

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 with 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 the Council will focus throughout the year on raising awareness, strengthening processes and improving our commissioning, procurement and contract management specifically in relation to Modern Slavery.

This is the Council's first transparency statement in relation to modern slavery and is relevant for the financial year 2018/19. An annual progress report will be published on our website, alongside a revised statement at the start of the financial year 2019/20.

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, monitoring numbers regularly. The Council currently has processes and procedures as a part of its Safeguarding Policy and work will be undertaken to further raise awareness of these processes.

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. 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. When commissioning and procuring works, goods or services, Officers will aim to ensure that, as part of developing the tender and the

ongoing monitoring and management, they consider the potential and likelihood of modern slavery. Where the potential of likelihood is deemed high, Officers will seek to develop a clear understanding of the supplier's supply chain arrangements.

The Councils 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 serves a population of 257,280 residents. It 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. Council staff are free to join trade unions.

The Council spends in excess of £240m per annum with third party suppliers on a wide scope 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 occur across all departments within the Council and can vary significantly in value. A central procurement team ensures professional support and advice to the process. Whilst the procurement of larger contracts is robust in respect of modern slavery, further work needs to be undertaken to strengthen work relating to contracts of small financial value.

OUR POLICIES

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 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. The Council will ensure that it engages with partners locally and regionally in order to strengthen

our collective understanding, and to make 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 Councils Political Leadership, through its Cabinet. This issue may be subject to detailed scrutiny at the direction of the Chair of the relevant Select Commission.

Raising awareness of our policies and procedures, alongside detailed training where required, will strengthen the Councils diligence in respect of Modern Slavery linked to procurement of goods and services, alongside wider contract management.

WHAT HAVE WE DONE

Efforts have been made to raise awareness not just within the Council but across wider partners and the public, through the inclusion of sessions and information as a part of Safeguarding Awareness week in 2018. Training is in place amongst safeguarding professionals. Officers are seeking to procure or develop an e-learning module aimed at raising awareness which can be offered to all staff.

A public commitment has been made, by the Council, to achieve the standards laid out within the Co-Operative party Charter against Modern Slavery.

Clear officer leadership has been assigned to this area of business and an internal task and finish group has been established to support implementation of the commitment to the charter, alongside strengthening our broader engagement with tackling Modern Slavery through direct delivery functions.

Officers have established operational links to increase the flow of intelligence, information and support to statutory partners and specialist officers. Reporting figures will also begin to be monitored and compared to areas of a similar nature to benchmark our services.

The Council has made explicit reference to Modern Slavery within our Whistleblowing Policy, which will be communicate to staff. The Council will also work with its suppliers to ensure they do the same.

WHAT DO WE NEED TO DO

Over the year ahead the Council will roll out training/briefings to staff, as appropriate, focussed on how to spot the potential signs of slavery and who to talk to. Enhanced training will continue to be made available to relevant front line and managerial staff, alongside specific training and/or briefings for procurement staff, commissioning staff and contract staff. Full compliance in respect of training needs is anticipated by the end of the financial year 2018/19.

The Council will develop detailed guidance relating to how relevant staff can identify risks within supply chains or the provision of services and know where to seek advice. The Council will also ensure support is provided to contract managers who need to continue oversight of contractors in relation to Modern Slavery and this will include information around issues such as whistleblowing policies and trade union membership.

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

Signed

Leader of the Council

Chief Executive