



# Modern Slavery Statement



# 1. Modern Slavery Statement

Sefton Council understands the risk that all forms of Modern Slavery pose both to our residents and visitors - and internationally, through the global nature of modern supply chains.

The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking does not exist within any part of its business, including its supply chain. Modern slavery comprises slavery, servitude, forced and compulsory labour, and human trafficking. The categories listed below are not exhaustive, but cover the main types documented in the UK.

- Labour exploitation
- Sexual exploitation
- Criminal exploitation
- Domestic servitude

The Council is committed to opposing Modern Slavery and recognises the role it can play as a public sector organisation, and with our partners, in its identification and disruption. The Council is fully committed to using all avenues open to us to tackle modern slavery by using our statutory powers, role as a public procurer and through utilising the strengths of all our partnerships through wider awareness-raising.

The Council has a zero tolerance approach to any form of Modern Slavery and is committed to acting in an ethical manner, with integrity and transparency in all business dealings.

The Council has values which guide its workforce. These include:

- Putting people at the heart of what it does;
- Listening, valuing and respecting each other's views;
- Developing a culture of challenge, ownership, innovation and improvement;
- Being ambassadors for Sefton;
- Being responsive and efficient;
- Being clear about what it can and cannot do.

The Council is committed to improving its practices to combat slavery and human trafficking and expects its suppliers, partners and third parties to adhere to these values and beyond, in the fight against slavery and human trafficking.

This statement sets out the Council's arrangements and procedures that exist to eradicate slavery and/or human trafficking.

## Organisation Structure and Supply Chains

The Council is a unitary authority providing all local government services for its residents; from refuse collection to public health functions, education provision and social care. 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.

## Related Policies

The Council prides itself on clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers.

The Council includes anti-slavery clauses in its suite of standard contract terms and conditions and tender documents. This is to ensure that the Council is only entering into contracts with suppliers who are as equally committed to complying with requirements under the anti-slavery and human trafficking laws, including but not limited to the Modern Slavery Act 2015.

The Council also has a Whistleblowing Policy which actively encourages and enables all Council employees, and others the Council deals with, who have serious concerns about any aspect of the Council's work to come forward and voice their concerns. The policy confirms the process for making a protected disclosure, which complies with the Public Interest Disclosure Act 1998, enabling, if necessary, employees may make disclosures without fear of reprisal or victimisation. This policy also specifically makes references to disclosing information which alleges a breach(es) of Modern Slavery Legislation.

The Council's Equality and Diversity Policy evidences a commitment to supporting the diverse needs of employees and the communities served. The Council works to ensure that the Council, as a work place, and the wider borough is a safe and supportive environment for every individual where they can live, work and have fun free from discrimination, harassment or prejudice.

The Employee Code of Conduct provides employees with guidance on the behaviour and conduct expected of them as public sector employees. The code crucially includes guidance on disclosure of information and applies to all employees.

The Council's Constitution also contains the Member's Code of Conduct which, amongst other things, notes that Members must not do anything which may cause the Council to breach any of the equality enactments.

The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures for the vetting new employees and ensures identities and qualifications are confirmed, and employees are paid directly into an appropriate, personal, bank account.

Sefton's Procurement Manager and team completed training in September 2020 to have Chartered Institute for Procurement and Supply (CIPS) Accreditation to the Ethics Standards. The training is designed to help prevent issues regarding fraud, bribery and corruption, human rights abuses and the impact of procurement on the environment.

Sefton Council is signed up to The Charter Against Modern Slavery (the Charter) is a motion by the Co-operative Party which places a positive obligation on those councils who sign up to the Charter committing the Council to proactively vetting their own supply chain to ensure no instances of modern slavery are taking place. [Co-operative Party Charter Against Modern Slavery – Co-operative Party](#)

## Due Diligence Processes

### Information

Sefton website has a dedicated [page](#) for modern slavery which contains advice on how to spot the signs and report concerns. It also links to an external webpage for the Merseyside Safeguarding Adults Board to provide further information.

### Corporate complaints system

The Council operates a complaints procedure to deal with complaints about its services, and this can be used to report community concerns which may merit investigation or reporting to a partner agency.

### Commissioning & Procurement

The Council expects all relevant suppliers of goods or services to have their own policy relating to working practices and modern slavery, or for evidence to be available to ensure their standards are in accordance with the Council's expectations. The Council expects its suppliers to ensure the same of their own supply chains.

The Council is committed to undertaking due diligence at all stages of the commissioning process to mitigate the risk of modern slavery and human trafficking within the supply chain. Due diligence measures include:

- Continuously developing the Council's understanding of the risks of modern slavery occurring and reviewing the supply chain to identify areas of vulnerability and risk.
- Considering appropriate steps to be taken to mitigate risks, particularly in those areas assessed to be at high risk of modern slavery.
- Taking appropriate measures in the selection of suppliers to enable the exclusion of suppliers with convictions under the Modern Slavery Act.
- To comply with the Modern Slavery Act 2015 the Council has updated questions within the procurement sourcing process. Selection questions require a bidder to evidence their compliance with the Modern Slavery Act. Any bidder who fails to evidence their compliance with the required legislation shall be excluded from participating further in the tender process. Incorporated within the Council's standard contract terms are clauses that specify the supplier's contractual obligation concerning Modern Slavery.
- Working to ensure that children services are supported to ensure that children are not exploited.
- Any supplier engaged by the Council to undertake the supply of goods and /or services is contracted to do so in line with the following policies:

- Safeguarding
- Equality & Diversity
- Code of Conduct
- Whistleblowing

In addition to publishing the Modern Slavery Booklet as part of Children's Social Care good practice guidelines, a resource sheet has been developed for staff which signposts practitioners to resources which can support them in their response to child trafficking. It includes good practice guidance produced by the Government, as well as guides and toolkits produced by non-governmental organisations, universities and the office of the Independent Anti-Slavery Commissioner.

These policies are key to ensuring that staff employed by the supply chain have appropriate channels to report any incidents of slavery and human trafficking.

## Awareness & Training

Awareness training sessions for Modern Slavery and Human Trafficking have been held to provide learners with an awareness of the signs of exploitation and trafficking in the UK and what support is available. The workshop is designed to provide learners from across the Council with an awareness of the signs of exploitation and trafficking in the UK and what support is available. The learning outcomes are

- To understand what is human trafficking / modern slavery
- To be aware of the signs to look out for
- To know what to do if you have concerns
- To know where you can seek advice

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## Risk Assessment and Management

The Council has robust risk assessment and management processes in place.

Support and advice in relation to risk assessments is available within the Council and can be provided by Procurement, Human Resources and Social Care departments.

