



**North  
Northamptonshire  
Council**

# **Modern Slavery Statement**

## **2021-22**

### **Introduction**

Modern Slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men using 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 North Northamptonshire 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 2021 - 2022.

As an organisation, North Northamptonshire 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 using external contractors.

North Northamptonshire Council is committed to preventing and acting against identified slavery and human trafficking in its corporate activities, its supply chains, and the wider community.

This statement covers the activities undertaken by North Northamptonshire Council to ensure that these are free from slavery and human trafficking.

## **Our structure, and our services and our supply chains**

North Northamptonshire Council is a local authority for the purposes of the Local Government Act 1972.

North Northamptonshire Council is the single unitary council responsible for providing a range of public services to residents and businesses in the areas of Corby, Kettering, Wellingborough, and East Northamptonshire.

It has replaced East Northamptonshire Council, Corby Borough Council, Kettering Borough Council and Borough Council of Wellingborough, and now delivers all the services which were previously provided by these councils.

These services include:

- collection of household waste
- maintenance of parks and open spaces
- street cleaning
- environmental health
- planning services
- Licensing

North Northamptonshire Council also delivers most of the services which were provided by Northamptonshire County Council, including Education, Highways, Adult Social Care and Libraries.

Through one council, we are transforming these services for the better and delivering them in a more joined-up and cost-effective way, including our supply chains.

## **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 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 staff in relevant roles, and councillors are expected to have read and work within. The Council does not work in isolation in respect of safeguarding and is committed to engaging with multi agency partnerships to protect and safeguard all vulnerable people. The policy and how to report can be accessed here.

[Policies and procedures \(northamptonshiresab.org.uk\)](http://northamptonshiresab.org.uk)

- Recruitment and Selection

The recruitment policy and processes for North Northamptonshire Council are transparent, support managers with undertaking a professional recruitment process to get the best candidate for the job. It includes robust procedures for pre-employment checks for employees and casual workers, including:

- right to work checks for new starters and internal movers
- identity checks for new starters,
- relevant qualifications and membership checks
- references
- DBS checks where relevant to job (including Certificates of Good Conduct for people who have lived overseas).
- Medical process for new starters

The Bank Mandate form ensures that employees and casual workers are paid directly into an appropriate personal bank account.

- Employment policies and practices.

There are clear and rigorous HR policies and procedures in place and clear management guidance so employees and casual workers are managed effectively. . We monitor and update our policies and processes and make positive improvements to our practice and delivery. The Council has regular forums to engage with the Trade Unions to develop policies and highlight any issues of concern.

The Council has procedures and policies in place on all major employment issues including attendance management, performance management, disciplinary, grievance, dignity at work, whistleblowing, and so on. Standards of expected behaviour are set out in the Codes of Conduct.

There are other policies focused on equalities, and support for employees throughout the employee lifecycle. The Council has an Employee Assistance Service that provides a confidential helpline, and access to a range of support.

All the employment policies and guidance are available on the Council's intranet.

- Agency Workers

The Council has formed a partnership with OPUS to source most agency workers. This is supported by an Agency Worker Policy. This is to ensure that the Council use only reputable employment agencies to source labour. The Agency Worker Policy contains the expectation that Opus undertakes the same level of pre-employment checks on agency workers as would be the expected standard of North Northamptonshire Council.

- Pay, grading, and other pay arrangements

To ensure that all employees are paid fairly and equitably, the Council has a robust Pay Policy, and uses a job evaluation scheme to evaluate new and significantly changed jobs, using trained evaluators. The Pay Policy sets out the authorisation process for any additional payments.

- Code of Conduct

New starters receive a document with their written statement that outlines key terms and conditions, key employment policies, and makes reference to the importance of the Code of Conduct, and that they can find it on the intranet. A similar document is used for Casual Workers to highlight key expectations. The Council's Code of Conduct 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, over and above any code of conduct that individual is subject to from their own employer or Professional body.

- Procurement Contractors & Service Providers.

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

### **Training and awareness**

The Council has an induction programme which includes mandatory safeguarding training which all employees must complete. The 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 North Northamptonshire 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.

The 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 Members for approval and will be reviewed on a regular basis by the Executive Member for Housing and Communities in consultation with the Assistant Director for Housing and Communities.

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