



Modern Slavery and Human Trafficking Transparency Statement

Introduction

Modern slavery is a global problem and international crime, affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds can fall victim to human trafficking. Victims can be controlled by force, threats, coercion, abduction, fraud and deception.

Crawley Borough Council is a local authority which provides a wide range of services alongside partners, to the local community. We are making a clear commitment to tackle modern slavery by signing up to this Modern Slavery and Human Trafficking Transparency Statement.

The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking does not exist within its supply chain or in any part of its own business. The term 'modern slavery' captures a whole range of exploitation which includes:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children in order to produce child abuse images or videos
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties
- **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars)
- **Bonded labour:** this includes descendant slavery when people give themselves into slavery as security against a loan or when they inherit a debt from a relative
- **Criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker

Other forms of exploitation include organ removal, forced begging fraud, forced marriage and illegal adoption.

Our responsibilities

The abuse of human rights in our supply chains through modern slavery is gaining greater awareness. The Council has a responsibility to prevent slavery and human trafficking within our supply chain and in any part of the organisation. It expects the same high standards from all of our contractors, suppliers and other business partners.

This Statement sets out the Council's actions and commitments to understand all potential modern slavery risks related to our activities and to put in place steps to combat and prevent acts of slavery and human trafficking within our business and supply chains. It applies to everyone working for the Council or on our behalf in any capacity. The Council's Corporate Management Team has overall responsibility for ensuring this Statement complies with our legal and ethical obligations, and that all those under the Council's control comply with it.

The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors, and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

Our Policies

The Council has a number of internal policies that help to ensure we are conducting business in an ethical and transparent manner and support compliance with Modern Slavery Act. These include;

- Procurement Code and wider Public Contract Regulations 2015
- Code of Conduct
- Equality, Diversity, and Inclusion Policy
- Safeguarding Policy
- Whistle-blowing policy

Due Diligence and Supply Chain Management

The Shared Procurement Service, who deal with most contracts worth £50,000 or more, will take the lead on tackling modern slavery within our supply chains, and will work in conjunction with stakeholder departments who may face the greatest risk of procuring goods, services or works associated with this crime. They will undergo training to ensure they are aware of the risks and issues and how to mitigate these in the procurement process.

The Council expects all suppliers regardless of size to actively work towards mitigating the risk of modern slavery within their organisations and its supply chain and may request evidence to demonstrate steps taken. In addition, the Shared Procurement Service has processes and due diligence mechanisms in place to ensure that modern slavery is tackled by its supply chain. These include:

- All relevant suppliers that wish to tender for Council contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015 to be able to bid – this is included in our Self-Declaration document contained in the tender pack. Any supplier who fails to evidence their compliance shall be excluded from participating further in the tender process.

- As part of our contract management processes, we undertake annual gathering and reviewing of Modern Slavery Statements for all suppliers with an annual turnover of £36m and over.
- We will include clauses in our standard contract terms that specify the supplier's contractual obligation concerning modern slavery.
- For all Above Threshold contracts or contracts where we believe there are likely to be greater supply chain risks, we will assess suppliers' recruitment policies and procedures to ensure that they are minimising the risk of modern slavery in their organisation.

The Shared Procurement Service commits to undertaking an annual risk assessment of its supply chain and will deliver training and guidance to contract managers to highlight the potential modern slavery risks.

The Council aims to monitor the commitments which our suppliers have pledged, including the identification and management of risks in relation to modern slavery and human trafficking. This is done by:

- Increasing openness, transparency and efficiency in the management of supply chains
- Improving ability to identify strengths, weaknesses, opportunities and threats in supply chains
- Improving communications with suppliers
- Enhancing relationships with suppliers

Our commitment

- We will disclose any identified instances of modern slavery.
- We will monitor our supply chains and report on any issues identified through non-compliance or insufficient information provided.
- We will ensure relevant staff have access to and are completing mandatory training which supports the Modern Slavery Act.
- We will evaluate the effectiveness of the training annually via feedback from participants.
- We will encourage the reporting of suspicions of slavery through the Council's Modern Slavery Single Point of Contact (SPOC). For Crawley Borough Council this is the Community Safety Officer.
- We will notify the Secretary of State of suspected victims of slavery or human trafficking under Sections 43, 52 and 54 of the Modern Slavery Act 2015.

Declaration

This Statement is made under Section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2023. It is approved by the Council's Corporate Management Team and Cabinet and will be subject to review on an annual basis.

Signed:
Leader of the Council, Crawley Borough Council

Signed:
Chief Executive, Crawley Borough Council