

Rotherham Metropolitan Borough Council

Modern Slavery Act 2015 Transparency Statement 2024/25

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 sharing 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 fifth transparency statement in relation to modern slavery and is relevant for 2024/25. An annual progress report will be published on our website, alongside a revised statement for the following year.

What is modern slavery?

Modern slavery is a term that includes any form of human trafficking, slavery, servitude or forced labour, as set out in the Modern Slavery Act 2015, and captures a whole range of types of exploitation, many of which occur together. These include, but are not limited to:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children to produce child abuse images/videos.

- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties.
- **Forced labour:** this can happen in various industries, including construction, manufacturing, hospitality, food packaging, agriculture, maritime and beauty sector (nail bars).
- **Criminal exploitation:** This can be understood as the exploitation of both adults and children to commit a crime, such as theft, burglary, cannabis cultivation, drug trafficking and other similar criminal activities that are subject to penalties and imply financial gain for the trafficker.
- **Human trafficking:** this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.
- **Other forms of exploitation:** human organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Nationally, there were 16,938 potential victims of modern slavery referred to the Home Office in 2022, representing a 33% increase compared to the preceding year number of 12,706 and the highest annual number recorded since 2009.

There is no typical victim, and some do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they are unable to speak the language, have their travel and identity documents removed and are told if they try to escape, they or their families will be harmed.

Locally and across the United Kingdom, Criminal Exploitation generally and 'County Lines' drug trafficking, has become a prominent way in which people, particularly children, are increasingly exploited. 'County lines' is the practice of trafficking drugs into rural areas and smaller towns and cities, away from the major conurbations. Many factors contribute to the way in which vulnerable children and other individuals are exploited by traffickers and it is an important factor that a child can never consent to their own exploitation. The Council is fully aware of its designation as a 'First Responder' organisation under the National Referral Mechanism (NRM) and its responsibility to identify potential victims and refer cases to the UK Human Trafficking Centre Competent Authority of the NRM.

The Council also works with other agencies to identify and tackle Modern Slavery, particularly through the Safer Rotherham Partnership (SRP), which is the statutory multi-agency Community Safety Partnership (CSP) for Rotherham, introduced by Section 6 of the Crime and Disorder Act 1998.

Our commitment

The Council recognises that it has a responsibility to take a robust approach to

modern slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty as a Council and 'First Responder' 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. To support this requirement, the Council will ensure staff are suitably trained to spot the signs and pass on relevant information for referral.

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.

Between April 2019 and December 2023, a total of 207 referrals from Rotherham were made by the Council and other First Responder Organisations to the NRM. The Council will continue to monitor the number of referrals and the action that it and other agencies have taken in respect of them.

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

Rotherham Council procures a diverse range of goods, works and services to enable the Council to deliver its public service. Procurement activity is categorised into 4 portfolio areas and the types of services include (but not limited to):

- **People:** commissioned social care provision for vulnerable children and adults, public health, homelessness
- **Places:** waste and recycling, green spaces, maintenance of the borough's highways infrastructure, facilities management, vehicles and transport, security, housing repairs and maintenance
- **Corporate:** ICT, professional services, financial services, consultancy, training, catering, leisure
- **Capital Works:** build and civil scheme development and delivery.

In 2022/23 financial year the Council spent in excess of £350m with over 2,500 external suppliers of which more than 99.9% were UK based.

In undertaking procurement activity and the assessments of suppliers, the Council utilises the mandated Selection Questionnaire from Cabinet Office. This provides criteria for assessment to reduce the risk of modern slavery and human trafficking in our supply chain.

In addition, the Councils contracts include clauses around suppliers' compliance towards legislation and best practice linked to modern slavery, including termination as a sanction for failure to comply. Contracts also include statements of expectation from the Council in that all employees are to be treated fairly, have the right to join a trade union and that the supplier must adopt a whistleblowing policy for staff to blow the whistle on any suspected cases of modern slavery.

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 Councils whistleblowing policy is available on the following link:

<https://www.rotherham.gov.uk/downloads/download/117/whistleblowing-and-serious-misconduct-policy>

The Councils Procurement Ethics Policy is available on the following link:

[Procurement Ethics 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 we 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.

The Council has updated its whistleblowing policy 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, the Council has maintained its commitment to having officers from across council directorates who have 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 2024 as part of a wider Modern Slavery training programme.

A modern slavery awareness raising seminar was delivered to Elected Members of the Council. The was jointly delivered by Council officers, South Yorkshire Police and the Gangmasters and Labour Abuse Authority (GLAA).

As part of Safeguarding Awareness Week, bespoke modern slavery training was delivered to members of the Care Sector by Council officers and the GLAA. This training focused on the rising number of reported labour exploitation within that sector.

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.

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.

A Modern Slavery Steering Group has been established within the Council, its purpose to oversee the Councils response to modern slavery and human trafficking and comply with the legislative requirements of the Modern Slavery Act 2015. An Action Plan has been produced to provide a clear structure for work to be carried out and this to record and monitor progress.

Modern Slavery continued to be a key priority for the SRP throughout 2023/24 and the Councils work, along with its partners towards eradicating it is reported to and monitored by the Safer Rotherham Partnership.

The Council worked with South Yorkshire Police on the development of intelligence and information in respect of modern slavery and the production of a detailed intelligence document that is used to advise both the SRP and the Modern Slavery Steering Group and inform and drive both Council and partner activity.

What we will 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 hoe and where to report.

The Council will continue to combat modern slavery by working in partnership and providing mutual support between departments and agencies.

The Council will continue to ensure that sound processes and procedures are in place to help identify and support potential victims of modern slavery, including staff having sufficient knowledge to be able to effectively deal with reports, incidents and issues raised.

The Council will work to further improve the gathering and sharing of modern slavery intelligence and information with its partners that may help to disrupt perpetrators and assist with bringing them to justice. This will be monitored through the Councils Modern Slavery Steering Group and the wider SRP, Community Safety Partnership.

The Council will work with its partner agencies to map the local modern slavery landscape to identify high risk industries and 'hot spots'.

The Council will work with its partner agencies to review and improve how young adults at risk of experiencing modern slavery are safeguarded during the transition from children to adult services and are age assessed appropriately.

The Council will continue to support its 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 organization, (<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