


SOP No:	0.3 (14)	Co-ordinator:	G. Cobb	 <i>Traffic Labour Supplies LTD</i> <b>MANAGED SUPPORT SERVICE</b>
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<b>M O D E R N   S L A V E R Y   P O L I C Y</b>				

## Modern Slavery Policy

The Modern Slavery Act 2015 sets out the steps that TLS has to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. TLS has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

Our business supplies labour and vehicles to the traffic management industry predominantly in England. All personnel (partners) undertaking any work on our behalf will be imputed onto our FastLane system and checked for right to work, identity and qualifications are also checked before any commencement of work.

### Our high risk areas

Traffic management is considered to be high risk by the nature of working and driving on public roads and motorways, in view of this we and or the organisation they are contracted to, ensure that all partners are qualified and drug and alcohol tested to mitigate the risk in these areas.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Anti- Bribery, Fraud and Corruption Policy**
- **Money Laundering and Terrorism Financing Prevention Policy**
- **Drug and Alcohol Policy**

### Specific Policies

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment (Fast Lane) policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our partners/employees and suppliers to act.

### **Our suppliers**

TLS operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery, and on site audits which include a review of working conditions where applicable. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

### **TLS ensure where practicable organisation we deal with;**

1. Have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training and Awareness**

We regularly conduct training and or briefing for our procurement team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## **Appendix Section:**

### **Identifying potential victims:**

#### **Question to consider as part of staff awareness with regard to modern slavery**

1. Is the victim in possession of a passport, identification or travel documents? Are these documents in possession of someone else?
2. Does the victim act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
3. Was the victim recruited for one purpose and forced to engage in some other job?
4. Was their transport paid for by facilitators, whom they must pay back through providing services?
5. Does the victim receive little or no payment for their work? Is someone else in control of their earnings?
6. Was the victim forced to perform sexual acts?
7. Does the victim have freedom of movement?
8. Has the victim or family been threatened with harm if the victim attempts to escape?
9. Is the victim under the impression they are bonded by debt, or in a situation of dependence?
10. Has the victim been harmed or deprived of food, water, sleep, medical care or other life necessities?
11. Can the victim freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?