

KENNY WASTE MANAGEMENT HAVE A ZERO TOLERANCE TO MODERN SLAVERY

Kenny Waste Management have a **zero tolerance** to Modern Slavery and this statement, made on behalf of the board, sets out its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

INTRODUCTION

Kenny Waste Management recognise the harmful impact slavery, servitude, forced labour and human trafficking (Modern Day Slavery) has on individuals, communities, and society. We understand the waste management sector has been targeted by organised criminal gangs to supply hidden exploited labour and we are determined to prevent this occurring within our business. Hidden labour exploitation is the exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider. 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.

ORGANISATION SUMMARY

We operate a UK wide waste recycling service which comprises of 'Waste Partners'. The waste industry typically uses migrant workers and with this there may be increased risks.

We process over two hundred thousand tonnes of waste a year and proudly, divert over 99% of the waste we receive from landfill. Our business relies on over 250 supply chain partners to help deliver our services and are proud that 100% of these are UK based companies.

We operate three sites across Greater Manchester, employ over 160 people, have a reported turnover of over twenty-eight million pounds. We have three business within our group, and the following companies are covered by this statement:

- > Kenny Services limited.
- > Kenny Waste Management limited.
- > Kenny Waste Management Social Enterprise limited.

POLICY STATEMENT

We commit to developing and adopting a proactive approach to ensuring that Modern Slavery does not occur within our business, or across our supply chain.

POLICY COMMITMENTS

We have made several commitments to ensure our policy is robust and effective:

- Designate appropriate managers to attend Modern Slavery training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. We will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around Modern Slavery and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of Modern Slavery to the Gangmasters and Labour Abuse Authority (GLAA) and Police.
- Provide information on tackling Modern Slavery to our workforce in a variety of formats in predominant languages spoken across our operation.
- Encourage employees and agency workers to report cases of Modern Slavery, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report Modern Slavery which may be occurring within their communities.
- Require all organisations in the supply chain to adopt policies and procedures consistent with the above.

2021 PROGRESS

- We have updated our policies and will continue to review our practices regarding modern day slavery. These policies include Whistle Blowing, Recruitment, Procurement and Anti-Slavery and Human Trafficking Policy.
- We have joined two working groups to participate in sector initiatives, share best practice between organisations and develop resources in an open and non-competitive manner:
 - 1) The Indirect Procurement Human Rights Forum's Waste & Recycling Working Group. The IPHR Forum is a group of UK retailers, brands and manufacturers with a common vision to protect and respect human rights in supply chains and address shared risks.
 - 2) The Waste & Recycling Modern Slavery working group, is a cross-sector network of over 20 organisations, chaired by the Slave Free Alliance. This group looks to identify and assess labour rights issues, develop shared resources to address human rights issues that are directly relevant to the sector we operate in.
- We actively contributed with the IPHR forum to develop a new *Tackling Modern Slavery in Waste and Recycling* Toolkit, which has been made widely publicly available for free of charge.
- All waste partners have completed a questionnaire and where necessary have shared their Modern Slavery Policy and Statement.
- A director of Kenny Waste Management Social Enterprise has joined the Trustee board of a charity supporting survivors of Modern Slavery and Human Trafficking.



EFFECTIVENESS IN ENSURING SLAVERY IS NOT TAKING PLACE

PERFORMANCE INDICATORS

We will know if the measures we are taking are effective if:

- There are no reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Members of the HR, Supply Chain, or Sales team identify no signs of slavery or trafficking during site audits and 'Waste Partner' selection.

FUTURE FOCUS

Kenny Waste Management will continually improve the steps we take to address Modern Slavery in line with sector best practice. As a responsible business, we will remain alert to the risks and will enhance all measures accordingly. Our focus will be on engaging our employees and continue to collaborate with supply chain partners to raise awareness and support them to adopt new policies and procedures.

In 2022, we will:

- Actively support waste sector campaigns to raise awareness of Modern Slavery.
- Provide our employees training on the issue, how to recognise the signs of someone trapped in a forced or hidden labour scenario and their responsibilities of embedding best practice across our business.
- Partner with an independent anti-slavery charity, Slave Free Alliance, to deeply understand the high/low Modern Slavery risks within our business.
- Design and print relevant workplace posters, worker leaflets providing employees information on Modern Slavery.
- Promote the use of the UnSeen phone app, enabling employees to effectively report suspected incidences of Modern Slavery wherever they see it, including out of work.
- We recognise that risks also exist within our supply chain, and only partner with organisations that show that their approach matches ours. We will engage with our partners and conduct specific audits to understand their own operations and policies, identifying training and support.
- We will release a Code of Conduct which all our partners will be expected to adhere to, this will reflect our own policy and commitments listed in this statement.

STATEMENT RESPONSIBILITIES

This statement is made pursuant to section 54 Modern Slavery Act 2015 and is Kenny Waste Management's Modern Slavery and Trafficking Statement.

It has been approved by the board of Kenny Waste Management, who shall take responsibility for this statement and its commitments, and this statement will be reviewed and updated as appropriate.



Neil Mackey

Managing Director
Kenny Waste Management
January 2022