

Modern Slavery and Human Trafficking

Policy and voluntary transparency statement

Document owner	Managing Director	Version	2
Issue date	23 July 2026	Review due	July 2027
Approval	Managing Director	Status	For approval

1. Purpose and status

Environmental Solutions through Partnership Limited (ESP Ltd) is committed to preventing slavery, servitude, forced or compulsory labour and human trafficking in its own activities and supply chains. ESP has zero tolerance for deliberate exploitation and will take proportionate, victim-centred action when a concern is identified.

ESP is a small and medium-sized enterprise and does not currently meet the £36 million turnover threshold that requires a statutory annual statement under section 54 of the Modern Slavery Act 2015. ESP nevertheless maintains this combined policy and voluntary transparency statement because modern slavery risk is not determined by an organisation's size and because clients and public-sector contracting authorities reasonably expect transparent, responsible supply-chain management.

This document covers each of the six information areas identified in section 54(5) of the Act and the Home Office's December 2025 statutory guidance: organisation and supply chains; policies; risk assessment; due diligence and remediation; training; and monitoring and effectiveness.

2. Scope

This policy applies to all directors, employees, workers, consultants, associates, agency workers and anyone acting for or on behalf of ESP. ESP expects equivalent standards from suppliers, subcontractors and other business partners. Compliance with this policy is a condition of working with ESP, subject to proportionate contractual arrangements.

3. Organisation, business and supply chains

3.1 Structure and services

ESP Ltd is a UK private limited company and the principal trading company within the ESP group, owned by ESP Tenens Ltd. The business is led by its Managing Director and directors. It provides professional consultancy, auditing, training and related support in environmental management, quality, health and safety, energy and landscape architecture, principally across the UK and Ireland.

ESP does not manufacture goods. Services are delivered mainly by directly employed professional and administrative staff, supported where necessary by specialist consultants, associates and subcontractors.

3.2 Supply-chain profile and visibility

ESP's principal tier-one supply-chain categories are:

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- Specialist professional consultants, associates, auditors, trainers and other subcontractors;
 - IT hardware, software, telecommunications and information-security services;
 - Office equipment, consumables, personal protective equipment and other business supplies;
 - Accountancy, legal, insurance, recruitment and other professional services;
 - Travel, accommodation, venues and training services;

ESP occupies space in Wolverhampton Science Park and therefore has no control of any services in relation to soft or hard facilities management or utilities.

Most direct suppliers and subcontractors are based in the UK or Ireland. ESP can identify its direct suppliers and subcontractors but may not have complete visibility below tier one, particularly for globally manufactured goods, electronic equipment, consumables, travel and hospitality. ESP treats limited lower-tier visibility as a risk factor and seeks further information where the sector, geography or labour model indicates heightened risk.

4. Policies and standards

This policy is supported by ESP's employment, recruitment, equality, dignity at work, grievance, speaking-up, health and safety, procurement, supplier appointment and subcontractor-management arrangements. Together, these require lawful and fair treatment and provide routes for concerns to be raised.

ESP's minimum standards are that:

- All work is freely chosen and nobody is required to lodge deposits, identity papers or passports as a condition of work;
- No worker pays recruitment fees or other improper charges to obtain work;
- Right-to-work checks and lawful recruitment processes are completed without discrimination;
- Pay, deductions, working hours, leave and employment terms comply with applicable law and are clearly communicated;
- Workers are treated with dignity and are free from violence, threats, coercion, debt bondage, harassment and intimidation;
- Safe and healthy working conditions are provided;
- Workers may raise concerns in good faith without retaliation; and
- Suppliers and subcontractors cooperate with proportionate due diligence, investigations, corrective action and remediation.

A deliberate or serious breach by ESP personnel may result in disciplinary action. A supplier or business partner breach may result in corrective action, suspension or termination, but ESP will consider the potential effect of any decision on affected workers and will not disengage in a way that increases harm.

5. Risk assessment and management

The Managing Director oversees a proportionate modern slavery risk assessment at least annually and whenever there is a material change in ESP's activities or supply chain. The assessment considers sector, country, use of migrant, temporary, agency or low-skilled labour, recruitment practices, subcontracting

depth, supplier visibility, unusually low pricing, adverse information and the severity of potential harm to workers.

Area	Risk and exposure	How ESP manages the risk
Direct workforce	Lower, but not zero. ESP's workforce is predominantly professional, directly engaged and paid through transparent payroll arrangements.	Right-to-work and identity checks; written terms; lawful pay and hours; grievance and speaking-up routes; awareness training.
Specialist consultants and subcontractors	Low to moderate, increasing where agency labour, further subcontracting or opaque labour arrangements are used.	Pre-appointment checks; confirmation of labour arrangements; risk-based contractual clauses; review where risks or concerns arise.
Labour-intensive services	Potentially higher in hospitality and similar sectors, particularly where migrant or temporary labour is used.	Use reputable suppliers..
Goods and global supply chains	Potentially higher below tier one for electronics, IT hardware, PPE, office goods and other manufactured products where ESP has limited visibility.	Prefer reputable suppliers; review published statements and standards; seek origin and supply-chain information for material or higher-risk purchases.
Client sites	ESP may encounter indicators at industrial, construction, minerals, manufacturing, waste or other sites even though it does not control the client's workforce.	Staff awareness; safe internal escalation; respect client safeguarding arrangements where appropriate; independent reporting where necessary to protect people.

Risk assessment is also repeated or escalated when:

- ESP enters a new country, sector or materially different service line;
- A supplier proposes agency labour, migrant labour, extensive subcontracting or a new high-risk source country;
- A price, deadline or purchasing practice appears incompatible with lawful labour costs or conditions;
- A concern, grievance, audit finding, adverse media report or credible allegation arises; or
- Legislation, government guidance, client requirements or the business model materially changes.

6. Due diligence in the business and supply chain

Due diligence is proportionate to risk and is integrated into supplier appointment and ongoing contract management. ESP records the rationale for its level of review rather than applying the same process mechanically to every low-value or low-risk purchase.

6.1 Before appointment

- Identify the supplier, service, operating locations and intended use of subcontractors or labour agencies;
- Screen for sector, country, workforce and supply-chain risk;

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- For higher-risk appointments, obtain and review relevant policies or statements, recruitment and worker-protection arrangements, ownership or supply-chain information and any credible adverse findings;
 - Confirm that workers are not charged recruitment fees and that identity documents are not improperly retained;
 - Consider whether pricing, deadlines and payment terms support lawful employment practices; and
 - Include proportionate obligations to comply with applicable law, provide information, notify concerns, cooperate with review and take corrective action.

6.2 Ongoing monitoring

- Review active higher-risk suppliers at least annually and other suppliers when a trigger or concern arises;
- Monitor performance, changes in ownership, labour model, subcontracting, operating country and credible adverse information;
- Request evidence or assurance where risk indicators are identified;
- Record findings, decisions, agreed actions, owners and completion dates; and
- Use ESP's commercial influence to prevent or mitigate harm and improve supplier capability where this is likely to protect workers.

6.3 Remediation and responsible disengagement

Where ESP identifies an actual or potential adverse impact, its priority is the safety and interests of affected people. ESP will take expert or law-enforcement advice where appropriate, seek to prevent continuing harm, support access to suitable remedy and require corrective action. Suspension or termination will be considered where a supplier refuses to cooperate, the risk cannot be controlled or continuing the relationship would contribute to harm. Any disengagement will be planned responsibly so far as possible to avoid worsening the position of workers.

7. Raising and responding to concerns

7.1 Internal reporting

Anyone with a concern should report it immediately to the Managing Director or another director if the concern involves the Managing Director or if that route does not feel safe. Concerns may be raised confidentially and will be handled on a need-to-know basis. ESP will not tolerate retaliation against a person who raises a concern in good faith.

Staff must not confront a suspected exploiter, alert a supplier or client, promise confidentiality that cannot be maintained, or undertake their own investigation where this could place anyone at risk or compromise evidence.

7.2 Immediate and external action

- If anyone is in immediate danger in the UK, call 999.
- A suspected UK case may be reported to the police on 101 or the Gangmasters and Labour Abuse Authority on 0800 432 0804.

- Advice or a confidential report may be made to the UK Modern Slavery & Exploitation Helpline on 08000 121 700 or through its online reporting service.
- A potential child victim must be referred urgently to the police and the local authority's children's social care service under child-protection procedures.
- Only a designated First Responder can make a National Referral Mechanism referral. An adult's informed consent is normally required; different safeguarding arrangements apply to children.
- Outside the UK, ESP will use the appropriate local emergency, safeguarding and law-enforcement routes and obtain specialist advice.

7.3 Management response

A director will make an immediate safety assessment, preserve confidentiality and relevant records, decide whether emergency or statutory reporting is required, and seek specialist advice. The response will be documented and may include safeguarding, referral, supplier engagement, an independent investigation, corrective action, remediation, suspension or termination. ESP will not rely on a supplier or client to investigate itself where that would be unsafe, inadequate or create a conflict of interest.

8. Training and capacity building

ESP makes this policy available to all staff and includes modern slavery awareness in induction. Awareness covers the nature and indicators of modern slavery, ESP's areas of risk, safe reporting, non-retaliation and the actions staff must avoid. All staff receive a refresher at least every two years and after a material policy or risk change.

Directors and personnel involved in recruitment, procurement, supplier management or client-site work receive additional role-appropriate briefing on risk assessment, responsible recruitment, purchasing practices, due diligence, responding to disclosures and victim-centred remediation. ESP may also provide guidance or capacity-building support to suppliers where this is proportionate and likely to reduce risk. Completion records and training materials are retained.

9. Effectiveness, performance indicators and review

The Managing Director reports performance to the Board at least annually. ESP uses both quantitative records and qualitative learning from concerns, supplier engagement and staff feedback. The absence of reported cases is not treated, on its own, as evidence that the controls are effective.

Performance indicator	Target	Evidence and frequency	Owner
New staff completing awareness within 30 days of joining	100%	Induction/training record; reviewed annually	Director responsible for induction
Current staff completing refresher within a two-year cycle	100%	Training record; reviewed annually	Managing Director
Higher-risk new suppliers/subcontractors assessed before appointment	100%	Supplier due-diligence record; checked at appointment	Appointing Director
Active higher-risk suppliers reviewed within the annual cycle	100%	Supplier risk register and annual review	Managing Director

Performance indicator	Target	Evidence and frequency	Owner
Modern slavery concerns acknowledged and triaged	100% within one working day	Confidential concern log; reviewed after each case and annually	Receiving Director
Corrective or remedial actions followed through	100% tracked to verified closure or recorded escalation	Action log with owner, due date and evidence	Responsible Director
Annual policy, risk and KPI review completed	100%	Board review record and updated policy/statement	Managing Director / Board

Historical KPI results are not included because the 2019 policy did not establish a formal measurement framework. Version 2 establishes the baseline and targets from its approval date. Verified results, incidents, actions, learning and any unmet targets will be recorded at the annual review and used to set improvement priorities. This limitation is disclosed deliberately rather than presenting an unverified claim of zero incidents.

10. Governance, approval and publication

The Board is responsible for approving this policy and voluntary statement. The Managing Director has overall accountability for implementation, the risk assessment, records, reporting and annual review. Directors are responsible for applying the controls within their activities. Everyone working for ESP is responsible for remaining alert and raising concerns.

The document is reviewed at least annually and sooner following a significant concern, legal or guidance change, material change in business or supply chain, or evidence that controls are not effective. Where ESP publishes this document as a modern slavery statement, it will be approved by the Board and signed by a director. The latest approved version will be made available to clients and other interested parties.

11. References

Modern Slavery Act 2015, section 54: [Transparency in supply chains](#)

Home Office Statutory Guidance (updated 1 December 2025): [Transparency in supply chains: a practical guide](#)

Government reporting service: [Report modern slavery](#)

Modern Slavery & Exploitation Helpline: [Online reporting service](#)

Approval

Approved by	Managing Director
Signed for ESP Ltd	
Name and position	Andrew C Fletcher, Managing Director
Approval date	01.07.26