

# Modern Slavery Statement

Modern slavery can take many forms including the trafficking of people, forced labour, and slavery.

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*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Barnsley Council's modern slavery and human trafficking statement for the financial year ending 31 March 2023: reviewed annually.*

Modern Slavery can take multiple forms and present in any community across the UK. This statement sets out Barnsley Council's actions to understand and respond to risks relating to modern slavery, acknowledging 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.

## **Structure, Business & Supply Chains**

### **The Role of Barnsley Council**

All Councils across the UK have a key role to play in tackling modern slavery, including in identifying and supporting victims, and working in partnership locally to encourage reporting. This statement sets out the Council's actions to understand all potential modern slavery risks related to its business, ensuring there is no slavery or human trafficking in its own business or its supply chains.

### **Modern Slavery & BREXIT**

Although the UK is no longer part of the European Union, Article 4 of the European Convention on Human Rights, concerning the prohibition of slavery and forced labour, is still in place. Should BMBC look to procure or import products or services from outside the EU, which poses an increased risk of slavery or human trafficking: it would undertake further consideration of supply chains to take account of potential risks.

BMBC expects all suppliers of goods or services to have their own policy relating to working practices or modern slavery; and for evidence to be available to ensure their standards are in accordance with the Council's expectations and statutory requirements.

### **The Supply Chain: what we do.**

- Contractors are required to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
- Any abnormally low-cost tender be challenged to ensure that they do not rely upon the potential contractor practising modern slavery.

- Suppliers advised that contracted workers are free to join a trade union and should not be treated unfairly for belonging to one.
- Publicise the whistleblowing system for staff to blow the whistle on any suspected examples of modern slavery.
- Tendered contractors are required to adopt a whistleblowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
- Contractual spending be reviewed regularly to identify any potential issues with modern slavery.
- Suppliers are advised of any risk identified concerning modern slavery and referred to the relevant agencies.
- Any contractor who is identified as a cause for concern regarding modern slavery will be referred for investigation via the National Crime Agency's National Referral Mechanism.

### **Policies in Relation to Slavery & Human Trafficking**

#### ***Taking Responsibility – Identification of Risk Together with Steps Taken to Prevent & Manage That Risk.***

As part of our initiative to identify and mitigate the risks of slavery and human trafficking, the Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Council's due diligence and reviews include:

- taking steps to improve substandard suppliers' practices, requiring them to implement action plans
- invoking sanctions against suppliers that either fail to improve their performance in line with an action plan or seriously violate our supplier conditions of contract, including the termination of the business relationship
- developing appropriate clauses and wording for all relevant documents where it is deemed appropriate to detail the Council's approach following the implementation of the Modern Slavery Act. In relation to the supply chain, this includes robust contract clauses and questions in the supplier selection process which enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act 2015.

The Council has a range of policies and processes which reflect our commitment to acting ethically, and with integrity to prevent slavery and human trafficking.

#### ***Due Diligence in Process in Relation to Slavery and Human Trafficking in Business & Supply Chains.***

Suspected or known incidents of slavery/trafficking reported to the relevant Police Authority, and the Public Health & Communities Directorate; whom are the direct link with the Serious & Organised Crime Unit, and Modern Slavery Board for South Yorkshire.

Under Section 52 of the Modern Slavery Act 2015, Local Authorities are under a duty to notify the Home Office if they identify a potential victim of modern slavery. BMBC are 'first responders' and can refer into the National Referral Mechanism (NRM), supplying information on potential victims and perpetrators.

BMBC are partners of Snowdrop: A South Yorkshire based Charity who offer support to survivors of slavery/trafficking: they also host full training for BMBC officers in recognising the warning signs of slavery/trafficking.

To encourage reporting BMBC has an active list of 'single point of contact' (SPOC), responders, who are specially trained in dealing with those affected by slavery/trafficking.

***Effectiveness in Ensuring that Slavery & Human Trafficking is not Taking Place in Business or Supply Chains, Measured Against Policy & Appropriate KPIs***

**Safeguarding Policies which apply** (*copies are available on request*):

- **Whistleblowing Policy:** The Council encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
  - **Employee Code of Conduct:** The Council's Code makes clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour, including when managing its supply chain.
  - **Recruitment Policy:** The Council directly recruits its employees via our in-house recruitment function. Where agency workers are used, these are procured via a third-party company which vets employment agencies to ensure they are reputable and always verifies the practices of any new agency it deals with before accepting workers from that agency.
  - **Preventing Illegal Working:** The Immigration, Asylum and Nationality Act 2006 (sections 15 – 25) details the specific offence of employing a person who is not permitted to work in the United Kingdom and requires the Council to make basic document checks on every person they intend to employ. By making these checks, the Council can be sure they will not break the law by employing illegal workers and therefore protecting against human trafficking and modern slavery.
  - **Disclosure and Barring Service Policies:** The Council has developed systems in its recruitment of personnel to ensure it only recruits persons who satisfy stringent verification checks, including identity checks and entitlement to work in the UK.
  - **Equality and Diversity Policies:** The Council's Equality and Diversity Policy and Equality Scheme declares the Council's commitment to making equality and diversity an integral part of the Council's business. This includes a commitment to use our influence and purchasing power to help make equality a reality for all: eradicating discrimination and inequality in employment, service delivery, and supply chain.
  - **Safeguarding of Children and Adults:** The Council employs numerous strategies and practices to ensure that its statutory duties and obligations to safeguard, protect and promote the safety and welfare of adults and children are continuously achieved. This includes protecting an adult and child's right to live in safety, free from abuse and neglect.
- Key Performance Indicators:** Monitoring and recording the numbers and frequency of training for front line and procurement staff.  
Audit, inspection & review practise across the organisation.  
Corporate Risk Register for continuous monitoring.

***Training & Capacity Building About Slavery & Human Trafficking.***  
**Our Commitment**

The Council will continue to report suspected slavery/trafficking via the National Referral Mechanism.

The Council will continue to offer both generic and specialist training, supporting efforts to raise awareness on slavery, both online, through social media and within its teams. The Council and its partners will also seek to raise awareness within communities on how to spot the signs of slavery.

We will continue to support contract managers, procurement officers and commissioning staff to develop their awareness and understanding in relation to modern slavery and human trafficking.

Develop key performance indicators which can be embedded in performance standards for particular groups of staff.

Training and awareness: posters displayed around Council premises, an e-learning module available to all staff and specialist training for relevant front-line officers.

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**Signed:**



Sarah Norman  
Chief Executive  
Barnsley Metropolitan Borough Council