



TEC TRAINING (GB) LTD  
**COMPANY POLICIES MANUAL**

## MODERN SLAVERY POLICY


---

### REVISION RECORD

Issue:	Date:	Comments:
1	Dec 2017	1st issue
2	Sept 2018	Internal audit – changes in bold
3	Sept 2019	Internal audit – changes in bold
4	July 2020	Internal audit – changes in bold
5	Sept 2020	Internal audit – changes in bold
6	Sept 2021	Following annual review
7	April 2022	Internal audit – changes in bold

---

### APPROVAL AND AUTHORISATION

Prepared by		Reviewed and signed of by
David Eve HSQE Advisor		Anwar Gorji Managing Director
		

TEC TRAINING (GB) LTD

**COMPANY POLICIES MANUAL**

**1. Policy statement**

1.1 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, 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. We have a zero-tolerance approach to modern slavery and 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 in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

**2. Supply chains**

**2.1 We have a broad range of suppliers, and having reviewed our business operations, the highest potential risk sits within the procurement of goods and services which are in categories known to be at risk of forced or compulsory labour. This includes suppliers of:**

- **Personal protective equipment (PPE) and uniforms**
- **Electronics (e.g. laptops, computers and mobile phones)**
- **Subcontracted workers (e.g. providing cleaning/building maintenance services)**

**2.2 We look to source goods and services from organisations that are reputable and where we can check their suitability.**

**2.3 We expect our suppliers to have internal policies and processes in place to meet the Modern Slavery Act 2015, which we verify during our due diligence checks. A small supplier who does not have these policies in place will be able to sign-up to our policies by contacting the procurement team.**



TEC TRAINING (GB) LTD

**COMPANY POLICIES MANUAL**

**2.4 Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant Tec Training policies.**

**3. Due Diligence**

**3.1 Tec Training is approved by The Rail Industry Supplier Qualification Scheme (RISQS), which helps suppliers in the British rail industry by providing a way for them to be formally recognised as capable providers of products and services. In 2019/20, a modern slavery working group was set up, supported by the RISQS owner, the Rail Safety and Standards Board (RSSB) with the purpose of greater collaboration to address modern slavery risk in the rail industry.**

**3.2 Tec Training has strict recruitment processes in place, ensuring that all our employees have the appropriate right to work. We are a formally accredited Real Living Wage employer, as set out by the Living Wage Foundation. This means that our direct employees are paid the Real Living Wage and that we require all of our contractors to pay their staff the Real Living Wage too. As a result of this, we believe that the risk of forced or trafficked labour in our supply chain is low.**

**4. Key Performance indicators**

**4.1 We monitor and categorise concerns reported to us through all channels. In 2020/21, no concerns were reported in relation to modern slavery and/or human trafficking.**

**4.2 We track completion rates of our latest in-house staff training for Modern Slavery.**

**3. Responsibility for the policy**

3.1 The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Operations Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Line 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 the policy and the issues of modern slavery in supply chains.



POLICY No. TT/POL/36

PAGE 4 of 4

ISSUE: 15 April 22

TEC TRAINING (GB) LTD

**COMPANY POLICIES MANUAL**

**3.4. The training manager is responsible for building awareness of modern slavery across our business and supply chain. Training on this policy, and on the risk our business faces from modern slavery in the supply chain will be arranged by the training manager.**

Signed by,

A handwritten signature in black ink, appearing to be 'A. Q.', is written over a light blue rectangular background.

Managing Director

Dated 15.04.22