

3.28 Anti-Slavery & Human Trafficking

Policy

We aim to operate our business with respect, empathy, accountability & transparency in all actions we take. As part of our culture of moral governance for good business, we operate to a set of core values and adopt behavioural values to all our business relationships. Inclusive is our zero tolerance to the exploitation of individuals in any form & our compliance to the Modern Slavery Act 2015. We as a business are committed to opposing modern slavery and human trafficking in all forms and preventing it in any way we can, and we expect no less from any person who works for us, or who we have business dealings with. Modern Slavery is a criminal offence and a violation of fundamental human rights. It may take various forms, but all have a common theme of depriving a person's liberty and human rights for personal or commercial gain. Our aim is to ensure, integral to all our business relationships, compliance to the Modern Slavery Act 2015. The following procedure is set out to inform you of how we need you to support us by ensuring modern slavery & human trafficking has no place within our Organisation, or with any of our supply chains. This not only supports the values of how we want to run our business, we feel strongly that this is the right thing for all of us to do.

Procedure

This procedure does not form part of any Employee's Contract of Employment. It provides a framework for the Organisation to deliver this policy and may be amended without prior notice.

Scope

All Employees, workers, volunteers and those who represent the Organisation or work alongside our Organisation & their third party representatives and partners.

1. Examples of Modern Slavery

Any practice that constitutes trafficking in persons of slavery. This includes, but is not limited to engaging in any form of trafficking of persons, using forced labour in the performance of any work, destroying, concealing, confiscating or otherwise denying access to a person's identity or immigration documents such as passports or driver's licences, regardless of the issuing authority, using misleading or fraudulent practices during the recruitment of candidate or an offer of work – such as failing to provide basic legal rights & information in a language that an individual can understand or, misrepresenting information of the terms of employment/hire or the nature of the work to be undertaken, individuals charged a recruitment fee. If in any doubt, please speak to your Line Manager.

2. Spotting the Signs of Modern Slavery

Guidance has been given on how we can all spot potential signs of a person who may have been trafficked or is being exploited. Not an exhaustive list but examples given are individuals who appear malnourished or unkempt, seem withdrawn, anxious & unwilling to interact, seem to be under the direct control and influence of others, live in cramped, dirty, overcrowded accommodation, have no access or control of their passport or identity documents, appear nervous, untrusting and avoids eye contact, show signs of abuse or health issues. If you are uncertain, please raise your concern with your Line Manager.

3. How we will Implement our Policy

Procurement

We recognise that the goods & services we acquire from others is a key area of risk that we need to manage, although we will conduct a risk assessment to identify exactly where our business may be at risk of modern slavery and human trafficking and take the appropriate actions.

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We will ensure all suppliers are aware of this Anti-Slavery & Human Trafficking policy and ensure they take actions within their businesses. Part of this will be to ascertain if they have suitable operating procedures in place, including anti-slavery & human trafficking, procurement, recruitment, whistleblowing (to raise concerns) and a system to monitor and audit compliance. We may also require a supplier to complete a Registration Form for Suppliers if deemed appropriate prior to doing business with them. We will include in our Terms & Conditions the requirement for compliance to this policy and our right to audit their activities if needed & practicable where we have reasonable suspicion of malpractice.

Communication

Our zero tolerance approach to modern slavery & human trafficking will be communicated to all of our workforce, suppliers, contractors and business partners at the outset of our business relationship & reinforced as appropriate thereafter. As part of our Terms & Conditions with an individual or business, we will make it clear that we will expect total compliance to our procedures and the Modern Slavery Act 2015. We will also make it clear that a breach of this requirement will be considered as a serious fundamental breach of our Terms & Conditions (see section 9. Breach of this Procedure below).

4. Responsibility

Management at all levels are responsible for ensuring those reporting to them understand & comply with this policy and are fully aware of the issue of modern slavery and human trafficking within our supply chains. You, as do the rest of our team at every level have an individual obligation to familiarise yourself with this procedure and to help us in the identification and prevention of modern slavery & human trafficking across our business and to report any concerns as part of your Contract with us. The HR Department has the responsibility for auditing our compliance & evaluating the effectiveness of this procedure in meeting our policy (our aims) and reporting their findings to the Board of Directors.

5. Raising a Concern

As with all of our procedures, we encourage all of our workforce, including you, to be our eyes and ears. Often it is you, our workforce, who are the first to witness, or have a suspicion of any kind of wrongdoing within our business. We will take all concerns in how we operate seriously. Please see Section 3.07 Raising a Concern or Formal Grievance. We also draw your attention to Section 3.27 Whistleblowing, which enables a route for you to bring serious concerns directly to the attention of any member of the management team. We aim to encourage openness and will support & protect anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. If you have reasonable belief that modern slavery or human trafficking in whatever form is, or may be taking place in any part of our business, or in any part of our supply chain, it is your duty to raise a concern.

6. Investigation Procedure

We will appoint a competent person to investigate all concerns raised who will:

Step One

Obtain & record full details, clarification and any supporting evidence from the person raising the concern

Step Two

Hold a full investigation & record finding. The investigator has the autonomy to involve any internal or external (company auditors/police) as deemed necessary in consultation with the Board of Directors.

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Step Three

If the investigation supports actions that may be considered as a potential gross misconduct issue for Employees, this will be further investigated and managed within our procedure 3.06 Misconduct Issues – The Disciplinary Process. If there is reasonable belief of an illegal practice, we reserve the right to inform the relevant authorities.

Step Four

Report any findings to the Board of Directors who will decide what action to take.

Step Five

The decision on actions to be taken will be recorded & implemented.

7. How we Will Evaluate our Effectiveness

Ebsford Environmental will audit that our business is being conducted in compliance with this policy. All Employees, workers, associates & third parties with whom we do business are required to fully and promptly cooperate with our internal and external auditors & investigators if required to do so. All individuals are contractually required to respond fully and truthfully to their questions, requests for information and documentation. Any failure, or suspicion that any party has tampered with any information or documentation, or has provided false answers or information, or deleted emails or other documents will be considered as a gross misconduct issue for an Employee & a fundamental breach of our Terms & Conditions for any non-employee. Upon the results of any review or audit, the HR Department will liaise with the Board of Directors on actions needed to ensure compliance with this procedure. You are invited to comment on this policy & procedure and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR Department on hr@ebsford.co.uk.

8. Confidentiality

We will treat all concerns, disclosures & any information provided to us in a confidential and sensitive manner. The identity of the individual raising the concern will be kept confidential so long as it does not hinder or frustrate our investigations. However, a fundamental part of the investigation may involve the person raising the concern or disclosure providing a statement as part of the evidence required. It is important to note that no contractual clause or agreement will override this procedure or your right to make a protected disclosure. We must declare that our duty to report any illegality will override any confidentiality clause.

Anonymous Allegations

We encourage you to put your name to any concerns or disclosures, as not to do so, makes it much less credible & will be considered at the discretion of the Board of Directors. In exercising discretion, we will take the following into account, the seriousness of the issues raised, the credibility of the concern, the likelihood of confirming the allegation from attributable sources.

9. Breach of the Procedure

Any alleged breach of this procedure would be investigated for an Employee within our 3.06 Misconduct issues – The Disciplinary Process with one of the potential penalties being dismissal. For a non-employee, as a fundamental breach of our agreed Terms & Conditions which may lead to the termination of our agreement with immediate effect.