

# TACKLING EXPLOITATION & SUPPLY CHAIN TRANSPARENCY

## MODERN SLAVERY STATEMENT



Financial Year: 1 April 2022 to 31 March 2023

Say **NO**  
to Slavery



### 1. Overview

Cardiff Council delivers a wide range of statutory and discretionary public services, provided directly through our own workforce, and through over 8,000 private and third sector organisations.

In March 2017, Cardiff Council became the first public body to sign the Welsh Government's **Code of Practice: Ethical Employment in Supply Chains**. The Code's 12 commitments include tackling Modern Slavery and Human Trafficking. This Statement sets out the action that the Council has taken, and will take, to ensure that there is no Modern Slavery and Human Trafficking in its own business or supply chains.

Cardiff Council is fully committed to providing visibility to its Modern Slavery Statement and ensuring 'Transparency in Supply Chains'. To this end the Council is working in partnership with Welsh Government, the wider public sector, suppliers, service providers, trades unions and others to address Modern Slavery challenges and drive collaborative action with a view to reducing risks and incidence of modern slavery.

### 2. What is Modern Slavery?

In the UK, the Modern Slavery Act 2015 defines criminal offences of slavery, servitude and forced or compulsory labour and of human trafficking and includes measures for the protection of potential victims.

Slavery is any system in which principles of property law are applied to people, allowing individuals to own, buy and sell other individuals.

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic servitude, forced labour, criminal activity or have their organs removed to be sold.

In 2021, the National Crime Agency recorded 479 potential victims of trafficking in Wales, an increase from 384 (+24.73%) in 2020.

There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they are unable to speak the language, have their travel and identity documents removed and are told that if they try to escape, they or their families will be harmed.

Locally and across the United Kingdom, Criminal Exploitation generally and 'county lines' drug trafficking in particular have become a prominent way in which people, particularly children, are increasingly exploited. 'County lines' is the practice of trafficking drugs into rural areas and smaller towns and cities, away from the major conurbations. Many factors contribute to the way in which vulnerable children and other individuals are exploited by traffickers and it is an important factor that a child can never consent to their own exploitation. An improvement in the number of referrals of potential victims of trafficking into the National Referral Mechanism (NRM) has been achieved in Cardiff due to the increased awareness training that has been provided to practitioners.

The Council is fully aware of its designation as a 'First Responder' organisation under the National Referral Mechanism and its responsibility to identify potential victims and refer cases to the UK Human Trafficking Centre Competent Authority of the National Referral Mechanism.

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### 3. Our Policies

Cardiff Council's five-year plan **Capital Ambition** puts tackling poverty and inequality at the heart of the Administration's priorities. The Council is an accredited Living Wage employer and we encourage our suppliers and contractors to pay the 'real' Living Wage.

The Council's over-arching **Corporate Safeguarding Policy** (which incorporates this Modern Slavery Statement) sets out the Council's duty and commitment to safeguard and promote the wellbeing of children, young people and adults at risk and to ensure that effective practices are in place throughout the Council and its commissioned services. The policy covers all functions and services of the Council and applies to all Council employees, elected members, foster carers, individuals undertaking work placements and volunteers working within the Council.

The other key strategies and policies include:

- The **Council's Procurement Strategy** sets a clear vision and the key organisational outcomes that implementation of the Strategy is looking to deliver. This includes delivery of the **Welsh Government's Code of Practice on Ethical Employment in Supply Chains** and the elimination of Modern Slavery, so that Cardiff Council plays a leading role in making Wales hostile to modern slavery. The Council's other key Policies in this area include:
- The Council's **Socially Responsible Procurement Policy** which sets out the Council's commitment to Ethical Employment, the Opening Doors Charter and the delivery of Community Benefits. The Council wants to work with organisations that share its values and a new combined Socially Responsible Procurement Strategy is due for publication in summer 2022 will reaffirm this commitment.
- The Council's Safeguarding Policy for Contractors provides guidance to Contractors so that they understand their role in supporting the Council to safeguard and promote the wellbeing of children, young people and adults at risk from abuse, neglect or harm.
- The **Whistleblowing Policy** enables Council staff and employees of the Council's contractors / suppliers to report unethical employment practices to the Council.
- **Employee Code of Conduct** makes it clear to employees the actions and behaviour expected of them when representing the Council. In performing their duties, they must act with integrity, honesty, impartiality and objectivity. The Council strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.
- **Recruitment policy** - the Council aims at all times to recruit the person who is most suited to the particular job. The Council has robust recruitment processes, which includes document checks to ensure that candidates are allowed to work in the UK.
- **Agency workers** – the Council sources all agency workers and temporary staff either through Cardiff Works (Council owned agency) or via Matrix SCM which is a managed service provider whose Modern Slavery Statement sets out their zero-tolerance approach to modern slavery.



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## 4. Our supply chains

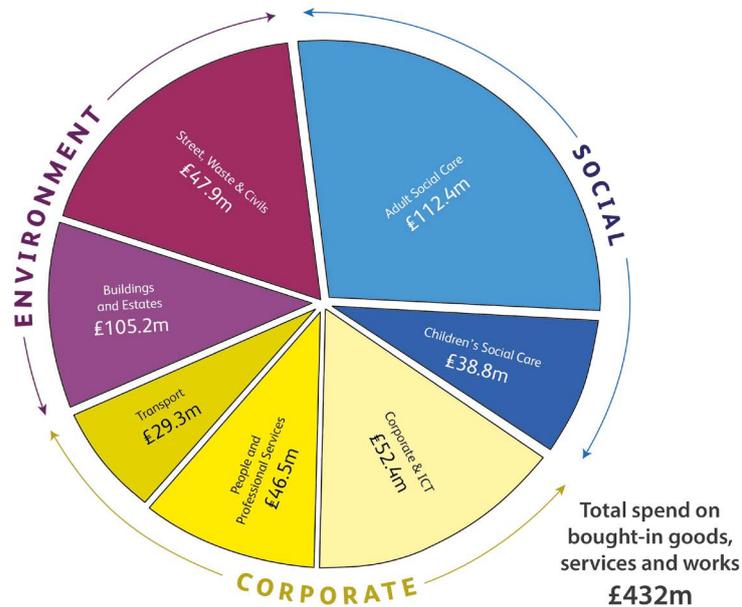
The Council spends over £480 million annually with over 8,000 suppliers who provide a broad range of goods and services. Over 99% of our spend is with UK based companies. However, the Council recognises that our supply chains spread across the world, and that parts of the supply chain could be engaged in modern slavery. The Council has limited resources to monitor and manage our supply chains and so will focus on our direct suppliers and will require our suppliers to ensure that their supply chain is free from modern slavery.

The high-risk sectors for Modern Slavery include agriculture, leisure, hospitality, catering, cleaning, clothing, construction and manufacturing. A review of Council spend has shown that for the majority of the high-risk areas the Council provides the service in-house, utilises national frameworks and/or local suppliers. The risk of modern slavery and human trafficking by our direct suppliers is considered low.

Through the tendering process, the Council ensures that our direct suppliers are aware of our commitment to tackle modern slavery and human trafficking and that they also understand their obligations as a supplier or contractor of the Council.

The Council undertakes due diligence when considering taking on new suppliers and will seek to review its existing suppliers on an annual basis through its contract management arrangements. The due diligence and reviews include:

- Ensuring compliance with the S54 (Modern Slavery Act 2015) requirement regarding a Modern Slavery Statement and, as part of tender evaluation and ongoing contract management, consideration of the potential and likelihood of modern slavery; seeking mitigations from the supplier through a clear understanding of the suppliers' structure, business and supply chains and policies in relation to slavery and human trafficking.
- Conducting supplier assessments to create a risk profile focusing on financial stability and also covering insurance and compliance with various employment policies including the Welsh Government's Code of Practice: Ethical Employment in Supply Chains.
- Taking steps to improve sub-standard supplier practices, including the provision of advice to suppliers and requiring them to implement Action Plans; for example, to demonstrate compliance with safer recruitment guidelines.
- Participating in collaborative initiatives focused on human rights and socially responsible procurement policies in general and modern slavery and human trafficking in particular.
- Invoking sanctions in respect of suppliers who fail to meet our expectations or to improve their performance in line with an Action Plan, which includes a provision to terminate the business relationship.
- With all invitations to tender for business with Cardiff Council over £1 million, there is an expectation that the supplier should be a signatory of the Welsh Government's Code of Practice: Ethical Employment in Supply Chains and the question is posed directly in Pre-Qualification Questionnaires (PQQs). This is also encouraged in all other tenders.



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## 5. Employee training

Cardiff Council is committed to developing and delivering tailored training to our employees, including the Commissioning and Procurement Team, in order to raise awareness of modern slavery, human rights abuses and blacklisting. Corporate training will be included as part of the rolling programme of training on the Contract Standing Orders and Procurement Rules.

A generic **Corporate Safeguarding Children & Adults Awareness Raising Online Training Module** already exists which includes issues of Modern Slavery and all Council employees are expected to complete it.

We will publicise what the Council is doing to tackle Modern Slavery to all staff and highlight the <https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page> site to all our employees.

The Modern Slavery Training addresses:

- The Council's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage or the provision of products by an unrealistic deadline.
- How to assess the risk of slavery and human trafficking in relation to various other aspects of the business, including resources and available support.
- How to identify the signs of slavery and human trafficking and action to be taken to report concerns and/or suspicions.
- The initial steps to be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to relevant parties within the Council (Multi-Agency Safeguarding Hub).
- The external help that is available, including the **Modern Slavery Helpline, Gangmasters and Labour Abuse Authority (GLAA)** and the Labour market enforcement - GOV.UK ([www.gov.uk](http://www.gov.uk)).
- The messages, business incentives or guidance that can be provided to suppliers and other business partners and contractors to implement anti-slavery policies.
- The steps the Council should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios or to implement changes in business practices arising from an Action Plan, including the termination of the business relationship.



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## 6. Duty to Notify

Specified public authorities have a duty to notify the Secretary of State of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. The 'duty to notify' provision is set out in Section 52 of the Modern Slavery Act 2015 and applies to local authorities in England and Wales which includes Cardiff Council.

Guidance on the duty to notify is provided at: [Modern slavery: duty to notify - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/modern-slavery-duty-to-notify)

This requirement in respect of potential victims of Modern Slavery is harnessed to responsibilities under the Social Services and Wellbeing (Wales) Act 2014 as set out in the Corporate Safeguarding Policy when, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

For concerns about children contact	029 2053 6490
For concerns about adults contact	029 20338439
Out of hours and on weekends contact	029 2078 8570 (Emergency Duty Team)
Alternatively, contact the Modern Slavery Helpline	08000 121 700

### If an individual is perceived to be at an immediate risk of significant harm call '999'

There are factsheets and a poster that explain what you need to do if you think someone has been a victim of Modern Slavery:

Modern Slavery - Duty to Notify Poster: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/560813/6.2286\\_HO\\_LL\\_Duty\\_of\\_notice\\_poster\\_2\\_v2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560813/6.2286_HO_LL_Duty_of_notice_poster_2_v2.pdf)

Modern Slavery – Duty to Notify Factsheet: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/560826/6.2286\\_HO\\_LL\\_factsheet\\_duty\\_to\\_notify\\_copy\\_V3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560826/6.2286_HO_LL_factsheet_duty_to_notify_copy_V3.pdf)



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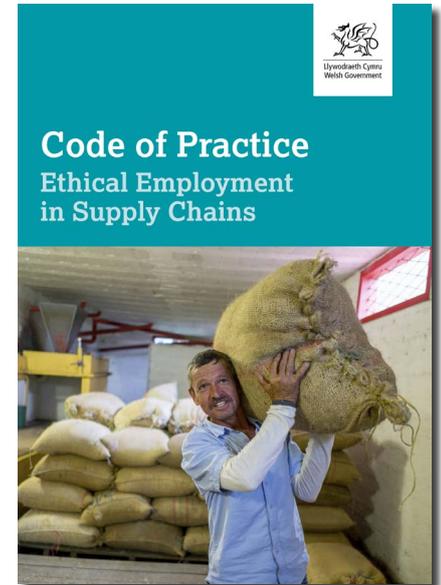
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## 7. What the Council has done

We have:

- Become a signatory of the Welsh Government's [Code of Practice: Ethical Employment in Supply Chains](#).
- Appointed an Anti-Slavery and Ethical Employment Champion - Councillor Chris Weaver.
- Councillor Weaver continues to oversee the implementation of the Code of Practice.
- Continued the process of reviewing our supply chains to identify high risk areas.
- Developed a [Socially Responsible Procurement Policy](#) which is subject of review.
- Undertaken a corporate review of the Modern Slavery Training being delivered across the Council and rolled-out a Covid-19 compliant (virtual) Training Programme for 2021/2022 which will continue into 2022/23.
- Developed measures to identify Key Performance Indicators which includes the number of Council staff who have completed the online training module (currently 3509 - up from 2212 last year).
- An improvement in the number of referrals of potential victims of trafficking into the National Referral Mechanism (NRM) has been achieved due to the increased awareness training that has been provided to practitioners.
- Continued to support Welsh Government efforts to Promote the Code of Practice and share best practice in relevant circumstances.
- Completed a review and updated the Council's tender documentation to ensure Modern Slavery and Human Trafficking issues are fully addressed which included clauses to:
  - (i) Check that contractors who have a turnover above £36million have a Modern Slavery Statement.
  - (ii) Include the Code of Practice: Ethical Employment in Supply Chains as a part of our tender documents.
- Completed a review and updated the Council's standard T&Cs to ensure employment practices are considered as part of the procurement process:
  - (i) Reviewed supplier contracts and mapped supply chains through due diligence – with an option to include sanctions or a termination clause if Modern Slavery is suspected.
  - (ii) Ensured the absence of undue time and cost pressures which could result in unethical treatment of staff.
  - (iii) Embedded a zero-tolerance approach to Modern Slavery.
- In accordance with the Code of Practice – Ethical Employment in Supply Chains – delivered on a Modern Slavery Communication Strategy to ensure awareness is raised across the Council and with partners through the provision of relevant posters and other material which have been made available through the Council intranet and website.
- We have supported the Bridgend County Borough Council in formulating and publishing its first Modern Slavery Statement (2021/22).
- Submitted Modern Slavery-related comments to inform an update of the Council's Whistleblowing Policy.



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## 8. What the Council will do

Cardiff Council will take the following action in our efforts to ensure that there is no Modern Slavery or Human Trafficking.

Ref	Action
1	In line with clause 7 of the Code of Practice, continue to ensure that the Council carries out a regular review of expenditure and undertakes a risk assessment. We will continue to: <ul style="list-style-type: none"> <li>Identify any high-risk suppliers and monitor for human rights abuses and unethical employment practices which will become a standard agenda item in contract meetings and reviews.</li> <li>Explore ways of working with our Tier 1 suppliers to raise awareness of Modern Slavery to prevent it from occurring through a formalised Risk Assessment process: <b>'Tackling Modern Slavery in Supply Chains'</b>.</li> <li>Ensure Category Management teams have access to latest case studies and relevant intelligence on potential exploitative practices to use within procurement processes.</li> </ul>
2	Utilising the Code of Practice – Ethical Employment in Supply Chains – deliver on a Modern Slavery Communication Strategy to ensure awareness is raised across the Council and with partner organisations and other agencies. <ul style="list-style-type: none"> <li>Share learning, best practice and emerging trends with relevant Directorates and their suppliers, together with other public sector partners and look to learn from their experiences.</li> <li>Continue engagement with Trades Unions to raise awareness of Modern Slavery with their members.</li> </ul>
3	We shall seek to ensure that any new requirements arising from the review of Welsh Government's 'Code of Practice – Ethical Employment in Supply Chains' are fully implemented within procurement and associated working practices once it is released, including Fair Work Guidance arising from the Social Partnership & Public Procurement Bill.
4	Review and update where necessary the Modern Slavery Statement annually and report progress on this Action Plan.
5	Continue a review of the system for supply chain verification and the process for the evaluation of existing suppliers through the formal Risk Assessment process: <b>'Tackling Modern Slavery in Supply Chains'</b> .
6	We shall evaluate the benefits of registering with the new British Standard for managing the risk of Modern Slavery when it is published (BS 25700 & BS 20151) once final guidance has been published
7	Review and revise a Self-Assessment Questionnaire (SAQ) for use in circumstances where a high risk of exploitation becomes apparent within our supply chains.

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## 8. What the Council will do

Cardiff Council will take the following action in our efforts to manage and minimise the risk of Modern Slavery or Human Trafficking in Cardiff.

Ref	Action
8	We shall continue to 'go the extra mile' and participate in campaigning and collaborative Human Rights initiatives aimed specifically at Modern Slavery and Human Trafficking, including pro-actively engaging with 'Anti-slavery Day', contributing to the LGA's Modern Slavery guide and the Human Trafficking Foundation's Best Practice manual for Councils. Further consideration will be given to participation in other proactive initiatives – supporting victims of Modern Slavery through collaboration with Non-Governmental Organisations and the Council's 'Into Work Service' – and lobbying for better victim support.
9	We shall encourage suppliers to add Modern Slavery social value clauses to new contracts as this will incentivise good practice, including the use of relevant tools and data sets.
10	We will continue to collaborate and deliver a targeted programme of Modern Slavery (virtual) training on a multi-agency basis and across the various Council directorates – in compliance with Covid-19-related restrictions, coordinated with wider Corporate Safeguarding training. <ul style="list-style-type: none"> <li>• In collaboration with Welsh Government and other partners, we shall scope the UK-national resources available for training and due diligence provided by the Crown Commercial Service and others.</li> <li>• We shall continue to identify staff requiring training in ethical employment practices and seek to build awareness / capacity particularly amongst front-facing members of staff working in the Community.</li> <li>• We shall look to utilise the pool of trainers available to deliver both classroom-based and virtual multi-agency training.</li> <li>• We will keep records of who has undertaken training across the various directorates and target those where completion rates require improvement.</li> <li>• We shall seek to enhance the available training to include further information on the current picture we are seeing of Child Exploitation (which accounts for the majority of CE cases within Cardiff) including the emergence of peer-to-peer exploitation.</li> </ul>
11	We shall seek to strengthen 'communities of practice' where Local Authorities work together to share best practice and achieve efficiencies of scale, e.g. sharing due diligence data across public, private and voluntary sectors to inform audits, etc. (using platforms such as TISCreport).
12	We shall continue to ensure devolved NRM decision making is closely aligned to existing safeguarding mechanisms. We will work to increase our understanding of the support needs of identified victims and monitor the benefits of a local decision-making process on the timeliness and effectiveness of the support provided.
13	We shall seek to provide support to Category Managers within the procurement process on the risk assessment and due diligence elements of contract management with a view to identifying high-risk suppliers.

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## 9. Supporting Material / Resources

In addition to the links highlighted throughout the Statement the Home Office has a range of documents and promotional material available - <https://www.gov.uk/government/collections/modern-slavery>

## 10. Statement Sign Off

This Statement has been approved by Cardiff Council's Senior Management Team and will be reviewed and updated annually.

Signed by .....

**Councillor Chris Weaver**  
Cabinet Member for Finance, Modernisation &  
Performance  
Cardiff Council

Date signed off 1 / 4 / 2022.....

Signed by .....

**Paul Orders**  
Chief Executive  
Cardiff Council

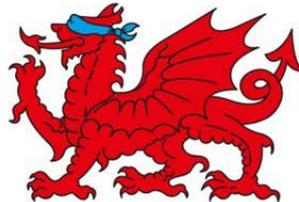
Date signed off 1 / 4 / 2022.....

### 'Na' i gaethwasiaeth yng Nghymru

Os gwelwch chi  
rywbeth, rhannwch ef!

Mewn argyfwng: **999**  
Heb fod mewn argyfwng: **101**  
Crimestoppers: **0800 555111**  
Llinell gymorth caethwasiaeth  
Modern: **0800 0120 700**

[cymru.gov.uk/gwrthgaethwasiaeth](http://cymru.gov.uk/gwrthgaethwasiaeth)



### Say no to slavery in Wales

If you see it,  
report it!

In an emergency: **999**  
Routine: **101**  
Crimestoppers: **0800 555111**  
Modern Slavery Helpline:  
**0800 0120 700**

[wales.gov.uk/anti-slavery](http://wales.gov.uk/anti-slavery)

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