

Doncaster Children's Services Trust Limited (Company Number: 08805834)

Modern Slavery and Human Trafficking Statement 2021/22

This statement sets out the actions undertaken by Doncaster Children's Services Trust ("the Trust") to understand and identify all potential modern slavery risks related to its business, and the steps put in place aimed at ensuring that there is no slavery or human trafficking in its business, or supply chains. This statement relates to actions and activities undertaken by the Trust during the financial year 1 April 2021 to 31st March 2022.

As an organisation providing services on behalf Doncaster Council, the Trust recognises that it has a responsibility to take a robust approach to prevent slavery and human trafficking. In addition to the Trust's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

The Trust is committed to preventing slavery and human trafficking in its activities and ensuring that its supply chains are free from slavery and human trafficking.

The Trust's Modern Slavery and Human Trafficking Statement ("the Statement") is reviewed and updated annually. This year's Statement was approved by the Trust Board on 17th August 2022. The Statement is reported to the Board or Executive Task Committee each year for monitoring and assurance purposes.

Lorraine Eastham

Head of HR and OD

17th August 2022

Introduction

At the Trust, we are committed to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms.

This statement is made pursuant to Section 54, Part 6 of the modern slavery Act 2015 and sets out the steps the Trust has taken and will take in relation to slavery and human trafficking.

Our Commitment

We recognise that modern slavery is a significant global human rights issue and includes human trafficking (for domestic or sex work and other forms of labour), forced and bonded labour, child labour, and domestic servitude.

Our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its forms. We act ethically and with integrity in all our relationships, and use all reasonable endeavours to take action directly, and within our sphere of influence, to ensure slavery and human trafficking is not taking place within our business or our supply chains.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. We have a commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Workforce

Our value “BE RESPECTFUL” promotes an enabling and inclusive environment in which all members of the Trust including those young people & families we work alongside are treated with dignity and respect, and bullying, harassment and discrimination are known to be unacceptable. The Trust is committed to fair, progressive and ethical working practices. The Trust adheres to The Public Interest Disclosure Act 1998. If any modern slavery cases were to be suspected, any alleged violation of human rights would be fully investigated and appropriate disciplinary action would be taken against any member of staff found to have acted unethically and in breach of the Trust’s commitment to Human Rights.

Our Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the Trust. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour (including the prevention of modern slavery) and breaches are investigated.

We have a bullying and harassment policy which prohibits any threat of violence and harassment and an employee code of conduct and values, and encourages the reporting of any concerns or breaches so that they can be dealt with appropriately in accordance with our policies and procedures.

The Trust offers an independent and confidential Whistleblowing hotline where concerns can be voiced confidentially and anonymously if they wish. The Trust encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Trust. The Trust’s whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

All staff have access to a 24/7 confidential external helpline service via an employee assistance programme. It provides staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

Our commissioning and procurement staff undertake annual CIPS training on Ethical Procurement and Supply, which includes modern slavery and human trafficking.

Recruitment and Selection

We have comprehensive HR policies in place. The Recruitment and Selection policy ensures that staff are committed to human rights throughout the process. Employees have the right to terminate employment, this is detailed in employee's employment contracts.

The Trust's recruitment processes are transparent and reviewed every 2 years or sooner if there is a legal or known requirement. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up. We have a recruitment checklist including the requirement for a passport or equivalent photo identification, if the staff member is not a British citizen, we request a right to work in the UK permit. These checks are made by one person who has this responsibility for the Trust.

For Agency workers, we only use reputable employment agencies through a neutral vendor arrangement to source labour. We have contracts in place that ensure the agencies act in an ethical manner, treat agency workers fairly and undertake the required employment checks.

Relevant Policies

The Trust reviews its policies and procedures regularly to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the MSA:

- Recruitment Policy;
- Whistleblowing Policy;
- Bullying & Harassment Policy;
- Contract Procedure Rules;
- Corporate Social Responsibility Policy;
- Employee Code of Conduct

All policies can be found on the Trust intranet.

Structure and Business

The Trust is a Private Company Limited by Guarantee, and is wholly owned by Doncaster Borough Council.

The Trust provides support and social services to the children and families of Doncaster. We work with local partners to do the best for children, young people and families in the Doncaster area who need support in their daily lives. We are an organisation that has developed over time. Our development has included working with an increasing number of local communities and increasing our presence throughout Doncaster.

The Trust's Business Plan sets out our mission which is to make a positive impact on the lives of our children, young people and families by being an outstanding partner and provider of services, which maximise life opportunities for all.

From September 2022, the Trust will be transferring to Doncaster Borough Council.

Assessing Risk

The Trust's work is not seasonal. We do not source goods and services from any high risk countries. Our suppliers are all UK based.

Our supply chains are not complex and normally the supplier we contract with provides the services – it is not usually dependant on a further supply chain. We rarely have contracts for goods, usually just services. The Trust has rigorous policies in place as well as a culture and ethos where modern slavery is not acceptable or tolerated. Because we are a relatively small organisation with relatively few suppliers we tend to have close relationships with our suppliers.

Our placement providers are subject to the Trust QA procedures and, where registered, by government agencies such as Ofsted.

Taking the above into account, the level of risk is limited.

Supply Chains

The Trust is clear that it has a zero-tolerance approach to slavery and human trafficking. We will not engage with businesses or contract with suppliers who fail to comply with or ensure that their suppliers comply with the requirements of the modern slavery Act 2015 (the "MSA 2015").

The Trust procures a range of goods and services, in accordance with the Public Procurement Regulations 2015, our Contract Procedure Rules, Commissioning Framework and Procurement Guidelines. These include (but are not limited to) the commissioning of placements for children and young people through Independent Fostering Agencies, Residential Accommodation, and 16+ Supported Living Accommodation and other associated services.

The Trust works closely with other agencies, including Doncaster Council and regional procurement bodies, by subscribing to frameworks such as the White Rose Frameworks which is established and managed by Leeds City Council.

When undertaking tenders, the Trusts' procurement process requires suppliers to confirm that they comply with the requirements of the MSA 2015 and declare any prosecutions thereunder. For this process we use a Standard Selection Questionnaire (SSQ), which is a self-declaration form, issued to the supplier. Suppliers will be disqualified from the bidding process if the answers to the questions posed are unsatisfactory. The SSQ asks whether potential suppliers are compliant with the annual reporting requirements of the MSA and asks for either evidence of compliance or an explanation as to why they have failed to achieve compliance. Successful suppliers must provide a copy of their modern slavery statement and policy as part of the due diligence process.

All new contracts issued include terms and conditions detailing suppliers' responsibilities regarding modern slavery and human trafficking and the Trust's right to terminate contracts if these are not complied with. We have also updated the majority of our older contracts

issued on previous terms and conditions to include relevant clauses in regard to modern slavery and human trafficking.

We challenge abnormally low tenders to ensure potential suppliers are not practising modern slavery as a way to cut costs.

The Trust continues to review our standard contract terms and conditions of purchase to ensure that they reflect anti-slavery legislation on an ongoing basis.

We require our key suppliers to have appropriate safeguarding policies, procedures and training in place in addition to providing confirmation of compliance with the MSA 2015. The Trust reviews these policies with both new and existing key providers on a regular basis.

If evidence is obtained within the supply chain indicating the presence of modern slavery, the Trust recognises its responsibility to work with others to address this as a matter of urgency. The Trust, in certain cases, will have the right to terminate business relationships where violations are discovered.

Non-Executive Directors (NED) Code of Conduct and Ethical Framework

The Trust expects all Non-Executive Directors to demonstrate the highest standards of conduct and behaviour. All NEDs are required to abide by a formal Code of Conduct. Breaches are investigated by the Chair of the Board.

The Trust requires all Non-Executive Directors to record and declare personal and prejudicial interests.

Partnerships

The Trust works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes Doncaster Council and the Local Safeguarding Boards.

Due Diligence

We continue to monitor suppliers we believe present modern slavery risks in our supply chain. As part of our initiative to identify and mitigate risk we:

- a) For full tenders, require suppliers to complete questions around modern slavery and violations. We also receive a copy of the supplier's modern slavery Statement and Policy which covers their governance, policies, training and supply chain management processes
- b) For spot purchase placement providers and other relevant suppliers, request suppliers complete our spot purchase questionnaire, which includes questions around modern slavery policies and convictions.
- c) Take any appropriate measures in supplier selection, so suspicious suppliers can be excluded;
- d) Include appropriate clauses in contracts with third parties to require compliance with the modern slavery Act; and
- e) Work collaboratively with our supply chain members to manage and mitigate the risk of modern slavery and human trafficking and identify areas for improvement.

We therefore have systems in place 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; and
- protect whistle blowers.

Update on Actions for 2021-22

1. Awareness and training

- We said we would provide training to run a social media campaign to raise awareness amongst all staff and volunteers. Due to capacity issues within the Communications Team this action has not taken place.
- We said our procurement staff will be complete Ethical Procurement and Supply training on an annual basis, from the Chartered Institute of Purchasing and Supply. This has been completed for 21/22 and will be undertaken on an annual basis.

2. Policy and Procedure Reviews

- We said we would continue to review our policies and procedures in order to ensure that they are fit for purpose and continue to provide the required protections throughout our supply chain. To support this, we said we would implement a responsible procurement policy and an anti-slavery policy. The work on this policy has been started, however before it was completed it was decided that the Trust would be transferring to Doncaster Council and so their policies and procedures will apply from September 2022. Therefore the Trust has not implemented its own revised policy at this point.

3. Supply Chains

- We said we would work closely with partners and suppliers to establish clear governance arrangements to ensure that modern slavery is addressed at a strategic level as well as developing referral pathways within the Trust to promote access to early intervention for victims in need of help and support. We now ensure all contracts are issued with clauses in regard to modern slavery. For key suppliers, we also check their modern slavery policy. The work on the referral pathways has been started, however before it was completed it was decided that the Trust would be transferring to Doncaster Council and so their policies and procedures will apply from September 2022. Therefore the Trust has not implemented its own revised policy at this point.
- We said we would undertake modern slavery due diligence for more suppliers where appropriate, by asking them to complete a questionnaire prior to contracts being issued and signed. This has been completed and will continue.

Actions for 2022/23

As the Trust is transferring to Doncaster Borough Council from 1st September 2022, it will cease to have the requirement to report its own Modern Slavery Statement and will use Doncaster Borough Council's procedures and policies from this date.

Signed and Approved by:

Name:	
Title:	Chair of the Trust
Date:	17 th August 2022