



# Anti-Slavery and Human Trafficking Policy

<b>Document Ref.</b>	<b>HRP0004</b>
<b>Version:</b>	<b>6</b>
<b>Dated:</b>	<b>07/6/2021</b>
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<b>Document Owner:</b>	<b>Darren O'Neill</b>

This document is to be reviewed upon alteration or after every 6 months by an authorised person in line with company quality procedures.

### Revision History


Next planned review date
7 June 2022

Version	Date	Revision Author	Summary of Changes
2	22.08.2019	Amanda Volante	Update to include - This policy is applied to all aspects of the delivery of ESF projects
3	01/09/19	Nick Yoxall	Annual Review and Format Update
4	07.11.2019	Amanda Volante	Amendment to Document Reference
5	4/11/2020	Darren O'Neill	Update to document owner and review date
6	7/6/2021	Darren O'Neill	Reviewed

### Distribution

Name	Title
All Employees	Anti-Slavery and Human Trafficking Policy

### Approval

Name	Position	Signature	Date
Catherine Storer	Managing Director		07.06.2021

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# Modern Slavery (Anti-Slavery and Human Trafficking) Policy

## 1. INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, 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. Essential Site Skills has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business. Essential Site Skills is also committed to ensuring there is transparency in our own business and that of others and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our staff, employers, learners, suppliers and other business partners. As part of our contract processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 2. SCOPE

This policy applies to all persons working for Essential Site Skills or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, Essential Site Skills may amend it at any time.

## 3. RELATED POLICIES AND PROCEDURES

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures which can be found on the Company Server. Staff are encouraged to familiarise themselves with the policies detailed below. If you have any queries about this policy, please contact the HR Manager.

- Whistleblowing policy
- Safeguarding policy

## 4. RESPONSIBILITY FOR POLICY

The Board of Directors have overall responsibility for ensuring this policy with the senior management team; and managers have day to day responsibility to ensure compliance with our legal and ethical obligation The HR Manager 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 control 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.

## **5. COMPLIANCE WITH THIS POLICY**

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager or the HR Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the HR Manager, or you may report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our business constitutes any of the various forms of modern slavery, raise it with your manager or the HR Manager. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Essential Site Skills is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found on the Company Server.

## **6. COMMUNICATION AND AWARENESS OF THIS POLICY**

Our zero-tolerance approach to modern slavery must be communicated to all involved in Essential Site Skills business to include suppliers, contractors and partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **7. BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Essential Site Skills may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy is applied to all aspects of the delivery of ESF projects.