

	<b>RUGELEY TOWN COUNCIL</b>	
	<b>MANUAL</b>	

## **Anti-Slavery and Human Trafficking Statement**

Updated May 2024

<b>Date created</b>	<b>Date adopted</b>	<b>Date last reviewed</b>	<b>Next review date</b>
September 2020	7 <sup>th</sup> October 2020	8 <sup>th</sup> May 2024	30 <sup>th</sup> June 2024

## Anti-slavery and Human Trafficking Statement

Rugeley Town Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

This Modern Anti-slavery and Human Trafficking Statement sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking 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.

### **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.

### **Standards**

Rugeley Town 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 to address actual instances of slavery and human trafficking.

### **Organisational structure**

Rugeley Town Council is a local authority of Cannock Chase District Council, which provides a wide range of statutory and discretionary services, delivered both directly by the Council and through external contractors.

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**Supply chains**

In the procurement process Rugeley Town Council would 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. Contract terms and conditions set out the requirements of contractors and subcontractors in relation to ensuring there is no slavery or human trafficking in their businesses.

The Council also requires its contractors and sub-contractors engaged in a 'regulated activity'<sup>1</sup> with children and adults at risk to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council's Safeguarding Policy.

**Policies and Plans**

Rugeley Town 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:

- Safeguarding Policy – sets out how the Council will safeguard and promote the welfare of children, young persons and adults at risk who come into contact with its services and activities. 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, councillors, co-optees, contractors, their agents and/or subcontractors, consultants, suppliers and service providers 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.
- Employee Code of Conduct – is the ethical framework that employees 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 procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications. 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.
- Rugeley Town Council Procurement – Sets out the strategic aims and principles of procurement activity. This includes safeguarding requirements which are expanded in the procurement guide for managers as defined by the Safeguarding Vulnerable Groups Act 2006 (as amended)

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- Procurement Equality Standard – aims to ensure that equality and diversity is embedded into the procurement processes.
- Comprehensive Equality Policy –sets out the Council’s legal obligation under the Equality Act 2010 and the various ways the Council meets its duties.

**Due diligence**

Rugeley Town Council’s due diligence approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to modern slavery for their own suppliers, subcontractors and other participants in their supply chains where their annual turn-over exceeds £36 million. Where turn-over is less than £36 million, suppliers are required to comply with this Modern Anti-slavery and Human Trafficking Statement.

**Training**

Rugeley Town Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, including modern slavery and human trafficking.

Induction briefings on equality and diversity and safeguarding are provided to Members following local elections.

**Our effectiveness in combating slavery and human trafficking**

Rugeley Town Council uses the following performance indicators to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

1. Number of suppliers evaluated using its supplier evaluation and due diligence measures;
2. Number of employees trained on code of conduct, human rights and modern slavery;
3. Number of cases reported on its whistleblowing system and resulting action. This Anti-slavery and Human Trafficking Statement will be reviewed annually.