

## **The Coventry and Solihull Waste Disposal Company Limited**

### **Modern Slavery and Human Trafficking Statement**

**Financial Year 2023/24**

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

Modern slavery includes slavery, servitude, human trafficking and forced labour. The Company has a zero tolerance approach to any form of modern slavery and it maintains practices to combat slavery and human trafficking. It will continue to work with its stakeholders on such policies during the forthcoming financial year.

#### **Organisational Structure**

The Coventry and Solihull Waste Disposal Company Limited operates an Energy from Waste Plant and is owned jointly by Coventry City Council, Solihull Metropolitan Borough Council, Warwickshire County Council and Leicestershire County Council.

The Company is committed to maintaining the highest ethical standards and to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chain. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business or supply chain.

#### **Policy on Slavery and Human Trafficking**

The Company's policies relating to slavery and human trafficking are as follows:

- Recruitment policy – we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff with a requirement for agencies to carry out similar checks on their staff;
- Equal opportunities – we have a range of controls to protect staff from poor treatment and/or exploitation, which comply with the relevant laws and regulations. These include provision of fair rates of pay, fair terms and conditions of employment and access to training and development opportunities;
- Anti-bribery policy – details of this are set out in the staff handbook which is available to all employees;
- Whistleblowing policy - details of this are set out in the staff handbook which is available to all employees.

## **Suppliers**

The Company is committed to ensuring that there is no modern slavery or human trafficking taking places in its supply chain or in any part of its business, and to acting ethically and with integrity in all of its business dealings and relationships. The Company expects the same high standards from all of its customers, suppliers and other business partners.

The Company only uses reputable recruitment agencies and will continue to ensure that all employee checks are undertaken to confirm eligibility to work.

## **Supplier Adherence to Values and Due Diligence**

The Company has zero tolerance to slavery and human trafficking. To help ensure those in its supply chain, its contractors and other business partners comply with its values, the Company will include in its purchase terms and conditions or other contractual documentation a requirement for suppliers to adhere to this requirement.

The Company will keep its contracting process under review and, where appropriate, include contractual provisions which reflect the values set out in this statement and monitor for compliance.

## **Actions to Improve Awareness and Report on Modern Slavery or Human Trafficking**

The Company's policy statement on modern slavery and human trafficking will be communicated to all staff via the team brief process and included within the employee handbook.

## **Risk Assessment and Management**

The Company assesses key risks to contravention of the Act within the business, amongst contractors and within the equipment and material supply chain. If this identifies areas of concern, the Company will develop mitigations that will be used in future to manage the risk as effectively as possible.

## **Training**

The Company will undertake training for its senior management team and those staff with responsibilities for procurement so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within the supply chain.

### **Performance Indicators**

The Company will be able to assess the effectiveness of the steps that it is taking to ensure that slavery and/or human trafficking is not taking place within the 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.

### **Approval**

The statement was approved by the Board of directors of The Coventry and Solihull Waste Disposal Company Limited on 10th July 2023 and will be reviewed annually.

Karl Starkey

Managing Director

The Coventry and Solihull Waste Disposal Company Limited