

Business 2 Business

Modern Slavery & Human Trafficking Statement 2023-24

(Modern Slavery Act 2015)

Introduction

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.

This statement describes our responsibilities under the Modern Slavery Act 2015, establishes guidelines and ensures actions are maintained to prevent slavery and human trafficking. All partners, sub-contractors and suppliers are required to promote these guidelines in line with our statement and legal requirements.

Business 2 Business has a zero-tolerance approach to modern slavery and human trafficking and is fully committed to preventing slavery and human trafficking in its corporate activities, and those of its supply chain partners. The prevention, detection and reporting of modern slavery and human trafficking in any part of our business or supply chain is the shared responsibility of all those working for us, or on our behalf. Our policies (which are listed below) make it clear that workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the Modern Slavery Act (2015) and failure to adhere to these standards will be dealt with by Business 2 Business with the severity required by the situation.

Business 2 Business' structure consists of a Board of Directors, managers responsible for specific business areas and/or workstreams, team supervisors and frontline staff; who may be working in a variety of different locations in addition to our four permanent fixed offices. Overall responsibility for oversight to ensure adherence to this statement rests with the Business 2 Business Board. Responsibility for managing specific requirements rests with managers involved in recruitment process design and operations such as our Operations Manager and Head of People. However, beyond this the guidelines are applicable to all Business 2 Business' operations, staff and all representatives of the company.

In undertaking our business purpose i.e. providing employability, education and skills support, Business 2 Business finds it helpful, and is sometimes obliged by commissioners to, procure supply chain partners. These partners are very diverse including large multi-national outsourcing suppliers, small third sector community-based organisations and frontline services provided by public sector bodies e.g. local authority delivered employability services.

Our Policies

To identify and mitigate risk, we operate a range of policies which serve to address the requirements of the Modern Slavery Act 2015.

Our policies also reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance. Policies that relate to Modern Slavery and Human Trafficking include:

Our Supplier Risk Management Policy

We expect the highest standards of conduct and probity throughout our supply chain, requiring all of our people and those within our suppliers to act with integrity and honesty. Business 2 Business works with suppliers to ensure that they meet these standards and comply with the requirements of The Modern Slavery Act 2015.

Our procurement processes include standard enquiries about modern slavery and trafficking, and we routinely examine our existing supply chain through legal, audit, risk and supply chain management processes.

In line with our Supplier Risk Management Policy, Business 2 Business conducts due diligence on all parties with whom it enters into business relationships. Our policy reflects the fact that some of our operating environments, and those of our suppliers, are high risk for modern slavery and human trafficking. All information gathered from our due diligence is updated annually from all suppliers. We are also committed to carrying out spot-checks and 'deep dives' to gather further information about a supplier and their practices.

As part of the due diligence process, Business 2 Business requires all new suppliers with a Modern Slavery Policy, set of guidelines and/or Code of Conduct, to share these with our contracting team prior to the granting of any awards. In addition, the following modern slavery and human trafficking questions are asked of all suppliers:

1. Does the organisation have a statement / policy on modern slavery and human trafficking?
2. Please supply the following
 - Your statement / policy on modern slavery and human trafficking
 - Details of any training undertaken for all staff
 - Details of procedures for dealing with cases
 - Details of practices/process of implementing the above, if none exist
3. How does the organisation flow down its statement / policy to all staff and supply chain and what checks are undertaken to ensure implementation?
4. What is the organisation's website address for details of the Modern Slavery Statement, if they are required to publish it?
5. Has the organisation dealt with any internal or supply chain incidents related to modern slavery or human trafficking in the past?
 - If yes, please provide accurate details with follow up actions.
6. Have the organisation, its responsible persons or any of its senior officers been investigated under the Modern Slavery Act 2015?
 - Please provide accurate details including any convictions

We are committed to capacity building across our supply chains and as such, we work with suppliers to develop modern slavery policies where none exist and/or to strengthen policies as required. Where suppliers are not fully compliant, they are required to provide a timed action plan, highlighting gaps in their process and corrective actions required. All gaps identified during due diligence are revisited after an agreed period against their action plan objectives.

Code of Conduct

Our code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

Whistle Blowing Policy

Business 2 Business encourages all its workers, service users, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, service users, customers or others who have concerns can use our confidential escalation process as detailed in the policy.

Recruitment Policy

We adhere to UK Employment legislation at all times in relation to the recruitment and management of our own staff. We use only specified, reputable employment agencies to source temporary labour and always verify the practices of any new agency before accepting workers from that agency.

Safeguarding Policy

Our Safeguarding policy sets out the legislative requirements to provide a duty of care, promote positive well-being and provide a clear process for escalating concerns to protect the welfare of individuals.

Equality, Diversity and Inclusion Policy

Our Equality, Diversity and Inclusion policy ensures that we treat people fairly and with respect. Business 2 Business is committed to being an Employer of Choice and we strive to continually improve our ways of working to ensure best practice in Equality, Diversity and Inclusion.

Where there is a risk of slavery and human trafficking

We have reviewed our business areas and those of our supply chain and have identified areas of risk that could potentially harbour Modern Slavery. These areas and the steps we have taken to assess and manage the risk include:

- Recruitment Agency staff, for which:
 - we always verify the employment practices of any new agency before accepting workers from that agency; and
 - our managers greet every agency supplied worker which involves informally checking their terms of employment; any concerns being reported immediately via our HR team to the GLAA.
- Hospitality and catering contractors supplying services for Business 2 Business events and meetings at external and internal venues, for which;
 - we openly discuss our approach to Modern Slavery and Corporate Social Responsibility (CRS) with suppliers during market engagement;
 - our supplier procurement and on-boarding processes, assess and address the risk for Modern Slavery and Human trafficking;
 - our contracts incorporate requirements under the Modern Slavery Act 2015; and

- our staff remain vigilant for the signs of modern slavery in the appearance and treatment of contractors' hospitality and catering workers.
- Facilities management contractors including cleaning, maintenance and construction contractors, for which;
 - we openly discuss our approach to Modern Slavery and Corporate Social Responsibility (CRS) with suppliers during market engagement;
 - our supplier procurement and on-boarding processes, address the risk for Modern Slavery and Human trafficking;
 - our contracts incorporate requirements under the Modern Slavery Act 2015;
 - we display highly visible translated whistleblowing notices specifically covering modern slavery; and
 - we encourage all construction-related suppliers to work towards Construction Line Gold and other accreditations which include enhanced compliance checks for Modern Slavery Act 2015 adherence;

Effectiveness in ensuring that slavery and human trafficking is not taking place

- We meet statutory employment requirements for 100% of our staff
- 100% of our employability supply chain partners have a Modern Slavery Policy, a set of guidelines and/or Code of Conduct specifying appropriate safeguards to address the risk of modern slavery.
- 100% of our existing suppliers have adhered to their Business 2 Business contractual requirements relating to Modern Slavery.

Training and capacity building about slavery and human trafficking available to our staff

As part of our commitment to preventing modern slavery and human trafficking we:

1. Require all new Business 2 Business staff to complete training on the content of the Modern Slavery Act 2015, staff responsibilities in relation to the Act and this statement; including how to identify and escalate any concerns.
2. Require existing staff to undertake regular refresher training
3. Display notices and posters to remain staff of their policy obligations
4. Continue to review and develop the policies, processes and controls we have put in place to support our commitment to mitigate risks of modern slavery across our organisation.
5. update this statement to meet the requirements of the Modern Slavery Act on an annual basis.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, is approved by the Board of Directors of Business 2 Business and constitutes our slavery and human trafficking statement.

Signed: *VarshaPatel*

Varsha Patel

Company Director