



**City of  
Doncaster  
Council**

## **Modern Slavery Transparency Statement 2024-2025**

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### **1. Introduction**

The City of Doncaster Council (the "Council") is a significant Local Government organisation that delivers a wide range of statutory and discretionary public services. As an employer, commissioner, and supplier the Council recognises it has responsibility to take a committed approach to the prevention and elimination of modern slavery. As a local authority the Council is legally required by the government to regularly report on the steps taken and the plans to prevent modern slavery.

Under the Act 'slavery' is where ownership is exercised over a person through;

- 'servitude' which involves coercion to provide services.
- 'forced or compulsory labour' involving work or service extracted from any person under threat of a penalty and for which the person has not offered themselves voluntarily.
- 'human trafficking' involving arranging or facilitating the travel of another to exploit them.

The Council has a statutory duty to comply with the Modern Slavery Act 2015 and a responsibility to notify the UK Secretary of State of suspected victims of slavery or human trafficking as set out under Sections 43, 52 and 54 of the Act.

The overall aim of the Modern Slavery Act is to pursue organised criminals and opportunistic individuals behind the modern-day slave trade and to prevent people from engaging in modern slavery crime. The Council signed up to the Charter Against Modern Slavery and this statement provides an update on adherence to this charter.

This statement sets out the steps undertaken by the Council to ensure that modern slavery and human trafficking does not occur within the Council's



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operations and its supply chains. The Council works with partners to enhance the elimination of Modern Slavery.

## 2. Organisation Structure, Business and Supply Chains

The Council takes a **zero-tolerance** approach to modern slavery. The Council will not engage with businesses or contract with suppliers who fail to comply with or fail to ensure that their supply chains comply with the requirements of the Modern Slavery Act.

### Operation and Supply

The Council operates within the United Kingdom (UK). Whilst the risk of modern slavery and human trafficking is considered low, the Council remains vigilant and takes steps to manage the risks. The Council has assessed its business operations and deemed them at low risk of modern slavery or human trafficking. The Council delivers many services through directly employed labour. Where the Council deliver services via third-parties robust due diligence is undertaken to understand any risks around Modern Slavery.

### Slavery and Human Trafficking Policies

The Council have clear and rigorous HR policies and procedures on all major employment issues and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers.

### Whistleblowing policy ([Link](#))

The Council encourages all its workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of the Council. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The Council's whistleblowing procedure makes it easier for workers and others to make disclosures, without fear of retaliation.

### Employee and Volunteer Code of Conduct ([Members Code of Conduct](#)) ([Employee Code of Conduct](#))

These codes provide clarity to employees and volunteers of the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee and volunteer conduct and ethical behaviour in all its operations and throughout their supply chains. Employees must behave honestly and follow the Council's policies and procedures. The Employee and Volunteers Code of Conducts clarifies that staff and volunteers must not behave in a manner inside and outside working hours which could damage the Council's reputation.



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## **Equality and Diversity**

The Council is committed to recruiting, developing, and retaining the best people, based on merit, from the widest possible talent base, regardless of their characteristics. How the Council supports equalities in the workplace goes beyond compliance with equalities legislation, it involves recognising different approaches are required for different people who have different needs and expectations and positively responding to this. We expect all our councillors, managers, employees, and suppliers to treat everyone with dignity and respect and provide the highest standards of service to customers and communities we serve.

## **3. Due Diligence Preventing Modern Slavery**

The Council's procurement and commissioning due diligence processes require suppliers to confirm that they comply with the requirements of the Modern Slavery Act and declare any prosecutions under this Act.

To ensure compliance with our values, behaviours and ethics, we have in place rigorous selection processes which include but is not limited to checks on economic and financial standing, convictions, and health and safety; to help ensure our suppliers and their supply chains are slavery free.

All suppliers undertake due diligence as part of the quote and tender processes, and this includes declaration of any prosecutions related to Modern Slavery and Human Trafficking. Any value contracts let undertake proportionate due diligence but at all levels this includes Modern Slavery. For public procurement tenders, contracts let prior to 24 February 2025, suppliers completed a self-assessment Selection Questionnaire (SQ).

In Section 2 'Grounds for mandatory exclusion', 2.1(a) suppliers declared if, in the past five years if the organisation or representative with authority has been convicted anywhere in the world in relation to:

- participation in a criminal organisation.
- corruption
- fraud
- terrorism
- money Laundering or terrorist financing; and
- child labour or other forms of human trafficking.

The Council can exclude suppliers that tick yes to declare they have been prosecuted for child labour or other forms of trafficking human beings.

Offences under:

- Section 4 of the Asylum and Immigration Act 2004
- Section 59A of the sexual Offences Act 2003
- Section 71 of the Coroners and Justice Act 2006
- Sections 49, 50 and 51 of the Drug Trafficking Act 1994
- Section 2 or Section 4 of the Modern Slavery Act 2015



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## **Supplier Code of Conduct** ([Supplier Code of Conduct CDC - 2025.pdf](#))

In January 2025 the Council introduced a Supplier Code of Conduct, this ensures suppliers are fully aware of the Council's approach and expectations of any supplier to the Council including Modern Slavery.

### **Recruitment**

The Council have robust and transparent recruitment and selection processes and ensure that all new workers recruited into a post at the Council, whether full or part-time employees, agency workers or contractors/consultants, have the requisite checks, which includes identification and right to live and work in the UK. Our offer of employment is subject to the following rigorous process:

- Acceptance of the terms and conditions contained within the contract of employment.
- The receipt of satisfactory references
- Evidence of any required professional qualifications (e.g., social work qualifications) and essential requirements.
- Any necessary Disclosure and Barring Service checks, where applicable
- The receipt of eligibility to work in the UK Identification check.

Recruitment and selection training is provided to managers and includes right to work checks and the importance of pre-employment checks.

### **Agency staff**

Where there is a need to source agency staff the Council uses a managed service provider to ensure that all workers, including agency workers, contractors, and consultants, go through the same checks as employees. This was reprocured through a robust procurement project in 23-24. This contract ensures that recruitment practices form part of the contractual arrangements and have been checked in advance of accepting workers. The service provider has undergone due diligence to ensure their practices comply with the legislation and decrease risk to the Council. The Council ensure that all agencies in our supply chain comply with our rigorous process and adhere to all legal requirements, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or terminated from the supply chain until such compliance can be evidenced.

### **Pay**

The Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life. This is something that equally applies to contractors supplying services and works to the Council. Quotes or tenders that are considered as 'abnormally low' are addressed through the procurement process as this can indicate low wages.



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In Section 7 of the SQ, assurance is given that if the supplier is subject to Section 54 of the Modern Slavery Act 2015, that they have complied with their obligations.

On 24 February 2025, the new Procurement Act 2023 and subsequent Procurement Regulations 2024 were introduced into Public Sector procurement.

The new Act builds on the previous legislation and strengthens the ability to exclude suppliers that pose risks around Modern Slavery and public bodies cannot legally contract with suppliers or associated persons, who will enable the delivery of the contract, that are debarred and are on the Cabinet Offices Debarment List.

Modern Slavery is classified in Procurement Act 2023 Schedule 6 Paragraphs 19-26 as a mandatory exclusion. The new Procurement Specific Questionnaire (PSQ) enables St Leger Homes to ask further questions on modern slavery if the contract being procured has a higher risk, this is included in Part 3 – Conditions of Participation of the PSQ, this is completed on a contract-by-contract basis.

The Council is in contact with all suppliers, stating our commitment to modern slavery, assessing their own arrangements, and amending contracts as and when they become due for renewal.

All contracts have specific Terms and Conditions with specific clauses linked to modern slavery.

## **4. Training and Capacity Building**

The Council provides training on Modern Slavery to Councillors, Employees and Partners. Mandatory training called *Protecting Vulnerable Adults and Children* (PVAC) enables staff to know how to report incidents of abuse and neglect including modern slavery and human trafficking. It is also delivered through additional Safeguarding Training.

The Council have specified certain individuals who have received training in recognising Modern Slavery so that they can take the necessary steps to report issues through the National Referral Mechanism. These individuals are located across the Council in front line services, for example housing, safeguarding and social care.

All Procurement staff have undertaken the Chartered Institute of Procurement and Supply's (CIPS) online course titled 'Ethical Procurement and Supply' and this is updated annually.





## 5. Charter Against Modern Slavery

The Council signed up to the Charter Against Modern Slavery. The Council has implemented the requirements of the charter and continues to improve practices. The status of the requirements is shown below;

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.	Complete – all procurement staff trained; any new starters complete as part of their induction.
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.	Complete – due diligence questionnaire and contract standard terms. Contracts contain default events and breaches of contract could be activated if modern slavery is present.
3.	Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	Complete – process in place for abnormally low tenders.
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.	Complete – Construction Charter, included in construction tender documents and Suppliers Code of Conduct.
5.	Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	Complete – Whistle Blowing Policy updated in 2025 – this is included in tenders; staff and third parties have access via the Council webpage.
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.	Complete – included in the invitation to quote and tender documents for contractors to have a Whistleblowing Policy or sign up to the Councils.
7.	Review its contractual spending regularly to identify any potential issues with modern slavery.	Complete – High-risk areas considered through periodic spend analysis.
8.	Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	Complete – Via contract management and spend analysis. Internal processes to report.
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.	Complete – details of National Referral Mechanism (now via the Home Office) on the webpage and in the Whistle Blowing Policy.
10.	Report publicly on the implementation of this policy annually.	Complete - via the statement published

The Charter is a way of recognising what Councils can do above their statutory obligations to raise awareness and ensure that their own supply chains do not contribute to modern slavery.



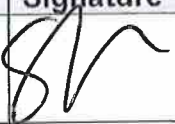
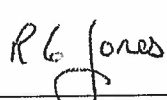
## **6. Risk Identification, Assessment, Management and/or Mitigation**

The Council has established safeguarding policies and procedures with its partner agencies to safeguard the welfare of children and vulnerable adults and protect them from harm. The Council works closely with South Yorkshire Police, based in Doncaster, and has designated single points of contact within the police who they can direct suspected issues related to Modern Slavery.

The Head of Service for Safer Communities, employed by the Council, attends countywide meetings, chaired by South Yorkshire Police and attended by other local authorities in South Yorkshire. This forum allows for the sharing of best practice and information sharing by the police and other key partners i.e., GLAA. The South Yorkshire Modern Slavery and Organised Immigration Crime partnership group also has established joint working practices to respond to emerging issues and themes.

The MSHT agenda is managed through the Serious and Organised Crime Theme Group that sits beneath the Safer Stronger Doncaster Partnership Executive Board. This group is responsible for working with partners to ensure that awareness is raised of the impact of modern slavery and human trafficking, including providing training to identify key signs.

## **7. Approval of this Statement**

Name	Designation	Signature	Date
Scott Fawcus	Service Director of Legal & Democratic Services & Monitoring Officer		13/8/25
Mayor Ros Jones	Mayor of Doncaster		4/8/25

