



# Waste & Recycling Sector

# iph<sup>r</sup> FORUM

## INDIRECT PROCUREMENT HUMAN RIGHTS

### IPHR Steering Group members:



WINTERBOTHAM DARBY



### with thanks to our Waste & Recycling Working Group members:





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## Introduction

This toolkit is aimed to provide businesses a best practice guide on how to address the risks of modern slavery within the waste and recycling industry and supply chain.

**This toolkit will provide practical guidance for staff in all areas of business including:**

- Human Resources
- Procurement
- Operations and technical
- Corporate responsibility and sustainability

**And includes**

- An introduction to Modern Slavery
- The risks of Modern Slavery within the waste and recycling sector
- Practical guidance for business on implementing effective management systems to prevent, detect and report modern slavery
- Additional resources

The audience for this guide is both big and small businesses, and whilst some businesses may already have measures in place, this guide can be used to help review the effectiveness of existing policies and procedure. It can also guide smaller businesses who do not need to comply but wish to develop a robust strategy in line with the Modern Slavery Act.

The Modern Slavery Act was passed by the UK Government in 2015, and is the first piece of UK legislation that focuses on the prevention of slavery and servitude.





Under the Modern Slavery act, businesses must prepare a slavery and human trafficking statement for each financial year, if the business supplies goods and services and has a total turnover of over £36million. Further guidance on who needs to publish a statement can be found here: <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#who-needs-to-publish-a-statement>

The information contained within the statement should include: information related to the businesses structure and supply chains; policies relating to slavery and human trafficking, due diligence process in its business and supply chain; areas of business at risk of modern slavery; how the business ensures modern slavery is not taking place; and the training available to staff.

## What is Modern Slavery?

**Modern Slavery is an umbrella term which encompasses the acts of slavery, servitude, forced or compulsory labour as well as human trafficking. The act ultimately involves one person or group of persons depriving another person of their freedom, for their own personal or commercial gain.**

**It can take many forms including:**

### Trafficking of people

Human trafficking is the offence of arranging or facilitating the travel of a person with a view to being exploited. The use of violence, threats, coercion, or deceit are used to recruit people for the purposes such as forced labour.

It is important to remember that the victim may consent to travelling by the promise of a better life.

### Forced Labour

Refers to any kind of work or service where the person has not voluntarily offered and cannot leave without the threat of penalty. This can be in the form of a physical punishment, but also loss of rights, financial penalty, or retention of identity papers.

### Bonded Labour

This is the world's most widespread form of Modern Slavery. Bonded labour or debt bondage can take place in different forms and involves taking a loan, or an advancement of wages and the person is forced to work to pay off the debt. An example can be a person paying recruitment fees upon their hiring, putting the worker in debt.

Many victims have travelled from overseas, often from Eastern Europe, Asia and Africa, and there are range of factors that drive vulnerability and lead to exploitation. However, we also see cases raised by UK nationals. Vulnerable people in the UK, especially from disadvantaged backgrounds are also at risk of forms of modern slavery.<sup>2</sup> Data from the Modern Slavery Helpline shows England as the fourth most common nationality for potential victims reported in 2020 (Romania being the most common, followed by China and then Albania).<sup>1</sup>



<sup>1</sup>202104071 | 14600907.pdf (modernslaveryhelpline.org)

## Modern Slavery in the UK

Due to the hidden nature of Modern Slavery, it is difficult to get an accurate number of victims of modern slavery in the UK. Through greater awareness, increases in reporting and improvements in police reporting, we have seen a rise in the number of cases of modern slavery put forward in recent years. For example, the modern slavery helpline received a 68% increase in calls and submissions in 2018, compared with the previous year.

According to a report published by the Centre for Social Justice (CSJ), and Justice and Care, nobody knows the true scale, but based on new police data, its estimated there could be at least 100,000 victims in the UK.<sup>5</sup> The UK is committed to the delivery of the UN Sustainable Development Goals which includes target 8.7: Take immediate and effective measures to eradicate forced labour; end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour.



# The Waste and Recycling Sector

The Gangmaster and Labour Abuse Authority (GLAA) intelligence team has developed an [industry profile for the waste and recycling sector](#) which looks at a variety of factors including how victims are recruited, their location, how they are transported to the UK and their accommodation.

## Headline trends for the Waste and Recycling sector in 2020 include:

### Victim Profile

- Victims are reported to be male, with Romanian nationals predominantly reported to be working in this sector
- Vulnerabilities are often targeted by exploiters including; migrants and those that have difficulty communicating in English. There are limited reports concerning the employment of minors.

### Location

- Various locations have been reported, but the cases in West Midlands are slightly higher.

### Recruitment

- There are intelligence gaps around the recruitment of workers and unsubstantiated reports suggest it can occur via friends or family or using an overseas recruitment agency.

### Transport to the UK

- There are unsubstantiated reports of workers being transported to the UK by coach or bus.

### Accommodation

Accommodation is often provided by the exploiter and a shared house is often reported. The reports frequently describe health and safety concerns with the accommodation.

### Payment

Workers report non-payment of National Minimum Wage; on average £4 an hour but can be as little as £2 per hour.

### Health and Safety

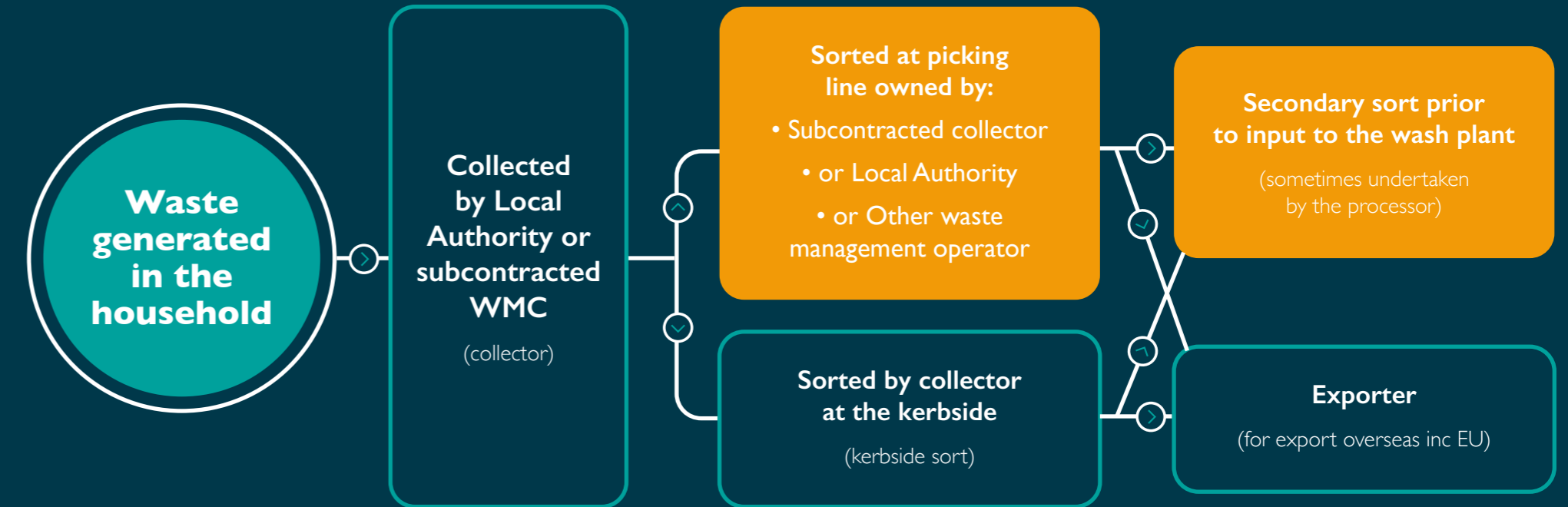
Health and safety issues are a concern including a dangerous and/or unsanitary working environment and lack of PPE. Some workers have reported being burnt and explosions occurring while at work.

With government recognising the increased risk of the sector, the Environment Agency (EA) has committed to working with police and enforcement agencies to eradicate modern day slavery from the waste and recycling industry by training officers to spot signs of exploitation during site inspections.<sup>3</sup>

# High Risk Areas within the Sector

Generally speaking, the highest risk stage of a waste supply chain in relation to modern slavery and labour exploitation is where there is sorting, or picking, required and where the use of temporary labour is relatively high. The below flow chart and following information shows a high level view of common waste streams and where the greatest modern slavery risks are likely to be present.

## Household Waste



\*Areas in orange are identified as higher risk for occurrences of Modern Slavery to take place due to low paid, manual labour



**E-Waste**

Due to the nature of components in this waste stream, which is also known as WEEE, there is a greater need than most for manual picking. This is often to remove hazardous components such as batteries, and other non-compliant items that could enter the plant process. They will also perform quality picking process removing certain grades of plastics and metals. This process and work are key to good quality recycling outputs. Due to seasonality this type of workforce can fluctuate, increasing in the summer months or in line with national holidays to ensure facilities keep up with the demand for their service. Often in this case facilities will use employment agencies for temporary workers.

**Textile Waste**

Within textile waste, the risk is often more present at the collection stage of textiles, whereby workers would collect from “door-to-door” filled bags of donated clothing and go onto to sort/separate them for further onward distribution whether it be reuse or recycling. Sometimes this work is paid per bag collected and in turn can equate to poor hourly rates.

**Plastics**

Plastics processing will often involve quality checks and manual input to processing plants. In this stream this is where agency workers are often used and here lies the highest risk of modern slavery within this type of workplace. A worker will either pick from or load into machinery items such as plastic bottles and will control the grade or colour of the material. They may also remove contaminants such as labels, cardboard, and food wastes. Like E-waste, this area of the workforce will see seasonal demands and in turn will increase the demand for temporary workers.

**Metals**

Metals wastes have a very similar process and nature to WEEE processing. Workers will manually pick throughout the process, removing non-metal wastes from their throughput material, preventing hazardous items or contamination from entering fragmenting of metals. This aids in the downstream quality of metal to enter processes that produce new metals. Due to the fluctuation of material these processors would potentially use employment agencies when the demand occurs. These roles often require less skill and in turn less pay.

**Future Demand**

Environmental concerns are driving a change in consumer behaviour, impacting on recycling rates and prompting an increase in the amount of recyclable packaging in use. More workers may be recruited, and workloads are likely to become increasingly demanding. There is also likely to be an impact on available workers due to changes to immigration laws following Brexit.

Since the outbreak of Covid-19, virtually every business and sector has faced disruption. Unfortunately, the uncertainties and impacts of the pandemic mean that those most vulnerable may have been hit hardest, leaving them more open to exploitation. People and businesses could be at a greater risk of modern slavery as a result. For example, the waste and recycling sector is seeing a huge recruitment drive and there is increasing competition for the available workforce, which can lead to reduced checks from businesses. With many enforcement and auditing agencies working from home, companies may not be held to the usual labour standards.



Slave-Free Alliance has provided guidance to business on how they can ensure due diligence process are still followed which can be found here: <https://www.slavefreealliance.org/modern-slavery-and-covid19-coronavirus/>.





## Spotting the Signs

**Due to the hidden nature of modern slavery it can sometimes be difficult to identify potential cases. There are no clear indicators to determine whether a person is a victim of trafficking or forced labour. However, there are signs to look out for, and should be considered within the context of other evidence, which will help businesses potentially identify a victim.**

If a worker has been identified as a victim of exploitation it is extremely important to take the [correct next steps](#).

### Physical Appearance

Does the worker appear unkempt in appearance?

Workers may look dirty, unkempt, or malnourished.

Does the worker seem withdrawn or frightened?

Victims can be subject to physical and/ or psychological abuse, which can make them less likely to raise an issue.

### Few or no Possessions

Have you seen the worker with any personal possessions?

Do they usually wear the same clothes?

Victims are usually removed of any personal possession, so when at work may have no money, phone, jewellery or even food. However, this can be difficult to spot if uniforms are provided.

### Control

When the worker arrives to work, do they turn up alone, or are they dropped off or picked up by another person?

Does the worker have the same home address as another employee(s)?

It may be that a worker is alone within a business, there may be several victims being exploited, or it could be that the exploiters are also working within the business. Victim may not speak for themselves, say very little, or could have a third party speak on their behalf. Usually victims will rarely interact with other colleagues.

Workers may also be reluctant to speak to management or anyone in an authoritative position.

A more extensive list of general modern slavery indicators can be found on the [Unseen website](#). Unseen also have [free resources available](#) for businesses to use to help raise awareness of modern slavery, including posters and cards which list some general indicators to look out for. There are also so downloadable resources on the Hope for Justice website <https://hopeforjustice.org/spot-the-signs/posters-and-other-resources/>

There is a short video which helps explain modern slavery and spotting some of the signs from the [Sustainable Supply Chain School](#), and a free [Slave Free Alliance video](#) that shows what modern slavery can look like for businesses. As well as training people within your own organisation on spotting the signs of modern slavery, colleagues should be trained to look for signs while on site visits, when visiting suppliers etc.

Whilst the list above highlights signs to look out for, it is important to remember not all signs will apply in every case, and these signs could be indicative of other issues. Each case should be considered on an individual basis, and if modern slavery (or any other issue affecting the welfare of the worker) is suspected, please act immediately.



## What to do if you suspect someone is a victim of modern slavery

### Much of the following is taken directly from Anti-Slavery International:

If you suspect that someone is in slavery, DO NOT automatically confront them, as this may lead to increased harm for them. Firstly, assess the situation, and report to a manager or to HR, if you are comfortable that it is safe to do so. Businesses should appoint a Single Point of Contact (SPoC) for modern slavery at each site, so that there is always someone who knows that they take responsibility for any disclosures.

If, for any reason, you are uncomfortable reporting your concerns to this individual, we would recommend using a whistleblowing procedure (which every organisation should have, and should communicate to all workers).

They should then inform relevant authorities or organisations working in the field.

### If you are in the UK and suspect someone might be in slavery, you have several options:

- Call the Modern Slavery Helpline on **08000 121 700** or fill out an online form.
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on **0800 432 0804**, or by email **[intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)**
- Contact Crimestoppers on **0800 555 111**
- Contact the Police
- Contact Anti-Slavery International or other [specialist anti-slavery organisations](#)





## Practical Steps for Business

**This checklist provides guidance on an effective management system to implement responsible steps and to mitigate against modern slavery infiltrating your business.**

### Checklist

Develop a modern slavery and labour exploitation policy

Allocate the resources required to fully implement the policy

Assign Board Director Accountability for implementing the policy and system

Communicate the modern slavery and labour exploitation policy to all employees

Assign responsibility for the implementation of this policy to specific individuals who will provide the Board, suppliers and other stakeholders with compliance updates and implementation performance as required

Assign a modern slavery Single Point of Contact (SPoC) who will take responsibility for any reported concerns relating to modern slavery or exploitation

Produce a Modern Slavery Statement (do this as best practice even if you do not meet turnover criteria) and review this annually. The statement should be published on an organisation's website with a link in a prominent place on the homepage or a copy provided, on request, within 30 days.

Provide Modern Slavery training and key performance measures to all employees with specific sourcing responsibilities

Provide Modern Slavery awareness training to all staff and update regularly

Have a clear process in place for escalation internally and with charities and authorities that will help and support

Ensure that a whistleblowing policy is in place, and that the whistleblowing mechanism is available and communicated to all workers

Consult and engage within your company so that appropriate processes and systems can be put into place (particularly in recruitment, procurement, and supply chain management)

Undertake a supply chain risk assessment and map to understand the risk and focus the effort

Communicate your policy to your suppliers and seek formal acceptance and commitment to its implementation

Undertake effective measurement, monitoring and remediation of your performance against the standards outlined

Actively engage with all suppliers to support continuous improvement towards compliance with the policy

Communicate annually the progress towards compliance with the policy.

Review the policy on an annual basis and whenever necessary and appropriate





## Example Functions and Responsibilities Matrix

The matrix below provides an example of how different functional units and responsibilities for performing due diligence can be assigned.

	Establish a modern slavery policy	Assemble internal team, with senior management support	Communicate policy to all employees	Provide training to all employees	Conduct self-assessment	Identify risks in recruitment process	Establish a corrective action plan	Develop a monitoring system	Establish effective grievance mechanism
Senior Management	●	●	●						●
Compliance Management	●	●		●	●	●	●	●	●
HR		●	●	●	●	●			●
Training Team			●	●					
Legal									●
Recruitment Agencies						●		●	
Procurement		●	●	●		●		●	
Payroll								●	
Operations Managers		●			●		●	●	●



## Procurement

The highest risk of modern slavery is often in an organisation's supply chain, rather than within their own operations directly.

There are a number of organisations that offer services to support effective management of modern slavery risks in the supply chain, but some basic steps to help you start on your journey are outlined below:

**Map your supply chain to identify your highest risk areas (reviewing the high-risk areas highlighted previously can help you to prioritise)**

- Although designed for the construction industry, The Sustainable Supply Chain School have a [free module on supply chain mapping](#) which may help inform your approach.

**Develop/share a supplier code of conduct or policy, which outlines your expectations of suppliers in relation to modern slavery and human rights.**

- The [ETI Base Code](#) is a good place to start.
- Share this with your suppliers and check that they are able to comply.
- Stronger Together have created a [Procurement Principles Template](#) which could be used/adapted

**Assess your suppliers' and potential suppliers' capability and maturity in assessing and managing the risks of modern slavery.**

- Stronger Together have produced a [free template of questions](#), which is included within their Purchasing Practices Toolkit, to ask as part of tenders.
- Check who is responsible for ethical trade and modern slavery within the supplier's organisation, and confirm their route of escalation if an incident or potential incident is identified.

**Monitor progress**

- Discuss modern slavery with your suppliers on an ongoing basis – do not 'check and forget'
- Track your own progress in training colleagues, mapping your supply chain and assessing and managing your risk

Stronger Together have produced a full [Tackling Modern Slavery through Purchasing Practices Toolkit](#), which provides further information, templates and checklists to help you develop your approach. There are also workshops to support your programme available.

## Labour Sourcing Good Practice

**Within the waste industry sourcing labour from third parties is commonplace. The nature of this workforce can present risk factors to exploitation and modern slavery.**

When sourcing labour indirectly it is important to understand from where, and how, your recruitment agencies and subcontractors source their labour. The below offers several factors to consider when sourcing labour to mitigate risks of modern slavery.

### Things to consider

*Labour providers should be reputable and able to demonstrate best practice and compliance within applicable regulatory frameworks:*

Use indicative pricing statistics to assess quotations and fees from agencies offering or charging suspiciously low rates.

Is the agency a member of a professional association, body or compliance scheme e.g. Recruitment and Employment Confederation (REC) or similar

Does the agency hold any additional affiliations, e.g. Investors in People, ISO standards? Whilst holding such does not constitute proof that an agency has no risk of forced labour, they may be considered indicative of good management

Does the agency use middlemen to source staff e.g. migrant workers? If Y, how many sub-agents are there? What checks does the agency do to ensure the subagent/s is working legitimately and adhering to standards?



Does the agency have a code of conduct? Does this specify a clear prohibition of the use of forced / trafficked labour

Have any fees or deposits been paid by the workers, to either the agency or any middlemen? What for, how much and are any of these refundable? Is there written documentation to substantiate this?

Have any documents been retained, e.g. passport, bank book/card? What arrangements are there for returning or allowing staff access to these? Is there written documentation to substantiate this?

What is the nature of the roles being recruited for; are they relatively low pay, unattractive/low skilled roles

Is work seasonal, unsocial in nature e.g. shift work

Are workers directly recruited from overseas?

Do all employees, including temporary workers, have a written contract outlining the terms of their employment or engagement.

No employee should have to pay any direct or indirect fees to obtain work.

All employees, including temporary workers, must be paid at least the legal minimum wage after any deductions except for PAYE, Pension, cash advance and NIC deductions.

Agency workers should receive equality insofar as it relates to pay under Regulation 5 of the Agency Worker Regulations 2010 (AWR) after 12 qualifying weeks. They are also entitled to day-one rights under Regulations 12 and 13 of the AWR.

Working hours should be monitored to ensure they are not excessive. Those working in excess of 48 hours per week must have agreed to the 48-hour opt out under the Working Time Directive.

Any time spent by a worker on an induction is classed as working time. This must be paid in accordance with national minimum wage rules.

Workers should be informed of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

All workers must have relevant training on health and safety, receive a health and safety induction, and be provided with the appropriate personal protective equipment to undertake their role.

Are workers paid by electronic transfer into their own personal bank account and not into the bank account of a third party (avoid cash in hand payments)

Does the agency routinely complete duplicate a bank account checks - Does a group of workers have their wages paid into the same bank account? This may be sign of an illegal gangmaster collecting all their wages.

Workers should not have monies deducted from their salary for accommodation, transport, food or to repay any supposed debt. Any deductions from salary for cash advances or transportation must be expressly consented to in writing by the worker.

Any deductions from salary, other than for pension, tax, national insurance contributions, attachment of earnings orders or deduction from earnings orders must be expressly consented to by the worker

Where workers are paying for transportation to work, the operator of that transportation service must hold an operator's licence

What checks does the agency perform to establish a worker's identity and eligibility to work? Applicants' right-to-work documentation must be taken in accordance with the List A and List B requirements as outlined by UK Visas and Immigration in its employer's guide 9.

Documents provided by the potential employee should be checked to ensure they are genuine, original and unchanged; and belong to the person who has given them to you.



Photos should be checked to ensure they are the same across all documents and look like the applicant.

Details such as names and dates of birth should be the same across all documents.

Does the agency/labour provider have a Modern Slavery Policy (and statement if applicable)?

Does the agency/labour provider provide a way for workers to raise concerns about modern slavery confidently and confidentially.

Are Modern Slavery multilingual posters where applicable, displayed, and leaflets available to workers.

Are regular welfare discussions, including around modern slavery being held with team members.

The above list is taken from experience as well as from resources such as Stronger together Toolkit - [Tackling Modern Slavery in the Construction Sector](#) which offers a more extensive list of best practice that you may wish to consider.

Finally, you should ensure there is an opportunity for you to talk to agency staff directly and audit the above (announced and unannounced). Talk to staff and understand if they have been given a written contract that they understand and have agreed to? Are they happy with the relationship with the agency? Is there any indication that fees may have been paid, for the employment or other 'services' such as uniforms or meals? Are they forced to work overtime? Is there anything to give you cause for concern that they might be being controlled by someone else? etc.

To support responsible recruitment practices, the IPHR Forum Developed the Minimum Standards for Labour Providers document ([included at the end of this toolkit](#)), which can be used to set clear minimum requirements with labour providers.

## What to do if someone has reported concerns about a victim of modern slavery in the business

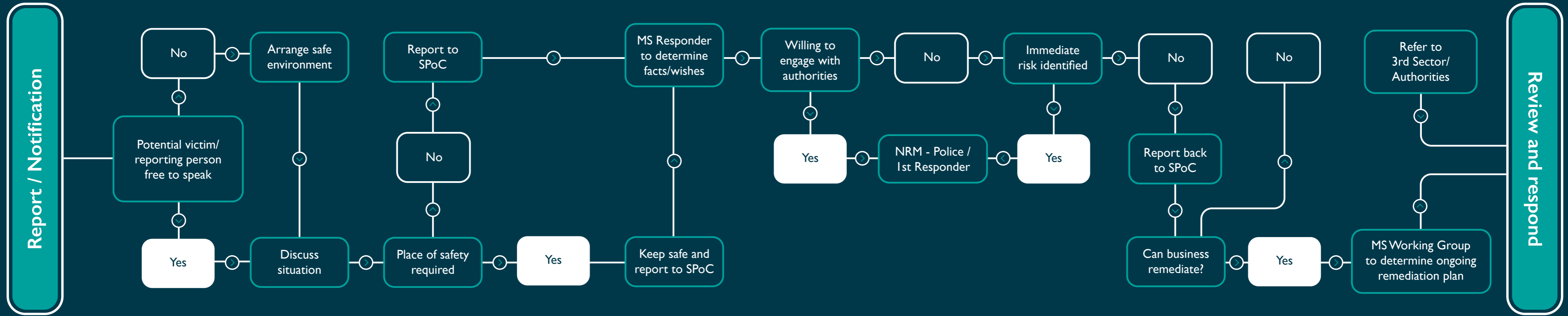
The reporting of potential modern slavery issues can be received through a variety of methods, such as self-reporting by the victim, reporting by a third party on behalf of a victim, or the reporting by a third party in respect of what they perceive to be a potential issue. These can be received through a variety of mediums such as in person to a colleague or third party, through dedicated reporting mechanisms such as whistleblowing or confidential reporting platforms or simply through the receipt of information through more traditional methods such as post, email, general telephone.

Once received there is a clear duty to act on such information and attend to the duty of care around the individual concerned. The level and urgency of action required will vary case by case and will be dependent on the level of risk identified.

Having an escalation process is important. It has to be bespoke to the business and take into account who will have responsibility for any disclosures at any point in time. This person is the Modern Slavery Single Point of Contact (SPoC). This needs to be communicated into the business especially to any members of staff who are likely to hear disclosures or see incidents. Slave Free Alliance does and can help with developing such a process.







# Modern Slavery Escalation/Remediation Flowchart

Accredited to:



The escalation flowchart should help determine the appropriate course of action.

A remediation policy should be developed to act as a framework in the event that an incident of modern slavery is identified in your business or supply chain. Stronger Together have produced a template that could be used as a starting point.



## Additional Resources

### Example Modern Slavery Policy

*N.B. This is a template to be modified as required and for inclusion within a wider Tackling Modern Slavery in Business and Supply Chains or Business and Human Rights policy.*

#### Policy statement

[Company] commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

#### Coverage

To which site(s) does this policy apply?

#### Responsibility

Who has overall responsibility for this policy?

Who (which jobholders) have specific responsibilities for various aspects of this policy?

#### Policy Commitments

[Company] shall:

1. Designate appropriate managers (who/job title) to attend Modern Slavery training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority and police.
6. Provide information on tackling "Hidden Labour Exploitation"

to our workforce through (list formats e.g. in a variety of formats such as workplace posters, worker leaflets, induction, other training).

7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities (detail how).
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

#### References

1. <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/modernslaveryintheuk/march2020>
2. <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>
3. <https://www.gov.uk/government/news/environment-agency-commits-to-fight-against-modern-slavery>
4. <https://www.gla.gov.uk/who-we-are/modern-slavery/industry-profiles-recycling-and-waste-industry-2020/>
5. <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/07/It-Still-Happens-Here.pdf>





# Minimum Standard for Labour Providers

**This document sets out the minimum standards that we expect any labour provider supplying workers onto our sites to follow.**

We are committed to ensuring that all of our workers' rights are protected and that they benefit from good labour standards, whether they are employed directly by us or indirectly by a labour provider.

We need your support and commitment to help us ensure that labour exploitation, modern slavery and human trafficking have no place in our business. As a supplier of labour into our business, we ask that you meet the following requirements, as a minimum, with an expectation to exceed as agreed in line with your customer

- 1.** The fundamental rights of workers are protected. Specifically, the ETI Base Code will be followed, which requires that:
  - a.** Employment is freely chosen
  - b.** Freedom of association and the right to collective bargaining are respected
  - c.** Working conditions are safe and hygienic
  - d.** Child labour shall not be used
  - e.** Living wages are paid
  - f.** Working hours are not excessive
  - g.** No discrimination is practiced

- h.** Regular employment is provided
- i.** No harsh or inhumane treatment is allowed
- 2.** A modern slavery and human rights policy will be in place, which will include tackling hidden exploitation.
- 3.** An escalation process must be agreed with customers on how to work together should any breach and/or concern of a breach occur against labour standards
- 4.** All business shall be conducted ethically, with no bribery, corruption or any type of fraudulent business practice.
- 5.** A sustainable charge for services will be made, which covers legal obligations, specific service costs, general business operating overheads plus a sustainable net margin. See ALP Charge Rate Guidance.
- 6.** Recruiters, managers and supervisors will be trained, on a regular basis, on how to spot the signs of labour exploitation and human trafficking, and how to report it.
- 7.** Processes will be in place to identify potential exploitation and human trafficking. These processes should include, but not be limited to, HR

cross checks to identify multiple uses of bank accounts and home addresses.

- 8.** Regular discussions with workers, including welfare checks should be carried out to identify possible exploitation and human trafficking.
- 9.** No workers will be required to lodge deposits or their identity papers and will be free to leave their employment after reasonable notice.
- 10.** No worker shall pay for a job. Workers will not be charged any fees, or have any deductions taken from wages.
  - a.** This includes, but is not limited to deductions/fees for the following: recruitment fees, training, induction, security checks, workwear, equipment needed to do the job, administration.
- 11.** All wages must be paid directly to the individual.
- 12.** All workers will receive a contract which sets out wages and working hours, for each specific contract they work on.
  - a.** Key terms and conditions of the job must be available to the worker in a language they can understand.
- 13.** A process will be in place to inform all workers of their rights and how to report any concerns.
  - a.** This can include, but should not be limited to, providing workers with a copy of the GLAA's Workers' Rights leaflet in a language they understand.

- 14.** Standard working hours in a week shall not exceed 48 hours. Overtime including the total working hours in a week shall not exceed 60 hours.
- 15.** Records of all working hours will be documented and maintained, reflecting all sites of employment if workers have worked on multiple sites or for multiple clients.
  - a.** These records will be used to evidence that working hours are not excessive and that any overtime worked is voluntary.
- 16.** Right to work checks will be carried out for every worker and appropriate records maintained.
- 17.** There will be no sub-contracting or use of labour sourcing agents without previous agreement from the client. These minimum standards will also apply to any sub-contractors/intermediaries.
- 18.** Modern slavery statement will be published in line with legislation and good practice, if required [note - UK law requires all UK businesses with a turnover of £36 million or over to publish a modern slavery statement].

**Please confirm that you have read and agree to meet these requirements:**

Signed by.....

Printed.....

On behalf of (company).....

Date.....



Call the Modern Slavery Helpline on  
**08000 121 700**