



Modern Slavery and Human Trafficking Statement

This annual statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that East Suffolk Services Limited (ESSL) has taken and will continue to take, to ensure that slavery and human trafficking are not taking place within its supply chains or in any part of its business. This statement is for the financial year ending 31 March 2024.

Introduction from the Managing Director

Modern slavery and human trafficking remain a real yet hidden issue in our society. East Suffolk Services Limited are committed to improving our practices to combat slavery and human trafficking. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We are absolutely committed to preventing slavery and human trafficking in all our activities, and to ensuring that supply chains are free from slavery and human trafficking.

East Suffolk Services Limited

East Suffolk Council created ESSL to operate as a Local Authority Trading Company (LATCo) delivering a range of crucial services, on behalf of the Council for its residents, businesses, visitors and the wider public. These services include Waste and Recycling Collections, Grounds Maintenance, Street Cleansing, Facilities Management, CCTV, Home Alarms and Parking Enforcement.

Consequently, the company purchases a wide range of goods and services. This Statement covers all activities of ESSL, including but not limited to all direct employees, agency workers, and services delivered on behalf of the Company by third party organisations and supply chains.

Our Supply Chains

Our supply chains include:

- Building products
- Cleaning products
- Agency staff

- Office Equipment and Furniture
- PPE and workwear
- Specialist contractors and equipment
- Stationery, books, publications, periodicals
- Vehicles and parts
- Software providers
- External Auditors

We internally review our supply chain to evaluate human trafficking and slavery risks and we conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

Our Policies on Slavery and Human Trafficking

ESSL operates the following policies that describe their approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

- **Whistleblowing policy** - We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** - The code makes clear to employees the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- **Recruitment/Agency workers policy** - We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency. New employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines as appropriate.
- **Safeguarding children and vulnerable adults' policy.** Our safeguarding policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery and is supported by training for staff.

- **Supplier Selection** – We are committed to ensuring that suppliers adhere to the highest standards of ethics. We allow potential suppliers to self-declare that they meet the relevant criteria in the supplier selection stage. If a supplier seriously misrepresents any information in filling in procurement documentation, and so induce the company to enter into a contract, the company will seek damages due to a contract being awarded to a bidder as a result of receiving false information.
- **Supplier Adherence** - We have zero tolerance to slavery and human trafficking within our supply chains and we expect all those within our supply chains, including Contractors, to comply with our values.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within our own organisation is substantially avoided due to our policies and procedures. As part of our initiative to identify and mitigate risk, we attempt to build long standing relationships with our suppliers and customers and ask our suppliers to ensure that they have adequate procedures in place to identify and prevent modern slavery and human trafficking within their own supply chains, and to notify us immediately of any actual or suspected slavery or human trafficking.

Furthermore, we conduct audits of our suppliers to monitor compliance with our expectations and legal requirements.

We require all HR Professionals to be suitably qualified in relation to recruitment procedures. Further all recruiting managers are supported by HR staff and training is offered in recruitment and interviewing techniques.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide guidance and training to our staff.

The Company will seek to incorporate an on-line/e-learning package for staff including those regularly awarding contracts, those in roles involving significant contact with the public, and HR professionals working within the organisation, providing training on modern slavery. This will be in addition to the Safeguarding Training which is delivered to all relevant staff. This includes information on signs of trafficking and slavery and how to refer concerns. Our modern slavery training covers:

- our business's procurement practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant person within the organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gang masters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

Guidance on the Modern Slavery Act is available at: [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/modern-slavery-how-to-identify-and-support-victims).