City of Doncaster Council

Modern Slavery Transparency Statement
April 2022 to March 2023

Introduction

The City of 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 and elimination of modern slavery, and are committed to doing this. As a local authority the Council is legally required by the government to regularly report on the steps taken and the plans to prevent modern slavery.

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 steps undertaken by the Council to ensure that modern slavery and human trafficking does not occur within the Council's operations and its supply chains. The Council works with partners to enhance the elimination of Modern Slavery.

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 modern 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 modern slavery or human trafficking.

Slavery and Human Trafficking Policies

The Council have clear and rigorous HR policies and procedures on all major employment issues 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 modern 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 workers 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 workers, 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 indicates low wages.

Equality and Diversity

The council is committed to recruiting, developing, and retaining the best people, based on merit, from the widest possible talent base, regardless of their characteristics. How the council supports equalities in the workplace goes beyond compliance with equalities legislation, it involves recognising different approaches are required for different people who have different needs and expectations and positively responding to this. We expect all our councillors, managers, employees, and contractors to treat everyone with dignity and respect and provide the highest standards of service to customers and communities we serve.

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 Selection Questionnaire (SQ) that is used by the Council in its contracting activities has been revised and has a more robust set of questions relating to Modern Slavery, as shown below.

4.2	You are a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015 if you carry on your business, or part of your business in the UK, supplying goods or services and you have an annual turnover of at least £36 million. If you are a relevant commercial organisation, please - ● confirm that you have published a statement as required by Section 54 of the Modern Slavery Act. confirm that the statement complies with the requirements of Section 54.	
4.3	If you have answered YES to any of the questions in 4.1, or NO to question 4.2, please explain what measures have been taken to demonstrate your reliability despite the existence of a relevant ground for exclusion. (Self-cleaning)	Yes ☐ No ☐

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If the contract is deemed at high risk of Modern Slavery, then on a case-by-case basis the Council can use the below questions to further test the prospective supply chain;

7.11	**Tackling Modern Slavery in Supply Chains**
7.11 (a)	If you are a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015, and if your latest statement is available electronically, please provide: ● the web address, ● precise reference of the documents. If your latest statement is not available electronically, please provide a copy.
7.11 (b) 7.11 (c)	If you are not a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015 (for example if your turnover is less than £36 million or you do not carry on your business, or part of your business, in the UK), please provide the above information in relation of any published statements on modern slavery or other relevant documents containing information of a similar type/level. Any modern slavery statement or other statement or document should contain at least the following information:
7.11 (d)	a. the organisation's structure, its business, and its supply chains; b. its policies in relation to slavery and human trafficking; c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains; d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

	e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; f. the training and capacity building about slavery and human trafficking available to its staff; or If all this information is not included in your modern slavery statement or other statement or documents, please provide an explanation as to why not and/or assurances that it will be included before contract award.

Suppliers are excluded from bidding if they have been found to have breached several different sets of legislation, specifically related to modern slavery are:

Child labour and other forms of trafficking human beings

- An offence under section 4 of the Asylum and Immigration (Treatment of Claimants etc.) Act 2004;
- An offence under section 59A of the Sexual Offences Act 2003
- An offence under section 71 of the Coroners and Justice Act 2009;
- An offence in connection with the proceeds of drug trafficking within the meaning of section 49, 50 or 51 of the Drug Trafficking Act 1994
- An offence under section 1, 2 or section 4 of the Modern Slavery Act 2015.

Charter Against Modern Slavery

The Council signed up to the Charter Against Modern Slavery. The Council has implemented the requirements of the charter and continues to develop to improve practices. The 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. Periodic review in 23/24.
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. Internal processes to report.
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.

The Council work closely with the South Yorkshire Police, based in Doncaster, and have designated single points of contact within the police who they can direct suspected issues related to Modern Slavery.

The Head of Community Safety, employed by the Council, attends countywide meetings, chaired by South Yorkshire Police, attended by other local authorities, in South Yorkshire. This forum allows for the sharing of best practice and information sharing by the police and other key partners i.e., GLAA. For example, a new performance template has been implemented in the Council that was used by a neighbouring local authority. The template provides data on the number of reports of MHSHT with a breakdown of the area and referring partners. This helps better inform required actions and gives a clearer understanding of where the hot spots are.

The MSHT agenda is managed through the Serious and Organised Crime Theme Group that sits beneath the Safer Stronger Doncaster Partnership. This group is responsible to work with partners to ensure that awareness is raised

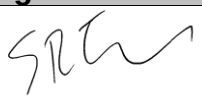
of the impact of modern slavery and human trafficking, and this will include providing training to identify keys signs.

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 to 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.

The Council have specified certain individuals who have received training in recognising Modern Slavery so that they can take the necessary steps to report issues through the National Referral Mechanism. These individuals are located across the Council in front line services, for example housing, safeguarding and social care.

Approval of this Statement

Name	Designation	Signature	Date
Scott Fawcus	Assistant Director of Legal & Democratic Services & Monitoring Officer		30/08/23
Councillor Phil Cole	Councillor and Cabinet Member for Finance & Trading Services		30/08/2023