

# Bristol Waste Company Modern Slavery and Human Trafficking Policy Statement

## Purpose

This statement sets out Bristol Waste Company's actions to understand potential modern slavery risks related to its business and the steps taken to ensure there is no slavery or human trafficking, forced labour or exploitation, in our own business and insofar as possible, in our supply chain, in accordance with the Modern Slavery Act 2015.

## Background

The Company first issued a statement on modern slavery and human trafficking in March 2019 and updates have been issued each year. This statement provides an update for 2024/25 reflecting the steps we will take to review our procedures and operations this year.

## Structure and Business

Bristol Waste is a Teckal company wholly owned by Bristol City Council. We operate the waste function for and on behalf of the Council with responsibility recycling and refuse collection; household recycling and reuse centres; street cleansing services and the treatment of the waste collected. We also provide cleaning and security services to the city council at its premises and workplaces across the city. In addition, we provide the above services for a wide range of commercial customers across the region.

The sector in which we operate is potentially attractive to perpetrators of slavery and human trafficking and stopping the practice is an important part of our corporate responsibility.

## Supply Chains

Bristol Waste purchases goods and services suitable for the industry sector, such as waste treatment services, fleet services, plant, industrial equipment, fuel, consumables, and sourced labour. Whilst the risk of slavery and human trafficking in most areas is low, the Company remains vigilant and will take all steps available to manage the risks presented.

## High-risk activities

A potential area of higher risk for slavery or human trafficking could be when recycling material is exported for processing in non-UK locations. Most of the recycled materials are sent to UK companies. However, some waste may be exported to the EU and further afield with the physical location making it difficult to monitor.

## Responsibility

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

**Policies and workforce data:** Our Human Resources team will ensure that appropriate HR policies are in place and reviewed on a regular basis. Data will also be reviewed to identify potential signs such as addresses where multiple employees live and bank accounts into which multiple wages are paid.

Recruitment agencies from whom we obtain temporary labour will be asked to provide their policies, statements, and information on practices they operate to combat the problem.

**Risk assessments:** Will be undertaken by the relevant service area where there is deemed to be a risk.

**Awareness:** Will take place again through a Toolbox-Talk briefing cascaded to all employees in addition to information that we hold on the Company intranet.

**Investigations/due diligence:** Employees will be reminded again in a Toolbox-Talk briefing, that any concerns they have should be raised with our Human Resources team in the first instance. Investigations will then take place into matters reported in accordance with Company guidance and procedure.

## Relevant policies

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

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

**People management:** HR policies and processes are in place to help safeguard employees from abuse and coercion while they are in employment.

**Whistleblowing:** All employees, customers, and business partners are encouraged to report any concerns, using the whistleblowing policy and procedure which makes it easy to make disclosures, without fear of victimisation. A 'Speak Up Guardian' has been appointed, at director level, as part of this process.

**Employee Code of Conduct:** Our Company's code clearly sets out the actions and behaviours expected of employees. We strive to always maintain the highest standards of conduct and perpetration of and/or failure to report slavery or human trafficking constitutes a breach of the code for which disciplinary action will be taken.

**Procurement policy:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

**Expectations of Suppliers:** We are committed to ensuring our 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.

And we evaluate as part of the tender process bidders compliance with the requirements of the Modern Slavery Act 2015 and what supply chain monitoring, they have in place.

## Due diligence

We are committed to zero tolerance of slavery and human trafficking in our supply chains.

Our due diligence and reviews include:

- **Supplier assessment:** potential 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 Modern Slavery Act 2015.

- **Agency / Temporary Workers:** future tendered procurement processes will require all suppliers to state compliance with the 2015 Act.

## Company Colleague briefing

We will again 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.

A Toolbox Talk briefing will be cascaded to employees and posted on our website and noticeboards. This will explain:

- the basic principles of the Modern Slavery Act 2015
- 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 2023.

## Board approval

This statement was approved by the Board of Directors and will be reviewed and updated annually.



Richard Williams  
Managing Director  
Date: October 2024