

Tamworth Borough Council Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Tamworth Borough Council adopts a zero-tolerance position on known violations of anti-human trafficking and anti-modern slavery laws. We are committed to improving our practices and ensuring there is no modern slavery or human trafficking in any part of our business and in so far as is possible requiring our suppliers to hold similar ethos.

This Modern Slavery and Human Trafficking Statement sets out the Council's actions to understand potential modern slavery risks related to its business and put in place steps that are aimed at ensuring that there is no slavery or human tracking in its own business, and its supply chains.

This Modern Anti-Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

The statement is reflective of an exceptional year due to the Covid pandemic and sets out plans for improvement in the next year as necessary.

The Modern Slavery Act 2015

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery. In broad terms:

- 'slavery' is where ownership is exercised over a person
- 'servitude' involves coercion to oblige a person to provide services
- 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them

Section 52 of the Act imposes a duty on public authorities, including district councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.

Section 54 of the Act imposes a legal duty on organisations, which supply goods and/or services from or to the UK and have a global turnover above £36 million, to publish a slavery and human trafficking statement each financial year.

The Council engages in commercial activity (statutory and discretionary) and provides a range of services to residents, businesses and visitors. This includes waste collection and recycling, collection of council tax and business rates, housing, homeless support, parks and open spaces, planning and

building control, street cleaning, promoting economic growth and regeneration, environmental health, leisure services, community safety and election administration. Services are delivered through a mixture of direct provision, commissioned services, contracted services, joint/shared services and partnerships. Its annual turnover is greater than £36million.

Standards

Tamworth Borough Council will meet the following standards and also expects those with whom it does business with, to meet these standards:

- To support every individual's human right to live free from abuse, servitude and inhumane treatment
- To promote ethical business and operational practices in corporate activity and the services delivered
- To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously
- To take appropriate steps with relevant partner agencies to address actual instances of slavery and human trafficking

Policies and Procedures

Tamworth Borough Council has a range of policies and plans in place which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations:

- Vision and Corporate Plan - The Council's vision is 'To put Tamworth, its people and the local economy at the heart of everything we do'" and our Corporate Plan includes a key priority to help tackle the causes of inequality and increase opportunities for all residents and businesses
- Safeguarding Children and Adults at Risk Policy – outlines a robust approach taken by the Council to safeguard the welfare of children and 'adults at risk'. (Reviewed and updated April 2021)

All staff and councillors are required to read and work within this policy. The Council works within multi-agency partnerships to protect and safeguard people and has an identified lead officer for modern slavery

The policy covers how the Council should comply with the duty to notify the Secretary of State of suspected victims of slavery and human trafficking.

- Whistleblowing Policy – encourages all its employees to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council, or the supply chain. The policy is designed to make it easy to make disclosures without fear of discrimination and victimisation. (Reviewed October 2019)

- Employee and Members Code of Conduct – is the ethical framework that employees and Members work to, which makes clear the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.
- Recruitment Policy – sets out robust processes in line with UK employment laws, including ‘right to work’ document checks and contracts of employment.. To comply with the Asylum, Immigration 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.
- Job Evaluation Scheme - ensures that all employees are paid fairly and equitably. When the Council uses employment agencies to source labour it verifies the practice of any new agency it is using before accepting workers from that agency.
- Equality and Diversity Scheme ‘Making Equality Real In Tamworth’ - sets out the how the Council will promote diversity and equality in the delivery of services provided both directly and in conjunction with our partners.

Supply Chains

In the procurement process, Tamworth Borough Council continues to expect all suppliers of goods and services to comply with all applicable laws, statutes, regulations [and codes] from time to time in force [including [but not limited to] the Modern Slavery Act 2015, their own anti-slavery policy (where applicable) and this Modern Anti-Slavery and Human Trafficking Statement.

The Council recognises that the organisation is exposed to greater risk when dealing with contractors and service suppliers. The Council has a wide range of suppliers delivering services across all directorates. The Council aims to reduce the risk of modern slavery in its supply chain by undertaking the following actions:

- Where appropriate key contractors are required to have safeguarding policies, procedures and training in place, in addition to providing confirmation of compliance with the Modern Slavery Act;
- Identify services that are more vulnerable to modern slavery and seeking assurance that their supply chain is free of modern slavery and human trafficking;
- All tenderers/suppliers are required to self-certify that they comply with the provisions of the Modern Slavery Act and our Invitation To Quote (ITQ) and Invitation To Tender (ITT) documents ask if the contractor is a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act").
- If a bidder fails to self-certify they are a compliant, their response is checked

- Successful contractors are asked for evidence that they are compliant with the annual reporting requirements contained within Section 54 of the Act. If they are compliant then the contractor is required to provide the relevant URL address and if they aren't, then the company is recorded as failing is removed from the procurement process.
- Where sub-contractors are involved, a reliance is placed on the main contractor. Our standard terms and conditions with regard to sub-contracting, state that:-

'the Contractor shall be responsible for the acts and omissions of any assignee or sub Contractor and its employees and agents as though they were the acts and omissions of the Contractor or the Contractor's employees or agents'

Training and awareness

Tamworth Borough Council has a programme of safeguarding training for all employees and elected members which continues to be utilised and is part of mandatory induction training – this is reported to Health and Wellbeing Scrutiny twice per year. Modern Slavery awareness is included in this training.

Level 1 safeguarding training - 2020-21 has seen the development and rollout of two safeguarding eLearning modules to staff and members. Level 1 safeguarding training must be refreshed every 3 years and is delivered as a rolling programme.

Level 2 safeguarding children training is delivered by the Staffordshire Safeguarding Children Board (SSCB) training team. Staffing roles that require this enhanced level of training have been identified and officers requested to complete this training. The training is delivered via Microsoft Teams and 8 officers attended the training in the last quarter of 2020-21.

Level 3 safeguarding children training provides subject specific training courses going forward the Partnership Vulnerability Officer will be working with managers to identify relevant safeguarding courses that will support staff in their job role.

Level 4 specialist training i.e. Designated Safeguarding Lead training. The Assistant Director Partnerships attended the training in the last quarter of 2020-21.

Information on Modern Slavery is incorporated into the Council's Safeguarding Policy and is available to all staff – an update to the policy was shared via Astute in April 2021

A bespoke eLearning Modern Slavery and human trafficking package remains available for all staff and members during induction enabling them to identify and know how to report suspected or disclosed incidents.

The Member Safeguarding Champion has been given relevant training in all areas of safeguarding and this role will continue.

At present any concerns can continue to be reported to the Designated Safeguarding Officer.

Relevant public information is now available on the Council's website.

How to Report Modern Slavery

If you suspect someone may be at risk of Modern Slavery telephone 101 to report it to Staffordshire Police, or if someone is in immediate danger always call 999.

Crimes can be anonymously reported via Crimestoppers on 0800 555 111 or via modernslavery.co.uk's hotline on 0800 0121 700

Partnership working

Tamworth Borough Council has a strong track record of working in partnership with other agencies to respond to safeguarding, slavery and trafficking issues. This includes supporting Staffordshire County Council, Staffordshire Commissioners Office for Police, Fire and Crime and Staffordshire Police through the Tamworth Community Safety Partnership.

The Council continues to work with colleagues to develop a common understanding and partnership approach to the threats, vulnerabilities and risks relating to slavery and human trafficking.

We also work with a range of agencies to safeguard children and adults at risk. This includes supporting the work of the local safeguarding boards and district Councils safeguarding network. The Council wants its employees to understand more about this growing issue and how to report any suspicions they may have, whether in a work or personal context.

Relevant staff continue to attend Staffordshire Police Modern Slavery and Human Trafficking Tactical group to share relevant information.

Risks have been identified with partners in premises subject to licensing regulations and all partners have taken a collaborative role to report concerns, investigate and take appropriate enforcement actions.

No referrals to the Tamworth Vulnerability Partnership were made during 2020/21 with regard to Modern Slavery concerns

Going Forward

The Council will strengthen its approach to tackling modern slavery by:

- Seeking reassurance via current training packages that staff remain up to date and have undergone relevant training

- Identify and train safeguarding champions in each Council service (in progress)
- Working with Service Managers to undertake relevant risk assessments as necessary with suppliers to ensure their understanding and compliance with the Modern Slavery Act where necessary

This Modern and Anti-Slavery and Human Trafficking Statement has been approved by Council's Corporate Management Team and endorsed by the Audit & Governance Committee and Cabinet. It will be reviewed and updated as necessary on an annual basis for monitoring and assurance purposes.

A handwritten signature in black ink, appearing to read 'AB', followed by a long horizontal line extending to the right.

Andrew Barratt
Chief Executive
September 2021