

Preventing modern slavery in the supply chain

A guide for suppliers

May 2024



What is modern slavery?

Modern slavery is a broad term used to encompass slavery, servitude and forced or compulsory labour, and human trafficking. It includes practices such as debt bondage, sale or exploitation of children and forced or servile marriage. The theme underlying all these offences is one person depriving another person of their liberty, in order to exploit them for personal or commercial gain. It is a crime that affects some of the most vulnerable in society. It is often hidden from view and many victims also do not self-identify, which means that quantifying the number of victims is challenging. However, the 2016 Global Slavery Index estimates that there are 45 million people in modern slavery globally.

There is an assumption that victims of modern slavery are often trafficked to the UK from other countries, but whilst migrants are vulnerable to modern slavery due to their need to work and language barriers, residents of the UK are also among the victims exploited in the UK and other countries. The government estimates there were almost 17,000 potential victims of modern slavery in the UK in 2022, an increase of 33% on the previous year. The crime is often hidden from the authorities and the general public. Victims may struggle to leave their situation because of threats, punishment, violence, coercion and deception, and some may believe that they are not in a situation of exploitation.

What is the Modern Slavery Act?

To combat modern slavery in the UK, legislation was introduced in England and Wales, Northern Ireland, and Scotland. Modern slavery crimes are not new to the UK, and they were punishable against previous offences prior to the introduction of the new Acts in 2015. The new legislation increased the maximum penalties for offences to life imprisonment and introduced further protection and support for victims. It also puts an obligation on all businesses with a turnover of £36 million or more that provide goods and services in the UK, to disclose in an annual slavery and human trafficking statement what steps they have taken during the financial year to ensure their business and supply chains are slavery free. The statement must be approved by the company's board of directors, signed by a director and published on the organisation's website, with a link on the homepage as soon as reasonably practicable after the end of each financial year. Although only larger organisations legally have to produce a statement on modern slavery, it is the responsibility of all ethical organisations to address the risks in their own organisation and their supply chain.

High risk areas

Exploitation risks are increased whenever or wherever people are vulnerable. Exploiters and gangs are practised in how to subdue, break, control and maximise economic return from the individuals they have enslaved. They may use a number of methods including financial indebtedness, psychological and physical violence, threats of violence, isolation and withholding victim's identification documents.

Victims may be unwilling or unable to make formal complaints due to fear of retribution, the psychological damage done by their abusers, lack of knowledge of their rights or how to enforce them, fear of retribution and self-blame and shame about the situation they are in.

Workers employed as temporary workers via recruitment agencies/labour providers are particularly at risk of being victims of modern slavery.

Industries that require a high level of manual labour, such as construction, waste management and facilities management, are also high risk.

What is SUEZ recycling and recovery UK doing?

We recognise that slavery, servitude, forced labour and human trafficking is a world-wide and growing issue. The waste management and recycling sector has been specifically targeted by perpetrators of this type of crime. As a leading waste management and recycling business in the UK, we recognise the need to adopt a robust approach to slavery and/or human trafficking and commits to identifying areas of risk within our business, and to develop strategies and approaches to mitigate those risks proactively.

SUEZ recycling and recovery UK works with Slave Free Alliance to assess the risks both within our organisation and in our supply chain, and to address them. We work closely with our agency labour providers, as we recognise this is an area of high risk. Our recruitment team has put in place checks to minimise the risks of modern slavery in the recruitment process. We have provided mandatory training for all SUEZ employees, which is included in the onboarding process for all new employees.

What you can do about it in your organisation

- Make a commitment to preventing modern slavery within your organisation and within your supply chain.
- Establish good management systems in your recruitment and onboarding processes internally and with labour providers to mitigate the risk of modern slavery.
- Train employees about modern slavery, so they know the signs of exploitation to look out for and what to do if they see them.
- Assess where the greatest risks are in your organisation and in your supply chain to identify low, medium and high-risk suppliers.
- Tackle the risks you have identified starting with the high-risk suppliers.
- Have an effective and confidential reporting mechanism in place to allow those experiencing exploitation and abuse, or witnessing such acts, to report them with confidence.

Resources to help

Supply Chain Sustainability School: SUEZ recycling and recovery UK is a partner of the SCSS, which is an organisation that provides free training and resources on a wide range of topics including modern slavery. We would recommend that you become a member of the school and complete the modern slavery learning pathway. <https://www.supplychainschool.co.uk/>

Stronger2gether is an organisation that provides free resources and training that can help. <https://www.stronger2gether.org/>

