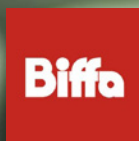




# Biffa and Slave-Free Alliance

HOW AN INDUSTRY-LEADING, ZERO-TOLERANCE APPROACH TO MODERN  
SLAVERY IS SETTING THE STANDARD FOR THE UK WASTE SECTOR

TOGETHER WITH



## Biffa and Slave-Free Alliance

Waste management is one of the sectors most impacted by human trafficking. By becoming a founding member of Slave-Free Alliance, Biffa has set a significant standard for the whole industry.

With an 8,000-strong workforce serving 200 UK sites, Biffa's size, coupled with the complexity of its supply chain and supplier management, presents considerable challenges. Slave-Free Alliance's expert input combined with Biffa's unyielding commitment has turned challenge into opportunity, revolutionising approaches to modern slavery.

### Starting the journey

A well-organised criminal gang lured and then trafficked vulnerable Polish victims to the UK with the promise of good money, but instead housed them in squalor, and used them as "commodities", putting them to work on farms, waste recycling centres and poultry factories.

Criminals targeted unwitting labour providers, including Biffa's managed service provider, resulting in victims being infiltrated into a Biffa Materials Recycling Facility (MRF) in the West Midlands.

In June 2016, Hope for Justice and Slave-Free Alliance contacted Biffa, advising that a potential victim of trafficking had been identified by them and had named a MRF as a location in which he had previously worked. At this time Biffa were unaware that this MRF has been targeted by criminals through their labour provider and had taken limited steps to understand risk and threats associated with modern slavery in their business and supply chain.

At the MRF site, Biffa began an investigation to establish the facts and identify other potential victims and if there were any employees engaged in modern slavery activity.

Strategically, Biffa recognised they needed to understand other potential areas of vulnerability within the business and find solutions to prevent any further incidents by identifying and disseminating lessons learnt. One of those solutions was for Biffa to become a member of Slave-Free Alliance.

## Responding together

Biffa engaged with Hope for Justice and Slave-Free Alliance, and worked with the labour provider to understand the scope of current investigations, including the police-led case focusing on the criminal gang.

Slave-Free Alliance carried out welfare interviews with potentially at-risk employees, to establish if they were endangered and to raise general awareness of modern slavery.

A cohesive investigative approach was agreed with Biffa's labour provider to ensure all named individuals were spoken to in a timely manner, but so as not to put anyone at potentially further risk or to prejudice the investigation.

Worker interviews were held with several staff on-site to ascertain their understanding of modern slavery, identify any suspicious activity or involvement, as well as an opportunity for them to raise any issues or concerns. Training and awareness sessions were delivered by Slave-Free Alliance across the site, including specific training to managers and supervisors.

Slave-Free Alliance undertook a series of informal engagement activities to raise general awareness of modern slavery, particularly focusing on migrant workers who were assessed as being at the greatest potential risk. Policies and procedures were reviewed and developed with the expert input of Slave-Free Alliance, to mitigate further risk.

"We are delighted that Biffa have been commended for our effective and proactive response to tackling the threat of modern slavery within our business, however it's important to remember that we do this because it is fundamentally the right thing to do. To succeed as a business we have placed a focus on modern slavery from both the top-down and bottom-up with buy-in at all levels of the business. Transparency is vitally important in our journey. There could be a temptation to hide from our experiences but sharing what we have learned internally and externally will continue to raise awareness of this issue and reduce the risks to us and the communities around us."

- Mel Flogdell, Divisional HR Director, Biffa



## Results, impact and improvements

- No further victims were identified during investigations at the MRF and no Biffa employee was identified as being complicit in any modern slavery activity. Welfare interviews and investigations were conducted at other Biffa locations and no potential victims were identified.
- The investigation highlighted a lack of employee awareness of the risks and signs of modern slavery. Forty-one employees in areas considered high risk received training from Slave-Free Alliance. Greater knowledge has resulted in potential concerns being identified and mitigated.
- Additional awareness resources were implemented, including multilingual newsletters defining modern slavery and outlining how employees can report concerns, including reporting via Hope for Justice and Slave-Free Alliance as an alternative pathway for employee reporting. Biffa's independent whistleblowing hotline, designed to encourage confidential reporting of concerns relating to the business or service providers, is also now widely promoted.
- Collaboration and transparency between Biffa and its labour provider has been improved.
- Modern slavery is a standing agenda item at operational monthly and quarterly meetings. Weekly incident reports assessing potential risks allow action to be taken at an early stage.
- Staff now have intranet access to Biffa's Modern Slavery Policy outlining the organisation's structure, business and supply chains; policies in relation to slavery and human trafficking; due diligence processes in relation to slavery and human trafficking and supply chains; the parts of the business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk; measures of effectiveness against KPIs; and training about slavery and human trafficking.
- Biffa's agency worker suppliers must now provide, and work to, acceptable action plans to manage compliance. Biffa incorporates assessment of the plans into existing audit procedures.



## Biffa's perspective

“Businesses in all sectors are concerned about discovering workers who are victims of modern-day slavery in their supply chains and **we want to ensure our staff know what to look for** and how to respond.

“Modern-day slavery is a huge problem in the UK and one that every business has a responsibility to help eliminate. We're proud to be in alliance with Hope for Justice, and strive to raise awareness, not only across our company and amongst our suppliers, but throughout the waste industry as a whole.

“**Being a member of Slave-Free Alliance has given us access to the experts in this field** and access to training, awareness-raising collateral and sharing of best practice and intelligence with Hope for Justice and other members at the quarterly seminars. The threat assessment helped us to identify further areas for improvement and strengthen our policies and procedures to reduce the risk.”

Mel Flogdell, Divisional HR Director, Biffa

“We are actively encouraging all of our suppliers to place a focus on modern slavery from both the top down and bottom up. Just because a business is free from slavery directly does not mean that your supply chain and labour suppliers aren't affected. We have a responsibility to look at all touch points within our business.”

Mark Robson, Head of Procurement, Biffa



# Considerations for your business

“No business is immune from the risks of modern slavery through organised crime. As attested by Biffa, by joining Slave-Free Alliance, you are demonstrating a strong commitment to socially responsible practice, alongside actively making a difference in ensuring exploitation is stamped out for good.

“Can you say with confidence that your business is adequately protected? What action would you take if you identified a suspected victim? If you are unsure, Slave-Free Alliance can provide bespoke solutions, eliminating uncertainty by equipping your business with the ongoing expertise needed to guard against forced labour, elevating you as an industry leader in ethical sourcing.”

**Marc Stanton, Director of Slave-Free Alliance**

