

## **MODERN SLAVERY STATEMENT BATH & NORTH EAST SOMERSET COUNCIL**

This Modern Slavery Statement is made in response to the requirements of Section 54 of the Modern Slavery Act 2015 (the Act).

Modern slavery is the severe exploitation of other people for personal or commercial gain. It can take many forms including trafficking of people, forced labour and servitude.

Bath & North East Somerset Council abhors modern slavery in all its forms and is committed to putting in place processes to prevent and eradicate it.

The statement sets out the following:

- What actions Bath & North East Somerset Council (the Council) has taken **to date**; and
- What actions the Council will continue to take to ensure that Modern Slavery is not taking place within its business, its community or its supply chains **in the next 12 months**.

This statement covers the financial year 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022 and addresses what improvements can be made to monitor the Council's suppliers and supply chains.

### **Potential Areas of High Risk of Modern Slavery**

High risk areas in the Council's supply chain where people could fall prey to Modern Slavery include:

- Low paid service contracts such as:
  - Cleaning
  - Catering
  - Security Guards
  - Care Workers
  - Gardeners
- Construction
- Areas where there is often forced/child labour including:
  - Textiles
  - IT and electronic equipment
  - Goods using minerals that are mined in areas of conflict

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Other high-risk areas that are not specifically supply-chain related include:

- Commercial Properties and other Commercial Interests
- Housing
- Social Care
- Wider Community

## **What has the Council achieved so far?**

Bath & North East Somerset Council operates in a devolved procurement environment. Budget holders with services have responsibility for buying goods and services by seeking quotes or issuing tenders to suppliers using the Council's procurement system followed by raising purchase orders and payment for goods and services received using the Council's financial system.

The Strategic Procurement Team works in conjunction with the service areas for high risk and high value procurement exercises and provides advice and support when required. In addition, they have responsibility for advising the Council in matters of procurement legislation, best practice, training and due diligence.

### **Tender Documents**

The Council's existing tender documents request that bidders confirm they meet the requirements of the Modern Slavery Act. This enables the Council where appropriate to exclude companies that cannot demonstrate that they comply with the Act.

This may not go far enough to understand how bidders are approaching the issues and what interventions they are putting in place, (if any), to prevent slavery in their supply chains.

The tender documents also include a Supplier Code of Conduct. This explains to bidders the standards that are required by all contractors, suppliers and their staff when doing business with the Council, including when they visit our sites or when they operate on behalf of the Council at other premises or with members of the public.

The Code of Conduct currently does not specifically address the issues relating to Modern Slavery.

### **New Suppliers**

The Council has already made improvements to its Supplier set up process. The current process does not specifically mention Modern Slavery, although budget holders must describe the product or service that is being bought on the setup form. As a result, the Strategic Procurement team can identify whether the products/service being purchased fall into any high-risk areas.

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## **Terms and Conditions of Contract**

The Council's Terms and Conditions of Contract were updated three years ago with a section on Modern Slavery and the statutory obligation for in-scope organisations to maintain and publish an annual Modern Slavery statement.

## **Sharing learning and best practice with other councils and local authorities**

The Council works closely with partners at the West of England Combined Authority (WECA), other local Councils and authorities, as well as being a member of the South West Procurement Board.

## **Commitments for the 2021 to 2022 tax year**

### **Research**

The Council will carry out research on the high-risk supply chain areas identified above and draw up a plan on how we will engage with key suppliers to find out what they are currently doing to eliminate Modern Slavery in their sub-contracts.

The Council will also consider how due diligence can be continued throughout the contract as part of good contract management and not just as part of a tender process. A process of auditing of supplier contracts will be developed.

### **Tender Documents**

The Council will expand the questionnaire section in the tender documents to include scored questions, where bidders would answer specific questions relating to their supply chains and how susceptible they are to Modern Slavery and the due diligence processes they will adopt to prevent it.

We will include the questions in tenders for high-risk categories.

We will expand the Code of Conduct to include a section on Modern Slavery.

### **New Supplier Set Up**

The Strategic Procurement team will establish how best to tackle any requests in high-risk areas, given the limited resources of the team.

## **Terms and Conditions of Contract**

The Strategic Procurement Team will revisit the terms and, liaising with the Legal Services, ensure modern slavery is appropriately covered.

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## Sharing learning and best practice with other councils and local authorities

Moving forwards the Strategic Procurement Team will continue to encourage a partnership approach on key, high risk procurement projects. We will share learning on Modern Slavery with these organisations and will keep them informed of any suppliers or contractors where we have concerns.

## Future Considerations

### Training

The Council has previously provided Contract Management Training to its staff which was well received. This training covered how to deal with problems relating to management of suppliers/contractors and how to introduce service level agreements and contract monitoring processes. The training did not cover Modern Slavery.

The Council will explore how best to train staff on all aspects of Modern Slavery, including whether it should be carried out internally or by an external specialist organisation.

### Monitoring and review

The Council will need to consider how to monitor and audit suppliers/contractors in the high-risk categories above in the longer term.

## SIGNED FOR AND ON BEHALF OF BATH AND NORTH EAST SOMERSET COUNCIL

Signature



Name.....Councillor Kevin Guy.....

Position.....Leader of the Council.....

Date.....12<sup>th</sup> July 2021.....

## SIGNED FOR AND ON BEHALF OF BATH AND NORTH EAST SOMERSET COUNCIL

Signature



Name.....Will Godfrey.....

Position.....Chief Executive Officer.....

Date.....12<sup>th</sup> July 2021.....

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