



MODERN SLAVERY ACT 2015 – CHESHIRE EAST COUNCIL TRANSPARENCY STATEMENT 2021/22

INTRODUCTION

The Modern Slavery Act 2015

The Council acknowledges the provisions set out in the Modern Slavery Act 2015 and this statement is made pursuant to section 54(1) of the Act, which places specific responsibilities on an organisation to ensure slavery and human trafficking does not exist within its supply chain, and in any part of its own business. Organisations need to demonstrate accountability through transparency to protect workers (both adults and children) from being abused and exploited, which in turn will bring greater confidence to customers and service users.

Modern slavery takes many forms, but some of the most common are criminal exploitation, sexual exploitation, servitude, human trafficking and forced and compulsory labour.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act.

Modern Slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

Modern slavery includes:

- **Forced labour:** Victims are forced to work against their will, often working very long hours for little or no pay, in dire conditions, under verbal or physical threats of violence
- **Debt bondage:** Victims are forced to work to pay off debts that realistically they will never be able to do
- **Sexual exploitation:** Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced, often under the threat of force, or another penalty

- Criminal exploitation: Often controlled and maltreated, victims are forced, against their will, into crimes such as cannabis cultivation or pick pocketing
- Domestic servitude: Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy, often sleeping where they work

This document sets out practices already in place within Cheshire East Council and any committed actions set for 2021/22 in response to the Modern Slavery Act 2015.

Structure and Business

Cheshire East Council is the third largest unitary authority in North West England, which, alongside partners, provides a wide range of services to the local community. Some of these service provisions are to the most vulnerable people in society and, as such, the Council has a statutory and high level of moral duty and care embedded within all its policies and practices.

The Corporate Plan 2021-25 sets out 3 main aims to be:-

- **Open**

We will provide strong community leadership and work transparently with our residents, businesses and partners to deliver our ambition in Cheshire East

- **Fair**

We aim to reduce inequalities, promote fairness and opportunity for all and support our most vulnerable residents

- **Green**

We will lead our communities to protect and enhance our environment, tackle the climate emergency and drive sustainable development

The Plan further states “we aim to reduce inequalities, promote fairness and opportunity for all and support our most vulnerable residents”.

A copy of the Corporate Plan can be found by clicking on this link [Cheshire East Council Corporate Plan 2021-2025 \(PDF, 4.2MB\)](#)

Supply Chain

The Council has a responsibility to prevent slavery and human trafficking within its supply chain and in any part of the organisation. Cheshire East Council is committed to ensuring that its suppliers adhere to the highest standards of ethics and to ensure that suppliers treat workers with dignity and respect and accordance with the requirements set out in employment legislation.

Whilst a high proportion of suppliers have a presence within Cheshire East, the Council’s supply chains stretch across the world. Raw materials and components can come from sources anywhere in the world and there may be many links in the supply chain which could be involved in modern slavery.

As the customer, the Council makes clear to our suppliers, and those wishing to do business with us, that they are required to provide confirmation that they are compliant with the **Modern Slavery Act 2015**. They are also required to confirm their subcontractors and suppliers comply with the act. The Council will build clauses regarding modern slavery into all new contracts, allowing for the termination of the contract if these clauses are breached.

Cheshire East has a Social Value Policy and a Sustainability Strategy Statement for Procurement purposes, the principles of which can be embedded into any Commissioning and Tendering processes. These pick up the issue of modern slavery, transparency and equality in supply chains. In addition, the Supplier Questionnaire, sent out with tenders, asks specific questions about Modern Slavery and bidders need to confirm that those in control of any organisation have not been convicted of any offences relating to the use of child labour or human trafficking.

Policies in relation to Slavery and Human trafficking

Cheshire East sits as a member of the Strategic Modern Slavery Partnership, working with other Local Authorities to deliver a PAN Cheshire Modern Slavery Business Plan.

The Cheshire East Safeguarding Children's Partnership, the Safeguarding Adult's Board and Safer Cheshire East Partnership Board have adopted a local Protocol for Responding to Victims of Modern Slavery.

Additional information can be found on www.stopadultabuse.org.uk.

Whistleblowing

Cheshire East Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The Whistleblowing Procedure is designed to make it easy for employees to make disclosures, without fear of retaliation and includes issues of possible fraud, corruption, exploitation sexual or physical abuse of clients.

<https://www.cheshireeast.gov.uk/pdf/information-for-staff/cheshire-east-council-whistleblowing-policy-approved-march-2018-corrected-hyperlink.pdf>

Recruitment

Cheshire East Council provides a range of services in order to meet the outcomes set out in its Corporate Plan. Those providing services are direct employees of the Council, agency workers engaged through the Council's service contracts with employment agencies; and services delivered on behalf of Cheshire East Council by third party organisations and in the Council's supply chains.

The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees which require the completion of relevant employment checks and standards which include eligibility to work in the UK and Disclosure and Barring Services (DBS) checks and suitable references are requested and followed up.

Agency Workers

The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

Employee Code of Conduct

The Council's Employee Code of Conduct clarifies the expectation of an employee's actions and behaviour when representing Cheshire East Council. As an employer, the Council strives to maintain the highest standards of employee conduct and ethical behaviour and potential breaches are investigated.

The Council operates a job evaluation scheme to ensure all employees are paid fairly and equitably.

The Council requires all Councillors to submit declaration of interests to record and declare personal and prejudicial interests.

The Cooperative Party Charter Against Modern Slavery

Cheshire East has adopted the Charter Against Modern Slavery and is committed to:

1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
7. Review its contractual spending regularly to identify any potential issues with modern slavery.
8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
9. Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
10. Report publicly on the implementation of this policy annually.

Training

The Council provides training for staff and partners involved in person centred services where Modern Slavery may be present. Upon receipt of a referral, or if Modern Slavery is suspected during a Safeguarding Enquiry, staff should be aware of the risk and follow reporting procedures. Safeguarding training has been extended to commissioners and partner agencies across Cheshire East.

Modern Slavery is included within the Cheshire East Council Induction Programme for new staff.

All staff can access an e-learning programme via <http://stronger2gether.org/resources/>
Elected members are required to complete Safeguarding Training on an annual basis.

Useful Links

Further information on Modern Slavery and Human Trafficking is available at the following websites:
<https://www.nationalcrimeagency.gov.uk> <https://www.barnardos.org.uk/what-we-do/protecting-children/trafficked-children> <https://www.programmechallenger.co.uk/> <https://www.antislavery.org>
#<https://www.stopthetraffik.org/> <https://www.afruca.org/> <http://www.mash.org.uk/>
<http://www.medaille-trust.org.uk/> <https://city-hearts.co.uk/>