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| Quality Procedures and Policies | CEN-012 | Issue Number | 6 |
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| Ethical Trading, Anti-Slavery and Human Trafficking | | Originator | Peter Hurlstone |
| | | Amended by | Peter Hurlstone |
| | | Approved by | Peter Hurlstone |

1. Scope

SETA Ltd. recognises the responsibility it shares with our suppliers to operate ethically whilst promoting decent working conditions in our supply chains is part of our strategy to act in a social responsible manner. In pursuit of our aims, we require that all our suppliers comply with this document, which is based on the 'Fundamental Conventions of the International Labour Organisation (ILO)' and all relevant national and international laws.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, 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 as enacted in the Modern Slavery Act 2015. SETA is committed to a zero tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships and supply chains. SETA expects the same high standards from all its staff, suppliers, contractors and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with SETA.

SETA expect all its suppliers to have ethical processes and policies in place throughout their supply chain. SETA will monitor supplier compliance with this policy through research and information capture and/or through a range of other tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirements for suppliers to provide reasonable information as evidence of compliance to this Policy.

2. Supply Chains

SETA is a Work Based Learning Centre who provides Training and Assessment on a variety of courses across the Engineering and Construction sector, to both Apprentices and Learners on Commercial programmes. All Employers SETA work with are checked before SETA engages in any business with them.

Although the main focus is Learning, Training and Assessment, SETA's main supply chains are goods purchased through reputable suppliers for the following:

- *Work tools and equipment*
- *Electrical cabling and equipment*
- *Oils, chemicals and gases*
- *Stationary and office supplies*
- *Office furniture*
- *Computer and IT equipment*
- *Metals, plastics, wood, laminates and other materials*

All suppliers are background checked before SETA engages in any business with them by investigating their own procedures and requesting a copy of their own Ethical Trading, Anti-Slavery and Human Trafficking procedure, should it not be available on their website.

3. Procedure

SETA acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although SETA as a Training Provider considers the risk of modern slavery to be low due to the nature of its business and supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following measures:

- *The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for SETA*
- *All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited*
- *SETA encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith; SETA has a whistleblowing policy which can be used to report any instances of modern slavery*
- *Wherever possible, SETA will obtain warranties from suppliers that they are free of modern slavery*
- *SETA has an Equal Opportunities policy and is committed to upholding human rights*
- *SETA will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate*

4. Commitments

Suppliers to SETA Ltd. shall commit to ensure that the following criteria is fully met.

Employment is freely chosen

1. *There is no forced, bonded or involuntary prison labour*
2. *Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice*

Freedom of association and the right to collective bargaining are respected

1. *Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively*
2. *The employer adopts an open attitude towards the activities of trade unions and their organisational activities*
3. *Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace*
4. *Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining*

Working conditions are safe and hygienic

1. *A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment*
2. *Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers*
3. *Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided*
4. *Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers*
5. *The company observing the code shall assign responsibility for health and safety to a senior management representative*

Child labour shall not be used

1. *There shall be no recruitment of child labour*
2. *Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; 'child' and 'child labour' being defined in the appendices*
3. *Children and young persons under 18 shall not be employed at night or in hazardous conditions*
4. *These policies and procedures shall conform to the provisions of the relevant ILO standards*

Living wages are paid

1. *Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income*
2. *All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid*
3. *Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded*

Working hours are not excessive

1. *Working hours must comply with national laws, collective agreements, and the provisions of points 2 to 6 that follow, whichever affords the greater protection for workers. Points 2 to 6 are based on international labour standards*
2. *Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced*
3. *All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay*
4. *The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by point 5 below*
5. *Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:*
 - a. *this is allowed by national law;*
 - b. *this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce,*
 - c. *appropriate safeguards are taken to protect the workers' health and safety; and*
 - d. *the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies*
6. *Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period*

No discrimination is practiced

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on such things as race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular employment is provided

1. *To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice*
2. *Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment*

No harsh or inhumane treatment is allowed

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Any breaches of this policy may result in SETA taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

SETA will not work with any party that has been identified as exploiting modern slavery and/or human trafficking and it will be reported to the police immediately.

5. Responsibility

The board of trustees and the Chief Executive Officer (CEO) have overall responsibility for ensuring this policy complies with SETA's legal ethical obligations, and that all those under our control comply with it.

The Centre Compliance Manager (CCM) 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 Quality systems and procedures to ensure they are effective in countering modern slavery.

Management 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 it and the issue of modern slavery in supply chains.

6. References

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide>

7. Review

This policy will be updated annually by the CCM or when changes in UK Law or Legislations occur.