Contents

[Introduction from the Chief Executive 2](#_Toc48644495)

[Organisational Structure and Supply Chains 2](#_Toc48644496)

[High-risk activities 2](#_Toc48644497)

[Responsibility 2](#_Toc48644498)

[Current policies and initiatives 3](#_Toc48644499)

[Performance 4](#_Toc48644500)

[Training 4](#_Toc48644501)

[Awareness-raising programme 4](#_Toc48644502)

[Our effectiveness in combatting slavery and human trafficking 5](#_Toc48644503)

# Introduction from the Chief Executive

This Statement sets out Torbay Council's, (hereinafter referred to as 'the Council) actions to understand all potential modern slavery risks related to our activities and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own activities and in our supply chains. This statement refers to actions and activities during the financial year 1 April 2020 to 31 March 2021.

The Council fully supports the Government's objectives to eradicate modern slavery and human trafficking and are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standard abuses. As part of local government, the Council recognises that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

The Council expects its joint venture partnerships, contractors, suppliers and its staff falling in scope of this legislation to be aware of and comply with the requirements of the Modern Slavery Act. To support this, the Council will implement communication and education programmes which will highlight the requirements of the Act, high risk areas in Torbay and referral mechanisms.

# Organisational Structure and Supply Chains

This Statement covers the activities of the Council, a local authority purchasing and providing local government services. We have over 1,000 employees and operate in Devon, England. The statement covers direct employees of the council, agency workers engaged through the council's standing list agreement; and services delivered on behalf of the council by third party organisations and in the council's supply chains. Our supply chains include an extensive range of contracts with external providers involving the supply of goods and services.

### High-risk activities

The council will conduct dynamic risk assessments of our activities to assess whether or not particular activities are high risk in relation to slavery or human trafficking. Any concerns should be raised with the Monitoring Officer.

We consider that we currently have no high risk activities.

### Responsibility

Responsibility for the council's anti-slavery initiatives is as follows:-

* Policies: The Senior Leadership Team is responsible for reviewing this statement and the Procurement, Contract Management and Commissioning Team is responsible for keeping under review contract procedures where risk is identified in the supply chain.
* Risk assessments/investigations/due diligence: It is the responsibility of the Procurement, Contract Management and Commissioning Team to ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking.

## Current policies and initiatives

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

The council operates the following Policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

* Whistleblowing Policy - the council encourages workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the council. This includes circumstances that may give rise to an enhanced risk of slavery or human trafficking. The council's procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
* Code of Conduct for Employees - the council's code makes it clear to employees the actions and behaviour that is expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
* Supplier Selection - the council is committed to ensuring that suppliers adhere to the highest standards of ethics. Where suppliers are appointed through a competitive tendering process, relevant organisations are required to self-certify that they have complied with the requirements of the Modern Slavery Act 2015, at supplier selection stage.

The council’s Procurement processes encourage fair pay and working conditions in our supply chain and eliminate modern slavery and human trafficking. These processes are documented on the Council’s website and internally via its intranet page for all its staff <http://www.torbay.gov.uk/procurement>

* Recruitment/Agency Workers Policy - the council aims to use only agency workers recruited through suppliers on the council's standing list agreement, where this is not possible the council will undertake appropriate due diligence checks on any other agency worker suppliers used. New workers are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines, as appropriate.
* Safeguarding Children and Vulnerable Adults Policy - our Safeguarding Policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of modern slavery or human trafficking.

Link to policies/procedures: <http://insight/information/childrens/child-protection-procedures/>

Link to safeguarding children board: <http://www.torbaysafeguarding.org.uk/publications/policies/>

Link to safeguarding adults' board: <https://www.torbayandsouthdevon.nhs.uk/services/safeguarding-adults/safeguarding-adults-board/>

* The Council is part of the Safer Communities Torbay Partnership working with Devon and Cornwall Police and other agencies and also with partners across the South West to develop a collaborative approach to tackling the issue of modern slavery.

# Performance

The council considers the risks to be low on the basis that although the council has suppliers from outside the UK, these are not considered to be involved in high risk areas of activity. However, as part of our initiative to identify and mitigate risk, we will:

* Require all HR professionals to be suitably qualified in relation to recruitment procedures and offer training in recruitment and interviewing techniques.
* Require recruiting managers to have undertaken the council's recruitment training.
* Have in place appropriate procurement procedures and ensure that all contracts with external providers have appropriate clauses.
* Keep under review supply chain and contract procedures.
* Ensure that in carrying out statutory functions, officers are aware of potential risks and have clear reporting lines.

We have in place systems to:

* Identify and assess potential risk areas in our supply chains.
* Mitigate the risk of slavery and human trafficking occurring in our supply chains.
* Monitor potential risk areas in our supply chains
* Protect whistle blowers.

# Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

* The council has introduced mandatory online training for all staff which covers understanding procurement and the contracts register.
* As part of the procurement strategy and implementation of a corporate contract management function in 2020/21, we will be developing guidance and further training modules for council staff which will include the latest information regarding modern slavery and human trafficking.

# Awareness-raising programme

As well as training staff, we will raise awareness of modern slavery issues by posting information on the council's intranet; Insight and in Staff News bulletins. Also from September 2020, we will have in place, an internet and contract management process in relation to suppliers.

# Our effectiveness in combatting slavery and human trafficking

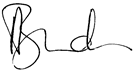
We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

* Monitoring complaints
* Monitoring training needs
* Feedback through Procurement, Contract Management and Commissioning Team reporting mechanisms

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes

our slavery and human trafficking statement for the financial year ending 31 March 2021. This

Statement will be reviewed and updated annually.

SIGNATURE …

CHIEF EXECUTIVE

Date: 23 September 2020