

Rotherham Metropolitan Borough Council

Modern Slavery Act 2015 - Transparency Statement

INTRODUCTION

This statement sets out the Council's actions to understand and respond to risks relating to modern slavery. The statement has been drafted in broad acknowledgment of the wide-ranging role of the Council; from front line staff regulating business or visiting homes, through to our commissioning and procurement of works, goods or services and management of contracts.

Modern slavery can take many forms and present in many ways. Our approach to this issue is embedded within our safeguarding policy and practice and we will focus throughout the year on continuing to raise awareness through regular briefings and an increase in the number of appropriately trained staff. We will also continue to work with partners to increase the levels of intelligence and information relating to modern slavery and the operational activity that results from such intelligence. Finally, we will continue to strengthen our understanding of the risks relating to modern slavery within supply chains and continue to promote the issues with our contractors and suppliers.

This is the Council's fourth transparency statement in relation to modern slavery and is relevant for 2022/23. An annual progress report will be published on our website, alongside a revised statement for the following year.

OUR COMMITMENT

The Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty as a Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015. In order to support this requirement, the Council will ensure all staff are suitably trained to spot the signs and pass on relevant information for referral. The Council will monitor the number of referrals regularly. The Council currently has processes and procedures as a part of its Safeguarding Policy in relation to modern slavery, and work will continue to further raise awareness of these processes.

The Council is committed to preventing slavery and human trafficking and to ensuring that its supply chains are free from slavery and human trafficking. This is managed by officers being made aware of the potential for modern slavery risks through awareness raising and appropriate briefings, alongside establishing robust assurance.. They will consider the potential and likelihood of modern slavery and, where these are deemed to be high, they will seek to develop a clear understanding of the supplier's supply chain arrangements:

The Council's clear commitment is as follows:

- That the Co-operative Party's Charter against Modern Slavery be adopted to ensure that our practices don't support slavery.
- That the Corporate Procurement Team be trained to understand modern slavery through the Chartered Institute of Procurement and Supplies (CIPS) online course on Ethical Procurement and Supply.
- That contractors be required to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
- That any abnormally low-cost tender be challenged to ensure that they do not rely upon the potential contractor practising modern slavery.
- That suppliers be advised that contracted workers are free to join a trade union and should not be treated unfairly for belonging to one.
- That the whistleblowing system for staff to blow the whistle on any suspected examples of modern slavery be publicised.
- That tendered contractors be required to adopt a whistleblowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
- That contractual spending be reviewed regularly to identify any potential issues with modern slavery.
- That suppliers be advised of any risk identified concerning modern slavery and refer them to the relevant agencies to be addressed.
- That any contractor who is identified as a cause for concern regarding modern slavery be referred for investigation via the National Crime Agency's national referral mechanism.
- That a report on the implementation of this policy be published annually

The Council has publicly committed to adopt the Co-Operative party Charter Against Modern Slavery, details of which can be found on the following link: [Modern Slavery Charter](#)

OUR BUSINESS AND SUPPLY CHAIN

The Council is a large employer with around 6,500 staff who undertake a wide variety of roles and have a variety of interactions with the public and businesses. The Council serves a population of 257,280 residents.

The Council spends over £240m per annum with third party suppliers on a wide range of works, goods and services ranging from catering through to care and construction. In the main these suppliers are based in the UK, with less than 1% of suppliers based outside of the UK. The commissioning and management of contracts occurs across all departments within the Council and contracts can vary significantly in value. The Council's central procurement team will ensure that professional support and advice to the process is available. Whilst the procurement of larger contracts is robust in respect of modern slavery, further work is needed to strengthen work relating to contracts of smaller financial value.

OUR POLICIES

The prevention of modern slavery is clearly embedded within Safeguarding practice at the Council. Copies of the relevant policy relating to adults can be found on the following link: [Modern Slavery – Safeguarding Vulnerable Adults](#). The equivalent Policy in relation to Safeguarding children can be found on the following link: [Modern Slavery - Safeguarding Children](#).

The Council's whistleblowing policy is available on the following link: [RMBC Whistleblowing and Serious Misconduct Policy](#).

OUR GOVERNANCE AND DUE DILIGENCE APPROACH

As a public body the Council works with various statutory and non-statutory agencies around issues of local and national concern such as modern slavery. We will ensure that we engage with our partners locally and regionally to strengthen our collective understanding of, and efforts to combat, Modern Slavery in all its forms.

Internally, our Strategic Leadership Team, led by the Chief Executive, will ensure operational delivery in line with the commitments made within this statement and further scrutiny will be provided by the Council's Political Leadership, through its Cabinet. This issue may be subject to detailed scrutiny at the direction of the Chair of the relevant Select Commission.

Awareness raising, and the strengthening of policies and procedures, alongside detailed training where required, will strengthen the Council's diligence in respect of modern slavery linked to the procurement of goods and services, alongside wider contract management.

WHAT HAVE WE DONE?

Following the public commitment made by the Council, to achieve the standards laid out within the Co-Operative party Charter against Modern Slavery, a significant amount of work has been delivered. This has included specialist training for procurement officers and the production of guidance for commissioners and contract managers, alongside proactive contact with suppliers where compliance with the Modern Slavery Act requirements is not apparent. In many cases this has quickly led to full compliance.

The Council has updated its whistleblowing policy during the previous year to ensure explicit reference to modern slavery. It has also updated its Invitation to Tender documentation in respect of requirements under the Modern Slavery Act 2015 and its Safeguarding Policy, that all suppliers and their staff delivering a contract must adhere to. It sets out that they must have an up-to-date Modern Slavery Transparency Statement (where required by law) and that these statements are registered at <https://TISCreport.org>.

To improve awareness and strengthen its ability to identify and respond to cases of modern slavery, during 2020 a total of 12 officers from across council directorates received specialist training to become single points of contact for modern slavery. This increased expertise has resulted in improved working practices and co-ordination between the Council, the Police, South Yorkshire Modern Slavery Partnership and the wider partnership. It is planned that additional officers are to be trained during 2022.

Officers have further developed links with local and regional partners to ensure that intelligence and information is received in the right way and appropriately acted upon, either through responsive or proactive operational activity.

Training and awareness raising material has been made available, with posters displayed around Council premises, an e-learning module available to all staff and specialist training for relevant front-line officers.

WHAT DO WE NEED TO DO?

The Council will continue to seek to increase the number of Modern Slavery referrals through the National Referral Mechanism. This is also a priority for the Safer Rotherham Partnership (statutory multi-agency Community Safety Partnership for Rotherham under the Crime & Disorder Act 1998)

The Council will continue to offer both generic and specialist training, and will continue to support this with regular efforts to raise awareness both online, through social media and within its teams. The Council and its partners will also seek to raise

awareness within communities, both about how to spot the signs and where to report them.

We will continue to support contract managers, procurement officers and commissioning staff to develop their awareness and understanding in relation to modern slavery and human trafficking. We will also continue to ensure active scrutiny of tenders that appear to be abnormally low in price and in particular will focus on contracts within high-risk industries.

The Council will continue to monitor contractual spend through the Transparency in Supply Chains organisation (<https://tiscreport.org/>) and work with suppliers who have not yet demonstrated compliance to encourage greater engagement with Modern Slavery issues and responses.

This statement should be read in conjunction with the Modern Slavery Act 2015¹ and the National Referral Mechanism².

Signed

Chief Executive

Leader of the Council