

Modern Slavery and Human Trafficking Policy

Tenders Group | Whitecroft Consulting Ltd | Company number 16981649

Policy owner	Director
Version and review	Version 1.0 25 September 2026 Review by 25 September 2027

1 Purpose and commitment

Tenders Group does not tolerate slavery, servitude, forced or compulsory labour, human trafficking or any other form of exploitation in our business or supply chain.

People who work with us must be able to choose their work freely, understand their terms, retain control of their identity documents, receive the pay due to them and raise concerns without fear of retaliation. We apply this commitment when engaging staff, contractors, interns and volunteers, and when selecting agencies or other suppliers.

Our work includes bid writing, bid management, tender reviews, training and procurement support. We recognise that exploitation can occur even in professional services, particularly where work is sourced through intermediaries, subcontracted or carried out remotely in another country. We therefore consider the people behind the service, as well as the supplier providing it.

2. Who this policy covers

This policy applies to Tenders Group's director, employees, workers, contractors, consultants, interns and volunteers. It also sets the standards we expect of recruitment agencies, subcontractors and suppliers acting on our behalf.

Everyone responsible for recruiting, allocating work, managing people or purchasing services must follow this policy. Suppliers must cooperate with reasonable enquiries about their labour practices and tell us promptly about any credible concern affecting work they perform for us.

3. How we manage people working for Tenders Group

We use the following controls when engaging people:

- **Clear terms:** We set out the nature of the role, duties, working arrangements, payment or volunteer status, and the person responsible for managing the work. We do not describe someone as a volunteer simply to avoid employment rights that may apply to their actual arrangement.
- **Identity and permission to work:** We verify identity and carry out the right to work checks required for work undertaken in the UK. For people working overseas, we consider the applicable local rules and the basis on which they are engaged.
- **Freedom to work:** We do not require anyone to surrender their passport or other original identity documents. We do not impose deposits or charge people a fee to obtain work with us.
- **Pay and payment:** We agree payment terms in advance for paid work, maintain a record of payments and examine unexplained requests for wages or fees to be paid to an unrelated third party. We do not knowingly permit unlawful deductions or withholding of pay.
- **Direct contact:** Where a person is introduced by an agency or intermediary, we remain alert to whether they can communicate freely about their work, terms and any concerns.
- **Safe reporting:** People working with us can raise concerns directly with the Director of Bids. A concern raised honestly will be taken seriously, whether or not it is ultimately substantiated.



Managers must pay particular attention to interns, volunteers and remote contractors. Their working arrangements must reflect what has actually been agreed and must not depend on threats, debt, withheld documents or pressure from another person.

4. How we manage supplier and subcontractor risk

Before engaging a supplier or subcontractor to provide labour or services on our behalf, we consider what the supplier will do, where the work will take place, who will perform it and whether another agency or subcontractor will be involved. The depth of the check reflects the level of risk.

Our checks may include confirming the supplier's legal identity, discussing how it recruits and pays workers, reviewing a relevant modern slavery policy or statement, and asking how workers can report concerns. Where an agency supplies a person to work with us, we seek clarity about who employs or engages that person and who is responsible for paying them.

We expect suppliers and subcontractors to prohibit forced labour, trafficking, worker-paid recruitment fees, confiscation of identity documents, intimidation and unlawful withholding of wages. They must apply suitable controls to any further subcontractors involved in our work.

If information is missing, inconsistent or concerning, we investigate before proceeding. We may require corrective action, pause an engagement or end a relationship. In making that decision, we consider the safety of any person who may be experiencing exploitation. Ending a contract without considering its effect on that person may increase their risk.

5. Signs we look out for

No single sign proves that someone is being exploited. We take concerns seriously where a person:

- appears unable to speak for themselves or is closely controlled by another person;
- does not have access to their own identity documents, bank account or earnings;
- appears frightened of an employer, recruiter or intermediary;
- describes a debt linked to obtaining work or accommodation;
- reports withheld pay, unexplained deductions or threats about immigration status;
- works excessive hours without genuine choice; or
- gives an account of their terms that conflicts with information provided by an agency or supplier.

We do not expect team members to investigate or establish the facts themselves before reporting a concern.

6. Reporting a concern

Anyone who suspects exploitation connected with Tenders Group's work should tell the **Director of Bids promptly** through their usual direct contact. They should record what they have observed or been told as accurately as possible and avoid making promises of secrecy.

If someone is in immediate danger, call **999**. For a non-emergency, concerns can be reported to the police on **101** or to the **UK Modern Slavery Helpline on 08000 121 700**. These external routes can also be used if the concern involves the director or the person reporting it does not feel safe raising it internally.

Do not confront a suspected exploiter, attempt to rescue someone independently or share a potential victim's details beyond those who need them to protect the person and respond appropriately.



7. How we respond

The Director of Bids will assess any immediate safety risk, keep a confidential record of the concern and seek advice from the police, Modern Slavery Helpline or another appropriate specialist service where needed.

We will preserve relevant information, limit access to it, cooperate with competent authorities and consider whether work with a supplier should be paused. Any action involving a supplier will take account of the potential victim's safety. We will document decisions, corrective actions and follow-up.

Tenders Group will not retaliate against a person who raises a concern honestly or assists with an investigation. We expect suppliers to provide the same protection to their workers.

8. Awareness, records and review

This policy is made available to people working for Tenders Group and to relevant suppliers. People involved in recruitment, supplier selection and managing contracted work are expected to understand the checks and reporting steps that apply to their responsibilities.

We keep proportionate records of engagement terms, relevant checks, supplier decisions, concerns raised and actions taken. The Director of Bids reviews this policy at least annually and sooner following a significant concern or a material change to our workforce or supply chain. The review considers whether the controls are working in practice and what needs to improve.

9. Modern Slavery Act reporting

This policy is an operational policy. It is **not** an annual slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015. The Director of Bids will review whether Tenders Group meets the statutory reporting criteria as the business grows. If it does, we will prepare and publish the required annual statement.

10 Approval

Approved for Tenders Group by: Darlintia Amfo, Director of Bids

Approval signature:  Date: 25th September 2026

This policy takes effect when approved. The signed copy is the controlled version.

