

# Modern Slavery Act

The council recognises its responsibilities under the Modern Slavery Act 2015 (MSA) and is fully committed to taking a robust approach in the prevention of slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

## **Organisation's structure**

It is intended that this statement covers the activities of the council in achieving its vision and strategic objectives as determined by its organisational structure.

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are developing an Anti-Slavery Policy reflecting our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Policy will be published on the Council's website as soon as it becomes available.

## **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are implementing a comprehensive supply chain compliance programme. This begins with ensuring that the elimination of any risk of modern day slavery features in our supplier on-boarding processes and strategic sourcing practices (including sourcing plans and invitations to tender). Where this is deemed to be a potentially significant risk of modern day slavery practices within our supply chain, we may conduct supply chain mapping, to enable us to determine, where the risk exists and determine an appropriate course of action.

In addition, the compliance programme consists of updating contractual templates for new procurements and raising awareness through procurement training for officers. The council has a procurement working group that oversees all procurement related matters from across the council including legal, finance and commissioners.

## **Due diligence processes for slavery and human trafficking**

In addition to including clauses in our service contracts which require our suppliers to warrant their compliance with the MSA, if the level of risk of trafficking in the supply chains requires, the contractor may be required to include equivalent clauses in their own contracts with sub-contractors, with the aim of enabling enforcement higher up the supply chain. Our customary restrictions on the ability of our contractors to subcontract without our approval in our services agreements, will enable the Council

to make its approval conditional upon the subcontractor also agreeing to comply with our Anti-Slavery Policy and the MSA and, reporting on any departures from these, if necessary.

## **Whistleblowing**

As part of its commitment to ensuring its own integrity in relation to all aspects of its own working practices, the Council has a clear and comprehensive policy, offering protection and support to individuals reporting on any malpractice which may be affecting a person's basic human rights or dignity, or otherwise unlawful, within its own organisation or among its service users.

## **Further steps**

We are committed to improving our practices to combat slavery and human trafficking and will review and continue to keep under review the effectiveness of the steps that we are taking to ensure that there is no slavery or human trafficking in our supply chains. As part of this we intend to take the following further steps to combat slavery and human trafficking:

- Identify and meet any training needs with the Council and/or its partners;
- Develop a set of key performance indicators against which our effectiveness can be monitored and reviewed;
- Ensure our approach is under regular review.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2016.

## **Modern Slavery Helpline**

You can find out more about Modern Slavery, report a suspicion or get help and advice from the [Modern Slavery Helpline website](#). They provide victims, the public, statutory agencies and businesses access to information and support on a 24/7 basis.