

Modern Slavery Act 2015 -Transparency Statement

In accordance with the Modern Slavery Act 2015, Oldham Council makes the following statement in relation to the financial year 2018/19 to ensure that no slavery or human trafficking is taking place in any part of its own business or any of its supply chains.

Oldham Council is committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

As part of the public sector, Oldham 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 as a Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

The statement sets out practices already in place at the Council, and any actions it has committed to in response to the introduction of the Act. Section 54 of the Modern Slavery Act states that an organisation's slavery and human trafficking statement might include information on:-

- its structure, business and supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps that it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
- the training about slavery and human trafficking available to its staff.

Oldham Council's structure and supply chains

Oldham Council is a metropolitan borough council with a population of 232,724¹ The Council employs around 2782 staff to provide a huge range of services to fulfil statutory and discretionary services for residents, businesses, visitors and partners.

- [Our Council structure](#)

The Council manages a wide range of services, delivered both directly by the Council and through other external providers, with a large and diverse supply chain. Oldham Council spends approximately £188 million per year on external goods, services and works procured from a wide variety of local, national and international organisations, businesses and voluntary sector organisations.

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

Oldham Plan: The [Oldham Plan](#) is Oldham's collective action statement explaining how we can all best serve the place we love and help its people, districts and businesses to thrive. Our Oldham delivery model is based around three fundamental shifts which will work together to deliver the ambitions of this Plan. These are: Inclusive Economy, Thriving Communities and Co-operative Services. These shifts are complemented and supported by a focus on two key enablers – public service reform and empowering people and communities.

Safeguarding: The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. The Council has comprehensive policies for safeguarding children and adults, which all staff and Councillors are expected to read and work within in order to protect individuals from abuse or neglect. Safeguarding referrals are made through the Multi-Agency Safeguarding Hub (MASH). There is multi-agency working through Operation Challenger to tackle organised criminality, which includes offences relating to modern slavery.

Recruitment: The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up. The Council uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. New employees 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.

Procurement: The Procurement Team is responsible for ensuring all procurement activity complies with the Council's 'Contract Procedure Rules' and wider 'Public Contract Regulations 2015'.

Whistleblowing: We operate a 'Whistleblowing Policy' so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of Conduct: Our 'Code of Conduct' explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. We also have a clear set of values and behaviours which all council employees are expected to adopt.

The Council is also a signatory to the [Charter Against Modern Slavery](#)

This statement should be read in conjunction with the Modern Slavery Act 2015¹ and the National Referral Mechanism².

Steps taken by Oldham Council to prevent slavery and human trafficking taking place in our business and supply chain

Oldham Council maintains a contracts register, listing contractors that we have a formal relationship with in addition to maintaining records of every supplier we have paid an invoice against for the last 18 months. We conduct due diligence on all suppliers before allowing them to become a contractual supplier. As part of our contract with suppliers, we require that they confirm to us that:

- They comply with the Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015
- They are a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?
- If they answer yes to the previous question, are they compliant with the annual reporting requirements contained within section 54 of the Act 2015?

In November 2016 the Cabinet Office introduced the Supplier Selection Questionnaire to be used for all tenders over the EU thresholds. As part of this process it is a compliance requirement for suppliers to declare they have no involvement in modern slavery.

We will continue to raise awareness of the Modern Slavery Act 2015 internally and as part of our procurement approach we will only award contracts to those providers which are able to demonstrate their compliance with the requirements of the Modern Slavery Act 2015

Training and capacity building about slavery and human trafficking available to its staff

All new employees to Oldham Council, undergo a corporate induction and mandatory training programme. This introduces new staff to the standards, values and behaviours we expect from our employees. In 2018/19 we will roll out training on modern slavery and human trafficking which will be made available through the Council's e-learning platform.

¹ <https://www.gov.uk/government/collections/modern-slavery>

² <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>

All Procurement Officers will receive Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply e-learning training in relation to modern slavery, ensuring they are able to identify and mitigate supply chain risk, along with guidance on how to manage supplier relationships and how to identify and report issues, including in relation to concerns related to modern slavery and human trafficking.

Actions for 2018/19

Over the coming year, actions to further mitigate any risk and further enhance governance arrangements will be taken. The implementation and effectiveness of these actions will be monitored and reported back on as part of the next annual review of this statement in 2019/2020.

Policy and Process


- Approval and publication of Modern Day Slavery statement
- Update procurement and contract procedure rules to ensure modern day slavery is incorporated into all contracts
- Update the Council's whistleblowing policy to include reference to Modern Day Slavery

Communication and training

- Modern slavery to be included in the safeguarding training delivered to Elected Members
- Training on Modern Day Slavery rolled out to all staff
- Presentation at 'meet the buyer' events to raise awareness
- All Procurement Officers will receive Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply e-learning training



Councillor Sean Fielding
Leader of the Council



Dr Carolyn Wilkins OBE
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