

# Bridgend County Borough Council

## Modern Slavery Statement

Financial Year: 1 April 2021 to 31 March 2022

### 1. Overview

Bridgend County Borough Council delivers a wide range of statutory and discretionary services to over 147,000 residents. The Council does this through its own workforce and through over 1,700 private and third sector organisations.

The Council is a signatory to the Welsh Government's [Code of Practice: Ethical Employment in Supply Chains](#). The Code of Practice includes the following employment issues:

- Modern Slavery and human rights abuses
- Blacklisting
- False self-employment
- Unfair use of umbrella schemes and zero hours contracts and
- Paying the Living Wage

The Code's 12 commitments include tackling Modern Slavery and Human Trafficking. This Statement sets out the action that the Council has taken, and will take, to ensure that there is no Modern Slavery and Human Trafficking in its own business or supply chains.

Bridgend County Borough Council is fully committed to providing visibility to its Modern Slavery Statement and ensuring 'Transparency in Supply Chains'. To this end the Council is working in partnership with Welsh Government, the wider public sector, suppliers, service providers, trade unions and others to address modern slavery challenges and drive collaborative action with a view to reducing risks and incidence of modern slavery.

### 2. What is Modern Slavery?

In the UK, the Modern Slavery Act 2015 defines criminal offences of slavery, servitude and forced or compulsory labour and of human trafficking, and includes measures for the protection of potential victims.

Modern Slavery is a serious crime that violates human rights. Victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self.

The Council is fully aware of its designation as a 'First Responder' organisation under the National Referral Mechanism and its responsibility to identify potential victims and refer cases to the UK Human Trafficking Centre Competent Authority of the National Referral Mechanism.

### 3. Our Policies

The [Corporate Plan 2018-23](#) sets out the Council's ambitions and commitments to citizens and its contribution to Wales' seven well-being goals as outlined in the Well-being of Future Generations (Wales) Act 2015. The vision is "one Council working together to improve lives". The Plan sets out the key principles that "underpin how we work" and the values that "shape how we work".

The Corporate Plan is updated on an annual basis and has 3 well-being objectives:

1. Supporting a successful and sustainable economy.
2. Helping people and communities to be more healthy and resilient.
3. Smarter use of resources.

The Council's over-arching **Corporate Safeguarding Policy** ([ADD LINK](#)) sets out the Council's duty and commitment to safeguard and promote the wellbeing of children, young people and adults at risk and to ensure that effective practices are in place throughout the Council and its commissioned services. The policy covers all functions and services of the Council and applies to all Council employees, elected members, foster carers, individuals undertaking work placements and volunteers working within the Council.

The other key strategies and policies include:

- The Council's **Socially Responsible Procurement Strategy** ([ADD LINK](#)) sets out the Council's commitment to "Improving Fair Work and Safeguarding practices adopted by suppliers." The Council wants to work with organisations that share its values.
- The Council has adopted the [Welsh Government's Code of Practice on Ethical Employment in Supply Chains](#) and the elimination of modern slavery, so that Bridgend County Borough Council plays a leading role in making Wales hostile to modern slavery.
- The [Whistleblowing Policy](#) enables Council staff and employees of the Council's contractors / suppliers to report unethical employment practices to the Council.
- **Employee Code of Conduct** makes it clear to employees the actions and behaviour expected of them when representing the Council. In performing their duties, they must act with integrity, honesty, impartiality and objectivity. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.
- **Recruitment policy** - the Council aims at all times to recruit the person who is most suited to the particular job. The Council has robust recruitment processes, which

includes document checks to ensure that candidates are allowed to work in the UK.

- **Agency workers** – the Council sources all agency workers and temporary staff through third party providers. We contract a managed service with Pertemps whose Modern Slavery Statement sets out their zero tolerance approach to modern slavery and is available on their website.

#### 4. **Our supply chains**

Bridgend County Borough Council delivers a wide range of statutory and discretionary services to over 147,000 residents. The Council does this through its own workforce and through over 1,700 private and third sector organisations.

The Council has a responsibility to manage public money with probity and to ensure that its £186m of annual procurement spend is managed in such a way that it supports the delivery of wider Council priorities. The Council recognises that our supply chains spread across the world, and that parts of the supply chain could be engaged in modern slavery. The Council will focus on our direct suppliers and will require our suppliers to ensure that their supply chain is free from modern slavery.

The high-risk sectors for modern slavery include leisure, hospitality, catering, cleaning, clothing, construction and manufacturing. A review of Council spend has shown that for the majority of the high-risk areas the Council provides the service in-house, utilises national frameworks and/or local suppliers. The risk of modern slavery and human trafficking by our direct suppliers is considered low.

Through the tendering process, the Council ensures that our direct suppliers are aware of our commitment to tackle modern slavery and human trafficking and that they also understand their obligations as a supplier or contractor of the Council.

The Council undertakes due diligence when considering taking on new suppliers and will seek to review its existing suppliers on an annual basis through its contract management arrangements. The due diligence and reviews include:

- Ensuring compliance with the s54 (Modern Slavery Act 2015) requirement regarding a Modern Slavery Statement and, as part of tender evaluation and ongoing contract management, consideration of the potential and likelihood of modern slavery; seeking mitigations from the supplier through a clear understanding of the suppliers' structure, business and supply chains and policies in relation to slavery and human trafficking.
- Conducting supplier assessments to create a risk profile focusing on financial stability and also covering insurance and compliance with various employment policies including the Welsh Government's Code of Practice: Ethical Employment in Supply Chains.

- Taking steps to improve sub-standard supplier practices, including the provision of advice to suppliers and requiring them to implement Action Plans; for example to demonstrate compliance with safer recruitment guidelines.
- Participating in collaborative initiatives focused on human rights and socially responsible procurement policies in general and modern slavery and human trafficking in particular.
- Invoking sanctions in respect of suppliers who fail to meet our expectations or to improve their performance in line with an Action Plan, which includes a provision to terminate the business relationship.

## **5. Employee training**

Bridgend County Borough Council is committed to providing a range of training for our employees in order to raise awareness of modern slavery, human trafficking and forced labour. In addition to awareness level training some staff will need training specific to their role for example identified first responders and commissioning and procurement staff.

We aim to provide a programme of training which will include:

- e-learning modern slavery / human trafficking awareness module
- Train the trainer workshop (awareness and first responder)
- Modern Slavery / human trafficking awareness workshop (3 hours)
- Anti-Slavery first responder course.
- Externally commissioned training for specific groups of staff (e.g. procurement and commissioning)

In addition to the training programme staff will have access to on-line resources which will include e-learning on specialist topics such as county lines, and links to videos, guides and external websites that hold information on modern slavery and human trafficking.

## **6. Duty to Notify**

Specified public authorities have a duty to notify the Secretary of State of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. The 'duty to notify' provision is set out in Section 52 of the Modern Slavery Act 2015, and applies to local authorities in England and Wales which includes Bridgend County Borough Council which as a designated first responder organisation can make referrals into the NRM. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

This requirement in respect of potential victims of modern slavery is harnessed to responsibilities under the Social Services and Wellbeing (Wales) Act 2014, and the All Wales Safeguarding Procedures as set out in the Corporate Safeguarding Policy when, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

**Bridgend MASH (Multi-Agency Safeguarding Hub)**

**South Wales Police MASH Staff (PPU)**

Phone: 01656 815808

**Safeguarding Adults Team**

Phone: 01656 642477

**Information, Advice and Assistance (IAA) Team (Children)**

Phone: 01656 642320

Email: [mashcentra@bridgend.gov.uk](mailto:mashcentra@bridgend.gov.uk)

**7. What the Council has done**

We have:

- Become a signatory of the Welsh Government’s Code of Practice: Ethical Employment in Supply Chains.
- Started the process of reviewing our supply chains to identify high risk areas.
- Developed a Socially Responsible Procurement Strategy and Delivery Plan.
- Continued to support Welsh Government efforts to promote the Code of Practice and share best practice in relevant circumstances.
- Become a member of the Western Bay Anti-Slavery Forum (WBASF) the key focus of the forum is to:
  - promote Anti-Slavery awareness training across the Western Bay (Bridgend / Neath Port Talbot and Swansea regions) footprint;
  - consider the frequency and type of referrals under the National Referral Mechanism (NRM) and receive updates on local Anti-Slavery MARAC and
  - facilitate an exchange of human trafficking information and intelligence gathering across the whole range of statutory services, and associated third party organisations.
- Committed to review what we offer under corporate safeguarding training to ensure we provide training where there are statutory responsibilities for the local authority.

**8. What the Council will do**

Bridgend County Borough Council will take the following action in our efforts to ensure that there is no Modern Slavery or Human Trafficking.

Ref	Action
1	In line with clause 7 of the Code of Practice, continue to ensure that the Council carries out a regular review of expenditure and undertakes a risk assessment. We will continue to:

	<ul style="list-style-type: none"> <li>• Identify any high risk suppliers and monitor for human rights abuses and unethical employment practices which will become a standard agenda item in contract meetings and reviews.</li> <li>• Explore ways of working with our Tier 1 suppliers to raise awareness of modern slavery to prevent it from occurring through a formalised Risk Assessment process: <b>‘Tackling Modern Slavery in Supply Chains’</b>.</li> </ul>
2	<p>Utilising the Code of Practice – Ethical Employment in Supply Chains – deliver on a Modern Slavery Communication Strategy to ensure awareness is raised across the Council and with partner organisations and other agencies.</p> <ul style="list-style-type: none"> <li>• Share learning and best practice across the Council, with other public sector bodies, partners and look to learn from their experiences.</li> <li>• Continue engagement with Trade Unions to raise awareness of modern slavery with their members.</li> </ul>
3	<p>We will deliver a targeted programme of Modern Slavery (virtual) training across the various Council directorates – in compliance with Covid-19-related restrictions, coordinated with wider Corporate Safeguarding training.</p> <ul style="list-style-type: none"> <li>• We shall continue to identify staff requiring training in ethical employment practices and seek to build awareness / capacity particularly amongst front-facing members of staff working in the Community.</li> <li>• We shall look to extend the pool of in-house trainers available to facilitate awareness level training for staff across the Council.</li> <li>• We will keep records of who has undertaken training across the various directorates and target those where completion rates require improvement.</li> </ul>
4	<p>Review and update where necessary the Modern Slavery Statement annually and report progress on this Action Plan.</p>
5	<p>We shall encourage suppliers to add Modern Slavery social value clauses to new contracts as this will incentivise good practice, including the use of relevant tools and data sets.</p>
6	<p>We shall participate in ‘communities of practice’ where Local Authorities work together to share best practice and achieve efficiencies of scale, e.g. sharing due diligence data across public, private and voluntary sectors to inform audits, etc. (using platforms such as TISCreport).</p>
7	<p>Complete a review and update the Council’s tender documentation to ensure Modern Slavery and Human Trafficking issues are fully addressed which include clauses to:</p> <ul style="list-style-type: none"> <li>(i) Check that contractors who have a turnover above £36million have a Modern Slavery Statement.</li> <li>(ii) Include the Code of Practice: Ethical Employment in Supply Chains as a part of our tender documents.</li> </ul>
8	<p>Appoint a Modern Slavery ‘Champion’</p>

9	<p>Complete a review and update the Council's standard T&amp;Cs to ensure employment practices are considered as part of the procurement process:</p> <ul style="list-style-type: none"><li>(i) Review supplier contracts and map supply chains through due diligence – with an option to include sanctions or a termination clause if Modern Slavery is suspected.</li><li>(ii) Ensure the absence of undue time and cost pressures which could result in unethical treatment of staff.</li><li>(iii) Embed a zero-tolerance approach to Modern Slavery.</li></ul>
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## **9. Supporting Material / Resources**

In addition to the links highlighted throughout the Statement the Home Office has a range of documents and promotional material available -

<https://www.gov.uk/government/collections/modern-slavery>