



Modern Slavery Transparency Statement April 2021 to March 2022

Introduction

Doncaster Council (the “Council”) is a significant Local Government organisation, and as an employer, commissioner and supplier, recognises that it has a responsibility to take a robust approach to the prevention of modern slavery, and are committed to doing this. As a local authority the Council will legally be required, by government, to regularly report on the steps taken to prevent modern slavery in its supply chains, and will be submitting the 2021/22 statement to the government’s new Modern Slavery Statement Register.

The Council has a statutory duty to comply with the Modern Slavery Act 2015 and a responsibility to notify the UK Secretary of State of suspected victims of slavery or human trafficking as set out under Sections 43, 52 and 54 of the Act. The overall aim of the Modern Slavery Act is to pursue organised criminals and opportunistic individuals behind the modern day slave trade and to prevent people from engaging in modern slavery crime. The Council signed up to the [Charter Against Modern Slavery](#) and this statement provides an update on adherence to this charter.

This statement sets out the activities undertaken by the Council to ensure that slavery and human trafficking does not occur within the Council and supply chains.

Organisation Structure, Business and Supply Chains

The Council takes a **zero** tolerance approach to modern slavery. The Council will not engage with businesses or contract with suppliers who fail to comply with or fail to ensure that their supply chains comply with the requirements of the Modern Slavery Act.

Countries of Operation and Supply

The Council operates within the United Kingdom (UK). Whilst the risk of slavery and human trafficking is considered low, the Council remains vigilant and takes steps to manage the risks.

The Council has assessed its business operations and deemed them at low risk of slavery or human trafficking.



Slavery and Human Trafficking Policies

The Council have clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers.

Whistleblowing policy ([Link](#))

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 makes it easier for workers and others to make disclosures, without fear of retaliation.

Employee and Volunteer Code of Conduct ([Members Code of Conduct](#))

These codes provide clarity to employees and volunteers of the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee and volunteer conduct and ethical behaviour in all its operations and throughout their supply chains. Employees must behave honestly and follow the Council's policies and procedures. The Employee and Volunteers Code of Conducts clarifies that staff must not behave in a manner inside and outside working hours which could damage the Council's reputation

Recruitment

The Council have robust and transparent recruitment and selection processes and ensure that all new workers recruited into a post at the 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:

- 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.
- Any necessary Disclosure and Barring Service checks, where applicable
- The receipt of eligibility to work in the UK Identification check.

Agency staff

Where there is a need to source agency staff the Council uses a managed service provider to ensure that all workers, including agency employees, contractors and consultants, go through the same checks as employees. This ensures that recruitment practices form part of the contractual arrangements and have been checked in advance of accepting workers. The service provider



has undergone due diligence to ensure their practices comply with the legislation and decrease risk to the Council. The Council 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

The Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life. This is something that equally applies to contractors supplying services and works to the Council. Quotes or tenders that are considered as 'abnormally low' are addressed through the procurement process as this indicate low wages.

Due Diligence Preventing Slavery and Human Trafficking

The Council's procurement and commissioning processes require suppliers to confirm that they comply with the requirements of the Modern Slavery Act and declare any prosecutions under this Act. The Council undertakes due diligence when considering contracting with new suppliers.

The below is an extract from the Selection Questionnaire (SQ) used by the Council in its contracting activities.

Section 7	Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015	
7.1	Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?	Yes ☐ No ☐
7.2	If you have answered yes to question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?	Yes ☐ Please provide the relevant url to view the statement. No ☐ Please provide an explanation.



Charter Against Modern Slavery

The Council signed up to the [Charter Against Modern Slavery](#). The Council have implemented the requirements of the charter, and continue to develop to improve practices. The current status of the requirements are shown in the below table;

1.	Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Complete – all procurement staff trained, any new starters complete as part of their induction.
2.	Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.	Complete – SQ, due diligence questionnaire and the contract standard terms. Contracts contain default events and breaches of contract could be activated if modern slavery is present.
3.	Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	Complete – process in place for abnormally low tenders
4.	Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.	Complete – Construction Charter, included in construction tender documents and Contractors Code of Conduct for all tenders.
5.	Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	Complete – Whistle Blowing Policy revised to include Modern Slavery statement and staff and third parties have access via the webpages.
6.	Require its tendered contractors to adopt a whistle-blowing policy, which enables their staff to blow the whistle on any suspected examples of modern slavery.	Complete – included in the invitation to quote and tender documents
7.	Review its contractual spending regularly to identify any potential issues with modern slavery.	Complete – High-risk areas considered through periodic spend analysis. Full review in 22/23.
8.	Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	Complete – Via contract management and spend analysis.
9.	Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.	Complete – details of National Referral Mechanism (now via the Home Office) on the webpage and in the Whistle Blowing Policy.
10.	Report publicly on the implementation of this policy annually.	Complete - via the statement published

The Charter is a way of recognising what councils can do above their statutory obligations to raise awareness and ensure that their own supply chains do not contribute to modern slavery.



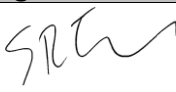
Risk Identification, Assessment, Management and/or Mitigation

The Council has established safeguarding policies and procedures with its partner agencies to safeguard the welfare of children and vulnerable adults and protect them from harm.

Training and Capacity Building

The Council provides training on Modern Slavery to Councillors, Employees and Partners. This is mandatory training called *Protecting Vulnerable Adults and Children* (PVAC) that enables staff to know how to report incidents of abuse and neglect including modern slavery and human trafficking. It is also delivered through additional Safeguarding Training.

Approval of this Statement

Name	Designation	Signature	Date
Scott Fawcus	Assistant Director of Legal & Democratic Services & Monitoring Officer		17/08/2022
Councillor Phil Cole	Councillor and Cabinet Member for Finance & Trading Services		27/07/2022