

Appendix 2

Modern Slavery Statement 2019/20 – Cross-reference with requirements of Cooperative Party Charter

Requirement	Related current and future activity	Lead
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.	<p>Current</p> <ul style="list-style-type: none"> Internal staff training/briefings on what suppliers must do to comply with the Modern Slavery Act. Attending relevant external training events. <p>Future</p> <ul style="list-style-type: none"> STAR to add CIPS course to its annual training plan for Procurement Officers. 	STAR
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.	<p>Current</p> <ul style="list-style-type: none"> Use of standard documentation that identifies suppliers covered by the legislation and seeks confirmation they are compliant. Rejecting suppliers that do not meet these standards. <p>Future</p> <ul style="list-style-type: none"> Where the requirements of the Modern Slavery Act 2015 applies, include clauses in relevant documentation which set out that contract termination is a potential sanction for non-compliance. 	STAR
Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	<p>Current</p> <ul style="list-style-type: none"> Challenging abnormally low tenders/quotations received to ensure no breaches of labour laws or human trafficking are taking place – regardless of contract value. Relevant clauses are included in the Procurement Handbook. <p>Future</p> <ul style="list-style-type: none"> Continuing current practice. Review Quality Management documentation (and amend if necessary) to ensure the process is sufficiently clear. 	STAR

Requirement	Related current and future activity	Lead
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.	Future STAR will add appropriate clauses that underline this in relevant documentation.	STAR
Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	Future <ul style="list-style-type: none"> • Reviewing and, if necessary, developing internal reporting mechanisms • Internal awareness-raising, e.g. via Connect (staff newsletter) • Inclusion within Modern Slavery training modules. 	Safeguarding Unit Corporate Marketing & Communications Team People & Organisational Development (POD) / Safeguarding Unit
Require its tendered contractors to adopt a whistle-blowing policy that enables their staff to blow the whistle on any suspected examples of modern slavery.	Future STAR will add appropriate clauses that underline this in relevant documentation.	STAR
Review its contractual spending regularly to identify any potential issues with modern slavery.	Current Reviewing spend is current STAR practice. Future <ul style="list-style-type: none"> • Developing additional risk analysis relating to Modern Slavery, including proportionate vetting and due diligence. • Exploring options to develop STAR led training for council staff on contract management including aspects relating to modern slavery. • Review Contract Procedure Rules of Council Constitution to explain employees' responsibilities relating to modern slavery in contract management. 	STAR STAR/ Internal Audit STAR/POD STAR

Requirement	Related current and future activity	Lead
Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	<p>Current</p> <ul style="list-style-type: none"> Referring any of its contractors identified as a cause for concern regarding modern slavery for investigation via the National Referral Mechanism. STAR has identified a “Modern Slavery Champion” to advise on and lead matters relating to modern slavery. <p>Future</p> <ul style="list-style-type: none"> Additional staff training. Review Contract Procedure Rules of Council Constitution to explain employees’ responsibilities relating to modern slavery in contract management. 	STAR
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.	<p>Current</p> <p>Part of STAR response if modern slavery was identified as a risk.</p> <p>Future</p> <ul style="list-style-type: none"> Additional staff training. Inclusion of process within Modern Slavery training modules. 	<p>STAR</p> <p>STAR</p> <p>POD/ Safeguarding Unit</p>
Report publicly on the implementation of this policy annually.	<p>Future</p> <ul style="list-style-type: none"> The Modern Slavery Statement will be reviewed and refreshed annually via a report to CRMG, including an assessment of progress. 	Policy, Performance & Reform