

MODERN SLAVERY STEERING GROUP ACTION PLAN

Action may exceed original target date

Action progressing and on track

Action completed

Action planned but not started

1	Deliver training to front line staff across agencies	Steve Parry	Apr-25	<p>Four Trafficking and Modern Slavery training courses were delivered in 2023-24, commissioned by the Rotherham Safeguarding Adults Board as part of their training offer. Four courses have been commissioned for delivery in 2024-2025.</p> <p>A session on Modern Slavery was delivered to GP's at an event at Magna on 14/11/24 A session on Modern Slavery and a session on 'Cuckooing' were delivered to professionals on 20th November and 22nd November respectfully as part of Safeguarding Awareness Week commencing 18th November 2024. Safer Rotherham Partnership social media content regularly posted to raise awareness of modern slavery.</p> <p>A number of new learning resources have been located in the MS Teams 'Training' folder for reference. These were obtained by members of RMBC Procurment Team. Work will progress on the development of a further training programme through 2025/26, with emphasis on further training for RMBC Modern Slavery SPOC's and also the recruitment and training of new SPOC's. The training of the SPOC's has been raised at the South Yorkshire Modern Slavery and Immigration Crime meeting with regards to the potential for joint training with the other three local authorities. January 2026 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 planned for 2026. The courses delivered during 2025 are included in a total of 21 courses delivered to Council staff since March 2021. Key components of all training delivered includes spotting the signs of modern slavery and human trafficking and how to report suspected cases. Work to progress early 2026 with Adult Safeguarding to co-ordinate Modern Slavery and Human Trafficking training and delivery throughout 2026/27</p>	Action progressing and on track
2	Raise awareness in respect of Modern Slavery to the public and targeted businesses such as letting agencies	Steve Parry	Apr-26	<p>Safer Rotherham Partnership social media content is regularly posted to raise awareness of modern slavery. Further work is still needed to target communications at businesses and is being considered as part of the 2025 training programme. Contact being made with RIDO and Chamber of Commerce regarding best approach to be adopted which could also include the use of Police and GLAA media resources i.e leaflets. Modern Slavery and 'Cuckooing' awareness raising information has now been circulated to Registered Landlords and 'Selective Licensing' Landlords across the borough via RMBC Startegic Housing. Meetings with the South Yorkshire Police Modern Slavery and Organised Immigration Crime Unit has resulted in improved working practices and information sharing around private social landlords. January 2026 Work to progress early 2026 with Adult Safeguarding to co-ordinate Modern Slavery and Human Trafficking training and delivery throughout 2026/27</p>	Action progressing and on track

3	That consideration is given to widening the levels of investigation and auditing of contracts procured by the council to focus on the 'layers' of sub-contractors, including binding specifications to audit or 'dip-sample' contracts along the supply chain	Karen Middlebrook/ Steve Parry	Apr-26	As part of the overall training programme, the GLAA have agreed to deliver training to appropriate council Contract and Procurement Managers in respect of labour exploitation. Delivery style and required content has been discussed through the Modern Slavery Steering Group. Next steps in relation to auditing contracts will be monitored through the Modern Slavery Steering Group. RMBC commissioning requires contractors to have a Modern Slavery Statement that is validated by the contract manager. Safe recruitment practice (e.g. background checks) is embedded in processes. January 2026 A refreshed RMBC Modern Slavery Transparency Statement 2026/27 is to be presented to Cabinet on 16th March 2026. Work to progress early 2026 with Adult Safeguarding to co-ordinate Modern Slavery and Human Trafficking training and delivery throughout 2026/27	Action progressing and on track
4	Improve and enhance the sharing of intelligence and information between partners	Steve Parry	Jun-26	January 2026 Work is 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. A draft agreement is currently being reviewed by the Councils Information Governance Unit. An Elected Members seminar is to take place on either 17th, 18th, 19th February 2026. The subject of the seminar is around partnership intelligence sharing and will be jointly delivered by South Yorkshire Police and the Council.	Action progressing and on track
5	Develop a Modern Slavery and Human Trafficking Training Plan 2026/27	Steve Parry	Apr-26	Work progressing with both internal and external departments and agencies in the development of the plan.	Action progressing and on track

COMPLETED ACTIONS 2022-2025					
No:	Action:	Lead Action Owner:	By When:	Progress Update:	Status:
1b	To elected members.	Steve Parry	Apr-24	Member Seminar took place on 21st November 2023, jointly delivered by RMBC, SY Police and Gangmasters & Labour Abuse Authority (GLAA) - Further Member Seminars will be delivered as and when required.	Action completed
2	That the SRP considers mapping the local modern slavery landscape to identify high risk industries and 'hot spots'	Steve Parry	Jan-25	<p>Full data and information sharing now takes place at the county-wide meeting of the multi-agency Modern Slavery and Organised Immigration Crime meeting. This group meets bi-monthly at which analytical data and information is provided by South Yorkshire Police analysts and GLAA. and data is also provided by the analyst on request. This forum and supporting data and shared information covers high risk industries and the changing modern slavery landscape - for example, hand car washes, nail bars construction sector, care sector. The group also provides current risk and threat updates. Certain sectors and products are at high risk for modern slavery, regardless of region. Typically, these sectors are:</p> <ul style="list-style-type: none"> •informal and unregulated, with poor visibility over lower tier suppliers. •reliant on a workforce to carry out jobs that are considered undesirable, hazardous or low-skilled. •Car washes, beauty sector – nail bars. <p>Seasonal and low-paying Examples of high-risk sectors include:</p> <ul style="list-style-type: none"> •industrial cleaning, meat works, hospitality, construction, manufacturing, agriculture and fishing. •The Care Sector, including the recruitment of workers from overseas. <p>Information to inform 2025/26 training plan.</p>	Action completed
3	That consideration be given to establishing an RMBC internal governance group, including representation from services who may encounter modern slavery	Emma Ellis	Jun-23	The first meeting of the Council's Modern Slavery Steering Group chaired by Head of Service, Community Safety and Regulatory Services was held on Thursday 29 th June 2023. The meeting focussed on agreeing Term of Reference, including membership and frequency of meetings. The group now meets on a regular basis and reports to the Safer Rotherham Partnership Board through the Protecting Vulnerable Adults Theme Group.	Action completed
4	That consideration is given to how young adults at risk of experiencing modern slavery are safeguarded during the transition from children to adult services and are age assessed appropriately	Kevin Buck/Tony Morrissey	Apr-24	<p>Discussed at CEDG and with the Evolve service who have connected with the HOS in adults. Work continues to formulate a more structured transition pathway. An Exploitation Strategy update specifically names modern slavery as a risk that requires a statutory assessment and response (in some circumstances). Lee Durrant is overseeing the training schedule. He highlighted that this is accessible via our virtual college for all children's professionals under the banner of PREVENT. The section 'Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation' within the Rotherham Safeguarding Children Partnership Manual has been updated and now explicitly identifies modern slavery and human trafficking and presents a pathway response when the risk is identified within children's services.</p>	Action completed

5	That consideration is given to developing referral pathways to ensure that modern slavery victims (both adult and child) have access to appropriate support (housing, advocacy, mental health) on a timely basis	Steve Parry	Jun-23	October 2023 - Local, established homelessness pathways and National Referral Mechanism (NRM) pathway already apply. These existing pathways have been communicated to all partners and included in future training development for clarity. Quality assurance mechanisms will be reviewed to ensure the pathways are effective and there are no barriers to accessing support.	Action completed
6	That consideration is given to re-launching the Strategic Partnership Information Sharing Group at the earliest opportunity to improve the way that agencies can share data and intelligence, including examining how IT systems can work better together	Emma Ellis/Steve Parry	Jan-24	The county-wide South Yorkshire Modern Slavery and Organised Immigration Crime meeting chaired by South Yorkshire Police has continued to meet on a regular basis. Data sharing takes place through the South Yorkshire Modern Slavery and Organised Immigration Crime, the RMBC Modern Slavery Steering Group and Safer Rotherham Partnership Protecting Vulnerable Adults and Protecting Vulnerable Children's partner groups. The steering group will continue to explore opportunities to share information and intelligence to improve outcomes.	Action completed
8	That consideration is given to how the Procurement Team can engage with the South Yorkshire Mayoral Combined Authority (SYMCA) supply chain advisor to improve processes, joint working, and awareness	Karen Middlebrook	Jun-23	Well established links already exist between the Councils Procurement Service manager and the SYMCA Supply Chain Advisor with regular meetings taking place between the two. The Councils Procurement Service Manager is a core member of the Councils Modern Slavery Steering Group.	Action completed
9	That consideration be given to allow victim advocates to make recommendations to Housing	Sandra Tolley	Jun-23	The process already in place in respect of the Council's Housing Assessment Panels does allow for third party representation and this would include the presentation of advice and recommendations by victim advocates for the panels to consider in respect of victims of modern slavery.	Action completed

Modern Slavery Steering Group Action Plan - Post Overview and Scrutiny Management Board 'Spotlight Review' which took place in November 2022.

No:	Action:	Lead Action Owner:	By When:	Progress Update:	Status:
COMPLETED ACTIONS 2018-2022					
	Council Actions:	Action owner	Progress note:		
	Incorporate the recommendations of the Council's Overview and Scrutiny Management Board Modern Slavery and Human Trafficking Spotlight Review (November 2022) within this action plan and agree action owners to ensure timely implementation	Emma Ellis, Head of Service, Community Safety and Regulatory Services	Recommendations received and incorporated into Modern Slavery Action Plan, as above and overseen by the Councils Modern Slavery Steering Group.		Action completed
	Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Karen Middlebrook	All relevant officers have now completed the course and passed the exam. Will seek to renew the training on an 3-yearly cycle.		Action completed
	Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance. (Section 54 of the Modern Slavery Act is a transparency in supply chains measure that requires businesses who a) carry on a business, or part of a business in the UK; b) supply goods and services; and c) have an annual turnover of £36million or more to produce an annual statement on the steps they are taking to prevent modern slavery in their supply chains and own organisation.)	Karen Middlebrook / Legal	<p>For all tenders undertaken above the EU threshold, the Council is mandated to the use the Selection Questionnaire (SQ) set by Central Government. One of the sections within this SQ is compliance with the Modern Slavery Act. For these types of tender, anyone failing to comply with the Act will not be shortlisted.</p> <p>The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act. The use of this tool has identified some suppliers, where direct engagement is now taking place through the Contract Managers within service areas to put them in a compliant manner.</p> <p>Further work is required by Legal to strengthen the Council's Terms and Conditions in this regard.</p> <p>Processes also require development in relation to contracts that are below threshold or where they are a call off from a framework agreement.</p> <p>The Council is now addressing this as contracts expire. New terms and conditions are drafted by Legal Services and entered into by all parties.</p> <p>Now complete and in place.</p>		Action completed

<p>Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.</p> <p>(Low cost tenders can be a sign of exploitation and should be challenged. Local Authorities can use Regulation 69 of the Public Contracts Regulations 2015 (Abnormally low tenders) which means they can require tenderers to explain the price or costs proposed in the tender.)</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>If the Council receives an abnormally low tender it would challenge this in accordance with Regulation 69 and this is detailed in the Council's tender template documentation for above threshold tenders.</p> <p>Working relationships within the Council have been strengthened with Procurement and Community Safety to try and tie this link. A list of high risk industries has been gathered and an understanding between the 2 teams that where an abnormally low tender is received in any of these industries, dialogue to take place to determine an agreed course of action.</p> <p>Further guidance has been developed.</p>	<p>Action completed</p>
<p>Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>Transparency within supply chains is supported and positively endorsed by Trade Unions and both national and local levels. Work has been done to include a section in the Council's updated tendering document that's highlights to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.</p>	<p>Action completed</p>
<p>Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>The Whistleblowing policy has been updated to include explicit reference to modern slavery. The Council's whistleblowing and serious misconduct policy is publicised and available on the internet and clear reference is made within the policy to modern slavery.</p>	<p>Action completed</p>
<p>Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>Work complete to streamline standard wording around Safeguarding within the Councils template tender documentation. The safeguarding section (8) of the Council's 'Invitation to Tender' document has been updated in respect of the policies that tendering organisations have in place. This includes the requirement for a 'Whistleblowing policy that is accessible to staff and volunteers'. (Section 8.2(I))</p>	<p>Action completed</p>
<p>Review its contractual spending regularly to identify any potential issues with modern slavery.</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act.</p> <p>The Councils Modern Slavery Lead is a member of the Councils Commissioning Board and guidance has been developed for Commissioning Officers or those with relevant responsibilities.</p>	<p>Action completed</p>

<p>Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed</p> <p>(It's important that suppliers also have aware of what modern slavery is, what the signs are and how they can tackle)</p>	<p>Karen Middlebrook / Sam Barstow</p>	<p>The Council has made systematic contact with non-compliant companies as identified through TISC-report. In many cases companies are found to be compliant however publications are not linked or verified so work is ongoing to support suppliers</p> <p>Linked with the action above and follow-up with companies however this now needs further review.</p>	<p>Action completed</p>
<p>Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.</p> <p>(This reiterates the duty for local councils to report concerns using the national referral mechanism, and a public commitment they will do that for their own contractors too)</p>	<p>Sam Barstow</p>	<p>A system is in place to support referrals regarding companies of concern.</p>	<p>Action completed</p>
<p>Report publicly on the implementation of this policy annually</p>	<p>Sam Barstow</p>	<p>A report is presented annually to Cabinet in respect of the Modern Slavery Transparency Statement.</p>	<p>Action completed</p>
<p>Confirm Policy Arrangements both in relation to Childrens and Adult</p> <p>(To ensure that effective Policy is in place which makes clear reference to modern slavery in relation to safeguarding practice/procedure)</p>	<p>Vicky Schofield/Andrew Wells</p>	<p>Complete.</p>	<p>Action completed</p>
<p>Develop an outline plan for compliance against the MS Charter requirements.</p> <p>(Ensure that the Procurement service is working toward compliance with the commitments made within the MS Charter)</p>	<p>Karen Middlebrook / Legal</p>	<p>Complete.</p>	<p>Action completed</p>

Explore available specialists training with wider Safeguarding Training	Sharon Clarke	All levels of Social Workers have had training and confirming that persons whom have "No recourse to public funds" are covered within the procedures.	Action completed
Ensure basic e-learning is available to front line staff and manager	Steve Parry	E learning provided on the Directions Councils website	Action completed
Ensure engagement in wider partnership activity to disrupt, prevent and address modern slavery	Steve Parry	Council in regular attendance at appropriate/relevant meetings.	Action completed
Establish operational links to support response to intelligence and information (Engage with the Home Office, Gang Master Licensing Authority, SYP and Border Force to ensure that proactive operational links are in place and that Rotherham benefits from operational partnership activity)	Sam Barstow	Ongoing links established and continue through existing structures.	Action completed
Develop a robust Transparency Statement on behalf of the Council	Sam Barstow	A refreshed Modern Slavery Transparency Statement is presented to Cabinet annually for approval prior to publication on the Councils website	Action completed
Confirm Policy Arrangements both in relation to Children's and Adult. (Ensure that effective Policy is in place which makes clear reference to Modern Slavery (MS) in relation to safeguarding practice/procedure)	Vicky Schofield/Andrew Wells	Complete	Action completed

	<p>Develop an outline plan for compliance against the MS Charter requirements.</p> <p>(Ensure that the Procurement service is working toward compliance with the commitments made within the MS Charter)</p>	Karen Middlebrook / Legal	Complete	Action completed
	<p>Improve the Councils ability to identify and respond to (MS).</p> <p>(Working with partners, seek opportunities to enhance the expertise and ability within the Council to respond to Modern Day Slavery)</p>	Steve Parry	<p>The Council is a member of the South Yorkshire (MS) Partnership</p> <p>It also is represented on the South Yorkshire (MS) Practitioners Group and the county-wide and local Organised Crime Boards.</p> <p>A total of 11 Council officers have now been trained as (MS) Single Points of Contact Officers (SPOC's). This has significantly increased knowledge and expertise within the Council to identify and respond to (MS).</p> <p>Through work with the South Yorkshire (MS) Partnership, a detailed quarterly report is now to be presented to the Safer Rotherham Partnership Board to inform its activities in tackling (MS).</p>	Action completed