

Modern Slavery Statement for financial year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Mid UK Recycling Ltd. has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Mid UK Recycling Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Mid UK Recycling Ltd. is an independent company working with businesses and councils. Our business operates in the private sector within the UK and has 600 to 700 active suppliers both UK based and internationally.

Our high-risk areas

Our company operates with a high number of Foreign National employees working within most areas of the business. The steps we take to help mitigate the risk of human trafficking and slavery in these areas are (but not limited to):

- Strict vetting and investigation of our supply chain (contractors, sub-contractors, policies and contracts etc.
- Regular audits and reviews of our practices for checking all employees are paid at least the minimum/living wage and have the right to work.
- We encourage the reporting of concerns and protection of whistle blowers
- Added provision to our tender documentation which includes the mandatory exclusion of any bidder who has been convicted under section 1, 2 or 4 of the modern day slavery act 2015.
- Mid UK Recycling will not knowingly support or deal with any business involved in slavery and/or human trafficking
- We have zero tolerance to slavery and human trafficking and we expect all contractors and those in our supply chain to comply with our values

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Policy statement on preventing hidden labour exploitation. This statement sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Equal Opportunities policy. The aim of the policy is to ensure no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
5. Our employee handbook explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
6. Recruiter Compliance Principles, ensuring personnel authorised to recruit understands our company's values and complies with the policy.

Our Suppliers

Mid UK Recycling Ltd. operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure the organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery

3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Steps we have taken

Management responsibility and general awareness

- Agreed management responsibility for this policy and statement and received unanimous endorsement from our Board of Directors.
- Raised general awareness by circulating an article to all staff explaining the statement
- Added provision to our tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Day Slavery Act 2015.

Training

We regularly conduct training for our Supervisors/Managers so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All Directors have been briefed on the subject.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.


Coverage

This statement applies to all Mid UK Recycling Ltd offices and sites and any company that falls under the Mid UK Recycling Ltd.'s group of Companies.

Approval for this statement

This statement was approved by the Board of Directors on 11/01/2019

Name: Chris Mountain (Managing Director)

Signature: 

Date: 18/01/2019