



Northumberland County Council

Modern Slavery Act 2015- Modern Slavery and Human Trafficking Statement For Financial Year Ending 31st March 2019

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery and forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Northumberland County Council is committed to ensuring that our ethical practices to combat slavery and human trafficking are followed throughout our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

Structure and Supply Chain

The Council is a unitary local Authority which provides all local government services for over 315,000 citizens. The Council manages a wide range of services delivered both directly by the Council and through external contractors with a large and diverse supply chain.

The Council currently employs over 9,000 staff in full and part-time contracts.

Policies

The Council has a range of policies and processes which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations which include:

- **Whistleblowing Policy:** The Council encourages its employees, its suppliers and those providing services under a contract with the Council in their own premises, (for example care homes), 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 slavery or human trafficking. The policy is designed to make it easier for employees to make disclosures, without fear of retaliation.
- **Employee Code of Conduct:** The Code makes it clear to employees, 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 including when managing its supply chain.
- **Recruitment Selection Code of Practice:** The Council directly recruits its employees via an in-house function. Where agency workers are used, these are procured via a third party company which has been evaluated and verified to ensure they are reputable.
- **Equality and Diversity Policy:** This includes a commitment to eradicate discrimination and inequality when delivering services and when employing others to deliver services on our behalf.

- Procurement Procedures: The Council considers the likely impact of and any associated criteria with regard to social issues, within its supply chain prior to the commencement of a procurement process via its Sustainable Impact Assessment Tool. The Shared Procurement Service aims to develop its own ethical procurement and supply policy and supplier charter within the next 12 months.

Due Diligence and Risk Assessment

The Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Due diligence includes:

- Contractor performance reviews to improve substandard suppliers' practices and monitoring of agreed actions;
- Invoking sanctions against suppliers that either fail to improve performance or seriously violate conditions of contract including the termination of the business relationship;
- Implementation of a Standard Selection Questionnaire (SQ), which includes the requirement for supplier disclosure of any offence under the Mandatory Exclusion Grounds and also requires confirmation of compliance with reporting requirements under Section 54 of the Modern Slavery Act 2015.

Effective Action

The Council has evaluated the principal risks related to slavery and human trafficking and has identified the following areas to be addressed:

- A lack of appropriate clauses in supplier contract terms & conditions;
- The need for enhanced training for staff to ensure the Council's position related to slavery and human trafficking is understood;
- Reputational

The Council is working to address the identified risks and to develop an action plan.

Training and Awareness-raising

Members of the Shared Procurement Service senior team are Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPS code of professional conduct. Over the next year, the Council's Procurement Team will be required to undertake specific training related to modern slavery and human trafficking in supply chains. The Council is also committed to ensure all staff have an awareness of the Act through mandatory training modules.