West Northamptonshire Council

Modern Slavery Statement

2024-25

Introduction

Modern slavery involves the recruitment, movement, harbouring, or receipt of individuals through force, coercion, abuse of vulnerability, deception, or other means for exploitation. Defined under the Modern Slavery Act 2015, it covers offences such as slavery, servitude, forced labour, and facilitating travel for exploitation. These crimes have profound impacts, causing severe physical and psychological trauma, social isolation, and a loss of dignity and autonomy for victims.

Section 54 of the Modern Slavery Act 2015 places a requirement on all "commercial organisations" with a turn-over in excess of £36 million per annum, to publish an annual Slavery and Human Trafficking Statement to confirm what they have done in the year to address the risks to human rights in their supply chains. This statement confirms West Northamptonshire Council's actions to ensure there is no slavery or human trafficking in its own business and/or its supply chains for the financial year 2025-26.

As an organisation, West Northamptonshire Council is responsible for the provision of a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. The Council manages a wide range of services which are delivered either directly or using external contractors.

West Northamptonshire is committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community.

This statement covers the activities undertaken by West Northamptonshire Council to ensure that these are free from slavery and human trafficking.

Our Structure, our business and our supply chains

West Northamptonshire Council is a local authority for the purposes of the Local Government Act 1972.

West Northamptonshire Council is the single unitary council responsible for providing a range of public services to residents and businesses in the areas of Daventry, Northampton and South Northamptonshire, detailed on our website

Through the establishment of a unitary council, we are continuing to improve the way services are delivered, ensuring they are more streamlined, effective, and financially responsible. This transformation reflects our commitment to providing better outcomes for residents and communities across the region.

Council Employment Policies

The Council reviews its policies and procedures on an ongoing basis to ensure that they remain compliant and fit for purpose. The following policies and procedures are considered key in ensuring that the Council meets the requirements of the Modern Slavery Act 2015:

- Procurement
- Safeguarding
- Code of Conduct
- Whistleblowing
- Disciplinary
- Dignity at Work
- Grievance
- Recruitment and Selection

Safeguarding Vulnerable Adults and Children

The Council understands its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. A comprehensive Safeguarding Policy is in place, which all workers and Councillors are expected to have read and work within.

The Council does not work in isolation in respect of safeguarding and is committed to engaging with multi agency partnerships in order to protect and safeguard children and vulnerable people. The Policy and how to report concerns can be accessed via the following links:

Northants Adult Safeguarding Board

Safeguarding adults – West Northants Adult Social Care

Human Resources / Employment Policies and Practices.

The Council remains committed to ensuring equality, eradicating unfair treatment and promoting good relations across and between all of our communities. There are clear and rigorous HR policies and procedures in place and high standards for employees which seek to minimise the risk of any form of modern slavery existing within the organisation. We will continue to monitor and update our policies and procedures and make positive improvements to our practice and delivery. The Council has policies and procedures in place to cover all major employment issues including a confidential whistleblowing reporting procedure.

Recruitment and Selection

West Northamptonshire Council is committed to maintaining a transparent and regularly reviewed Recruitment and Selection Policy, along with robust procedures and processes. These ensure that all new employees undergo thorough vetting, including verification of identity, qualifications, and the requirement for payment into a valid personal bank account.

In accordance with the Asylum, Immigration and Nationality Act 2006, all prospective employees must provide evidence of their eligibility to work in the United Kingdom. Additionally, references are requested and diligently followed up to support the integrity of our recruitment practices.

Agency Workers

When using temporary workers, the Council will normally use OPUS Northamptonshire, as the Council's preferred supplier.

Where workers are engaged by a third-party supplier and come to the Council via OPUS Northamptonshire, we will monitor the contract to ensure that only reputable employment agencies are used.

If temporary workers are supplied by another agency, the Council use only reputable employment agencies to source labour. We will also verify the practices of any new agency we propose to use, prior to accepting workers from that agency.

Pay and Grading

In order to ensure that all employees are paid fairly and equitably, the Council use a job evaluation scheme. All new and changed jobs are evaluated by a panel of trained evaluators.

Employee Code of Conduct

All worker are issued with the Council's Code of Conduct which makes clear the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and any breaches are investigated fully. This code also applies to contractors, agency staff, volunteers and those on student / work experience placements working on behalf of the Council.

Procurement Contractors & Service Providers.

As an organisation the Council are committed to ensuring that its contractors adhere to using the highest standards of ethics. All tender processes undertaken in line with the Public Contract Regulations 2015 require the bidders to provide confirmation that they are fully compliant with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015.

Equality and Diversity

The Council is committed to making equality an integral part of its daily business and as a major employer, service provider and commissioner we are committed to advancing equality of opportunity and providing fair access and treatment in employment opportunities and when delivering services to those in the community. We will seek to embed equality and diversity into our everyday business.

We expect all representatives of the Council including Councillors, Managers, Employees and Contractors to treat everyone fairly, with dignity and respect.

Partnerships

Through its Community Safety function, the council leads the West Community Safety Partnership, for which modern slavery and serious organised crime is a priority. We strive for a community where awareness of all forms of human trafficking & modern slavery is commonplace and that across all sectors people work collectively to eradicate its existence in our community.

The Council 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 both our Safeguarding Children and Safeguarding Adults Boards.

Training and awareness

The Council has an induction programme which includes mandatory safeguarding training which all employees must complete. The Council will seek to continue to develop its training offer to improve its staff's ability to identify and report modern slavery and human trafficking.

Performance indicators

The effectiveness of the steps taken by West Northamptonshire Council to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chains, will be measured through the following methods:

Thorough investigation of all allegations, complaints, whistleblowing reports and safeguarding referrals received from employees, members of the general public or law enforcement agencies regarding Modern Slavery and Human Trafficking. The Council will ensure that any learning from these is acted upon and shared appropriately.

Working with Suppliers

The makeup and nature of our global supply chains for goods and services is increasingly complex. Modern Slavery and Human Trafficking can be present within any community and whilst slavery can be found anywhere in the chain, it tends to be much worse further down the value chain where there is little visibility and where the poorest and most vulnerable work. The Council will continue to work to ensure that all vulnerable people are safeguarded and recognises the high-risk groups in its community including workers with certain occupations such as car washes/care workers and those resident in multiple occupancy properties.

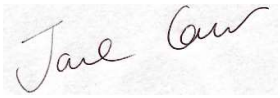
The Council will continue to adhere to Section 52 of the Modern Slavery Act which places a duty to notify on the local authority. Any incidents of Modern Slavery will be referred to the Police and other appropriate governing boards such as the Community Safety Board.

Review and Approval

This statement has been submitted to the Cabinet Member for Community Safety and Engagement and to the Director of Communities and Opportunities for approval

and will be reviewed on a regular basis by West Northamptonshire Council lead for Modern Slavery.

All staff and councillors hold a responsibility to identify and report concerns through the identified channels.



Jane Carr

Director of Communities & Opportunities