

Modern Slavery Statement

This is made in accordance with the Modern Slavery Act 2015 and constitutes Bywaters (Leyton) Limited's slavery and human trafficking statement for the financial year ending 31st March 2018.

This statement sets out the steps taken by Bywaters to identify, address and prevent modern slavery and human trafficking within our business and supply chain.

Bywaters structure, business and supply chains

Bywaters is London's leading recycling and waste management organisation serving London and the South East since 1952. We provide a comprehensive range of tailor-made recycling and waste management services offering all types of businesses the option of a 'zero direct to landfill' solution. We directly employ approximately 400 people, all of whom are based in the United Kingdom. Whilst our staff are not in any category that is perceived to be susceptible to modern slavery in this country, Bywaters ensure robust policies and procedures are in place for our contractors and suppliers.

Bywaters' commitment to respect employees in the workplace includes its full support to the Modern Slavery Act 2015, and efforts to promote ethical principles and practices related to the prevention, exploitation and abuse associated with modern slavery and human trafficking.

Bywaters expects the commitment to these principles from its supply chain, and will not support or do business with suppliers knowingly involved in slavery or human trafficking.

Bywaters policies and procedures

Bywaters' values are cemented in the principle that everyone should be treated with dignity and respect. This includes the provision of decent working and employment conditions, combined with a salary which should not be below the national minimum or living wage. We have developed an induction process that is compliant to the Home Office' Right to Work guidelines, which delivers a fair recruitment process for all prospective employees, including temporary and permanent. All of our employees have a personal responsibility for maintaining a respectful work atmosphere, free of abusive or unprofessional conduct.

We have a number of policies and procedure which aim to minimise the risk of modern slavery, which are reviewed annually. These include:

- **Whistleblowing:** All our staff have access to our whistleblowing policy.
- **Equal opportunities:** Ensures all our staff are treated fairly regardless of race, religion or belief, gender, age marriage or civil partnership, pregnancy/maternity, sexual orientation, gender reassignment or disability.
- **Health and Safety in the workplace** – Promotes a safe and healthy working environment.

Due diligence

Bywaters has a tailored compliance questionnaire as part of our vetting process for suppliers. The questionnaire includes a risk management identification process for monitoring modern slavery within suppliers' supply chain, as well as internal work processes. The questionnaire also ensures we receive updated policies, accreditations and safety procedures to manage our Duty of Care effectively. The questionnaire sets out clear expectations for our suppliers, including the mandatory requirement for suppliers to inform Bywaters of any breach to their process, as well as the actionable steps Bywaters should take if suppliers do not comply with our required standards.

Bywaters only engage with suppliers which have been vetted through our compliance questionnaire, including a full review of discrimination policies addressing modern slavery and human trafficking.

Bywaters uses two providers to supply agency staff to the business on a regular basis. Our providers must comply with Home Office Right to Work regulations, and guarantee staff wages are paid electronically directly into each worker's bank account.

Risk assessment

Bywaters carries an annual risk assessment in relation to modern slavery and human trafficking. This is carried out by our in-house SHEQ (Safety, Health, Environment, and Quality) Team and the results shared with Human Resources and the board of directors. As Bywaters do not fall within a high-risk category, we predominantly focus our efforts on our supply chain. We monitor compliance to the Modern Slavery Act through due diligence procedures and contractual terms with our suppliers.

Bywaters policies and procedures are reviewed annually; this includes a review of our Human Resources and Recruitment policies and procedures, to ensure compliance with all relevant laws for the protection of human rights.

Measuring effectiveness

Following our annual risk assessments, audits are conducted at regular intervals with our suppliers to ensure compliance. The SHEQ team is responsible for monitoring Bywaters' and our suppliers' processes in line with all applicable laws, any issues identified are raised with the board of directors.

Training

In order to maintain compliance and raise awareness, training on modern slavery and human trafficking is provided to all staff involved in our recruitment process as well as those involved in our supply chain management. Training is provided via an online training portal, which includes the definitions of modern slavery, its significance to Bywaters and identifiable signs of human trafficking and modern slavery. Each delegate is required to answer a series of questions following the training with the training refreshed every two years. In addition, this training is also provided to the companies which provide Bywaters with agency and temporary staff.

Signed by: 

Position in company: Managing Director

Date: 27th March 2019