

**Nuneaton and Bedworth Borough Council**  
**Modern Slavery and Human Trafficking Annual Statement**  
**1 April 2022 to 31 March 2023**

**1. Introduction**

- 1.1 Nuneaton and Bedworth Borough Council, acting on behalf of itself and Nuneaton and Bedworth Community Enterprises Limited (NABCEL), is committed to preventing slavery and human trafficking in our corporate activities and in our supply chain management. This statement sets out Nuneaton and Bedworth Borough Council's (and NABCEL's), actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within the organisation, our sub-contractors, partners or supply chains.
- 1.2 As part of Local Government, the Council recognises that it has a responsibility to be alert to the risks and take a robust approach to preventing slavery, exploitation and/or human trafficking in all its forms. Modern slavery in its wider sense is commonly accepted to include forced or bonded labour, human trafficking, child slavery, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and forced or early marriage.
- 1.3 This statement is made in pursuant to Section 54 of the Modern Slavery Act 2015 and relates to actions and activities during the financial year 1 April 2022 to 31 March 2023. The Council will be reviewing the Statement on an annual basis and a new updated Statement, acknowledging any further actions that may have been taken, will be published in each subsequently year. This statement has been approved by the Council's Senior Management Team and Cabinet. It will continue to be reviewed and updated annually as required by the Modern Slavery Act 2015. Please note elements of this statement do not apply to NABCEL, such as the Corporate Plan, but the Council and NABCEL endeavour to expand training and policy to raise further awareness for NABCEL and its employees , a target for the 2023/2024 financial year.

**2. The Modern Slavery Act 2015**

- 2.1 The Modern Slavery Act 2015 (the Act) consolidates various offences relating to human trafficking and slavery. Broadly speaking:
- 'slavery' is where ownership is exercised over a person;
  - 'servitude' involves coercion to oblige a person to provide services;
  - 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
  - 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.
- 2.2 Section 52 of the Act imposes a duty on public authorities, including district councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.

- 2.3 Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the UK and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.
- 2.4 The Council engages in commercial activities by providing services (some of which are statutory and some discretionary) and its annual turnover is greater than the specified £36 million. Whilst the Act does not state that local authorities specifically are included in those organisations legally required to publish a statement, the Council has chosen to do so as a matter of good practice. The Council is keen to raise awareness of slavery and human trafficking and as a large-scale local employer and provider of services, it is seen as imperative that the Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

### **3. Standards**

- 3.1 The Council will meet the following standards and also expects those with whom it does business, to meet them:
- To support every individual's human right to live free from abuse, servitude and inhumane treatment.
  - To promote ethical business and operational practices in corporate activity and services delivered.
  - To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains.
  - To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated.
  - To take appropriate action to address actual instances of slavery and human trafficking brought to the Council's attention and to take all reasonable steps to support and protect its victims.

### **4. Organisational Structure**

- 4.1 Nuneaton and Bedworth Borough Council is a local borough council, providing a range of statutory public and discretionary services to its customers, residents, businesses, visitors and partners using internal resource and where applicable, external organisations.
- 4.2 The organisational structure is available on our [website](#).
- 4.3 NABCEL is a wholly owned subsidiary of Nuneaton and Bedworth Borough Council, providing a range of services including property management, cleaning services, gas and electrical works.
- 4.4 The senior management team structure is available on the [website](#).

### **5. Due diligence - Supply Chains and Countries of Operation and Supply**

- 5.1 The Council conducts its procurement activity in accordance with its [Procurement and Accounts Payable Strategy](#) and Contract Procedure Rules contained in Part 4 – Rules of Procedure of the Council Constitution. Please note, the Council updated its strategy

effective April 2023, but it consulted throughout 2022/2023 with Officers, Elected Members and Cabinet. The previous strategy (2017 – 2022) is available and can be provided if requested.

- 5.2 All services performed by the Council and NABCEL are within the United Kingdom and all goods and services procured from direct suppliers are within the United Kingdom. That said, it is possible materials used in the supply of the services and works are manufactured overseas.
- 5.3 Whilst the risk of slavery and human trafficking is considered low due to the nature of the Council's business, the Council remains vigilant to any potential risks, and through our procurement policy, strategy and guidance sets high expectations from its supply chains. Additional policies, strategies and plans are provided below to cover non-procurement related provisions.
- 5.4 The Council's [Standard Terms and Conditions](#) include clauses which include obligations for suppliers to adhere to modern slavery, equalities and human rights obligations as well as obligations related to Children Act 2004/Care Act 2004 (As amended). Please note other forms of contract are used in procurement activity when accessing public sector framework agreements (such as the Crown Commercial Services framework agreements) and/or model form construction industry forms of contract.
- 5.5 As for procurement processes, the Council and NABCEL utilise the Crown Commercial Services Standard Selection Questionnaire for its formal tender and quotation processes, which requires suppliers to declare if they are a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015, and if so, a link or copy of their statement. Furthermore, for large procurements where there may be a risk of modern slavery (such as large construction projects), the Council may ask suppliers to declare if they have a policy committed to addressing modern slavery within the organisation as well as a modern slavery action plan. An action plan may include provision for training, supply chain engagement, measurement and continuous improvement plans as well as toolbox talks.
- 5.6 It is worth noting the Procurement team have a range of positions, two of which are MCIPS qualified (more senior officers) and others working towards CIPS qualifications.

## **6. Policies, Strategies and Plans**

- 6.1 The Council reviews its policies, strategies, procedures and plans on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are key in meeting the requirements of the Modern Slavery Act 2015.
  - [Safeguarding](#)
  - [Equality and Diversity](#)
  - [Nuneaton and Bedworth Community Safety Partnership \(NABSCOP\)](#)
  - Corporate Plan – [Building a Better Borough](#)
  - Employee Code of Conduct (which also includes Conflicts and Declarations of Interest) – Item 5B of the Constitution
  - Members' Code of Conduct – Item 5AA of the Constitution
  - Confidential Reporting Code – Item 5I of the Constitution

- Procurement and Accounts Payable Strategy mentioned above.
- Recruitment and Selection Policy
- Grievance Policy and Procedure
- [Pay Policy Statement](#) (published and renewed annually)

## **7. Agency Workers**

- 7.1 At times where the Council needs to make use of temporary workers, these are sourced via a managed framework and/or reputable suppliers.

## **8. Training**

- 8.1 The Council makes available various training resources, including Safeguarding training which is mandatory for all front-line employees in appropriate roles. In addition, an online e-Learning module is available in relation to raising awareness of Modern Slavery and its impact is available to all employees. A target for the 23/24 financial period is to mandate this training for senior officers to continually develop knowledge and awareness across the Council.

## **9. Partnerships**

- 9.1 The Council works in partnership with a range of partners and agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes other Warwickshire County Council, Warwickshire Police, Warwickshire Police and Crime Commissioner and [Nuneaton and Bedworth Community Safety Partnership \(NABSCOP\)](#). The [Warwickshire Safeguarding website](#) have guidance and procedures relating to the trafficking and exploitation of children and on the duty to report.

## **10. Monitoring our effectiveness**

- 10.1 The Council will use the following steps to regularly review and monitor the measures being implemented to address slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:
- (i) Record the number of employees provided with training on modern slavery and human trafficking.
  - (ii) Carry out periodic reviews to identify any deficiencies within our policies and practices and take appropriate action to rectify these to strengthen our ability to address slavery and human trafficking.
  - (iii) Carry out periodic internal audits to ensure compliance with the policy

## Declaration

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Nuneaton and Bedworth Borough Council's modern slavery and human trafficking statement for the financial year ending 31 March 2023.

Signed:



**Brent Davis**

**Chief Executive**

**Date: 29/09/23**

Signed:



**Councillor Kris Wilson**

**Leader**

**Date: 29/09/23**