

# Bristol Waste Company Modern Slavery and Human Trafficking Statement

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## Introduction

Bristol Waste Company is issuing this statement to detail the actions we have taken to ensure our business and supply chain are slavery free. The sector in which Bristol Waste Company operates can be attractive to perpetrators of this type of crime and Bristol Waste Company is committed to stopping the practice. Bristol Waste Company recognises that such an approach is an important part of our corporate responsibility and therefore we will continually review our steps taken and procedures.

## Structure and Business

Bristol Waste Company is a Teckel company wholly owned by Bristol City Council and operate the waste function for and on behalf of the Council. Bristol Waste Company is responsible for collecting recycling and refuse from the properties in Bristol (in excess of 196,000 properties), running the Household Waste Recycling Centres, cleaning the streets and treating and recycling of the waste collected.

## Purpose

This statement sets out Bristol Waste Company's actions to understand potential modern slavery risks related to its business and put in place steps aimed at ensuring there is no slavery or human trafficking, forced labour or exploitation in its own business or its supply chain

## Supply Chains

Bristol Waste Company operates in the waste management sector and purchases goods and services suitable for the industry sector, such as; waste treatment services, fleet services, plant, industrial equipment, fuel, consumables and sourced labour. We currently spend around £18m per annum with over 300 suppliers. Whilst the risk of slavery and human trafficking in most areas is considered to be low, Bristol Waste Company remains vigilant and will take all steps available to manage the risks presented.

## High-risk activities

Bristol Waste Company has determined that a potential area of high risk for slavery or human trafficking could be when recycling material is exported for processing, in particular outside of Europe. Where Bristol Waste Company has contracts to export material, we will ensure that we only work with businesses who have also committed to ensuring their supply chains are slavery free, and who have published their Modern Slavery and Human Trafficking statement.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives are as follows:

**Policies:** Human Resources will ensure that appropriate HR policies are in place and reviewed on a regular basis.

**Risk assessments:** are undertaken by the relevant service area where there is deemed a risk of modern slavery or human trafficking.

**Investigations/due diligence:** any concerns regarding modern slavery or human trafficking will be raised with Human Resources in the first instance.

**Briefing & awareness:** of human trafficking and modern slavery will be raised through articles on the website and briefings cascaded to all staff.

## Relevant policies

Bristol Waste Company operates the following policies that describe its approach to the identification of modern slavery risks, and steps to be taken to prevent slavery and human trafficking in its operations:

**Recruitment:** The company's recruitment policy and processes are designed to select candidates on merit and ensure that all prospective employees are legally entitled to work in the UK.

**People management:** Once in employment, the company's HR policies and processes are in place to help safeguard employees from abuse and coercion.

**Whistleblowing policy** - The company encourages all workers, customers and other business partners to report any concerns. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Employee Code of Conduct:** This code makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.

**Expectations of Suppliers:** Bristol Waste Company is committed to ensuring its suppliers adhere to the highest ethical and environmental standards. Suppliers are required to demonstrate during any tender process that they provide safe working conditions, they are committed to the environment and they are committed to their corporate responsibility.

## Due diligence

Bristol Waste Company is committed to zero tolerance of slavery and human trafficking in its supply chains.

The organisation's due diligence and reviews include:

- **Supplier assessment:** suppliers are assessed at tender stage as part of the evaluation process.

- **Terms and Conditions:** the use of standard terms with all contracted suppliers requiring suppliers to comply with the Act
- Any exporter of recyclable materials must be committed to ensuring their supply chains are slavery free and have published a Modern Slavery and Human Trafficking Statement
- **Agency / Temporary Workers:** future tendered procurement processes will require all suppliers to state compliance with the Act

## Awareness-raising and briefing

Bristol Waste will heighten employee awareness of the Modern Slavery and People Trafficking Act 2015 and remind all employees of the arrangements for reporting suspected or discovered cases of slavery or human trafficking.

Modern slavery notices/briefings will be cascaded to employees and posted on our website and noticeboards. These will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- our business purchasing 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 employees can do if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Bristol Waste Company;
- what external help is available, for example through the Modern Slavery Helpline, Gang-masters and Labour Abuse Authority and "Stronger Together" initiative.

This statement is made in accordance with S54(1) Modern Slavery Act 2015 and constitutes Bristol Waste Company's Slavery and Human Trafficking statement for the financial year ending March 2020.

## Board approval

This statement was approved by Bristol Waste Company Directors, and the Board of Directors will review and update this annually.

Managing Director's signature:



Managing Director's name:

Tony Lawless

Date: 27<sup>th</sup> March 2019