

Modern Slavery, Ethical Employment & Supply Chains Statement

2024-2025



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Cyngor Sir Gâr
Carmarthenshire
County Council



Overview

In accordance with the Modern Slavery Act 2015, Carmarthenshire County Council recognises it has a responsibility as an employer to be aware of the potential for instances of modern slavery and to report such instances or concerns to the relevant body. We are committed to acting ethically and with integrity and transparency in all business dealings. We will put effective systems and controls in place to safeguard against any form of modern slavery taking place within the Council or our supply chain.

In June 2018, the Council's Executive Board signed up to the *Welsh Government's Code of Practice on Ethical Employment in Supply Chains* which aims to ensure that all public sector organisations are taking action to eradicate unlawful and unethical employment practices. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Carmarthenshire County Council's Ethical employment and supply chains statement for the financial year ending 2025. It sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Modern Slavery

Modern Slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. We work with a variety of suppliers from large corporations, sub-contractors to small to medium local suppliers providing a wide range of services. Our supply chain members are diverse, not only in the goods and services that they provide but also in the size and structure of their organisations. We encourage smaller businesses to apply to join our supply chain in order to promote local business initiatives in Wales.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Ethical Employment & Supply Chains Policy.** This policy sets out the context for ethical trade and employment practices for the Council and our supply chains and outlines our commitment, steps taken and future planned steps to address slavery and human trafficking risks.
- **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.
- **Equal opportunities.** As an equal opportunities employer we have a statutory duty to promote equality under the Equality Act 2010, and are fully committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We have a range of controls to protect staff from poor treatment and/or exploitation. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities. All employees are required to adopt a positive, open and fair approach and ensure the Council's Equality and Diversity Policy is adhered to and applied consistently to all irrespective of race, colour, nationality, ethnic or national origins, disability, religion and belief or

non-belief, age, sex, gender reassignment, gender identity and gender expression, sexual orientation, pregnancy or maternity, marital or civil partnership status.

- In addition, the **Welsh Language Standards** ask us to 'ensure that the Welsh language is treated no less favourably than the English language' and this principle should be adopted within the Council and our supply chain.
- **Safeguarding and Whistleblowing.** Our policies and procedures provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people providing our services are being treated, or about practices within our business or supply chain without fear of reprisals.
- **Employee Code of Conduct and behavioural standards guidance.** These make clear to employees the actions and behaviours expected of them. The Council strives to maintain the highest standards of employee conduct and ethical behaviour.

Progress to Date:

- The Council has an annual third party spend in the region of £310m per annum. Due diligence is undertaken to mitigate the risks when procuring contracts in high-risk areas for modern slavery offences, including construction, cleaning, manufacturing and workwear.
- Where appropriate the Council will, as part of its tendering and contracting process, seek assurances from suppliers and potential suppliers that they have no knowledge of any of the above forms of modern slavery within their organisations or supply chains. The Council will expect that those suppliers take responsibility to seek similar assurances from their own supply chains.
- Staff involved in procurement activities advised to undertake relevant training on Modern Slavery and Ethical Employment via the Welsh Government e-learning module.
- A Sustainable Risk Assessment is carried out on procurement over £25k, this addresses ethical employment issues.
- Suppliers have been encouraged to commit to the Welsh Government's Code of Practice on Ethical Employment in Supply Chains.

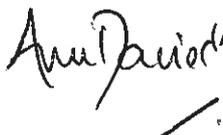
Planned Activities:

During 2024-25 as part of our commitment to preventing modern slavery and human trafficking the Council will undertake the following activities:-

- Continue to make staff aware of the Modern Slavery Act 2015 and inform them of the appropriate action if they suspect a case of slavery or human trafficking.
- Ensure that consideration of the modern slavery risks and prevention are added to procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.

This statement was approved on 15/07/24 by Cabinet.

Signed:

 (Anti-Slavery and Ethical Employment champion)