

Committee Name and Date of Committee Meeting

Cabinet – 16 March 2026

Report Title

Modern Slavery Transparency Statement - Annual Refresh

Is this a Key Decision and has it been included on the Forward Plan?

Yes

Executive Director Approving Submission of the Report

Andrew Bramidge, Executive Director of Regeneration and Environment

Report Author(s)

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Ward(s) Affected.

Borough-Wide

Report Summary

This report provides the annual update in relation to the activities of the Council and its partners in seeking to both address and prevent modern slavery and a refreshed draft Modern Slavery Transparency Statement 2026/27 for consideration and approval prior to publication. (Appendix 1).

Recommendations

That Cabinet:

1. Note the progress made to date.
2. Approve the Modern Slavery Transparency Statement 2026/27 and its publication on the Council's website.

List of Appendices Included

Appendix 1 – Draft Modern Slavery Transparency Statement 2026/27.
Appendix 2 – Modern Slavery Action Plan.
Appendix 3 – Initial Equality Screening Assessment (Part A).
Appendix 4 – Carbon Impact Assessment.

Background Papers

[Modern Slavery Act 2015](#)

[Co-operative Party Modern Slavery Charter](#)

[Rotherham Metropolitan Borough Councils Transparency Statement](#)

[Cabinet Report 17th March 2025](#)

[Modern slavery | South Yorkshire Police](#)

[Report Issues - GLAA](#)

Consideration by any other Council Committee, Scrutiny or Advisory Panel

No

Council Approval Required

No

Exempt from the Press and Public

No

Modern Slavery Transparency Statement - Annual Refresh

1. Background

1.1 At the meeting of the Council on 25 July 2018, Council resolved:

- That the Co-operative Party's Charter against Modern Slavery be adopted to ensure that the Council's practices do not support slavery.
- That the Corporate Procurement Team be trained to understand modern slavery issues 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 tenders should be challenged, to ensure that they do not rely upon the potential contractor practicing 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 that enables 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 is 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.

1.2 Following this commitment, detailed reports have been presented to Cabinet annually. These reports provide updates about the activity of the Council and its partners, in seeking to both address and prevent modern slavery. The reports include a refreshed Modern Slavery Transparency

Statement which is considered by Cabinet and, if approved, published on the Council website.

- 1.3 Changes to the 2026/27 Modern Slavery Transparency Statement compared to the 2025/26 statement are:

What is Modern Slavery

- The latest national picture in respect of referrals to the National Referral Mechanism compared to previous Transparency Statements.

Our Commitment

- The latest local data in respect of referrals to the National Referral Mechanism compared to previous Transparency Statements.

Our Policies

- Modern Slavery and Human Trafficking now embedded within the Council's Child Exploitation Strategy.

What we have done

- Worked with landlords, including those operating in Selective Licensing Areas, with the provision of awareness raising, spotting the signs of modern slavery information and reporting pathways.
- Worked with South Yorkshire Police Modern Slavery and Organised Immigration Crime Unit on the enhancement of reporting pathways and intelligence/information sharing processes.
- Worked with South Yorkshire Police, other South Yorkshire Local Authorities and other partners on the development of a Human Trafficking and Modern Slavery Information Sharing Agreement.
- Worked with South Yorkshire Police and partners on the development and publication of 'A Strategic and Tactical Response to Modern Slavery and Organised Immigration Crime in South Yorkshire, 2025 - 2028'.
- Delivered four bespoke Human Trafficking and Modern Slavery training courses to Council staff at the Rockingham Professional Development Centre, with more courses planned for 2026.
- Continued as a core member of the South Yorkshire Modern Slavery and Organised Immigration Crime Partnership.

2. Key Issues

- 2.1 Following the commitment made by the Council, a range of activities have been, and continue to be delivered within an established action plan.

- 2.2 Staff within the procurement team undertook the Chartered Institute of Procurement and Supply (CIPS) ethical procurement and supply training as required in the Co-operative Party's Charter for modern slavery in 2018 when the charter was adopted. The team have been undergoing a refresh of this training with all relevant staff having completed this. This training has now been programmed for renewal in every three-year period as part of the overall modern slavery training provision.
- 2.3 Since the previous report, supply chains relating to solar products have been identified as posing a risk of modern slavery, in particular those sourced or affiliated with Xinjiang Uyghur Autonomous Region in China where forced labour has been identified as prevalent. Given China's dominance in the solar industry, the Council has therefore undertaken additional due diligence in its recent procurements to further reduce the risk of modern slavery within its solar supply chains.
- 2.4 Alongside standard compliance clauses related to the Modern Slavery Act 2015 and the Co-operative Party's Charter, supply chain transparency questions are also included within the award criteria and are assessed based on project specific factors.
- 2.5 Research published by Crawford *et al* in 2023 in their report 'Over exposed' is used as a guide to understand better supply chain pathways when provided with bidders' supply chain mapping information.
- 2.6 Supplier third party accreditations, such as the Solar Stewardship Initiative and serial number tracking, are also used to reduce risk further. Multi-tier supply chain transparency is challenging, especially in supply chains as complex as solar products and national action to include supply chain transparency in grant requirements makes a positive contribution to addressing these challenges.
- 2.7 As the Council's net zero programme develops, ongoing discussions regionally and locally with the immediate supply chains will be required to keep abreast of new developments in this area.
- 2.8 Improvements to processes around Modern Slavery continue to be delivered through the raising of awareness and the provision of training, and through further developing the Council role within the multi-agency South Yorkshire Modern Slavery and Organised Immigration Crime Partnership and the Safer Rotherham Partnership (SRP) Organised and Violent Crime Board, which tackles serious and organised crime.
- 2.9 During 2025, four bespoke Human Trafficking and Modern Slavery training courses were delivered to Council staff at the Rockingham Professional Development Centre, with more courses to take place throughout 2026.
- 2.10 The courses delivered during 2025 are included in a total of 21 courses delivered to Council staff since March 2021.
- 2.11 Key components of all training delivered includes spotting the signs of modern slavery and human trafficking and how to report suspected cases.

- 2.12 As part of the Modern Slavery and Human Trafficking Training offer, discussions have taken place with South Yorkshire Police and other South Yorkshire Local Authorities at the South Yorkshire Modern Slavery and Organised Immigration Crime Partnership with the proposal that additional Council Officers receive more thorough, detailed training to enhance their role as dedicated Modern Slavery Single Point of Contact Officers (SPOCs). This will further improve knowledge and expertise across the Council in respect of the identification and response to modern slavery cases and in the provision of support to victims.
- 2.13 Officers have continued to develop 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. As a result of work with the South Yorkshire Police Modern Slavery and Organised Immigration Crime Unit, reporting pathways have been further improved with the introduction of an electronic reporting template available to partners.
- 2.14 Work is also progressing with South Yorkshire Police, South Yorkshire Local Authorities and wider statutory and non-statutory partners on a bespoke Modern Slavery and Human Trafficking Information Sharing Agreement which will further enhance the sharing of relevant information between partners.
- 2.15 Tackling Modern Slavery and Human Trafficking has been a key priority for the SRP since April 2019 when it was first included in the 2019/2022 Partnership Plan, and again in the 2022/2025 plan. It was again retained as a priority within the recently published SRP Community Safety Strategy 2025/2028 as part of the Tackling Violence, Abuse and Exploitation theme with the following objective and performance indicators:
- ‘Improve knowledge and awareness around identifying the signs of Modern Slavery and the mechanisms for reporting’*
1. *Number of referrals to the National Referral Mechanism (NRM)*
 2. *Number of training and awareness raising activities*
- 2.16 All activity is managed through the Council’s Modern Slavery Steering Group and the multi-agency Organised and Violent Crime Board with oversight by the SRP Board.
- 2.17 The Council continues to work closely with the South Yorkshire Police Modern Slavery and Organised Immigration Crime Unit and the Gangmasters and Labour Abuse Authority (GLAA) in respect of raising awareness with partners, stakeholders, and the public.
- 2.18 The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive appropriate support. Only designated first responders can refer cases to the NRM. Local Authorities are designated ‘first responder organisations’ and are therefore able to refer cases to the NRM.

- 2.19 Between April 2022 and December 2025, a total of 161 referrals from Rotherham were made by the Council and other first responder organisations to the NRM. All referrals are reported to the Safer Rotherham Partnership Board via the Performance Management Framework.

Year	Q1	Q2	Q3	Q4	Total
2022/23	9	20	7	18	54
2023/24	15	11	12	11	49
2024/25	9	7	8	11	35
2025/26	12	7	4		23
Total	45	45	31	40	161

- 2.20 Support from the National Referral Mechanism (NRM) continues to be provided to potential victims of modern slavery through safe house accommodation on an outreach basis. Whilst outreach is provided to people across South Yorkshire, outreach clients will live either in council accommodation, National Asylum Support Service (NASS) accommodation, with friends, family or in their own private accommodation. In addition, support outside of the NRM structure is also provided by the Snowdrop Project who provide post NRM support in Barnsley, Rotherham and Sheffield.

3. Options considered and recommended proposal

- 3.1 The Council is required to produce an annual update in relation to activities associated with modern slavery. The Council is further required to update its published 'Transparency Statement' each year. The report and attached action plan discharge the requirement for an annual update on activity.
- 3.2 Attached at Appendix 1 is the refreshed Modern Slavery Transparency Statement 2026/27 and at Appendix 2 is the current Action Plan managed through the Council's Modern Slavery Steering Group.
- 3.3 No alternative options have been considered because of the clear and ongoing commitment made by the Council since 2018.

4. Consultation on proposal

- 4.1 Council Officers continue to work with a range of partners through the Safer Rotherham Partnership, which prioritises activity to address Modern Slavery. Direct consultation in respect of the Transparency Statement with external partners has not taken place as this is a Council specific statement.

5. Timetable and Accountability for Implementing this Decision

- 5.1 Following Cabinet approval, the refreshed Modern Slavery Transparency Statement will be published on the Council website.
- 5.2 The Head of Community Safety and Regulatory Services continues to act as the Council's lead for Modern Slavery and is accountable for the

implementation of the action plan.

6. Financial and Procurement Advice and Implications

- 6.1 All costs associated with the delivery of the action plan have been contained within existing approved budgets.
- 6.2 The Council's procurement team will continue to support service areas in their procurement activity and identify through the pre-procurement phase, potential market industries where modern slavery may be prevalent and ensure the tender and resulting contract are robust to address this issue.

7. Legal Advice and Implications

- 7.1 As set out in the body of this report and previous reports about this issue, the Council is required to comply with duties as set out in the Modern Slavery Act 2015, including the duty to co-operate with the Independent Anti-Slavery Commissioner (section 43), the duty as to presumption of age of victims of human trafficking where there are reasonable grounds to believe they may be under 18 (section 51), the duty to notify the Secretary of State of suspected victims of slavery or human trafficking (section 52) and the requirement to publish a transparency statement, including on the Council's website (section 54). This report and Appendices set out how the Council complies with these duties and the other requirements of the Modern Slavery Act 2015.
- 7.2 The Council also has a duty to consider crime and disorder implications under Section 17 of the Crime and Disorder Act 1998. As Modern Slavery has been adopted as part of the protecting vulnerable adults key priority by the Safer Rotherham Partnership, the Council, as a 'responsible authority' of the partnership, has a duty to exercise its various functions with due regard to the likely effect of the exercise of those functions on crime and disorder and a duty to do all that it reasonably can to prevent crime and disorder in its area, specifically in this case, Modern Slavery.
- 7.3 In approving the Modern Slavery Transparency Statement 2025/26 and publishing on the Council's website ensures that the Council is complying with its statutory duty under section 54 of the Modern Slavery Act. It is a requirement under the Act for a commercial organisation to prepare a slavery and human trafficking statement for each financial year. If the organisation has a website, it must publish the statement on the website and include a link to the statement in a prominent place on the homepage.
- 7.4 If an organisation fails to comply with the Section 54 duties the Secretary of State can obtain an injunction to enforce it; a failure would also leave the Council open to legal challenge such as judicial review.

8. Human Resources Advice and Implications

- 8.1 Human Resources supports the Council's approach to tackling modern slavery by advising on people-related risks, including safe recruitment practices, pay and employment standards, and the fair treatment of

employees. HR supports the communication of employee rights and routes for raising concerns and promotes appropriate training and awareness. These arrangements are delivered within existing policies, procedures and resources.

9. Implications for Children and Young People and Vulnerable Adults

9.1 The recommendations link to the following Strategic Outcomes of the Council Plan 2025-2030:

- Places are thriving, safe and clean.
- Children and young people achieve.
- Residents live well.

They also link to the SRP, Rotherham Safeguarding Children Partnership and Rotherham Safeguarding Adults Board priorities of:

- Improve knowledge and awareness around identifying the signs of modern slavery and the mechanisms for reporting.
- Ensure that action to tackle and disrupt crimes relating to child criminal and sexual exploitation is effective by scrutinising the plans, actions and performance outcomes of the Rotherham Safeguarding Children Partnership, Child Exploitation Delivery Group.
- Preventing and responding to criminal and sexual exploitation, improving safety in communities, and addressing defined risks including extremism.
- Reducing the incidence of neglect through early help, consistent professional practice, and better awareness of signs, risks, and routes to support.
- Make sure that all services have appropriate systems and processes in place to support and safeguard adults effectively.

10. Equalities and Human Rights Advice and Implications

10.1 The publication of the statement itself, which is the decision within the report, does not represent any change in policy or delivery of function, but reflects work done across a range of Council services, which are subject to their own decision-making processes and therefore equality impact assessment as appropriate. Therefore, an equality analysis is not required to accompany this report as there are no direct equality implications for the refresh of the published transparency statement.

11. Implications for CO2 Emissions and Climate Change

11.1 Climate change and modern slavery are linked in a vicious circle. Even as climate change increases the likelihood of natural disasters, so people who are displaced or forced to migrate are more likely to be exploited, in the same industries which are most to blame for global CO₂ emissions.

11.2 Through robust safeguarding and supply chain assurance, the Council can mitigate the carbon as well as the human cost of modern slavery. This has special relevance to the renewable energy sector, where solar PV and

battery electric vehicle supply chains may risk sourcing materials or components which have been produced by forced labour.

- 11.3 A carbon impact assessment with more details and a short bibliography is included as Appendix 4.

12. Implications for Partners

- 12.1 Modern slavery duties stretch across both the public and private sector. Statutory and other partners are actively engaged locally, regionally, and nationally. The Council has worked over the previous year on an intelligence led basis to increase links with private industry and contractors and suppliers in relation to modern slavery.

- 12.2 Tackling modern slavery and human trafficking continues to be a priority for the Council and the SRP.

13. Risks and Mitigation

- 13.1 There are no risks directly rising from this report.

14. Accountable Officers

- 14.1 Sam Barstow Service Director Community Safety and Street Scene

Approvals obtained on behalf of Statutory Officers: -

	Named Officer	Date
Chief Executive	John Edwards	27/02/26
Executive Director of Corporate Services (S.151 Officer)	Judith Badger	23/02/26
Service Director of Legal Services (Monitoring Officer)	Philip Horsfield	27/02/26

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This report is published on the Council's [website](#).