partners, and our contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

All Employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for an incidence of modern slavery is prevented. Adherence to this Policy forms part of all Employee's obligations under their contract of employment.

To underpin our compliance with practical steps, we intend to implement the following measures;

- Conduct risk assessments to determine which parts of our business are most at risk of modern slavery so that efforts can be focused on those areas;
- Engage with our business partners both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

## 4. Responsibility

Ultimate responsibility for the prevention of modern slavery rests with TWNW LTD Board of Directors. The Board of Directors has overall responsibility for ensuring this Policy and its implementation comply with our legal and ethical obligations.

Managers (at all levels) are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on its contents and the issue of modern slavery.

## 5. Concerns

'Whistleblowing' refers to the disclosure by individuals of suspected malpractice, illegal acts or omissions at work.

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Examples of the types of concerns that may be raised include;

- You suspect a person acting on behalf of TWNW LTD is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our business partners is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of TWNW LTD or one of our business partners who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of TWNW LTD or one of our suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The list is not exhaustive and is representative of the types of concerns which may be raised.

### **6. Protection of Those Raising Concerns**

TWNW LTD aims 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 of our business partners.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

### **7. Internal Reporting**

As a first step, Employees should normally raise concerns with their immediate Line Manager where applicable. However, depending on the seriousness and sensitivity of the issue and the nature of the concern, Employees may feel unable to raise the matter with their Line Manager and in this instance should approach the next level of management. The guiding rule is that Employees should address their complaint to the level of management who they believe is not involved in the matter.

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If an Employee feels unable to raise the matter with their Line Manager, or their Superior, the matter should be raised with one of the designated officers who have responsibility and training in dealing with whistleblowing concerns such as the Managing Director directly.

A Line Manager in receipt of an allegation should refer it to the Managing Director as outlined above.

### **8. External Reporting**

This Policy has been developed in order to provide Employees with the guidance and reassurance they need to raise a concern internally. However, it is recognised that there may be circumstances where Employees feel it necessary to raise their concerns outside the business and in these circumstances, Employees have a number of external avenues open to them.

Protect is the UK's whistleblowing charity, who aim to stop harm by encouraging safe whistleblowing in the event of suspected modern slavery or human trafficking concerns.

To contact Protect:

- Telephone - 020 3117 2520
- Email - [info@protect-advice.org.uk](mailto:info@protect-advice.org.uk)

Employees can also raise their concerns with the proper authority (guidance is available from GOV.UK

– Whistleblowing, where you can find a list of prescribed people and bodies).

### **9. Investigating Procedure**

Action taken by TWNW LTD will depend upon the nature of the concern.

Disclosures will be assessed to;

- Determine whether a further investigation should be conducted;
- Determine the form the investigation should take;
- Appoint an investigating officer to undertake the investigation.

If it is decided that an investigation is required, an Investigating Officer will be appointed who will aim to abide by the following steps;

- Obtain full details and clarifications of the concern;
- Investigate the concern with third parties / witnesses where possible and obtain objective statements;
- Secure all evidence in an admissible format;

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- The discloser will, as far as possible, be kept informed of progress and, if appropriate, the final outcome of the investigation;
- Reporting of the findings will depend on the nature of the disclosure;
- If appropriate, a copy of the outcomes will be reported to the Board.
- Confidential records will be maintained for monitoring purposes.

### **10. Timescales**

Investigations will be conducted as speedily as possible whilst having regard to the nature and complexity of the disclosure.

### **11. Outcomes**

Depending on the findings of the investigation, outcomes may vary from no further action to sanctions against perpetrators.

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

Our zero-tolerance approach to modern slavery must be communicated to all Employees and business partners and at the outset of our business relationship with them and enforced as appropriate thereafter.

### **13. Review**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.