



## Modern Slavery Act Transparency Statement for the period 01 April 2021 to 31 March 2022

### Introduction

The Modern Slavery Act 2015 (the “Act”) places specific responsibilities on organisations to ensure slavery and human trafficking does not exist within their supply chains, and in any part of their own businesses. Organisations need to demonstrate accountability through transparency to protect workers, adults and children from abuse and exploitation.

Belfast City Council is committed to improving practices to prevent slavery and human trafficking. The Council expects suppliers, partners and third parties to adhere to the same values and principles to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Act and constitutes Belfast City Council’s slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2022.

### Our structure and our supply chains

The Council is the local authority for the Belfast area with responsibility for a wide range of services including local planning, economic development, tourism, street cleaning and parks, leisure and waste management.

The [Belfast Agenda](#) is the community plan that the whole city is working towards. Our vision is that by 2035 Belfast will be a city

- Where everyone benefits from a thriving and prosperous economy
- That is welcoming, safe, fair and inclusive for all
- That is vibrant, attractive, connected and environmentally sustainable
- Where everyone experiences good health and wellbeing and
- Where everyone fulfils their potential

Our political governance structure is set out below:



Belfast City Council procured goods, works and services from circa 2,400 suppliers during the last financial year with a supply chain mostly based in the UK and Ireland.

The Council has a responsibility to prevent slavery and human trafficking within its supply chain and in any part of the organisation. As the customer, the Council makes clear to our suppliers, and those wishing to do business with us, what is expected of them.

The Council's tender process require all applicable tenderers to provide confirmation that they are compliant with the Act. They are also required to confirm their subcontractors and suppliers comply with the Act.

### **Our policies in relation to slavery and human trafficking**

Belfast City Council have the following policies or procedures in place, related to mitigating the risks of slavery and human trafficking:

#### **Safeguarding**

We recognise our responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults. Our child safeguarding procedures are well established. Our current focus is on reviewing, underpinning and improving how we take care of adults and the reporting system. This will include a new Safeguarding All ages policy to be in place by January 2023.

#### **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 or services are provided on the Council's behalf. To this end we have developed an internal toolkit which integrates equality and diversity into everything we do from policy development to service planning and delivery. The Council's new five-year Equality Scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 was approved in January 2021.

We are an Equal Opportunities employer and welcome applications from all sections of the community. We are a Lead Partner and Member of Excellence of Employers for Disability NI with members of our recruitment team being accredited as "Disability Positive". We have a dedicated helpline for any applicants who require reasonable adjustments or whose first language is not English. We appoint strictly on the merit principle and 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.

We operate a job evaluation scheme to ensure all employees are paid fairly and equitably.

#### **Raising Concerns**

We encourage workers to raise any concerns that they may have and there are established arrangements in place for handling these. Externally, members of the public and customers can use our [Corporate Complaints Compliments and Comments](#) procedure to report concerns.

#### **Fraud and bribery**

We are committed to protecting the public money we look after and to making sure that the opportunity for fraud, bribery or any other financial impropriety is reduced to the lowest possible risk. We have policies and procedures to manage the risk of fraud, bribery and other financial impropriety, including arrangements for prevention and detection as well as arrangements for reporting and investigation.

## **Code of Conduct**

We expect all employees and Councillors to demonstrate the highest standards of conduct and ethical behaviour. We require all Councillors and relevant officer to submit declarations of interests to record and declare personal and pecuniary interests.

## **Social Value Procurement Policy**

Our [Social Value Procurement Policy](#) sets out our approach to delivering on the council's inclusive growth commitments and explains our social value objectives, the impact these changes will make and how we will work with suppliers using our social value toolkit to achieve our ambitions.

### **Due diligence in assessing modern slavery risk in operations or supply chains**

Belfast City Council's Commercial and Procurement Services team operate a Category Management structure. A Category Management structure within the team enables greater transparency in the identification of risks associated with modern slavery on a category basis.

### **Risk Assessment and Management**

All new suppliers, for new applicable contracts, are assessed as part of the Council's tendering process to ensure that they meet the requirements of the Act.

The Commercial and Procurement Services team completed CIPS Ethical Procurement training achieving the professional standard of CIPS Corporate Ethics kite mark for the service.

An integral part of the risk management will be the new Safeguarding All Ages policy due to be introduced January 2023 and the associated updated training already in place, which includes Modern Slavery and Human trafficking as topics.

### **Key performance indicators to measure effectiveness of steps being taken**

We will communicate this policy to our staff to make them aware of the issue and the Council's obligations.

In October 2021, Belfast City Council approved suggested actions for various council departments based on guidance from the Northern Ireland Local Government Association. These actions include: providing Modern Slavery Awareness Training for all council personnel in public facing services; designating a point of contact to report modern slavery concerns and raise awareness of modern slavery among communities; and collaborating with other councils and agencies. This action plan is being taken forwards by officers.

The Northern Ireland Department of Justice is expected, at some point, to announce guidance on the new duty to report incidences of modern slavery. This may require further training and guidance being issued to staff.

### **Training on modern slavery and trafficking**

The Commercial and Procurement Services team commit to retaining the professional standard of CIPS Corporate Ethics during 2021/22. Further Council officers involved in procurement activity will also be selected for this training.

Signed on behalf of Belfast City Council by:

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**Nora Largey**  
**Interim City Solicitor and Director of Legal and Civic Services**

**Date:**

#### **Policy Control**

<b>Organisation</b>	Belfast City Council
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