

THE YORWASTE GROUP ANTI-SLAVERY POLICY

1. WHAT IS SLAVERY?

Modern slavery is a crime which results in an abuse of human rights. The Modern Slavery Act (MSA) 2015 is a vital way of protecting communities and individuals.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

2. HOW IS IT RELEVANT TO US?

Modern slavery is a complex crime and ensuring it does not take place in our organisation requires all of us to be vigilant and take action.

We need to pay particularly close attention to:

- our supply chain;
- any outsourced activities, particularly to countries that may not have adequate safeguards;
- cleaning and catering suppliers;
- corporate hospitality.

3. RESPONSIBILITIES

Our organisation, managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. This means that everyone needs to recognise and understand the complex issue of modern slavery and how we can ensure that it does not take place within our organisation or our supply chains. Everyone must observe this policy and be aware that turning a blind eye is not an option.

The organisation

We will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policy (see Recruitment)
- check our supply chains (see Supply chains)
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process for all staff
- seek to raise awareness so that everyone knows what we are doing to promote their welfare
- make a clear statement that we take our responsibilities to our employees and our customers seriously

Managers

Managers will:

- listen and be approachable to all members of staff
- respond appropriately if they are told something that might indicate that someone is in an exploitative situation
- remain alert to indicators of slavery (see Identifying slavery)
- raise the awareness of members of staff, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to assess situations appropriately

Colleagues

You must:

- Be alert—if you suspect that anyone (a member of staff or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- follow our reporting procedure if someone tells you something you think might indicate that they or someone else is being exploited or ill-treated
- tell us if you think there is more we can do to prevent people from being exploited

4. OUR PROCEDURES

Anti-slavery statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our customers seriously. This statement is published on our websites www.yorwaste.co.uk ; www.sjb-recycling.co.uk ; www.yorganicscompost.co.uk ; www.toddwaste.co.uk.

Supply chains

We ensure that we check our supply chains to make sure the potential for slavery and human trafficking is significantly reduced.

We ensure that the organisations and supply chains we work with know that we do not accept any form of exploitation.

Wherever possible our supplier contracts contain an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking.

Recruitment Practices

Using agencies

We follow firm policy and only use agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved suppliers.

This includes:

- conducting background checks;
- investigating reputation;
- ensuring that the staff provided have the appropriate paperwork (for example work visas);
- ensuring that the agency provides assurances that the appropriate checks have been made on the person they are supplying;
- keeping agencies on the approved list under regular review.

General recruitment

- We always ensure that all staff have written terms of employment and that they have not had to pay any direct or indirect fees to obtain work;
- We always ensure staff are legally able to work in the UK;
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, our staff will follow our reporting procedures (See Reporting slavery).

5. IDENTIFYING SLAVERY

Sometimes individuals do not understand that they have been exploited and are entitled to help and support.

The following key signs are not exhaustive but could indicate that an individual may be subject to slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents;
- The person shares the same address with several other members of staff;
- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off and collected from work;
- The person is withdrawn or they appear frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside their immediate environment.

An individual may display a number of the indicators set out above but they may not necessarily be subject to slavery or trafficking. You will need to build up a picture of the individual's circumstances which may indicate something is not quite right. If you have any suspicion, you must report it.

6. REPORTING SLAVERY IN THE WORKPLACE

Talking to someone about your concerns may stop someone else from being exploited or abused. If you have concerns you should discuss them as soon as possible with your manager or with a director who will decide a course of action and provide any further advice. More information is available in the Whistleblowing Policy in the Company Handbook.

Not all individuals want to be helped and there may be instances where reporting a suspected trafficking case puts the individual at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with a manager or director before taking any further action.

7. MONITORING OUR PROCEDURES

We will review our Anti-slavery policy regularly. We will provide information and/or training on any changes we make.