

# Vale of Glamorgan Modern Slavery and Human Trafficking Statement

April 2023

## Our Commitment to the Modern Slavery Principles

The Vale of Glamorgan Council is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We remain committed to doing business in a responsible way, which includes a commitment to do all that we reasonably can to prevent all forms of modern slavery in any part of our own business and our supply chain.

We expect our customers and suppliers to share and uphold these ethical values and principles.

## Why is this important?

The Council recognises that victims of slavery and human trafficking are treated as commodities and exploited for criminal gain.

The Council intends to combat this crime. The Council is a member of the Local Safeguarding Group and will work with South Wales Police and other law enforcement agencies to help disrupt this illegal act and bring to justice perpetrators of such crimes across the Vale.

This Statement therefore serves as the basis of current and future policies and procedures to help combat this crime.

## Our Supply Chain

We will use our best endeavours to:

- identify and assess potential risk areas;
- mitigate the risk of the occurrence of slavery and human trafficking;
- monitor potential risk areas; and
- protect whistle blowers.

Requirements covering Modern Slavery and Human Trafficking will be embedded into Procurement documentation.

We plan to establish a robust system of contract management that delivers our requirements in the most effective manner. It will include the identification and management of risks relating to modern slavery and human trafficking and will include:

- improving communications with suppliers;
- enhancing relationships with existing suppliers;
- establishing effective supplier relationship management strategies; and
- reviewing supplier compliance with our ethics, policies and procedures when conducting audits.

Our aim is to provide a level of training that supports our ability to manage contracts effectively.

## Ownership

Responsibility for our modern slavery policy and programme sits with our Human Resources and OD Team reporting directly into our Resources Directorate.

Our Human Resources Team, in conjunction with our Finance and procurement team, work in partnership to review all policies and procedures in a timely manner.

Our internal organisational structure can be found by clicking [here](#).

## Risk Assessment and Management

The following activities will continue to be undertaken to ensure that the Council is compliant with the Modern Slavery Act 2015:

- Councillors Induction and Training – includes safeguarding and modern slavery and human trafficking.
- Employee Training – the Council has mandatory training for all employees on modern slavery enabling them to recognise and report on relevant concerns. In addition,

specific training is also provided to those employees with procurement and contract management functions to consider appropriate measures in projects. Scheduled refresher training will be conducted at least every 4 years.

- The Council is fully aware of its designation as a First Responder 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.
- Suppliers, Contractors and Service Providers – when procuring goods or services, potential suppliers will be questioned about compliance with section 54 of the Modern Slavery Act 2015, required to demonstrate due diligence and intellectual rigour to prevent slavery within their own supply chains.
- Recruitment processes – we have strict recruitment processes in place, ensuring that all our employees have the appropriate rights to work, this is managed by our inhouse Lifecycle Team, part of the Human Resources Department. We use approved recruitment agencies to support us in sourcing workers on permanent and fixed-term bases. Whilst these agencies are permitted to source potential candidates from within their own supply chains, relevant checks (including right to work, Disclosure and Barring Service (DBS) and Baseline Personnel Security Standard (BPSS) checks) are carried out, where appropriate.
- We will work in 2023 to become a formally accredited Real Living Wage employer, as set out by the Living Wage Foundation. This means that our direct employees are paid the Real Living Wage and that we require all of our contractors to pay their people the Real Living Wage, too. As a result of this, we believe that the risk of forced or trafficked labour being directly employed by The Vale Council is low.

This Modern Slavery statement encompasses the requirements of the ethical employment obligations as set out with the Code of Practice. The policy will be communicated throughout the Council through e learning and collective training sessions to all employees.

The Senior Leadership Team will monitor its effectiveness, review, and report any significant changes to the policy for determination by the Cabinet.

In addition, the Council will appoint a member of the Senior Leadership Team to undertake the role and the responsibilities as Anti-Slavery and Ethical Employment Champion to support the Council's stance on unethical employment practices, modern slavery, human trafficking and other human rights abuses.

## Our Policies

Our commitment to conducting business ethically and responsibly is reinforced throughout various company policies, including:

- **Our Code of Conduct** sets the standard of behaviour that is expected of everybody employed at the Council and those doing business on our behalf, to ensure we all work in an open and honest way.

Our Code of Conduct will be reviewed in 2023, to ensure it remains progressive and compliant.

**Speak Out policy (Whistleblowing):** Staff members, members of our supply chain or the public can raise concerns about wrongdoing (including human rights violations) taking place in The Vale of Glamorgan Council.

Our Policy and procedures have been reviewed in 2021 and 2022 to ensure we offer the most appropriate channels to do this – including a confidential 24/7 reporting service called 'Speak Out'. Reports can be made to the Speak Out service anonymously, should the discloser feel more comfortable reporting in this manner.

**Contracts and Procurement policy:** Our Procurement policy and strategy references modern slavery and was last updated in February 2023.

In addition, the following are available to all our staff through the Staffnet and Staffnet plus:

- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy
- Safer Recruitment Policy

This voluntary statement is made with reference to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Vale of Glamorgan Council's Modern Slavery and Human Trafficking statement for the financial year ending 31 March 2024.

This statement was approved by the Cabinet of The Vale of Glamorgan Council on 27 February 2023