

Committee Name and Date of Committee Meeting

Cabinet – 17 March 2025

Report Title

Modern Slavery Transparency Statement - Annual Refresh

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

No, but it has been included on the Forward Plan

Strategic Director Approving Submission of the Report

Andrew Bramidge, Strategic Director of Regeneration and Environment

Report Author(s)

Steve Parry, Community Safety Officer.
01709 334565 or steve.parry@rotherham.gov.uk

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 2025/26 for consideration and approval prior to publication. (Appendix 1).

On the 1 November 2022, the Council's Overview and Scrutiny Management Board (OSMB) held a 'Spotlight Review' into the Council's and partners responses to tackling Modern Slavery and Human Trafficking in Rotherham. This was supported by a wide range of partners.

The findings and recommendations from the review were considered, approved, and incorporated into the current Modern Slavery Action Plan (Appendix 2).

Recommendations

That Cabinet:

1. Note the progress made to date.
2. Approve the Modern Slavery Transparency Statement 2025/26 and its publication on the Council's website.

List of Appendices Included

Appendix 1 – Draft Modern Slavery Transparency Statement 2025/26.

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 18th March 2024](#)

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 to enable 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.

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's website.

- 1.3 Changes to the 2025/26 Modern Slavery Transparency Statement compared to the 2024/25 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.

- The delivery of Modern Slavery and Human Trafficking training to professionals from across the partnership during Safeguarding Awareness Weeks, over 450 General Practitioners and Health Professionals at an open learning event held at Magna Science Adventure Centre.
- Worked with Social Landlords, including the Selective Licensing Areas, with the provision of awareness raising, spot 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.
- Included a full section '*Children from abroad, including victims of Modern Slavery, Trafficking and Exploitation*' in the Rotherham Safeguarding Children Partnership Manual that identifies Modern Slavery and Human Trafficking and presents a pathway response when risk is identified within Children's Services.

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, focussing on the Modern Slavery Charter requirements and OSMB recommendations.
- 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-op Parties 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 every three-year period

as part of the overall modern slavery training provision.

- 2.3 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 Councils role within the multi-agency South Yorkshire Modern Slavery and Organised Immigration Crime Group and the local Fortify Bronze Group, which tackles serious and organised crime. Between January and March 2024, Rotherham Safeguarding Adults Board commissioned four 'Trafficking and Modern Slavery' training courses that were delivered to 48 professionals from across the partnership.
- 2.4 As part of Safeguarding Awareness Week, 18th – 22nd November 2024, bespoke modern slavery training was delivered to 54 professionals from a cross section of agencies. This training focused on raising awareness of modern slavery and human trafficking, how to spot the signs and how to report suspected cases.
- 2.5 Training was also delivered to 450 members of the health service, including General Practitioners, Nurses and other medical professionals at an open learning event held on 14th November 2024 at the Magna Science Adventure Centre. Again, this training focused on raising awareness of modern slavery and human trafficking, how to spot the signs and how to report suspected cases.
- 2.6 During October 2024, Modern Slavery and Human Trafficking awareness raising information has been distributed to social landlords within the Councils Selective Licensing Scheme. This includes, how to spot the signs and how to report suspected cases.
- 2.7 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 Team, reporting pathways have been further improved with the introduction of an electronic reporting template available to partners.
- 2.8 The section '*Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation*' within the Rotherham Safeguarding Children Partnership Manual was updated in December 2024 and now explicitly identifies modern slavery and human trafficking and presents a pathway response when the risk is identified within children's services.
- 2.9 Tackling Modern Slavery and Serious Organised Crime continue to be key priorities for the Safer Rotherham Partnership (SRP) and activity is managed through the Protecting Vulnerable Adults and Serious Organised Crime theme groups with oversight by the SRP Board which is chaired by the Cabinet Member for Corporate Services, Community Safety and Finance.
- 2.10 The Council has 8 employees from across directorates who have received the necessary training to be successful in becoming modern slavery Single

Point of Contact Officers (SPOCs). This has improved knowledge and expertise across the Council in respect of the identification and response to modern slavery cases and in the provision of support to the victims of modern slavery. The development of these officers will continue, and it is planned that extra officers will receive training during 2025/26 as part of a Modern Slavery and Human Trafficking Training Plan.

- 2.11 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.
- 2.12 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.
- 2.13 Between April 2022 and December 2024, a total of 126 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.
- 2.14 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.
- 2.15 Good progress has been made in respect of the actions within the existing action plan, with the majority of actions now fully completed. Work will now progress through the Modern Slavery Steering Group on the development of a revised action plan, including new, appropriate actions to enable further progression and improvements throughout 2025/26.

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 2025/26 and at Appendix 2 is the current Action Plan based on recommendations by the OSMB 'Spotlight Review' from November 2022 and managed through the Councils 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's 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 will also leave the Council open to legal challenge such as judicial review.

8. Human Resources Advice and Implications

8.1 Human Resources can support the tackling of the threat of modern slavery through an understanding the key people risk, advising on recruitment, communicating employee rights and procedures for raising issues and available training.

9. Implications for Children and Young People and Vulnerable Adults

9.1 The recommendations links to the following Council Plan themes:

- People are safe, healthy, and live well.
- Every child able to fulfil their potential.

In addition, addressing the recommendations links explicitly to the SRP priorities of:

Protecting Vulnerable Children

- Work together with partners and the public to reduce the risk of child sexual exploitation (CSE) and child criminal exploitation (CCE) ensure accurate recording of investigations and quality outcomes.
- Increase understanding of CSE and CCE, reporting, and responses, with professionals and the public through training and awareness raising.
- Increase understanding of CSE and CCE, how it affects our communities and how our actions as a partnership improve the lives of children.

Protecting Vulnerable Adults

- Protecting and supporting vulnerable adults from harm, crime and becoming victims of exploitation as well as preventing them from becoming victims of modern slavery.

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.
- 10.2 Tackling modern slavery and human trafficking is a key priority for the Council and the Safer Rotherham Partnership. The potential for the exploitation of different groups is acknowledged and is monitored and managed by the multi-agency Protecting Vulnerable Adults and Children theme groups and reported to the Safer Rotherham Partnership Board.

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 is a key priority for the Council and the Safer Rotherham Partnership.

13. Risks and Mitigation

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

14. Accountable Officers

- 14.1 Emma Ellis, Head of Service, Community Safety and Regulatory Services

Approvals obtained on behalf of Statutory Officers: -

	Named Officer	Date
Chief Executive	Sharon Kemp OBE	03/03/25
Strategic Director of Finance & Customer Services (S.151 Officer)	Judith Badger	17/02/25
Assistant Director of Legal Services (Monitoring Officer)	Phil Horsfield	19/02/25

Report Author: Steve Parry, Community Safety Officer
01709 334565 – steve.parry@rotherham.gov.uk

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