



BARNSLEY

Metropolitan Borough Council

MODERN SLAVERY STATEMENT

Introduction

This statement sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020 and will be reviewed annually.

As part of the public sector, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Council is committed to improving its practices in accordance with relevant Action Plans to combat and prevent slavery and human trafficking in its corporate activities, also ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Barnsley Council is a unitary authority providing all local government services for its citizens, from waste collections and clean-up teams to public health, schools and social care. The Council manages a wide range of services, delivered both directly by the Council and through external contractors, with a large and diverse supply chain.

Countries of operation and supply

We would expect and request assurance that the practices of companies and organisations operating within the EU adhere to Article 4 of the European Convention on Human Rights, concerning the prohibition of slavery and forced labour. Should the Council look to procure or import products or services from outside the EU which could pose an increased risk of slavery or human trafficking, it would undertake further consideration of supply chains in order to take account of potential risks.

The Council would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the Council's expectations and statutory requirements. We would request that our suppliers ensure the same of their own supply chains.

Responsibility

As a Council we are committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business.

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 in its operations.

Policies: Council policies are developed by officers employed by the authority and are then agreed by a relevant board or committee, which would include Councillors, trade unions, senior officers and partner organisations.

Risk assessments: Organisation responsibility for human rights would be cross-Council. Modern slavery risk analysis would be provided by Financial Services Risk Management who will actively develop strategies and safeguards around this.

Investigations/due diligence: In respect of suspected or known incidents of slavery or trafficking we would refer these to the relevant police authority and also to our colleagues in Stronger, Safer & Healthier Communities if in Barnsley, who are our direct link with the local Serious and Organised Crime Board which has a responsibility for modern slavery.

The Council actively works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain roles such as cleaning and care work, and large numbers of adults in multiple occupancy domestic properties. As part of its safeguarding responsibility the Council has previously commissioned safeguarding training for colleagues across the authority to help identify any signs of potential safeguarding incidents and the relevant referral pathways.

Under Section 52 of the Modern Slavery Act 2015, Local Authorities are under a duty to notify the Home Office when they identify a potential victim of modern slavery; further, as first responders, we can refer into the National Referral Mechanism any information and / or suspicions of slavery or trafficking and we would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their manager, the police and the relevant safeguarding board if this incident was in Barnsley.

Any investigations in relation to suspected or confirmed modern slavery would be conducted with the support of partners and experts.

Specific 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. Employees, customers or others who have concerns can raise these via either their manager, the Council's Monitoring Officer (currently the Executive Director of Core Services and Solicitor to the Council) or the Head of Internal Audit.

- **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 as usual. This includes a commitment to use our influence and purchasing power to help make equality a reality for all, and to take action to eradicate discrimination and inequality when delivering services, when employing others to deliver services on our behalf and when providing funding to others to provide services.
- **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.
- **Domestic and Sexual Violence Strategy Barnsley:** This policy, held by Barnsley's Crime and Drugs Partnership, includes actions and aims to reduce instances of domestic and sexual violence in the city and specifically references modern slavery as a potential example of this. The strategy includes the responsibility of partners, including the Council, in tackling all aspects of domestic and sexual violence in the town and specifically references modern slavery as a potential example of this. The strategy includes the responsibility of partners, including the Council, in tackling all aspects of domestic and sexual violence and the strategy details what services are available for support.

Due diligence of suppliers

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.

Training and awareness-raising

The Council recognises that certain colleagues within the Council should be required to complete training on modern slavery in order to raise awareness and continue compliance with the Modern Slavery Act 2015.

Training is in place for employees to be able to; explain what human trafficking is and the difference types that exist; recognise the signs/indicators of different types; and know how to respond appropriately to a victim and a case of human trafficking.

Indicators of slavery and exploitation are often hidden. The Council will ensure that its employees are familiar with the signs of identifying modern slavery. Victims can be any age, gender, ethnicity or nationality.

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 2019.

Signed:

Sarah Norman, Chief Executive