
Modern Slavery Policy and Statement

Policy Statement

We are passionate about caring for our colleagues and are proud to be part of the communities in which they live. Our responsibility goes far beyond that of just providing people with work and we consider it our duty to ensure all of our colleagues, their families and our partners are provided safe and welcoming environments in which they work.

At TC Facilities Management (TCFM) we understand that Modern slavery impacts 5 people in every 1,000 across the globe and are committed to play our part in tackling this very real issue. With this statistic in mind, we are always mindful that this could be happening to any one of our colleagues, their families or within our supply chain and it is our responsibility to ensure we provide safe and confidential ways in which they feel they can talk to us should they need to.

The following statement sets out our commitments and approach in dealing with Modern Slavery and Human Trafficking.

Our Company

TCFM operates in the Facilities Management sector, predominantly in the retail, distribution and office sector. We are a privately-owned service provider, established in 1962, based in the UK and with a primarily UK based supply chain. We employ over 2,800 colleagues in a number of locations across the UK, from a wide variety of backgrounds and nationalities.

Our Policies to Mitigate the Risk of Modern Slavery

We have an *Anti-Slavery Policy*, which sets out our zero-tolerance stance on slavery and human trafficking, as well as providing our colleagues with guidance on how to identify and report slavery concerns, if necessary, using the separate *Whistleblowing Policy*. Our Code of Conduct sets out the labour, social and environmental standards that we expect of our suppliers and their sub-contractors, subsidiaries, and own suppliers.

TCFM and our suppliers ensure there is no slavery, forced labour or human trafficking in our business or at any stage of our supply chain and those suppliers who manufacture products should meet the provisions of the Ethical Trading Initiative (ETI) Base Code or similar standards.

All new suppliers are requested to adhere to our Code of Conduct and, as set out below, we ask certain suppliers to report on this through the Code of Conduct Questionnaire, as part of our due diligence process.



Employment is freely chosen.



Freedom of association and the right to collective bargaining are respected.



Working conditions are safe and hygienic.



Child labour shall not be used.



Living wages are paid.



Regular employment is provided



No harsh or inhumane treatment is allowed.



No discrimination is practised.



Working hours are not excessive.

How we Identify and Manage Risks

Recruitment

Our industry leading recruitment processes ensure that not only are we and the customers we serve safe and legal; we can use the checks we do as a safeguarding process for our colleagues.

All our colleagues undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ our people directly with checks in place to ensure that payment of salary is made directly to that person.

In addition, we carry out Right to Work checks bi-annually for all colleagues, either through our own assessment or one carried out in conjunction with our client.

Our *Recruitment Procedure* outlines the mandatory requirements which includes the requirement to use approved agencies in the recruitment process. Our *On-Boarding Procedure* seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

Training

We continue to strengthen colleague awareness of our stance on slavery and human trafficking. We have updated our guidance for our suppliers, adding details of plans for managing the risk within our supply chain. This complements the training created for our own people, so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness should they see or fear something suspicious.

We believe that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our colleagues and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

We are taking a targeted approach to more detailed training on slavery and human trafficking (either by way of workshop training or an e-learning module, as appropriate). This will cover our people involved in our procurement processes and the hiring of colleague, especially where this involves the promotion and monitoring of our agency workers.

We will re-train all our line managers throughout 2023 in the awareness of Modern Slavery and Human Trafficking.

Business and Supply Chain Risk Assessment and Risk Management

Within our Supply Chain

Our supply chain includes sub-contractors, suppliers, and labour agencies. Our Supplier Code of Conduct reflects our longstanding commitment to ensuring that we act ethically and with integrity in all our business relationships, supported by continuous development and implementation of effective systems and controls. As part of our due diligence checks when on-boarding new suppliers we require that they sign up to and adhere to the Code of Conduct including ensuring that they conduct business within all applicable laws and regulations, including the Modern Slavery Act and that they make proper provision for the health, safety and wellbeing of all colleagues, visitors, and customers.

Supplier Code of Conduct

TCFM is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of TCFM's supplier code of conduct will lead to the termination of the business relationship.

As part of our commitment to ensure that we do not have any slavery or forced labour in our supply chain we committed in the last financial year to review all our processes and seek to engage with a third party who could assess the effectiveness of our policies and processes so we are continuing to deliver on the commitments made.

We are proud to report we are working in partnership with EcoVadis a leading driving force of sustainability and ethics. Throughout 2020 we will embed with their help and guidance a full programme that allows us to monitor and measure our commitments to our workforce and our suppliers.

Within our Sub-Contractor Supply Chain

Our Supply Chain also includes the use of labour providers. TCFM seeks to have minimal use throughout the business as it is recognised that this can potentially pose a risk to TCFM. We also recognise that we can minimise the risk to our business by directly employing colleague on permanent terms and conditions. Any agency labour provider use must be authorised by Procurement and all relevant due diligence documents must be provided for review by the relevant teams prior to supply of labour.

Recruitment/Agency workers policy - TCFM uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All Agencies who supply temporary labour into our business will be audited a minimum of once a year.

Agency labour providers must be Gangmaster Licencing Authority (GLA) registered and follow the provisions of the Gangmaster Licencing Act 2004. Whilst a GLA licence is not always needed to supply colleague into our sites due to the nature of the work, we recognise that the standards that the GLA enforce, are all requirements that protect workers from poor treatment and exploitation and therefore also ensures that we can mitigate the risk of modern slavery and human trafficking. TCFM also carries out regular yearly due diligence checks on any agency labour provider used in the business.

Anti-slavery and Human Trafficking Policy

What is Slavery

The Modern Slavery Act 2015 covers four activities:

Slavery

- Exercising powers of ownership over a person.

Servitude

- The obligation to provide services is imposed by the use of intimidation

Forced or Compulsory Labour

- Work or services are demanded from a person under the threat of any consequence and for which the person has not offered themselves voluntarily.

Human Trafficking

- Arranging or facilitating the travel of another person with a view to their exploitation.

This policy covers all four activities.

How is it Relevant to us?

Modern slavery is a complex and multifaceted crime and tackling it requires many companies and individuals to play a part. At first glance, individuals may think this subject is irrelevant to us, but it is not.

At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

The Modern Slavery Act 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to our supply chain, especially those areas which have historically proven to be a risk of the activities:

- Outsourced activities such as waste management etc.
 - Short term hire of low skilled labour.
 - Sourcing of raw materials from certain locations in the world.
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Responsibilities

TCFM, our managers and our colleagues have responsibilities to ensure our colleagues are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that “turning a blind eye” is unacceptable and simply not an option.

The Company (TCFM)

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation.
- Be clear about our *Recruitment Policy*.
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act.
- Lead by example by making appropriate checks on all colleagues, recruitment agencies, suppliers, etc to ensure we know who is working for us.
- Ensure we have in place an open and transparent grievance process for all colleagues.
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
- Make a clear statement that we take our responsibilities to our colleagues and our customers seriously (see our *Modern Slavery statement*).

Managers

Our managers will:

- Listen and be approachable to colleagues.
 - Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation.
 - Remain alert to indicators of slavery.
 - Raise awareness and ensure all colleagues are provided a copy of this policy and be aware of their responsibilities.
 - Use their experience and professional judgement to gauge situations.
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Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority you must:

- Keep your eyes and ears open – if you suspect someone is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery).
 - Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
 - Tell us if you think there is more, we can do to prevent people from being exploited.
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The Risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- Certain areas of the supply chain have been identified as being at a higher risk and these were identified previously in the policy.
- Recruitment either through agencies or direct We manage these risk areas through our procedures set out in this policy.

Our Procedures



Modern Slavery Statement

We make a clear statement that we take our responsibilities to our colleagues, people working within our supply chain and our customers seriously, and this is updated once a year.

Supply Chains

We tell the companies we do business with, that we are not prepared to accept any form of exploitation.

All relevant supplier contracts will contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their colleagues from engaging in slavery or human trafficking.

We apply reasonable due diligence to risk assessing our supply chain and use the following mechanisms to do this:

- a) Supplier mapping initially performed on spend level and then industry sector to identify key vulnerabilities.
- b) Risk assessment of spend areas in relation to the supply chain and their propensity of historically proven risk.
- c) Training and knowledge for key procurement.
- d) Ensuring all suppliers deemed “at risk” are fully supportive to the aims of this policy (including asking for copies of their Modern Slavery statement and policies).
- e) Harmonising those processes which are already mutually inclusive of the aims of this policy into the due diligence.
- f) If any issues are identified then this is escalated to the senior management team in the business, with all methods of remediation to be available (up to and including exiting the relationship with the supplier).

Recruitment

Using Agencies:

- a) TCFM follows firm policy and only uses agreed specified reputable recruitment agencies.
 - b) We expect all recruitment agencies with whom we engage:
 - i. To fully comply with Modern Slavery Act 2015.
 - ii. Are free from ethical ambiguities.
 - iii. Are transparent, accountable, and auditable.
 - c) If TCFM has reason to believe that any recruitment agency has failed to meet these standards, the People Support Team should be informed and any contracts with them would be terminated.
 - d) We keep agencies on the list under regular reviews.
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General Recruitment

- a) We always ensure all colleagues have a written Contract of Employment.
- b) We always ensure colleagues are legally able to work in the UK.
- c) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the People Support Team will be informed and they will follow our reporting procedures.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive, however remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it to the People Support Team who will follow our reporting procedures.

Reporting Slavery

- Talking to someone about your concerns may stop someone else from being exploited or abused.
 - If you think that someone is in immediate danger, dial 999 or the Modern Slavery Helpline on 08000 121 700.
 - Otherwise, you should discuss your concerns with the People Support Team who will decide a course of action which may include contacting the Police or the Gangmasters and Abuse Authority (GLAA).
 - Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the People Support Team before taking any further action.
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Training

We ensure that all colleagues are made aware of this policy, and their obligations to comply with this policy.

Monitoring our procedures:

- We will review our Modern Slavery statement and policy regularly, at least annually. We will provide information and/or training on any changes we make.



Peter Ellis

CEO

9th November 2023