

Modern Slavery Policy

This document has been authorised by:

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2.0			Reviewed & made controlled Document

About the Policy

The Modern Slavery Act 2015 is in place to prevent the unlawful acts of modern slavery, in which a person is held in slavery, servitude or forced labour, and human trafficking.

Exploitation can include (in addition to the above):

- Sexual exploitation (i.e. forced into prostitution, regardless of age of the individual being exploited)
- Removal of organs
- Securing services by force, threats or deception (in particular if the individual being exploited is a child or an adult at risk). This can also include an individual being forced into committing criminal acts against their will as a possible debt-bondage process.

Indicators of modern slavery include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having freedom of movement i.e. Passport being taken
- Clear exploitation of an individual by another for financial or sexual gain.

Policy Statement

ESP Ltd provide services surrounding environmental, quality, health and safety energy and landscape architecture consultancy across the UK and Ireland. ESP Ltd is committed to ensuring that opportunities for modern slavery and human trafficking

do not arise within the business and supply chain and are identified, as appropriate, as part of interaction with clients.

Responding to concerns about modern slavery

Within the business

If any staff member has any suspicions or concerns that any aspect of modern slavery may be occurring directly within the organisation, they must take appropriate action(s). In the first instance this should be to discuss this with their line manager immediately. On a case-to-case basis, the next steps could include:

- Notifying the police
- Contacting the Modern Slavery helpline (0800 0121 700)
- With the individual's consent, completing a referral to the National Referral Mechanism (NRM) (national framework for identifying potential victim of human trafficking and modern slavery and providing appropriate care) (England and Wales/Scotland/Northern Ireland)
- Referral to an external agency

ESP supply chain

Where it is suspected that modern slavery is taking place within the ESP supply chain the staff member should notify their line manager immediately. The line manager will immediately inform the supply chain partner and inform them that they have suspended the supply of their goods and services. They will then ask them to investigate the issue and report back within 24 hours. If sufficient information has not been received within that period then ESP will:

- Notifying the police
- Contacting the Modern Slavery helpline (0800 0121 700)

ESP Clients

Whilst working for clients, if it is suspected the modern slavery is taking place then the consultant working with the client will refer to their line manager. Their line manager will inform the client. They will ask them to investigate the issue and report back within 24 hours. If sufficient information has not been received within that period then ESP will:

- Suspend work with the client
- Notify the police
- Contacting the Modern Slavery helpline (0800 0121 700)

Partnership

As a small company who work to provide consultancy and training services through building partnerships, we have a zero-tolerance policy towards any form of slavery and human trafficking. Because of this we will ensure that:

- Individuals have the right to work in the country of employment.
- As a minimum, a Living Wage is paid.
- Pay reflects current market values for the sector and role.
- Working hours restrictions are complied with, and excessive working hours discouraged.
- That bullying, discrimination and harassment is not permitted or tolerated in any form.
- That office and site conditions are safe and provide a working environment conducive to the protection of the environment, human health and quality workmanship.