



**iph**r  
FORUM

**WASTE & RECYCLING  
MODERN SLAVERY  
PROTOCOL**

# Waste & Recycling Sector Modern Slavery Protocol

## Context and Introduction

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers. We have a common vision to protect and respect human rights in our goods and services not for resale supply chains and facilitate collaborative responses to shared risks.

The IPHR Forum Waste & Recycling Working Group was formed to enable the IPHR Forum to increase and prioritise activity to address human rights issues in the waste & recycling sector.

The Working Group includes IPHR Steering Group members in addition to stakeholders with interests in human rights in the waste & recycling sector, including waste service providers, NGOs and Governmental bodies. Our vision is that through collaboration, we will drive positive change to improve the human rights of workers in waste & recycling supply chains.

## About

This Protocol is a voluntary agreement between organisations and is a public pledge of commitment to work collaboratively to tackle modern slavery and prevent exploitation or abuse of workers. In this context, working collaboratively includes working within an organisation and its supply chain, with others in the industry and with NGOs and government bodies, as appropriate.

The Protocol:

- Sets out how organisations will take action to protect vulnerable and exploited workers.
- Is a way to engage with the waste and recycling industry, helping build understanding of risks and embed responsible practices to improve standards and protect workers.
- Is outcome focussed, specifically designed for the industry.
- Is intended to support and require actions such as awareness raising of the issues, promotion of the agenda with peers and supply chains, and information sharing with appropriate bodies where labour exploitation is suspected.

## What the Protocol Isn't

The Protocol is not a form of certification. By signing up to the Protocol there is no review or audit of an organisation's practices and therefore the pledge is made on trust. It is expected that all organisations signing up to the protocol show a commitment to operating a robust modern slavery management system, but the act of public commitment to this Protocol is no guarantee of that. An organisation's signature of this Protocol should therefore not replace standard ethical due diligence any contracting organisations may typically undertake.

# Benefits of the Protocol

In signing up to the Protocol, your organisation benefits from:

- A way to show your commitment to eliminating modern slavery and exploitation
- A way to support and shape your management of modern slavery and labour exploitation risks, in turn helping protect workers, improve employee retention and protect reputation and customer relationships
- A voice to shape change in the industry in relation to tackling modern slavery and human exploitation
- Best practice shared across the group to improve working practices around tackling modern slavery



# Who is it For?

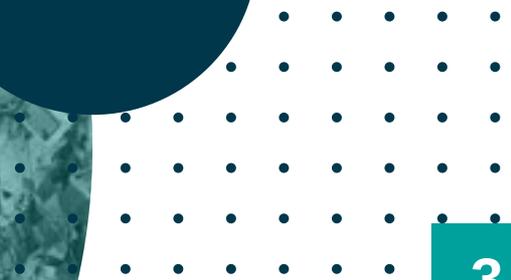
This Protocol is for:

- Organisations who acknowledge the threat of modern slavery and exploitation of workers, those who wish to understand more and those who are committed to taking action to tackle the issue.
- Organisations open to working in collaboration with other, like-minded organisations to raise awareness and share knowledge.

# Guiding Principles

The following internationally recognised frameworks have informed the creation of this Protocol. Organisations making a public commitment to the Protocol are expected to show continuous improvement in meeting the standards that these frameworks set out.

- The UN Guiding Principles on Business and Human Rights - a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations..
- The Ethical Trading Initiative (ETI) Base Code – An internationally recognised code of labour practice, founded on the conventions of the International Labour Organisation.
- The International Labour Organisation (ILO) Core Conventions – The ILO is a tripartite UN agency bringing together governments, employers and workers. ILO’s Governing Body has identified eight “fundamental” Conventions, covering subjects that are considered to be fundamental principles and rights at work.



# Implementation & Ways of Working

## Requirements & Signatories

Organisations signing up to the Protocol are expected to meet some minimum requirements to help manage the risks of labour exploitation and modern slavery<sup>1</sup>. In addition, they are expected to work collaboratively to help protect workers in this sector. The specific requirements are:

## Commitment to a Management System Related to Human Rights, Labour Exploitation and Modern Slavery

- A management system is a framework by which an organisation manages policies and processes to achieve a certain objective. [The IPHR Waste & Recycling Modern Slavery Toolkit](#) provides a checklist to support the development of an effective management system to mitigate modern slavery risks.
- This should also cover supply chain management in relation to labour exploitation and modern slavery

## Production of a Public Modern Slavery Statement, Even if Below Threshold

- All businesses with a turnover of more than £36million must produce a Modern Slavery Statement. However, it is best practice for all businesses to develop a Statement that outlines their approach to tackling Modern Slavery, as well as outlining the progress and actions your business is taking. This becomes a useful and live document that is updated annually to demonstrate what you are doing to internal and external stakeholders such as customers.

## Clear Lines of Accountability and Responsibility

- Clarity in relation to who is responsible and who is accountable for different elements of your overall modern slavery strategy is important. [The IPHR Modern Slavery Waste & Recycling Toolkit](#) provides an example 'functions and responsibilities matrix' which can be used as a starting point, but any approach should be specific to your organisation.

## Clear Escalation Process

- An escalation process in the event of a concern being raised should be bespoke to the business and should consider who will have responsibility at any point in time. A template escalation flowchart is provided in the [IPHR Modern Slavery Waste & Recycling Toolkit](#).
- An effective grievance mechanism should be in place.

## Continuous Improvement

- Commit to a journey of improvement, with a year-on-year plan of continuous improvement. You are also prepared to ask for advice and support, either from a professional organisation or from others who are also committed to this Protocol. IASC have a [useful maturity framework](#) that can be used to help inform a continuous improvement plan.
- An annual review of policies and processes should be used to help inform a continuous improvement plan.

## Sharing Information

- If a modern slavery incident, or suspected incident, is identified, it's important that information is shared with the right bodies, and in the right way. This helps protect potential victims and helps inform the development of anti-slavery activity. Please visit <https://www.gla.gov.uk/> for further information.

## Remedy Mechanism in Place

- This should be survivor-focussed and include full investigation of the violation of rights to inform any changes to prevent further instances. Guidance for companies to develop effective remedy mechanisms is available [from the ETI](#) and from Stronger Together as part of their [Tackling Modern Slavery in UK Businesses Toolkit](#). Oxfam and Reckitt have also produced a useful [grievance mechanism toolkit](#) which is free to download.

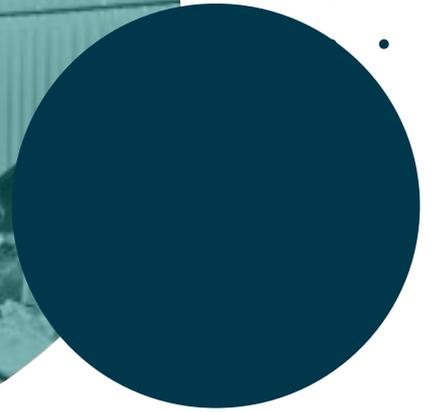
## Raising Awareness

- Raising awareness of Modern Slavery is critical to increasing people's understanding of what it is, who is affected and importantly how to spot the signs. Some workers are not aware that they are being exploited and being treated illegally. Ensuring that people understand and are regularly trained is vital to rooting out and eliminating modern slavery and exploitation.
- Guidance on spotting the signs of modern slavery and posters that can be used to help raise awareness are [available from Unseen](#), who operate the UK Modern Slavery Helpline.
- This includes raising awareness internally, e.g. as part of induction processes and annual training, and through the supply chain.

## Working Together with the Industry

- Active commitment to sharing learnings, insights and challenges with others in the industry.

<sup>1</sup> The IPHR Waste & Recycling Working Group have produced a [Modern Slavery toolkit](#) which provides practical guidance for any organisation looking to improve or build their approach to tackling modern slavery.



# The Commitment

In signing up to this Protocol, you are committing to continuous improvements in meeting the requirements and principles set out in here. It is recognised that there may be areas which require further development, but in signing this document you are committing that your organisation will work to address any gaps.

A public commitment of signing up to the protocol should be made by sharing one or more of the available resources (email banner, poster or logo).

Signed by \_\_\_\_\_

Job title \_\_\_\_\_

On behalf of (company) \_\_\_\_\_

Date \_\_\_\_\_





# Thank You

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Call the Modern Slavery Helpline on  
**08000 121 700**