

Halton Borough Council Modern Slavery Act Transparency Statement

Modern Slavery is a crime, and an abuse of human rights. The Modern Slavery Act became law on 26 March 2015. It is designed to tackle the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

The Act contains a '**Transparency in Supply Chains Clause**' (54) which aims to encourage businesses to be more transparent about what they are doing and increase their accountability for any slavery & human trafficking within their business and their supply chain(s).

Under this clause organisations with:

- a turnover of £36 million or more
- Supplies goods and/or services

MUST prepare and publish a 'Slavery & Human Trafficking' statement **each financial year**.

Modern slavery includes:

- Forced labour; Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence.
- Debt bondage; Victims are forced to work to pay off debts that realistically they will never be able to.
- Sexual exploitation; Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced often under the threat of force, or another penalty.
- Criminal exploitation; Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.
- Domestic servitude: Victims are forced to carry out housework and domestic chores with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

Halton Borough Council supports the implementation of the Modern Slavery Act 2015. This statement sets out the Council's actions to understand the potential modern slavery risks related to its business and the steps it has put in place to ensure that no slavery or human trafficking takes place in its own business or through its supply chains.

The Council provides a wide range of statutory and discretionary services for its residents, businesses, visitors and wider public and consequently purchases a wide range of goods and services from third party suppliers.

The Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty as a Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

The Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking

Council Constitution

The Council's Constitution sets out a range of policies and procedures relating to officer and member codes of conduct, as well as policies and standing orders relating to procurement and whistleblowing. The Constitution is reviewed on an annual basis.

<http://councillors.halton.gov.uk/ieListDocuments.aspx?CId=649&MId=5870&Ver=4&info=1>

Policies and Processes in relation to slavery and human trafficking

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

Safeguarding

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and 'adults at risk' of abuse, harassment, neglect or exploitation. A wide range of training relating to the safeguarding of both children and adults is also available

The Council works within multi-agency partnerships, such as the Halton Safeguarding Children Board and the Halton Safeguarding Adults Board to protect and safeguard people.

<http://www3.halton.gov.uk/Pages/health/PDF/safeguard/Safeguardguidance.pdf>

<http://haltonsafeguarding.co.uk/>

Procurement

The Council procures goods and services from various suppliers and this is governed by our procurement strategy.

Halton Borough Council operates a fair and open competition by following transparent and auditable procedures in all of its tendering and contracting activity. It aims to provide a wide range of businesses with a variety of commercial opportunities by publishing all its opportunities in excess of £1,000. To trade with the Council businesses need to register on the North West e tendering portal [The Chest](#).

Further information about the Council's Procurement practices can be found here: <https://www3.halton.gov.uk/Pages/business/doingbusinesswithus/doing-business-with-us.aspx>

Recruitment

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 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.

Agency Workers

The Council uses the only reputable employment agencies to source labour. The Council does this by using the Matrix Agency interface. Matrix checks the practices of any new agency it is using before accepting workers from that agency. Their Modern Slavery Statement can be found here: <http://www.matrix-scm.com/modern-slavery-act/>

Pay

The Council operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council has also extended its payment of the National Living Wage to all employees, not solely those over the age of 25.

Employee Code of Conduct

The Council's Employee Code of Conduct makes clear to both 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 and breaches are investigated

Whistleblowing

The Council encourages all its employees, contractors and other business partners to report any concerns related to the direct activities or to the supply chains of the

Council. The Council's whistleblowing policy is designed to make it easy for employees to make disclosures, without fear of retaliation and is published on the staff intranet.

Members' Code of Conduct and Ethical Framework

The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. Breaches are investigated by the Monitoring Officer. Further details of this are contained within the Council's Constitution, which is reviewed on an annual basis

Councillors' Declarations of Interests

The Council requires all Councillors to record and declare disclosable pecuniary interests and other disclosable interests.

Due diligence processes and steps taken to assess and manage the risk of modern slavery in Halton Borough Council's business and supply chain

In November 2016, the Cabinet Office introduced the Supplier Selection Questionnaire, which should be used in all tenders over the EU thresholds; this requires suppliers to declare any involvement in modern slavery.

The Council has included reference to the Act as a mandatory gateway – Pass/Fail question into all of the relevant tendering documents that are published as part of the procurement process for both above and below EU Threshold.

Training about slavery and human trafficking

The Council provides training in safeguarding for staff and partners involved in person centred services.

Halton Borough Council is a member of a number of equality networks and actively work through these to raise awareness of the issues associated with modern slavery and human trafficking, and disseminate information accordingly.