

## **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 we will focus throughout the year on continuing to raise awareness through regular briefings and an increase in the number of staff trained. 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 understanding of the risk relating to modern slavery within supply chains, continuing 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 the Council's 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, monitoring numbers regularly. The Council currently has processes and procedures as a part of its Safeguarding Policy 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. 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 of the concluded arrangement. They will consider the potential and likelihood of modern slavery, and where these are deemed high, 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 6,100 staff (including school 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 265,800. (Census 2021 – Office for National Statistics)

The Council spends in excess of £300m 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 <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 will ensure 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; <https://www.rotherham.gov.uk/downloads/file/1456/south-yorkshire-safeguarding-adults-procedures>

The equivalent Policy in relation to Safeguarding children can be found on the following link;  
[2.4.3 Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation \(proceduresonline.com\)](#)

The Council's whistleblowing policy is available on the following link;  
<https://www.rotherham.gov.uk/downloads/download/117/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 partners locally and regionally in order 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, the strengthening of policies and procedures alongside detailed training where required, will seek to strengthen the Council's diligence in respect of modern slavery linked to 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, 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, 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, in particular that they 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 improved expertise has resulted in improved working practices and co-ordination between the Council, Police, South Yorkshire Modern Slavery Partnership and the wider partnership. It is planned for additional officers to be trained during 2022.

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

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 training, both generic and specialist, and will continue to support this with regular efforts to raise awareness both online, through social media and within teams. The Council and its partners will also seek to raise awareness within communities, both how to spot the signs and where to report.

We will continue to support contract managers, procurement officers and commissioning staff to develop 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/>) to work with suppliers who have not yet demonstrated compliance and encourage greater engagement with Modern Slavery issues and responses.

*This statement should be read in conjunction with the Modern Slavery Act 2015<sup>1</sup> and the National Referral Mechanism<sup>2</sup>.*

Signed

Chief Executive

Leader of the Council