

Introduction from the Chief Executive

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 31 March 2026.

Torbay Council' (hereinafter referred to as 'the Council) supports:

- the implementation of Section 54 of the Modern Slavery Act 2015, which consolidates slavery and trafficking offences, encompassing tougher penalties and sentencing rules and greater support for victims; and
- the Government's objectives to eradicate modern slavery and human trafficking

Torbay Council, as a public sector organisation, an employer, community leader and a procurer is committed to taking a preventative approach to modern slavery and human trafficking within its corporate responsibilities and activities. This also includes co-operating with partners and between internal services across the organisation, to work towards the disruption of such activities.

This Statement explains how the Council works to understand all potential modern slavery and human trafficking risks related to our activities and the measures we put in place to prevent modern slavery or human trafficking in our own activities and supply chains.

The Council expects its subsidiary companies, partners, contractors, suppliers and its staff falling in scope of this legislation to be aware of and comply with the requirements of the Modern Slavery Act. To support this, the Council will implement communication and education programmes which will highlight the requirements of the Act, high risk areas in Torbay and referral mechanisms.

Organisational Structure and Supply Chains

This Statement covers the activities of the Council, a local authority purchasing and providing local government services. We have over 1,000 employees and operate in Devon, England. The statement covers direct employees of the council, agency workers engaged through the Council's framework agreement; and services delivered on behalf of the council by its subsidiaries, third party organisations and their supply chains. Our supply chains cover an extensive range of contracts with external providers involving the supply of goods, services and works.

High-risk activities

The Council risk assesses its activities to establish whether any are high-risk in relation to slavery or human trafficking. Any concerns should be raised with the Monitoring Officer.

We consider that we currently have no high-risk activities.

Responsibility

Torbay Council has a corporate crosscutting role as an employer, community leader and procurer with responsibility to safeguard people within our communities.

This extends responsibilities to Adult Social Care, Children's Social Care, Housing, Corporate Procurement, Human Resources as well as Community Safety. Torbay Council works closely with Devon & Cornwall Constabulary and other enforcement agencies as appropriate to share

intelligence and work collaboratively to address issues relating to modern slavery or 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. Our Modern Slavery Statement reflects 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 in our supply chains.

Policies and Procedures

The Council operates the following Policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

- Whistleblowing Policy - the council encourages workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the council. This includes circumstances that may give rise to an enhanced risk of slavery or human trafficking. The council's procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
- Code of Conduct for Employees - the council's code makes it clear to employees the actions and behaviour that is expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- Recruitment/Agency Workers Policy - the council aims to use only agency workers recruited through suppliers on the council's standing list agreement, where this is not possible the council will undertake appropriate due diligence checks on any other agency worker suppliers used. New workers are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines, as appropriate.
- Safeguarding Children and Vulnerable Adults Policy - our Safeguarding Policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of modern slavery or human trafficking.
- Link to policies/procedures: <http://insight/information/childrens/child-protection-procedures/>

Supply chain due diligence

The Council's approach to procurement encourages fair pay and working conditions in our supply chain and eliminate modern slavery and human trafficking. These processes are documented on the Council's website and internally via its intranet page for all its staff <http://www.torbay.gov.uk/procurement>. In addition, we use Supplier Conditions of Participation to ensure the organisations we contract with adhere to the highest standards of ethics. Where suppliers are appointed through a competitive tendering process, relevant organisations are required to self-certify that they have complied with the requirements of the Modern Slavery Act 2015 and award of a contract is conditional on them being able to evidence this.

Partnership Working

The Council is part of the Safer Torbay partnership working with Devon and Cornwall Police and other agencies and with partners across the South-West to develop a collaborative approach to tackling the issue of modern slavery.

Strategic direction for partnership working is through the Devon and Cornwall Anti-Slavery Partnership which has the strategic aim of ensuring modern slavery and human trafficking is considered as daily business. The Council is represented within that partnership which is working to increase knowledge and understanding of modern slavery; implement best practice and increase reporting.

- Link to Safer Torbay website [Safer Torbay - Torbay Council](#)
- Link to safeguarding children board: <http://www.torbaysafeguarding.org.uk/publications/policies/>
- Link to safeguarding adults' board: <https://www.torbayandsouthdevon.nhs.uk/services/safeguarding-adults/safeguarding-adults-board/>

The Council will be developing a Modern Slavery policy to support delivery of obligations under both the Modern Slavery Act 2015 and the Procurement Act 2023.

Effectiveness and Key Performance Indicators

The Council considers the risks to be low on the basis that although the Council has suppliers from outside the UK, these are not considered to be involved in high-risk areas of activity.

However, as part of our initiative to identify and mitigate risk, we will:

- require all HR professionals to be suitably qualified in relation to recruitment procedures and offer training in recruitment and interviewing techniques
- require recruiting managers to have undertaken the Council's recruitment training
- have in place appropriate procurement procedures and ensure that all contracts with external providers have appropriate clauses
- keep under review supply chain and contract procedures
- ensure that in carrying out statutory functions, officers are aware of potential risks and have clear reporting lines
- ensure that all officers have completed the mandatory Safeguarding training with specific training on MSHT, and review this regularly.

We have in place systems to:

- identify and assess potential risk areas in our supply chains
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains
- protect whistle blowers

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

The Council has introduced a new suite of mandatory online training for staff involved in procuring goods, services and works and managing contracts on behalf of the Council, this includes

- Understanding Procurement – providing underpinning knowledge in relation to the council's statutory and legal obligations in relation to external spend
- Advanced Procurement – in depth learning on how to undertake a procurement process
- Advanced Contract Management – in depth learning on how to manage contracts
- As part of the implementation of our Modern Slavery Policy we will be developing guidance and further training modules for Council staff covering the latest information regarding modern slavery and human trafficking, with further training also being provided under our new Manager's Learning and Development Framework.

Awareness-raising programme

As well as training staff, we will raise awareness of modern slavery issues by posting information on the council's intranet; Insight and in Staff News bulletins. As part of wider awareness raising activity we will be working with public transport providers to ensure their drivers are aware of modern slavery and HT and how to report.

Our effectiveness in combatting slavery and human trafficking

We use the following methods to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- monitoring complaints
- monitoring training needs
- feedback through Commercial Services reporting mechanisms

This Statement will be reviewed and updated annually.



ANNE-MARIE BOND

CHIEF EXECUTIVE OF TORBAY COUNCIL

Date: 30 May 2025