

OFFICE MANUAL, SECTION 12

ANTI-SLAVERY

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KEY

[A31] = Electronic Folder Reference

REVISION TABLE

Revision	Date	Comments
1	07/12/2016	First issue.
2	25/05/2018	Reviewed by J Walpole. No changes.
3	01/07/2019	Reviewed by J Walpole. No changes.
4	30/06/2020	Added sections on Investigation Process and Employee Protection
5	07/07/2021	Added sections on spotting signs of modern slavery and list of external organisations
6	23/03/2022	Reviewed by J Walpole. No changes.
7	18/04/2023	Extended section 2, new section 3, updated section 6, reformatted section 7
8	15/03/2024	Table 1 updated, new section 7, minor rewording of section 8.1
9	19/03/2025	Updated logo, update to policy statement

1. ANTI-SLAVERY POLICY STATEMENT

Robert Walpole and Partners (RWP) is committed to preventing slavery, both within the company and its supply chain.

RWP is committed to treating all members of the workforce fairly and with respect. As part of this commitment, RWP is an accredited Living Wage Employer, ensuring that all directly employed staff and regularly contracted workers receive at least the real Living Wage, as set by the Living Wage Foundation. RWP has a zero-tolerance policy regarding slavery and human exploitation. Any employee or supplier found to be facilitating, encouraging or being otherwise associated with slavery-related activities will face disciplinary action. Normally this results in dismissal in the case of employees, or the termination of business arrangements in the case of suppliers. These cases will also be reported to the police under the Modern Slavery Act 2015.

RWP seeks to promote slavery awareness among staff, suppliers and customers where possible. The policy applies to all applicants, employees and clients. Suppliers are encouraged to incorporate a similar policy into their own policy documentation.

Robert Walpole and Partners is committed to:-

- a) Complying with the provisions of Modern Slavery Act 2015.
- b) Providing training and guidance for key decision makers such as management and those involved in the supply chain management process.
- c) Examining and reviewing existing procedures for recruitment, supplier selection and approval.
- d) Developing mechanisms for resolving accusations of slavery.
- e) Reviewing this policy on a regular basis.

Progress in implementing this policy will be reviewed annually by the partners.

Signed: _____



M. J. Walpole
Senior Partner

Date: 19/03/2025

2. WHAT IS MODERN SLAVERY

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after (Public Health England [website](#), “Modern slavery and public health” published 7 December 2017).

More information and guidance related to Modern Slavery Act 2015 can be found by visiting government website: <https://www.gov.uk/government/collections/modern-slavery-bill> .

‘Modern slavery can occur undetected in the organization’s workforce without its knowledge. Victims might be legitimately employed by a business but could be exploited and controlled by someone external to the organization. For example, a worker’s wages could be taken from them by offenders often through control of victims’ bank accounts. Modern slavery can also occur in third-party recruitment of employees, especially when workers are recruited from abroad or for low-skilled work. Abuses via third-party recruitment can include, e.g. debt bondage linked to repayment of illegal recruitment fees and threats if workers want to leave their employers. The use of labour providers increases the risk of exploitation within a workforce as it blurs oversight and accountability, especially when labour providers outsource to other labour providers.’ (BS 25700:2022)

3. VULNERABLE WORKERS AND GROUPS

British Standard 25700:2022 states that ‘certain groups might be more vulnerable to exploitation and modern slavery’. These include:

- a) migrant workers,
- b) women and marginalized workers,
- c) seasonal migrant workers,
- d) precarious/informal workers,
- e) young workers and children,
- f) socially disadvantaged groups (e.g. homeless, disabled or belonging to minoritized ethnic group),
- g) workers operating in the informal economy or domestic settings.

Please refer to section 4 for guidance on how to spot signs of modern slavery.

4. HOW TO SPOT THE SIGNS OF MODERN SLAVERY

Below are some general indicators that someone might be a victim of a modern slavery:

- a) **Physical appearance:** shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected; they may have untreated injuries.
- b) **Isolation:** rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work; relationships which don't seem right - for example a young teenager appearing to be the boyfriend/girlfriend of a much older adult.
- c) **Poor living conditions:** be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address.
- d) **Restricted freedom of movement:** have no identification documents, have few personal possessions and always wear the same clothes day in and day out; what clothes they do wear may not be suitable for their work; have little opportunity to move freely and may have had their travel documents retained, e.g. passports.
- e) **Unusual travel times:** be dropped off/collected for work on a regular basis either very early or late at night; unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it isn't clear why they'd be there.
- f) **Reluctant to seek help:** avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

5. EXTERNAL ORGANISATIONS ABLE TO OFFER SUPPORT

'Victims might be reluctant to tell their story and could feel fear or shame and worry they won't be believed. They might not recognize they are in fact a victim and might not know the rights they are entitled to. They might be suffering from stress and mental health problems due to their circumstances.' (BS 25700:2022).

Below table provides contact details of external organisations that can offer further guidance and support to victims of modern slavery.

Table 1: Contact information for external support organisations

Organisation	Website	Contact details
Gangmaster and Labour Abuse Authority	https://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol/	0800 432 0804 (free from UK landline) or 0115 959 7049 or 0115 959 7052 (9am - 5pm Mon-Fri) intelligence@gla.gov.uk
Modern Slavery Helpline	https://www.unseenuk.org/	08000 121 700 (24/7)
Salvation Army	https://www.salvationarmy.org.uk/modern-slavery	0800 808 3733 (24/7)
Hope4Justice	https://hopeforjustice.org/contact-us/	(+44) 0300 008 8000 (9am-5:30pm Mon-Fri). help@hopeforjustice.org
Crime Stoppers	https://crimestoppers-uk.org/	0800 555 111
Police	https://www.police.uk/	101 or 999 if someone is in immediate danger

6. OUR POLICIES AND PROCEDURES

Modern slavery can be linked to other anti-social or criminal activities. RWP has a number of policies in place to ensure that all of our business is conducted in honest and ethical manner. These include:

- a) **Quality Assurance Policy** (part 1 of RWP Office Manual) that describes various training opportunities we provide to our staff and our process for selecting suppliers.
- b) **Health & Safety Policy** (part 2 of RWP Office Manual) that describes our approach to general health and safety aspects of employment as well as management of Occupational Health.
- c) **Equality Policy** (part 4 of RWP Office Manual) that regulates how we advertise job opportunities and subsequently recruit people.
- d) **Anti-Corruption Policy** (part 5 of RWP Office Manual) that ensures our compliance with anti-bribery and anti-corruption regulations.
- e) **Whistleblowing Policy** (part 8 of RWP Office Manual) that ensures accountability and transparency within the business by providing mechanism to voice concerns.
- f) **Sustainable Procurement Policy** (part 15 of RWP Office Manual) that explains what we do in terms of social responsibility.

7. MANAGEMENT OF SUPPLY CHAIN RISK

7.1. Supplier onboarding process

Robert Walpole and Partners is a design consultancy providing civil engineering services for water and rail infrastructure operators. We operate from a single office in Slough. The nature of our business means that the greatest risk of encountering modern slavery is embedded within our supply chain. The types of goods and services we purchase, are summarised in Table 2. All of our subcontractors provide specialised services where incidents of Modern Slavery are relatively low. Supplier's Questionnaire, completed during supplier approval process, allows us to assess potential supplier's approach to modern slavery. Once approved, supplier's performance is regularly monitored, and any identified issues are conveyed using Feedback on Suppliers form. This is then followed up by further communications to verify what corrective actions were implemented thus completing due diligence on our supply chain. In addition, we aim to foster long-term relationships with our subcontractors and have managed to achieve this for a large proportion of our supply chain.

Table 2: Types of outsourced goods and services

Subcontractors	Suppliers
Confined Space Surveys (Access & Safety Teams)	Employment agency
Drainage Services (Site surveys)	IT Hardware
Environmental Consultants	Office supplies
Geotechnical & Geo-environmental Site Investigation Services	PPE Supplier
Health and Safety Consultants	
Hydraulic Analysis Consultants	
IT Support Services	
Medical Services Provider	
Protection Services (LUL, DLR, NR)	
Surveying Services (Topographical & 3D Laser Scan)	
Training Providers	

7.2. Recruitment companies

Recruiting through third-party companies poses a risk of modern slavery. In order to mitigate this risk, we take the following steps:

- a) Conducting comprehensive due diligence to confirm that our recruitment partners do not engage in modern slavery practices.
- b) Providing training to our team members on the risks of modern slavery, how to identify it and subsequently report it (e.g. [Supply Chain Sustainability School](#)).

7.3. Subcontractors providing labour

All workers should have a written contract of employment and be able to confirm that they have not had to pay any direct or indirect fees to obtain work. They should be paid at least the legal minimum wage and not have wages deducted for accommodation, food, or to repay any supposed debt. Workers should be informed of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. Additionally, their working hours should be monitored.

All subcontractors are expected to undertake checks on all worker documentation, including:

- a) Right to work checks which includes verifying the documents are genuine, original and unchanged and belong to the worker.
- b) The period during which the worker has a right to work in the UK has not expired.
- c) Photos are the same across all documents and look like the worker.
- d) Dates of birth are the same across all documents.
- e) If two documents give different names, the worker has supporting documents showing why they are different, e.g. a marriage certificate or divorce decree.
- f) The worker is in possession of their legal documents (passport, identification document and their own bank account details).
- g) An in-person check is carried out to verify that the worker is the person pictured in any identity documents provided, a copy of the documents is taken, and they are then signed and dated to record that the in-person check has taken place.
- h) For non-British and Irish passport holders, a current home office right to work certificate is held by the employer and has been validated.

8. YOUR RESPONSIBILITIES

8.1. You must not engage in any form of modern slavery.

The prevention, detection and reporting of any form of modern slavery are the responsibility of all employees or those working under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure or if you have any other queries or concerns, these should be raised with business Partner.

8.2. You must ensure that you read, understand and comply with this policy.

You must notify a business Partner as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

9. INVESTIGATION PROCESS AND EMPLOYEE PROTECTION

All concerns regarding suspected conflict with or breach of this policy should be reported to business Partner as soon as possible and will be dealt with in accordance with RWP Investigation and Grievance process (part 13 of RWP Office Manual).

In line with RWP Whistleblowing Policy (part 8 of RWP Office Manual), no one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward.