

BRACKNELL FOREST COUNCIL

MODERN SLAVERY TRANSPARENCY STATEMENT (2022 – 2023)

Our vision

Bracknell Forest Council recognises its responsibility to take a robust approach to modern slavery.

This statement sets out Bracknell Forest Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at making sure that there is no form of slavery in our own business and our supply chains. This statement relates to measures during the financial year 1 April 2022 to 31 March 2023 and ongoing initiatives.

As part of Local Government, we recognise that we have a responsibility to take a robust approach to modern slavery. In addition to our responsibility as an employer, we acknowledge our duty as a Unitary Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 54 of the [Modern Slavery Act 2015 \("the Act"\)](#).

We are committed to making sure that any incident of modern slavery that occurs within our purview will be reported in line with the 2015 Act. Our aim is to be an organisation that identifies such incidents, and which will work with our partners and suppliers in an ethical, transparent way and with integrity in all our business transactions.

The publication of this Annual Statement is part of that commitment and highlights our activities to address this.

Definition of Modern Slavery

Modern slavery is a heinous and often hidden crime, and the impact can be devastating for the victims. Modern slavery can be broadly grouped into four categories but is not limited to:

- **sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images or videos
- **domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties
- **labour exploitation:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty

- **criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker
- other forms of exploitation include organ removal, forced begging fraud, marriage, and illegal adoption

Our Organisation

Bracknell Forest Council is a unitary local authority in the heart of Berkshire. We spend approximately £130 million per year on external goods, services and works ranging from construction of new buildings and facilities management, cleaning, supply of IT equipment, clothing and foods to care services and a wide range of other support, professional and people-based services. These goods, services and works are procured from a wide variety of local, national and international organisations, businesses and voluntary sector organisations. Each supplier in turn may have its own supply chain. The challenge for Bracknell is to ensure compliance and adherence to best practice - not only within the organisation and our suppliers but also in the supply chains that serve them.

Policies

Within our own business:

We have a number of procedures in place that contribute to trying to ensure modern slavery does not occur in our business:

- robust recruitment policy and process which are compliant with UK employment legislation, the process includes a number of pre-employment checks, for example 'right to work' document checks, referencing and understanding any employment gaps. DBS checks are undertaken for relevant posts
- employee code of conduct and mandatory training which defines the responsibilities and standards required for all who work for and on behalf of us including interims, agency workers and employees seconded to other organisations
- reporting knowledge or suspicion of slavery through our whistleblowing procedures and hotline which ensures that staff or members can raise their concerns confidentially without fear of reprisal
- responsibility to develop, implement and monitor policies and processes to safeguard the welfare of vulnerable adults and children and works within multi-agency partnerships to protect and safeguard people
- staff awareness training for specific staff which supports the Modern Slavery Act

HR & Recruitment:

We have a robust and transparent recruitment and selection process and ensure that all new workers recruited into a post at Bracknell Forest Council, whether full or part-time employees, agency employees or contractors/consultants, have the requisite checks, which includes identification and right to live and work in the UK. Our offer of employment is subject to the following rigorous process:

Permanent Staff:

- Acceptance of the terms and conditions contained within the contract of employment
- The receipt of satisfactory references
- Evidence of any required professional qualifications (e.g., social work qualifications) and essential requirements, such as a clean driving licence
- Any necessary Disclosure and Barring Service checks, where applicable
- The receipt of eligibility to work in the UK
- Identification check.

• **Agency staff:**

- Bracknell Forest Council works closely with Matrix SCM our Managed Service Provider for agency workers to ensure that all workers, including agency employees, contractors and consultants, go through the same checks as Bracknell Forest employees. We ensure that all agencies in our supply chain comply with our rigorous process and adhere to all legal requirements, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or terminated from the supply chain until such compliance can be evidenced.

• **Pay:**

- Bracknell Forest Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life and has for a number of years ensured that employees are paid above the rate of the Living Wage. This extends to contracts awarded to ensure suppliers are compliant with legislative requirements for pay.

Procurement & Supply Chain:

We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our procurement activity complies with the Council's Contract Standing Orders in line with the wider Public Contract Regulations 2015.

To comply with the Modern Slavery Act 2015, our professional and technical ability questions within the Selection Questionnaire address Modern Slavery within the

procurement sourcing process. The questions require a bidder to evidence their compliance with the Modern Slavery Act if they are a relevant commercial organisation as defined by Section 54 of the Modern Slavery Act 2015. Any bidder who fails to evidence their compliance with the required legislation shall be excluded from participating further in the tender process.

Incorporated within our standard contract terms are clauses that specify the supplier's contractual obligation concerning Modern Slavery.

Procurement strives to ensure compliance with modern slavery legislation through its operations. We may terminate a contract where a supplier is in breach of its obligations in respect to the Modern Slavery provisions and/or require a contractor to remove any subcontractor or staff member suspected or known to have committed a Modern Slavery offence from the performance of the services.

Through its Strategic Contract Management, the Council collaborates with external partners to maximise our impact in identifying and combatting modern slavery. Our contract managers utilise supply chain management techniques to ensure that effective contract management is applied to direct suppliers and their supply chain to deliver our requirements in the most compliant manner.

This would include the identification and management of risks in relation to modern slavery and human trafficking. This is done by:

- increasing openness, transparency, and efficiency in the management of supply chains
- improving ability to identify strengths, weaknesses, opportunities, and threats
- improving communications with suppliers
- enhancing relationships with suppliers

The contract managers are also responsible for undertaking annual audits on suppliers to make sure they are compliant with the contract agreement. This includes provisions in the contract management process to avoid modern slavery.

Action Plan for Year Ahead:

	ACTIONS	LEAD
1.	Publish the 2022-2023 statement on the Council's website and communicate the statement widely across the Council's supply chains and businesses in the borough, encouraging other businesses to also follow best practice and mitigate the risk of modern slavery in their businesses and supply chains.	Communications Procurement Commissioning
2.	Managers are using the approved managed service provider for recruitment. Any other agencies are set up within the compliant framework.	Human Resources Procurement
3.	Requirements are put in place for lead contractors with the aim of mitigating the risk of exploitation in the Council's supply chains. Contract and commissioning terms and conditions are reviewed to ensure they reflect the Council's values and response to modern slavery.	Legal Commissioning Procurement
4.	Review and map the Council's supply chains and conduct a thorough risk assessment of primary and secondary high-risk contractors.	Commissioning Procurement
5.	High-risk supply chains used by the Council are supported to use the Modern Slavery Assessment Tool (MSAT) or complete a modern slavery questionnaire to assess compliance.	Procurement
6.	Develop a training programme for commissioning, contract managers and more widely to train and raise awareness of staff on modern slavery.	Human Resources Commissioning Procurement
7.	Ensure training on Modern Slavery is undertaken as part of induction process and targeted training where appropriate linked to safeguarding.	Human Resources Commissioning Procurement

Further information

This statement was approved by the Council's Chief Executive on 6th June 2022.

This statement will be reviewed on an annual basis. The next review will take place by 6th June 2023.

This statement is also on the [UK Government Modern Slavery Statement Register](#)

Further information on modern slavery can be found on [GOV.UK](#).