



environmental
services
association

ESA CODE OF CONDUCT

MODERN SLAVERY AVOIDANCE

All ESA Members will:

- Ensure compliance with the Modern Slavery Act at all times across all of their operations.
- Possess an anti-slavery strategy, including policies to raise awareness of the risks and prevalence of forced labour, identify instances of potential forced labour, and appropriate staff training to enable victim support. This will need to include:
 - A suitable reporting mechanism that allows potential incidents to be reported confidentially. This should be open to workers, suppliers, contractors, and anyone who may come into contact with potential victims within a business. This could be a whistleblowing helpline or intranet site and would need to be trusted and widely communicated.
 - Consideration of how labour is recruited to minimise the risk of modern slavery, both directly and through third parties. This could include face to face interviews with all candidates, use of only independent interpreters, and regular audits to check for instances of duplicate addresses or duplicate next of kin etc.
 - This would apply to businesses own labour requirement and also third-party labour providers. ESA members should ensure their third-party labour providers recruit against the code of conduct.
- Collaborate with charities and other stakeholders to share and develop best practice in fighting modern slavery.
- Share intelligence with other organisations to help stamp out modern slavery where it arises
- All Members must report all instances of identified modern slavery to ESA. This information would be held confidentiality by the Association but could be used to build a picture of the level, the geographic hotspots and the mechanisms of the exploitation. Anonymised information could also be used to inform other Members so they can build the latest intelligence into their anti-slavery strategies.
- Work with their suppliers to minimise the risk of forced labour.
- Train supervisors to spot the signs associated with potential victims, and make provisions to offer immediate support to identified victims.
- This will require the establishment of an appropriate response policy, developed in collaboration across all business lines and supported by the board of directors.