

# **Modern Slavery Act 2015- Modern Slavery and Human Trafficking Statement For Financial Year Ending 31 March 2022**

## **Introduction**

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

The Council has a zero-tolerance approach to any form of modern slavery. 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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out Northumberland County Council's actions to understand all potential modern slavery risks related to our services and businesses, and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own services and businesses, and our supply chains.

## **Structure and Supply Chain**

This statement covers the activities of Northumberland County Council. The statement covers direct employees of the Council, agency workers engaged through the Council's managed service, services delivered on behalf of the Council by third party organisations and in the Council's supply chains.

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.

## **Countries of Operation and Supply**

Northumberland County Council only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low due to the nature of the Council's business, the Council remains vigilant to any potential risks, and will take all steps available to manage any risks presented.

## **High Risk activities**

The Council considers that, due to the nature of its business and the policies/processes that are in operation, there are no areas of its business that are considered to be at high risk of slavery or human trafficking.

## Responsibility

Responsibility for the Council's anti-slavery initiatives is as follows:

- **Policies:** These are developed by officers in the relevant Service area and are agreed in line with the Council's scheme of delegation. Policies are reviewed regularly to ensure that they remain current and relevant.
- **Risk Assessments:** To be undertaken by the relevant service area where there is deemed to be a risk of modern slavery or human trafficking, with the support of colleagues within Human Resources and Organisational Development (HR&OD) and Procurement.
- **Investigations/Due Diligence:** Any concerns regarding modern slavery or human trafficking should be raised with the Council's Head of Procurement in the first instance.
- **Training:** Awareness of the issue of human trafficking and modern slavery is available to all staff through E-learning material, and bespoke training when appropriate offered via specialist providers.

## Relevant Policies

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

- **Safeguarding Polices:** In order to safeguard and promote the welfare of children and adults living in Northumberland, the Council's safeguarding strategy is underpinned by a range of policies and guidance.  
<https://www.northumberland.gov.uk/Care/Support/Safeguarding.aspx> - Safeguarding Adults information and  
<https://www.northumberland.gov.uk/Children/Safeguarding.aspx> - Safeguarding Children information.
- **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.  
<https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Economy-and-Regeneration/NCC-Whistleblowing-Policy-HRP-40-V1-3.pdf>
- **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's recruitment processes are transparent and reviewed regularly. 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 Immigration, Asylum 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.
- **Internal Staff Bank/External Agency Workers:** The Council has set up its own Staff Bank where it directly appoints temporary staff to deploy within the Council and meet service needs. It has robust procedures in place to check identity and eligibility to work, and a process to enable payment of salary directly into an appropriate personal bank account. Service managers cannot recruit temporary staff without first seeking approval. The Staff Bank reduces the need to use external agency workers. However, 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 Corporate Social Responsibility Policy:** 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 Corporate Social Responsibility Commitment Assessment.
- **Counter Fraud Policy:** This reminds employees to be alert to any improper conduct or suspicious behaviour and provides guidance on how to report their concerns about risks related to fraud and corruption whether it is attempted from within or outside of the Council.
- **Bribery and Corruption Policy:** This policy sets out the Council's responsibilities, and of its employees, in observing and upholding the Council's position on bribery, corruption and money laundering issues.

## **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.

### **Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if: no reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### **Training and Awareness Raising**

Members of the Council's 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.

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures including the suite of information and guidance available via the Council's website, and our safeguarding leads.

The Council has developed specific modules via e-learning and specific training providers, which are available to ensure all staff have an awareness of the Act and modern slavery and human trafficking.

We are continuing to consider ways to increase awareness within the Council, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

### **Approval for this Statement**

This statement has been approved by the Chief Executive of the Council, Daljit Lally. It will continue to be reviewed and provided annually.



Signature: .....

**Chief Executive**

.....Date: 06/10/2021

