

TOTAL CARE CLEANING LTD

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Document Title: Modern Slavery & Human Trafficking Policy

Company: Total Care Cleaning Ltd

Approved By: Managing Director

TCC-IMS-POL-MSHT

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1. Purpose

Total Care Cleaning Ltd is committed to preventing modern slavery and human trafficking in all areas of our business operations and throughout our supply chain. We recognise our responsibilities under the **Modern Slavery Act 2015** and are committed to acting ethically, responsibly and transparently.

Modern slavery is a serious crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking.

2. Scope

This policy applies to:

- All employees (permanent, temporary and agency workers)
- Contractors and subcontractors
- Labour suppliers and recruitment agencies
- Suppliers of goods, materials and services
- Any other third parties working on behalf of Total Care Cleaning Ltd

This policy covers all work activities undertaken by Total Care Cleaning Ltd, including cleaning services delivered in **schools, commercial premises, public buildings and client sites**.

3. Policy Statement (Zero Tolerance)

Total Care Cleaning Ltd has a **zero-tolerance approach** to modern slavery and human trafficking.

We will take appropriate action, including disciplinary action and contract termination, where modern slavery risks are identified or suspected.

We commit to:

- operating in a lawful and ethical manner
 - ensuring fair treatment of workers
 - ensuring recruitment practices are transparent and lawful
 - checking that supply chain partners meet our standards
 - encouraging reporting and protecting whistleblowers
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4. Definitions

Modern slavery includes:

- **Slavery:** ownership and control of a person as property
 - **Servitude:** forced obligation to provide services under coercion
 - **Forced or Compulsory Labour:** work extracted under threat, intimidation, debt bondage, or loss of rights
 - **Human Trafficking:** arranging or facilitating travel with the intent to exploit
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5. Roles and Responsibilities

5.1 Managing Director

The Managing Director is responsible for:

- ensuring this policy is implemented and reviewed
- ensuring adequate resources are available to manage modern slavery risks
- approving supplier and labour provider controls
- ensuring suspected cases are escalated and acted upon

5.2 Supervisors / Managers

Supervisors and managers are responsible for:

- implementing recruitment and onboarding controls

- monitoring working conditions and welfare
- reporting concerns immediately
- ensuring subcontractors comply with our standards

5.3 Employees

All employees are responsible for:

- understanding the signs of modern slavery
- reporting any concerns immediately
- cooperating with any investigation
- following company procedures at all times

5.4 Suppliers / Contractors / Labour Providers

Suppliers are expected to:

- comply with the Modern Slavery Act 2015
- maintain ethical employment practices
- provide evidence of compliance when requested
- allow audits or checks where necessary

6. Recruitment and Employment Controls

Total Care Cleaning Ltd will take steps to ensure recruitment and employment practices are fair, lawful, and do not expose individuals to exploitation.

Controls include:

- verifying **Right to Work in the UK** prior to employment
- verifying identity and proof of address
- ensuring all employees receive written terms and conditions
- ensuring wages meet at least **National Minimum Wage / Living Wage** requirements
- ensuring pay is made through traceable methods (e.g., bank transfer)
- ensuring employees are not charged recruitment fees
- ensuring employees keep control of their own documents (e.g., passports)

- ensuring employees are free to leave employment in accordance with contract terms
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7. Supply Chain and Contractor Due Diligence

We recognise that cleaning businesses may face increased risk due to reliance on labour supply chains, temporary staff and subcontractors.

Total Care Cleaning Ltd will:

- assess modern slavery risks when onboarding new suppliers/subcontractors
- request supplier declarations / confirmations of compliance
- require subcontractors to comply with our policies and standards
- monitor subcontractor working practices on site
- review supplier performance and compliance periodically

Where appropriate, we may request:

- proof of Right to Work checks being conducted
 - confirmation of wage compliance and working hour controls
 - proof of employee training and welfare systems
 - insurance and legal compliance documentation
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8. Recognising Warning Signs

Modern slavery may not always be obvious. Indicators may include:

- workers who appear fearful, withdrawn or anxious
 - workers with restricted freedom of movement or supervised constantly
 - individuals lacking ID, or someone else holding their documents
 - poor working conditions, fatigue, or signs of abuse
 - workers who do not speak for themselves or avoid eye contact
 - evidence of withholding wages or threats
 - individuals appearing under debt control or intimidation
 - workers living at their workplace or in overcrowded accommodation
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9. Reporting Concerns (Whistleblowing)

Any employee or worker who suspects modern slavery must report it immediately.

Reports can be made to:

- Site Supervisor / Line Manager
- Managing Director
- Confidential reporting route (if in place)

Total Care Cleaning Ltd will:

- investigate all reports promptly and sensitively
- protect individuals who report in good faith
- maintain confidentiality where possible
- not tolerate retaliation, threats or victimisation

If there is immediate risk of harm, **call 999**.

10. Action and Response

Where modern slavery risks are suspected or confirmed, we will:

- remove individuals from immediate risk where possible
- suspend or terminate supplier/subcontractor arrangements if necessary
- work with relevant authorities where required
- support any affected person as appropriate
- maintain records of actions taken

We may also report concerns to:

- Police / emergency services
 - Local Authority / Safeguarding Lead (where children or vulnerable adults may be impacted)
 - The UK Modern Slavery & Exploitation Helpline (where appropriate)
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11. Training and Awareness

Total Care Cleaning Ltd will ensure that relevant personnel receive awareness training so they can:

- recognise key indicators
- understand how to report concerns
- understand our legal responsibilities and ethical expectations

Training may be delivered via:

- induction training
 - toolbox talks
 - supervisor/management briefings
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12. Monitoring and Review

This policy will be:

- reviewed **annually** (or sooner if legal/operational changes occur)
 - monitored through supplier checks, audits and workforce engagement
 - updated when new risks or changes to operations are identified
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13. Related Documents

This policy supports and links to the following documents within our IMS:

- Recruitment & Vetting Procedure
 - Right to Work Check Procedure
 - Safeguarding Policy (Children & Vulnerable Adults)
 - DBS / Enhanced DBS Policy (where applicable)
 - Code of Conduct Policy
 - Whistleblowing Policy
 - Contractor / Supplier Evaluation Procedure
 - Staff Induction Procedure
 - Training & Competence Matrix
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14. Policy Declaration

Total Care Cleaning Ltd is committed to conducting business with integrity, fairness and transparency. We will not tolerate modern slavery or human trafficking in any form and will take all reasonable steps to ensure our operations and supply chain remain ethical and compliant

Signed:

Byron Phillips-Noble

Byron Phillips-Noble

Managing Director

Date: 05/05/25