

Modern Slavery Statement

April 2022 – March 2023

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1. INTRODUCTION

This modern slavery statement articulates our commitment and intended actions in addressing modern slavery throughout our organisation and business activities. This statement is made with reference to section 54 of the Modern Slavery Act 2015 and constitutes as the council's modern slavery statement for the financial year ending March 2023.

Modern slavery is a serious crime which violates human rights and is happening across the world, including the UK. Human trafficking, slavery, servitude and forced or compulsory labour are all forms of modern slavery. It also covers practices such as forced or sham marriage and organ harvesting. Victims are targeted and abused by individuals and organised criminal gangs. Kirklees Council ("the council") acknowledges its duty to comply with the Modern Slavery Act 2015, which has an aim to eradicate modern slavery by imposing tougher penalties on perpetrators and strengthening support and protection for victims. Therefore, as an employer, service provider, commissioner, and contractor of other bodies, we take full responsibility and have a robust approach to modern slavery.

The council acknowledges its duty under the Modern Slavery Act 2015 to notify the Secretary of State of suspected victims of slavery or human trafficking. Whilst the true scale of modern slavery is not known, on a national scale the Home Office reported that there were 16,938 potential victims (adults and children) of modern slavery referred into the National Referral Mechanism (NRM) in 2022, the highest number since the NRM began in 2009 and of which 0.18% (31) referrals were reports of modern slavery from Kirklees Council ([see source](#)). A further 4,580 adult potential victims were referred via the National Duty to Notify process for adults who did not consent to an NRM referral ([see source for NRM and DTN](#)).

Our vision for Kirklees is to be a district that combines a strong, sustainable economy with a great quality of life - leading to thriving communities, growing businesses, high prosperity, and low inequality where people enjoy better health throughout their lives. To support our vision, this statement sets out the activities undertaken by the council to tackle modern slavery in its business, supply chain and across communities. It sets out the council's position and intended actions to address potential modern slavery risks related to its business. We shall do this by:

- Legislation - acknowledging our duty under section 52 of the Modern Slavery Act 2015 to notify the Secretary of State of suspected victims of slavery or human trafficking; section 54 to publish an annual modern slavery statement and section 43, to cooperate with the Independent Anti-Slavery Commissioner upon request.
- Organisational structure and supply chains - opposing any form of modern slavery and ensuring it does not exist in our own business or supply chains.
- Risk assessment and due diligence - recognising and responding to modern slavery in our corporate activities, supply chains and the wider community.
- Relevant policies and standards - raising awareness of this issue across our business and supply chain, strengthening our processes in line with our standards.
- Staff training and awareness - raising awareness of this issue with all council employees and across our business and supply chain to help us identify modern slavery.

2. ABOUT US

Kirklees Council is one of five local authorities in West Yorkshire. It covers an area of 157 square miles and has a population of around 433,300. Kirklees benefits from its cultural diversity and is a welcoming authority; we work alongside partners and communities to provide refugees and asylum seekers with the help they need to successfully integrate in their new community. The council and partners aspire to being the best in the UK and having safe, strong communities is a key priority for us.

We take our responsibility to safeguard the most vulnerable in society very seriously and this involves protecting people from the serious crime of modern slavery.

3. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Kirklees Council provides a wide range of vital public services, some of which are universal whilst others depend on need. These services include keeping children safe, supporting older and vulnerable Kirklees residents, keeping communities safe, providing sport and leisure facilities and green spaces, tackling homelessness and supporting people to live in affordable, good quality housing, keeping the streets of Kirklees clean and managing waste and making our roads safe.

The council have relationships with external businesses to provide a range of products and services to the people of Kirklees. Most of our suppliers are UK companies and SMEs. The council spent approximately £542m on goods, works and services with external suppliers in the 2022/23 financial year.

The council takes a number of steps to reduce the risk of modern slavery and human trafficking in our supply chains when we buy goods and services from external businesses and organisations. Some of the steps currently taken are:

- The requirement for contractors to demonstrate compliance with any applicable legislation. In practice, this means contractors with an annual turnover of £36 million or more must confirm that they have a modern slavery statement, as per the requirement of the Modern Slavery Act 2015, and include a link to this on their website. If suppliers fail this question, they will be disqualified from the bidding process.
- Assessing potential suppliers' compliance with the obligations of the Modern Slavery Act 2015 in the tender process, which includes the request for assurances that appropriate procedures are in place to combat modern slavery.
- Applicable contracts specifically reference compliance with the Modern Slavery Act 2015 and include an associated right to audit.

4. RISK ASSESSMENT AND DUE DILIGENCE

Kirklees Council are committed to ensuring that our supply chain demonstrates the same ethical values and practices as ourselves. It is known that in the UK, contracts with the highest risks of people falling victim to modern slavery include construction workers and the service sector in areas such as hospitality, security, cleaning and catering. Globally, contracts associated with the production and manufacture of textiles, electronic equipment and construction materials are seen to have the highest risks of poor working conditions and abuse of human rights. The council recognises these risk characteristics through its commitment to be compliant with the provisions as set out in the Modern Slavery Act 2015 and our own procurement procedures and policies for combating modern slavery.

In practice, we have a minimum expectation that any organisation with which we work, commission, or procure a service from, operates appropriate policy and practice in relation to modern slavery.

Furthermore, the approach we adopt to supplier selection is in line with that developed by Crown Commercial Services and is utilised nationally across the public sector. Tenderers must state whether they are a relevant commercial organisation as defined by section 54 ("transparency in supply chains etc.") of the Modern Slavery Act 2015. If they are, they are required to confirm their compliance with the annual reporting requirements contained within the Act. Failure to meet these requirements are treated as a ground for mandatory exclusion from the tender process.

Again, we recognise that this is a developing area for the council and will become best practice as more of our ambitions in this area are achieved.

5. RELEVANT POLICIES AND STANDARDS

The following policies and procedures are key in meeting the requirements of the Modern Slavery Act 2015 and preventing modern slavery in our services and operations. The council reviews its policies and procedures regularly to ensure they remain compliant and fit for purpose:

- Kirklees Corporate Safeguarding Policy 2022 (due to be published soon)
- [Kirklees Modern Slavery Strategy 2022 2027](#)
- [Confidential Reporting Code \(Whistleblowing Policy\) February 2023](#)
- [Kirklees Council Contract Procedure Rules May 2023](#)
- Kirklees Council Employee Handbook 2015 (revised April 2022)

We have a range of clear and rigorous HR employment policies and practices to ensure that employees of Kirklees Council are not exploited at work and minimise the risk of any form of modern slavery existing within the council and our suppliers.

The council's approach to employee relations is collective bargaining and we have a local framework agreed with our three recognised trade unions, Unison, UNITE and GMB. The framework for engagement in employee relations sets out how the council consults and negotiates with our local trade unions. Employees have the opportunity to become a member of a trade union and we also have a number of staff networks which are a source of information and provide support. Information on how to get in touch with our unions or staff networks is available on our staff intranet.

Kirklees Council has a robust and transparent recruitment and selection process and ensures that all new workers recruited to the council, whether full or part-time employees, agency employees or contractors/consultants, have the requisite checks. Our offer of employment is subject to the following rigorous process:

- The receipt of satisfactory references.
- Evidence of any required professional qualifications, e.g., social work qualifications, and essential requirements, such as a clean and valid driving licence.
- Lived or worked abroad checks where needed.
- Disclosure and Barring Service checks, where applicable.
- The receipt of eligibility to work in the UK, reviewed where it's not continuous at point of employment.
- Identification check.
- Acceptance of the terms and conditions contained within the contract of employment.

Where any documents are required, they are copied and originals returned.

The contract includes details of salary, hours of work and leave entitlement. It also provides the notice periods that employees are required to give to terminate employment or are entitled to receive if their employment is terminated. All council employees, regardless of age, are paid at least the National Minimum Wage. When sourcing agency staff, the council has a managed service provider which must be used for all general agency requirements. The agencies used within the contract are required to comply with anti-slavery and human trafficking laws and policies.

When available, overtime is offered but is not compulsory. Depending on the nature of the role, the council offers a flexitime scheme and where this isn't available there is a set working pattern that is determined by the manager.

The council does not employ anyone under the minimum school leaving age but does offer work experience placements for compulsory school aged pupils. When a person under the age of 18 is employed, or hosted on a work experience placement, the council undertakes a risk assessment to protect their health, safety and wellbeing.

6. STAFF TRAINING AND AWARENESS

The council raises awareness of modern slavery signs and how to report this with all employees especially those in a public facing role through the council's safeguarding training. Delivered in partnership between the council and West Yorkshire Police, awareness sessions are accessible to anyone who works or volunteers in Kirklees and are promoted in forums such as staff team meetings, the Kirklees Safeguarding Children Partnership and Kirklees Safeguarding Adults Board. People in specific roles are supported and additional training is available to council teams, partners, and community groups working with adults, for example briefings on specific types of exploitation and associated issues such as 'Domestic Servitude' and 'Cuckooing'. We also recommend externally recognised training courses to our employees.

Our dedication to raising awareness of modern slavery in Kirklees also extends to both the private industry and public forum, working alongside our partners in a place-based way to continue to raise awareness in our communities, improve reporting of concerns and signpost victims to information and advice. We are also committed to raising awareness amongst members of the public through regular engagement sessions, sharing literature and talking to individuals.

Our internal staff in Procurement Services have completed the Government Commercial College course on tackling modern slavery in supply chains, see link [E-learning: tackling modern slavery in public sector supply chains - GOV.UK \(www.gov.uk\)](https://www.gov.uk/e-learning/tackling-modern-slavery-in-public-sector-supply-chains). This course aims to increase the understanding of commercial professionals at each stage of the commercial lifecycle and how to identify and mitigate modern slavery. The course also a focussed on how to monitor and assess supply chains for labour rights issues, using Personal Protective Equipment (PPE) as a sample case study.

7. PROGRESS IN 2022/23 AND NEXT STEPS

7.1 MODERN SLAVERY STRATEGY AND ACTION PLAN

Objective: To work alongside the Kirklees Modern Slavery Partnership to develop a strategic plan and underpinning partnership action plan.

Progress: In November 2022, we refreshed and published a five year [Modern Slavery Strategy for 2022-2027](#) which is a key priority of our Communities Partnership Plan, detailing our aim of working with partner agencies to tackle modern slavery in all its forms. Alongside this, we set out an accompanying action plan developed in consultation with the partnership and signed off at the Communities Strategic Delivery group, in which objectives are aligned with the 4P's approach within the national modern slavery strategy - Pursue, Prevent, Protect, Prepare.

Next Steps: Continue to review and implement the objectives set out in our internal modern slavery partnership action plan which outlines raising awareness, increasing referrals to the National Referral Mechanism (NRM), supporting victims, partnership working and disrupting any modern slavery activity.

7.2. LEARNING, TRAINING AND AWARENESS

Objective: To ensure internal and partner agency staff, including public and professional bodies, have modern slavery awareness training and understand where and how to report a concern.

Progress: During Safeguarding Week in June 2022, we delivered training to practitioners from a range of organisations including the local authority which included sessions on domestic servitude, a presentation for private industries in Kirklees as part of a suite of safeguarding briefings, and modern slavery awareness sessions in partnership with West Yorkshire Police reaching in excess of 100 people from partnership organisations, services and communities. To further enhance the current support and awareness of modern slavery to internal council staff we have developed an eLearning module as part of the council's corporate learning system which provides a short briefing on responsibilities, spotting the signs and reporting concerns.

Next Steps: In 2023/24, alongside continuing to monitor and discuss the uptake of training and refreshers through the Modern Slavery Partnership, we will launch and communicate the eLearning training council wide and monitor completion rates.

7.3. PROCUREMENT AND SUPPLY CHAINS

Objective: To work alongside council experts to ensure that due diligence is built into procurement procedures and ways of working.

Progress: We have ensured that requirements are built into the bidding process and documents for contractors to demonstrate compliance with modern slavery legislation. In practice, this means contractors with an annual turnover of £36 million or more must confirm that they have a modern slavery statement, as per the Modern Slavery Act 2015, and include a link to this on their website. If suppliers fail this question, they will be disqualified from the bidding process.

Next Steps: In 2023/24 we will carry out a piece of work to map our supply chain and undertake a risk assessment on these with a focus on our key contracts, known as tier one and tier two suppliers. We will also develop our procedures and best practice in accordance with the government guidance set out in the [PPN 02/23 - Tackling Modern Slavery in Government Supply Chains – Guidance](#).

7.4. COMMISSIONING AND CONTRACT MANAGEMENT

Objective: To ensure that commissioning and contract functions within the council can identify modern slavery within the supply chain and have the appropriate information to manage and resolve issues alongside providers.

Progress: We have been working alongside the council's internal legal department to ascertain that the next version of the council's standard contract terms & conditions will expect applicable contracts to reference compliance with the Modern Slavery Act 2015 and include an associated right to audit.

Next Steps: In 2023/24 we will provide our contract managers with tools they need to monitor performance and modern slavery risk through the implementation of relevant contract key performance indicators (KPIs.). We will also provide guidance for monitoring high risk contracts with clear implications and termination clauses for breach of contract.

8. DECLARATION

This statement was agreed and approved by:

Jill Greenfield (Service Director for Communities & Access Services)

Signed:



Date: 15 September 2023

To be reviewed: April 2024

The statement has also been endorsed by the Chief Executive and Executive Leadership Team and the Portfolio Holder for Communities and Portfolio Holder for Corporate Services.

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