

Report to Finance, Assets & Performance Scrutiny Committee – September 2018

Modern Slavery update

Sarah Moore – Partnerships Manager

A recent resolution carried by full Council was as follows;

Council resolves:

1. *To subscribe to Anti-Slavery International's Anti-Slavery Charter (<https://www.antislavery.org/anti-slavery-charter/>).*
2. *To reaffirm the Council's Modern Slavery Statement, adopted under the Modern Slavery Act 2015, s.54, in May and approved by the Portfolio Holder for Community Safety and Wellbeing.*
3. *To require the Portfolio Holder to place before the relevant scrutiny committee a report on the implementation and operation of the Modern Slavery Statement, so that the Council's policy and processes can be properly reviewed and recommendations received. This must be done prior to May 2019.*

Introduction

Modern slavery is an international crime which affects an estimated 29.8 million victims globally. It is a growing issue which transcends age, gender and ethnicity. Such victims include persons forced to work illegally against their will in sectors such as agriculture, hospitality, construction, retail and manufacturing.

Section 54 of the Modern Slavery Act 2015 (the Act) requires organisations above a certain size, which supply goods or services, to prepare and publish an annual Modern Slavery and Human Trafficking Statement.

The Council's 'Modern Slavery and Human Trafficking Statement 2018/19' sets out the Council's actions to recognise all potential modern slavery risks related to its business and corporate activities, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains.

The statement was approved by the Council's Executive Management Team and the Portfolio Holder of Community Safety and Wellbeing in May 2018. It will continue to be reviewed and updated annually.

Organisational structure

The Council's core business is the supply of Public Services to residents of its Borough. The Borough of Newcastle-under-Lyme covers some 81 square miles and has a population of approximately 123,000 (based on the 2011 census). The Borough Council employs around 550 staff with a mix of full time and part time, administrative, technical and support officers.

The Borough Council has a budget of £6.597m for goods and services and estimated £2.549m available budget for capital expenditure (2018/19). The Borough Council of Newcastle-under-Lyme operates a devolved procurement structure where each directorate / service area are responsible for their own purchasing /procurement and contracting function, this is supported corporately by strategic procurement officers.

The Corporate Procurement support team, led by the Business Improvement Manager, is responsible for strategically supporting officers in the contracting of high value, high-risk commodities as well as offering support in the Council's general supply chain. This team work

closely with the Council's Partnerships Team, who have responsibility for community safety, safeguarding and vulnerability.

Council Policies on slavery and human trafficking

The Council is committed to ensure that all parts of our business and supply chain are slavery free.

As part of the Council's procurement, contracting and contract review processes with its suppliers and their supply chains, it will endeavour to ensure that all suppliers on strategic, high value, high risk agreements are monitored and supported by use of an ongoing monitoring process. We will continue to develop tools to address and develop action plans that address modern slavery and other key sustainable /social value issues.

The Council will also ensure that any tendering activity includes statements to ensure compliance to this Act. In particular, the Council aims to reduce the risk of modern slavery in its supply chain by undertaking the following actions:

- Where appropriate require key contractors to have safeguarding policies, procedures and training in place, in addition to providing confirmation of compliance with the Modern Slavery Act.
- Consider modern slavery factors when making procurement decisions.
- Include modern slavery criteria in specification and tender documents where appropriate.
- Consider modern slavery factors when evaluating specifications and tenders.

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are also considered to be key in meeting the requirements of the Modern Slavery Act:

- Safeguarding - the Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults with needs for care and support. The Council has a comprehensive Safeguarding Policy which all staff and councillors are expected to read and work within. The Council works within multi-agency partnerships to protect and safeguard people.
- Recruitment - the Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly to an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.
- Agency Workers - the Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.
- Pay - the Council operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council has paid the Living Wage or more to its employees since 2013. The Council is an accredited Living Wage Employer, meaning that the approach has been extended to relevant contracted staff as those contracts have come up for renewal.
- Employee Code of Conduct - the Council's Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.
- Whistleblowing - the Council encourages all its employees, customers and other business partners to report and concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

Anti-Slavery Charter

The Council have also recently signed up to the Anti-Slavery Charter which sets out basic measures that states, businesses and societies must take to end slavery across the globe.

Supplier adherence to our values

The Council is committed to a zero tolerance of slavery and human trafficking. Any supplier or potential supplier who does not adhere to these values or is found not to be compliant will be suspended and removed from the Council's supplier list and will not be considered for future supply unless they are able to demonstrate full adherence with the requirements of the Modern Slavery Act.

Training

To ensure high level of understanding of the risks of modern slavery and human trafficking the Council provide training to officers prior as part of contract monitoring and procurement processes on a one to one basis.

Training has been undertaken with the Partnerships Team through the membership of Staffordshire Safeguarding Children's Board (SSCB) and will be disseminated over the coming months to the relevant Officers and Members within the organisation.

What we are going to do in the future

The Council expresses its commitment to work towards greater transparency toward the people/officers working on the Council's supply chain. We are committed to developing a supply chain code of practice to which all our strategic and high value suppliers will need to abide by.