



Modern Slavery Statement 2025/2026

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1. Introduction

The City of Doncaster Council (the "Council") is a major Local Government organisation delivering a wide range of statutory and discretionary public services. As an employer, commissioner, and supplier the Council recognises its responsibility to prevent and eliminate modern slavery in all its forms. The Council publishes this annual statement in accordance with the principles of the Modern Slavery Act 2015 and demonstrates the steps it is taking to prevent modern slavery within its operations and supply chains.

Under the Act modern slavery includes:

- **Slavery** – where ownership is exercised over a person.
- **Servitude** – where a person is coerced to provide services.
- **Forced or compulsory labour** – where work is extracted under threat and not offered voluntarily.
- **Human trafficking** - arranging or facilitating travel for the purpose of exploitation.

The Council has a statutory duty to notify the Secretary of State of suspected victims under Sections 43, 52 and 54 of the Act.

The Council continues to uphold the principles of the [Charter Against Modern Slavery](#) and this statement outlines progress made during 2025/26.

This year's statement also reflects changes introduced through the Procurement Act 2023 and the Procurement Regulations 2024, which came into force the 24th February 2025.



2. Organisation Structure, Business and Supply Chains

The Council maintains a **zero-tolerance** approach to modern slavery. We will not engage with suppliers who fail to comply with the Modern Slavery Act or who cannot demonstrate robust supply chain controls.

Operations and Supply Chain Overview

The Council operates solely within the UK and has assessed its direct operations as **low risk**. Where third-party suppliers are used, robust due diligence is undertaken to identify and mitigate risks.

Policies

The Council maintains clear HR and ethical policies that minimise the risk of modern slavery. These policies are regularly reviewed to ensure they remain aligned with national guidance and best practice.

Whistleblowing policy ([Link](#))

The Council enables its workers, customers, business partners and the public to report concerns confidentially.

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

These codes set expectations, to employees and volunteers, for ethical behaviour when representing the Council. Employees must behave honestly and follow the Council's policies and procedures.

Supplier Code of Conduct ([Supplier Code of Conduct CDC - 2025.pdf](#))

This code outlines the mandatory standards for all suppliers, including modern slavery compliance.

Recruitment

The Council has 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.



3. Due Diligence Preventing Modern Slavery

The Council's procurement processes require suppliers to confirm compliance with the Modern Slavery Act and declare any relevant convictions.

To ensure compliance with our values, behaviours and ethics, we have in place rigorous selection processes which include but are not limited to, checks on economic and financial standing, convictions, and health and safety; to help ensure our suppliers and their supply chains are slavery free.

From 24th February 2025, the Procurement Act 2023 introduced strengthened exclusion grounds. The Act builds on the previous legislation and strengthens the ability to exclude suppliers who pose risks around Modern Slavery. Public bodies cannot legally contract with suppliers or associated persons that are debarred and are on the Cabinet Office Debarment List.

The offences associated with Modern Slavery are specified within Schedule 6 of the [Procurement Act 2023](#) and constitute mandatory exclusion grounds where the relevant conditions apply. The Procurement Specific Questionnaire (PSQ) enables the Council to ask further questions on modern slavery if the contract being procured has a higher risk. These elements are included in Part 3 – Conditions of Participation of the PSQ.

All contracts have specific Terms and Conditions with specific clauses linked to modern slavery.

4. Training and Capacity Building

The Council provides training on Modern Slavery to Councillors, Employees and Partners. Mandatory training called *Protecting Vulnerable Adults and Children* (PVAC) ensures staff know how to report incidents of abuse and neglect including modern slavery and human trafficking. It is also included in the Council's Safeguarding Training.

The Council has identified and provided specific training to designated officers 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.

All procurement staff complete the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply course annually.



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- 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.

Recruitment and selection training is provided to managers and includes right to work checks and the importance of pre-employment checks.

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 contract was re-procured through a robust procurement process in 2023/24. This contract 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 that 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 can indicate 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 suppliers to treat everyone with dignity and respect and provide the highest standards of service to customers and communities we serve.



5. Charter Against Modern Slavery

The Council continues to meet all ten commitments of the [Charter Against Modern Slavery](#). An audit will be undertaken in 2026 to assess ongoing compliance and identify areas for improvement.

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 – due diligence questionnaire and 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 and Suppliers Code of Conduct in tender documents.
5.	Publicise its whistle-blowing system for staff to “blow the whistle” on any suspected examples of modern slavery.	Complete – Whistle Blowing Policy updated in 2025 – this is included in tenders; staff and third parties have access via the Council webpage.
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 for contractors to have a Whistleblowing Policy or sign up to the Council's policy.
7.	Review its contractual spending regularly to identify any potential issues with modern slavery.	Complete – High-risk areas considered through periodic spend analysis.
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 – through publication of this annual statement.

The Charter provides a framework through which councils can go beyond their statutory obligations to combat modern slavery and improve ethical supply chain management.

6. Risk Identification, Assessment, Management and/or Mitigation

The Council has established safeguarding policies and procedures with partner agencies to safeguard the welfare of children and vulnerable adults and protect them from harm. The Council works closely with a range of statutory, voluntary



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and community sector partners to identify and respond to concerns relating to Modern Slavery, Human Trafficking and exploitation. Established information-sharing and referral pathways are in place to ensure safeguarding concerns can be escalated and addressed appropriately.

The Head of Service for Safer Communities participates in regional and local partnership forums focused on Modern Slavery, exploitation and associated safeguarding risks. These arrangements provide opportunities to share intelligence, emerging trends, best practice and learning with key partners, including local authorities, criminal justice agencies, regulatory bodies and specialist support organisations. Through these established partnership networks, agencies work collaboratively to identify risks, coordinate responses and develop effective approaches to preventing and responding to Modern Slavery and related forms of exploitation.

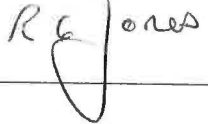
Modern Slavery and Human Trafficking (MSHT) forms part of the wider safeguarding and community safety agenda overseen through established partnership governance arrangements within the Safer Stronger Doncaster Partnership. Operational oversight is provided through the OCG Silver Group, which works with relevant partners to identify emerging risks, coordinate activity and promote awareness of exploitation-related issues. These arrangements support the sharing of intelligence, best practice and learning, while helping to ensure that professionals are equipped to recognise the indicators of modern slavery, human trafficking and other forms of exploitation and respond appropriately.

7. Priorities for 2026/27

During 2026/27 the Council will:

- Implement a Contract Tiering Tool across the contract portfolio.
- Complete risk assessments for all high-risk contracts.
- Enhance contract management monitoring arrangements for identified high-risk suppliers.
- Review supplier compliance with the Supplier Code of Conduct.

8. Approval of this Statement

Name	Designation	Signature	Date
Scott Fawcus	Service Director of Legal & Democratic Services & Monitoring Officer		28.07.26
Mayor Ros Jones	Mayor of Doncaster		29.07.26