



An ALLIED UNIVERSAL® Company

TSS (Total Security Services) Ltd

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Modern Slavery Policy

Introduction

TSS (Total Security Services) Ltd is absolutely committed to being the market leader in ethical and compliant supply. This policy is intended to ensure that TSS complies with the Modern Slavery Act 2015.

Scope

This policy is applicable to all employees (both salaried and hourly paid), workers, contractors and applicants.

Responsibility

As an employer we have a responsibility to comply with the Modern Slavery Act, ensuring we have the correct procedures in place to maintain this.

Managers have a responsibility to follow, lead and therefore ensure their teams conduct themselves in line with this Policy. They also have a responsibility to communicate and monitor the operation of this Policy within their area of responsibility.

All individuals, employees, workers, contractors, applicants and suppliers have a responsibility to assist the Company in meeting the requirements of the Modern Slavery Act by providing truthful information when required, to meet the terms of this Policy and to report any known acts that are in breach of this Policy.

What is Modern Slavery?

Modern Slavery is a form of organised crime whereby people are exploited for criminal gain. Victims can be reluctant to come forward for fear of retribution and consequences from their abusers.

The Modern Slavery Act is designed to tackle slavery in the UK, consolidating previous trafficking, and slavery offences.

Generally Modern Slavery can be defined as:

- Individuals being forced to work
- Individuals being owned or controlled
- People being dehumanised
- Individuals being physically constrained or having
- restriction placed on their freedom of movement
- Child Labour

We want to be able to demonstrate that we have adequate procedures in place to ensure our employees are able to recognise when Modern Slavery may be in existence. In addition we want to prevent people associated with the Company either exploiting individuals or individuals being exploited. It is important to ensure no employee acts in a way which is inconsistent with our Company objectives nor do they undervalue the integrity of the business.

We do not believe it is appropriate for any employees (and persons associated with the Company) to partake in activities which would engage or encourage Modern Slavery on any level. Our Statement below sets out the steps taken by us to ensure TSS and supply chains are slavery free.

Modern Slavery Statement

TSS does not condone Modern Slavery, Child Labour and Human Trafficking in any form and as such have implemented policies and procedures to ensure that individuals engaged with us do so of their own free will and are not forced into labour.

Working from our head office in East London, TSS employs over 7,000 employees consisting of Security Officers and Office Staff. TSS supplies a daily workforce of Security Officers to leading public and private sector companies and organisations across the UK; utilising a large pool of thoroughly vetted Security Officers for permanent or temporary deployment in line with BS:7858 standards.

TSS is strategic in its thinking with a responsive approach to future needs, utilising local knowledge, Officer network and Client assessment approaches to ensure supply of the right people at the right time, working with Clients to ensure legal and ethical compliance throughout each process.

TSS offers each individual it engages with a contract of employment and a contract for service, which reinforces our duty of care to the individual. This helps us to ensure that every individual we engage with is being treated fairly, that they are not being exploited, and have the resources to raise any concerns or issues with us.

TSS also provides a confidential health and well-being programme which employees can contact and discuss any domestic, whistleblowing, traumatic and health concerns with a trained professional to seek advice.

TSS also equips our employees with the necessary skills and training to recognise and eliminate these practices from the supply chain, by way of TSS on-boarding processes and ongoing Eligibility to Work, General Data Protection Regulations and Equality, and Diversity training. In addition to providing training to all employees on Modern Slavery awareness and how to escalate concerns in a safe and confidential manner.

TSS also has a number of rules and policies in place to minimise the risk of exploitation and forced labour taking place within our labour pool and supply chains:

- TSS interviews all individuals, in person, before engagement;
- TSS do not allow individuals to provide bank account details of an account in any name other than their own;
- TSS checks for duplicate addresses to ensure there are not a large number of individuals living at the same location;
- TSS does not arrange or offer permanent accommodation;
- TSS will not engage any individual who cannot produce, in person, all required eligibility to work documentation;
- TSS does not accept any form of reward for engaging or providing work to individuals;
- TSS conducts rigorous document checks at multiple stages of the recruitment and onboarding process, before employing any individual.
- TSS will not speak to a family member or representative on behalf of an employee unless they have spoken to the employee confidentially before to gain consent.
- TSS are a recognised service provider with the Living Wage Foundation working together to raise awareness of the living wage rates and providing all clients with a 'Living Wage' option.

TSS also operates a confidential email address (hr@totalsecurity.co.uk) for employees , where individuals can raise their concerns and speak to someone in confidence regarding any work related matters. Issues are dealt with confidentially and support is provided to those who may be victims of exploitation and modern slavery to make us aware and allow us to help them. TSS policies and procedures are readily available to all employees via an online learning management system.

TSS complies with the ETI base-code and is regularly audited by Sedex to ensure our workers receive fair treatment, the correct pay, and are working in safe and good working conditions. It regulates hours, pay and tax issues, prevention of forced labour as well as mistreatment of workers.

TSS operates an Approved Suppliers List. Suppliers are selected and approved using one or more of the following criteria:

- Past performance, satisfactorily supplying products or services over the years being used;
- Certification to ISO9001;
- Industry recognised, uniforms, patrol monitoring, equipment etc;
- Commitment to the Modern Slavery Act;
- Commitment to pay the 'Living Wage' rates

Potential new suppliers are requested to complete a Supplier Evaluation Questionnaire. This questionnaire asks for proof of the Company's commitment to adhering to the Modern Slavery Act.

Upon return, the questionnaire is reviewed to determine whether they are able to supply in accordance with Company requirements.

Review

This policy will be maintained and reviewed at least annually, on a regular basis by the Human Resources Department.

Associated Policies

Equality, Inclusion and Diversity Policy

Anti-Bribery policy

QMS – QP07 - Purchasing

Signed on behalf of TSS (Total Security Services) Ltd

Approved by:



Brendan Musgrove – Managing Director

This statement was approved and signed on 23rd March 2023.