

## Modern Slavery and Human Trafficking Statement

### 1. Introduction

1.1 This statement sets out Charnwood Borough Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

1.2 As part of the public sector, Charnwood Borough Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. The Council also works with local safeguarding boards to share best practice and to enable effective communication between relevant bodies, including law enforcement, local authorities, health care bodies and local groups.

### 2. Organisational Structure & Supply Chains

2.1 This statement covers the activities of Charnwood Borough Council. The Council manages a wide range of services which are delivered both directly by the Council and through external organisations.

#### ***Countries of operation and supply***

2.2 Charnwood Borough Council only operates in the United Kingdom. Due to the nature of the Council's business, the risk of slavery and human trafficking is considered low, however the Council remains vigilant to any potential risks.

#### ***High-risk activities***

2.3 The Council considers that, due to the nature of its business and the policies/processes (see below) that are in operation, there are no areas of its business that are at high risk of slavery or human trafficking.

#### ***Responsibility***

2.4 Responsibility for the Council's anti-slavery initiatives is as follows:

- **Policies:** These are developed by officers employed by the Council and are then agreed by the relevant board or committee.

- **Risk assessments:** These will be undertaken by officers within the relevant service area with support from, Designated Safeguarding Officers (DSO's), Human Resources and the Finance & Procurement Service, as required.
- **Investigations/ due diligence:** Any concern regarding modern slavery or human trafficking should be raised with the Strategic Director of Corporate Services in the first instance.

### 3. Relevant Policies

3.1 The Council has the following policies in place to support its commitment to identifying and preventing slavery and human trafficking in its operations:

- **Whistleblowing Policy and Procedure** – The Council encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. The Council's [Whistleblowing Policy and Procedure](#) is designed to make it easy for workers and suppliers to make disclosures, without fear of retaliation.
- **Employee Code of Conduct** – The Council's Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour. Any breaches are investigated, and action taken as necessary.
- **Expectations of Suppliers** – The Council is committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Council works with suppliers to ensure that they meet the required standards. However, serious violations of these expectations will lead to the termination of the business relationship.
- **Recruitment/ agency workers policy** – The Council recruits its employees via its in-house recruitment function. New workers are thoroughly and properly vetted for their eligibility to work in the UK in accordance with the Home Office and Cabinet Office scrutiny Guidelines, as appropriate. Where agency workers are required, these are acquired through a managed service provider who verifies the practices of any new agency it is using before accepting workers from that agency. All recruitment of agency staff is undertaken in line with the [Prevention of Illegal Working Policy](#) (which links to the Home Office requirements) and stipulates that any potential workers are checked by the relevant agency.
- **Safeguarding Children & Vulnerable Adults** – The [Children and Young People Safeguarding Policy](#) and [Adults in Need of Safeguarding Policy](#) sets the Council's duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery.

#### 4. Due Diligence

- 4.1 Charnwood Borough Council undertakes due diligence when considering taking on new suppliers. In relation to new suppliers, the following questions are issued as part of the procurement process:

Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015	
<p>Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf</a></p>	<p>Yes <input type="checkbox"/>            N/A <input type="checkbox"/></p>
<p>If you have answered yes to question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?</p>	<p>Yes <input type="checkbox"/>            Please provide the relevant URL             No <input type="checkbox"/>            Please provide an explanation</p>
<p>Has your organisation, its directors or any other person who has the power of representation, decision or control of the named organisation ever been convicted of slavery, servitude, forced or compulsory labour, child labour or an offence in human trafficking and other forms of trafficking in human beings within the last five years?</p> <p><b><i>Bidders who answer 'Yes' to question x will automatically fail the Legal Obligations schedule.</i></b></p>	<p>Yes <input type="checkbox"/>             No <input type="checkbox"/>            Please provide an explanation</p>
<p>In accordance with the Modern Slavery Act 2015 all organisations carrying out business within the UK, with a total annual turnover of £36m or more are required to produce a slavery and human trafficking statement for each financial year.            Please confirm if your organisation has an annual turnover of £36m or more.</p>	<p>Yes <input type="checkbox"/>             No <input type="checkbox"/></p>
<p>If you answered yes to the above question, please confirm that you are compliant with the annual reporting requirements contained within Section 54 of the Act 2015?</p> <p><b><i>Bidders who answer 'No' to this question and who have an annual turnover of over £36m or more will automatically fail the Legal Obligations schedule. Bidders who answer yes to this question will be asked to provide evidence of the annual report upon award of contract.</i></b></p>	<p>Yes <input type="checkbox"/>             No <input type="checkbox"/></p>

## **5. Risk**

**5.1** Whilst the Council's activities are not considered to be in high risk areas, as part of our initiative to identify and mitigate risk we will:

- Require all HR professionals to be suitably qualified in relation to recruitment procedures.
- Require Learning & Development professionals to be suitably qualified in relation to training in recruitment and interviewing techniques.
- Have in place appropriate procurement procedures and ensure that contracts with external providers have appropriate clauses
- Keep under review supply chain and contract procedures
- Ensure that in carrying out statutory functions, officers are aware of potential risks and have clear reporting lines.

**5.2** Additionally, we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk area in our supply chains
- Protect whistle blowers.

## **6. Training and Awareness- Raising**

**6.1** The Council recognises that certain employees within the organisation should be required to complete awareness training in relation to modern slavery and human trafficking. This is currently included within the 'Silver Safeguarding' training, provided by the Council to officers, and further opportunities to offer the training more widely are being explored.

**6.2** Additionally, the Council has published an awareness- raising document (produced by the Home Office) which is available to all employees and covers the following:

- The basic principles of the Modern Slavery Act 2015
- How to identify and prevent slavery and human trafficking
- What external help is available (e.g. the Modern Slavery Helpline).

## **7. Our effectiveness in combatting slavery and human trafficking**

**7.1** We use the following to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Monitoring complaints
- Monitoring training needs
- Feedback from monitoring of corporate contracts

In order to assess performance and measure our effectiveness in combatting slavery and human trafficking, compliance will be monitored at through the Equality Working Group, on a quarterly basis, and any mitigating action and/ or recommendations will fed to the Senior Leadership Team, as appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021. It will be reviewed and updated annually.

**Designated Elected Member**

***J. Poland***

**Date:** 01/04/2020

Cllr. James Poland

**Decision endorsed by:**

***R. Mitchell***

**Date:** 13/05/2020

Rob Mitchell (Chief Executive)