



Northamptonshire County Council

Modern Slavery Statement

(2020 -2021)

Introduction

Modern Slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the [Modern Slavery Act 2015](#) and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after

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 Northamptonshire County 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 2020 - 2021.

As an organisation, the County 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 through the use of external contractors.

Northamptonshire County Council 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 Northamptonshire County Council to ensure that these are free from slavery and human trafficking.

Our Structure, our business and our supply chains

Northamptonshire County Council is a local authority for the purposes of the Local Government Association 1972.

The County Council's vision is to create a "county where we all look after each other and take responsibility, where the vulnerable are protected and supported, and where the people who can help themselves receive the assistance they need to stay independent and healthy". The Council Plan 2019-2021 advises that by working together with partner agencies and local communities we want to:

- Enable individuals and communities to achieve better outcomes
- Whenever possible, co-design and co-deliver services with partners and communities
- Innovate to find better and more sustainable ways of delivering services
- Focus precious resources where they have the biggest impact, in preventing need and intervening early.
- Utilise new service models which are designed to be scalable and affordable in the long term.
- Use technology and digital solutions to help meet the needs of residents.
- Commission and procure services and goods with partners, to get the best return for the Northamptonshire pound.
- Use our properties to maximise occupancy levels, generate income and manage costs.
- Ensure that those that have a role to play, internally and externally, are engaged, have a voice and contribute to the transformation of services

- Ensure changes take into account equality gaps and mitigate impact, so that we reduce inequalities and disparity of opportunities.

[*https://www3.northamptonshire.gov.uk/councilservices/council-and-democracy/performance-and-plans/Documents/Council%20Plan/Council%20Plan%202019%20to%202021.pdf](https://www3.northamptonshire.gov.uk/councilservices/council-and-democracy/performance-and-plans/Documents/Council%20Plan/Council%20Plan%202019%20to%202021.pdf)

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 organisation meets the requirements of the Modern Slavery Act 2015:

- **Safeguarding**

The County 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 staff and councillors are expected to have read and work within. The County 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 all vulnerable people. The policy and how to report can be accessed here; <https://www.northamptonshiresab.org.uk/Pages/policies-and-procedures.aspx>

- **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.

Northamptonshire County Council has procedures and policies in place on all major employment issues including disciplinary, resolution of workplace concerns , respect at work (Bullying and Harassment, Codes of conduct and confidential reporting procedures exist (Whistleblowing), as well as other policies that support fair treatment of employees including attendance management and ill health capability, performance capability, performance management, recruitment and selection etc.

- **Recruitment**

The recruitment procedure and processes within the County Council are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures that they are able to confirm their identity, qualifications and that they are paid directly into an appropriate personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006 all prospective employees are also required to supply evidence of their eligibility to work in the United Kingdom. References are also requested and followed up.

- **Agency Workers**

When using temporary workers, the Council use only reputable employment agencies to source labour and verifies the practices of any new agency it proposes to use prior to accepting workers from that agency.

- **Pay**

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

- **Employee Code of Conduct**

All staff are issued with the Council's Code of Conduct for Employees which makes clear the actions and behaviours expected of them when representing the Council. The Council strive 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 County Council are committed to ensuring that its contractors adhere to using the highest standards of ethics. All tender processes undertaken require the bidders to provide confirmation that they are fully compliant with the Modern Slavery Act 2015.

Equality and Diversity

The local authority 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 County Council including Councillors, Managers, Employees and Contractors to treat everyone fairly, with dignity and respect.

Training and awareness

Northamptonshire County Council has an induction programme which includes mandatory safeguarding training which all employees must complete. The County 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 Northamptonshire County 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.
- Reviewing and evaluating high risk supply chains and contracted services as part of ongoing contract management / monitoring activity.

Working with Suppliers and Due Diligence

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.

Northamptonshire County 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 Cabinet members for approval and will be reviewed on a regular basis by the Northamptonshire County Council lead for Modern Slavery.

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