

Modern Slavery Act

Annual Transparency Statement 2023/24

Introduction

This annual statement sets out the Council's ambitions to understand all potential Modern Slavery risks related to its activities, and to put in place steps to ensuring that there is no slavery or human trafficking in the Council's activities and supply chains.

The Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 is to pursue organised criminals and opportunistic individuals involved in the modern-day slave trade and human trafficking, and to prevent people from engaging in, or becoming victims of, Modern Slavery and Human Trafficking crime.

Armagh City, Banbridge and Craigavon Borough Council recognises its responsibility to take a robust approach to slavery and human trafficking. The Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensure that supply chains are free from slavery and human trafficking.

Publication of this annual statement is part of that commitment, and highlights activity undertaken over the past 12 months.

Review of the Slavery and Human Trafficking Statement

Armagh City Banbridge and Craigavon Borough Council will review and update this statement annually. This will be the responsibility of the Safeguarding Coordinator.

Definition of Modern Slavery

Modern Slavery is a term used in the Modern Slavery Act and Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 to encapsulate the offences of slavery, servitude and forced/compulsory labour, and human trafficking and can be defined as:

Slavery: Where someone exercises over another person powers associated with the right of ownership.

Servitude: Where someone is obliged to provide services using coercion, including the obligation to live on another person's property.

Forced or Compulsory Labour: Where work or service is exacted from someone under threat or coercion and for which that person has not volunteered.

Human Trafficking: Where the movement of an individual is arranged or facilitated, with a view to that person being exploited, even if they have given their consent to travel.

However, **Modern Slavery** includes numerous types of exploitation, many of which may occur together, and may not be limited to the definitions above.

Under Section 1 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 a person will commit an offence if they:

1. Hold another person in slavery or servitude and the circumstances are such that they know or ought to know that the person they hold is in slavery or servitude, or;
2. Require another person to perform forced or compulsory labour and the circumstances are such that they know or ought to know that the person is being required to perform such labour.

Under Section 2 of the Act, a human trafficking offence will have been committed if an individual has arranged or facilitated the travel of another person with a view to that person being exploited. This includes:

1. If that individual intends to exploit the other person during or after travel, or;
2. If that individual knows or ought to know that the other person is likely to be exploited by someone else.

Guidance on the Modern Slavery Act is available at: [Modern slavery and human trafficking | nidirect](#) and [nilga-modern-slavery-council-guide-04052020.pdf](#)

Organisation and Supply Chains

Armagh City, Banbridge and Craigavon Borough Council provides a wide range of statutory and discretionary services for its residents, businesses, visitors and the wider public. Consequently, it purchases a wide range of goods and services.

This Statement covers all activities of the Council, including but not limited to all direct employees, agency workers, and services delivered on behalf of the Council by third-party organisations and in the Council's supply chains.

This statement is about understanding potential Modern Slavery risks related to the Council's activities and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own activities and in its supply chains, as well as supporting efforts to eliminate modern slavery and human trafficking in the wider community.

Partnerships

Partnership working is key to preventing Modern Slavery and supporting those that are most vulnerable in our communities. Armagh City, Banbridge and Craigavon Borough Council work in partnership with PCSP, LASP and SBNI and this is a consideration for all Partnership working across the Council area.

Partners within the Armagh City, Banbridge and Craigavon Borough Council area safeguarding policies set out the responsibilities of the Council to identify signs of potential abuse amongst children and vulnerable adults, which may include signs of Human Trafficking or Modern Slavery.

Armagh City, Banbridge and Craigavon Borough Council Policies

Set out below are the key related policy areas currently operated by the Council.

Safeguarding

Council's Safeguarding Policy supports and emphasises that safeguarding is everyone's business. Everyone has a fundamental right to be safe. Whatever the cause, and wherever it occurs, harm caused to children and adults by abuse, exploitation or neglect is not acceptable.

This Policy is our contribution to the fulfilment of a Northern Ireland Executive Programme for Government commitment to deliver a package of measures to safeguard children and adults who are at risk of harm and to promote a culture where safeguarding is everyone's business. It sets out our responsibilities and details where support can be obtained.

Equality and Diversity

We are committed to equality and diversity and actively seek to eradicate discrimination and inequality when developing services, and when goods and services are provided on our behalf. To this end, we have a dedicated Policy, Equality & Diversity Team to support us in areas of policy development to ensure service planning and delivery takes account of our Equality Scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998.

Procurement

Contracts are awarded in accordance with the Council's specific requirements for the management of Safeguarding, Health and Safety, Risk, Business Continuity, and Equality.

The Council's procurement process and guidance outlines information and our supplier's obligations under the Modern Slavery Act and Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. This includes how to report concerns of Modern Slavery within our Safeguarding Policy and procedures.

Our contract terms include clauses to mitigate the risk of Modern Slavery in our supply chains.

Recruitment/Agency Workers

We are an equal opportunities employer and welcome applications from all sections of the community and appoint strictly on the merit principle. Our recruitment processes require the completion of relevant pre-employment checks which include eligibility to work in the UK and the uptake of suitable references, where required.

The Council uses a specified and reputable employment agency for the recruitment of agency workers. All new employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with appropriate legislation.

The Council will continue to regularly review and update its list of preferred suppliers for the recruitment of agency workers. It will maintain process checks to ensure that each supplier complies with regulations under the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

Raising Concerns (Whistleblowing)

The Council strongly encourages all its full and part-time employees, temporary and casual staff, agency staff and contractors who are appointed to provide a service on behalf of Council. (including Council suppliers and those providing services via a contract to Council, service users, members of the public or volunteers to report any concerns related to the direct activities of the Council, its supply chains, or the behaviour/actions of colleagues or customers. This includes any circumstances that may give rise to an enhanced risk of Slavery or Human Trafficking.

The Council's Raising Concerns Policy and procedures are designed to make it easy for workers to make disclosures, without fear of reprisal.

The Policy will be reviewed as required to reflect the duties incumbent on Armagh City, Banbridge and Craigavon Borough Council.

Armagh City, Banbridge and Craigavon Borough Council Code of Conduct

The Council's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the Council. As an employer, the Council strives to maintain the highest standards of employee conduct and ethical behaviour. The Council's Code of Conduct requires all employees, without fear of recrimination, to bring to the attention of the appropriate level of management any deficiency in the provision of service or illegal or unethical conduct or discriminatory conduct.