

# **South Derbyshire District Council Modern Slavery Transparency Statement 2018-19**

**Communities Team**

**Oct 2018**

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### Version Control

Version	Description of version	Effective Date
1.0	Modern Slavery Transparency Statement 2018-19	June 2018

### Approvals

Approved by	Date
F & M Committee	11 <sup>th</sup> October 2018

### Associated Documentation

Description of Documentation	
SDDC Modern Slavery Referral procedure	

## 1.0 Introduction

This Statement constitutes South Derbyshire District Council's (The Council) actions to ensure there is no slavery or human trafficking in its own business or supply chains. This Statement is for the financial year commencing 1 April 2018 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As part of the public sector and a member of the Derby and Derbyshire Modern Slavery Partnership, the Council is committed to improving its practices to identify and combat this crime. The Council accepts its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor with other bodies; and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as required by section 52 of the Modern Slavery Act 2015.

The Council is committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, supply chains and the wider community, and ensuring these are free from slavery and human trafficking.

This Statement covers all activities of South Derbyshire District Council. The Statement covers employees of the Council, agency workers and services delivered on behalf of the Council by third party organisations and the Council's supply chains.

## 2.0 Our Business and our Supply Chains

The Council's vision statement is 'Making South Derbyshire a better place to live, work and visit'.

The Council's values provide a framework for the way it wants to work, helping to deliver its vision and achieve its key objectives. Throughout its work, the Council will:

- Put residents first
- Set clear targets
- Act decisively
- Lead for success
- Actively listen and resolve problems
- Develop the Council's staff
- Be driven by economy, effectiveness and efficiency

The Corporate Plan 2016-2021 sets out the Council's values and vision for South Derbyshire and defines its priorities for delivering services. It describes how - under four themes of People, Place, Progress and Outcomes - the Council will work with partners to improve the quality of life of residents, community groups and businesses.

One of the key aims under the 'People' theme is to; 'Protect and help support the most vulnerable, including those affected by financial challenges'.

The Council has responsibility for providing a wide range of statutory and discretionary services for its residents, businesses, visitors and partners, either delivered directly or through external contractors or partners.

The Council procures goods and services from various suppliers and this is governed by its Procurement Guidance and Procedure Manual.

### **3.0 Policies**

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 considered to be key in meeting the requirements of the Modern Slavery Act.

#### **Corporate Plan 2016-2021**

The Corporate Plan is a key document that describes the Council's priorities, resources and how progress is monitored. The Plan also shows how the Council will work more closely with its partners: police, parish councils, the voluntary sector and the health services to ensure it maximises its resources to provide better joined-up services.

For more information about the Council Plan 2016–2021 go to: <https://www.south-derbys.gov.uk>

#### **Safeguarding**

The Council accepts its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. The Council has a Safeguarding Policy and provides training and information on its requirements to employees and Elected Members. The Council will also ensure that any volunteers, commissioned or contracted services are also aware of the Safeguarding Policy and their responsibilities within it. The Council also works within multi-agency partnerships to protect and safeguard people.

#### **Employment Policies and Practices**

The Council is committed to advancing equality, eradicating unfair treatment and promoting good relations across and between all our communities.

The Council has employment policies and procedures that minimise the risk of any form of modern slavery existing within the organisation. These include disciplinary, grievance, harassment, Employee Code of Conduct, confidential reporting procedures, as well as other policies that support fair treatment of employees including attendance management, performance capability, recruitment and selection etc.

Management guidance and toolkits are also provided to ensure that policies are applied consistently and fairly.

#### **Recruitment**

The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for screening new employees to ensure they are able to confirm their identities, work history, qualifications, and they are paid only into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are required to supply evidence of their eligibility to live and work in the UK. References are also requested. Where the duties of the post require regular and unsupervised access to children or vulnerable adults a

check is completed using the Disclosure and Barring Service, either at a standard or enhanced level. A new employee cannot commence their duties with the Council until all these checks have been completed.

### **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. It also utilises a central government agency framework for the majority of agency workers that are required.

### **Pay**

The Council uses a job evaluation scheme, facilitated by an independent partner, to ensure that employees are paid fairly and equitably.

The Council employs people under different national terms and conditions of service dependent on their occupations. These national conditions of service provide consistency across employment groups in terms of pay, allowances and other employment conditions, as well as determining annual pay awards.

### **Employee Code of Conduct**

The Code of Conduct makes clear the actions and behaviours expected of employees when representing the Council. The Council requires the highest professional standards of employee conduct and ethical behaviour and breaches are formally investigated. The Code also applies to contractors, agency staff, volunteers and those on student / work experience placements working on behalf of the Council.

### **Whistleblowing Policy and Procedure**

The Council enables its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. This Policy and Procedure provides a confidential and robust framework for employees and members of the public to raise any concerns and for them to be formally investigated where appropriate.

### **Procurement Contractors and Service Providers**

The Council is committed to ensuring that its contractors adhere to the highest standards of ethics. The Council expects its key contractors to have safeguarding policies, procedures and training in place. From April 2016, all tender processes require bidders to provide confirmation that they are compliant with the Modern Slavery Act 2015.

## **4.0 Equality and Fairness**

The Council annually publishes its Corporate Equalities Report, which demonstrates how it has played its part in helping to make society fairer by tackling discrimination and providing equality for all. This is supplemented by the annual Corporate Equalities and Safeguarding Action Plan, which sets down priority projects for the coming year.

As a major employer and provider of services, the Council is committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services as well as protecting and supporting the most vulnerable in the community. Equality and Safeguarding

are embedded into everyday business. The Council requires all Elected Members, employees, partners and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers.

To re-enforce this commitment, all employees and Elected Members receive training in equality and fairness as well as safeguarding. An internal group, which includes Elected Members and representatives from across all relevant service areas, monitor, promote and keep under review progress on the Equalities and Safeguarding Action Plan and any emerging patterns/trends.

## 5.0 Partnerships

Through its local statutory Community Safety Partnership (The Safer South Derbyshire Partnership), the Council links in with the Derby and Derbyshire Modern Slavery Partnership. Bringing together public, private and voluntary organisations to disrupt perpetrators and support victims of human trafficking and modern day slavery in Derby and Derbyshire and further afield. The Council will strive for a community wherein awareness of all forms of human trafficking and modern day slavery is commonplace and that across all sectors people work collectively to eradicate its existence. The Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes the Derbyshire Safeguarding Children and Adults' Boards.

## 6.0 Training and Awareness

The Council has a robust induction process and a mandatory training programme that all employees must complete, including separate courses on Safeguarding Awareness and Equality and Fairness. This enables employees, particularly in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

A Modern Day Slavery Referral Procedure Document has been produced and is accessible to all staff. The content includes:

- What modern slavery is
- The different types and what the signs of modern slavery are
- What can be done to flag potential concerns
- How to refer and support potential victims
- Who to speak to for support and guidance
- The National Referral Model and the Duty to Notify

A dedicated page to Modern Slavery is available to all on the Council's Website.

The Council recognises that employees are required to complete training on modern slavery. This has commenced with a focus on customer-facing roles and consideration then given to prioritising staff responsible for supply chain management, and those who have a direct influence on the employment of staff or contractors and for procuring goods and services.

## 7.0 Performance

The Council will assess the effectiveness of the steps that are taken to ensure that slavery and / or human trafficking is not taking place within our business or supply chains through:

- Investigating all allegations, complaints, whistleblowing reports received from employees, the public, or law enforcement agencies regarding modern slavery and human trafficking.
- Undertaking a number of community awareness programme for adults and children.
- Providing training for all staff working in supply chain management and with responsibility for the employment of staff/contractors and/or the procurement of goods and services.
- Reviewing and evaluating high risk supply chains, occupations and contracted services as part of ongoing contract management activity.

## 8.0 Working with Suppliers and Due Diligence

The nature of global supply chains for goods and services is increasingly complex. Modern Slavery can be found anywhere in the chain but it tends to be much worse the further down the value chain, where there is little visibility and where the poorest and most vulnerable work.

Human rights due diligence is also a key concept in the United Nations Guiding Principles' on Business and Human Rights (UNGPs). The UNGPs specify that due diligence processes should "include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed".

The Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of modern slavery are referred to the Police and the Designated Modern Slavery Lead within Community Safety, who is the Council's direct link to Derbyshire Constabulary Operation Wilberforce and Local Serious and Organised Crime Boards.

The Council works to ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Any investigation and/or victim support in relation to modern slavery is conducted through the Derby and Derbyshire Modern Slavery Partnerships Multi Agency Tactical Response Agreement.

## 9.0 Review and Approval

This Statement has been approved by the Council's Finance and Management Committee. The Statement will be reviewed on a regular basis. Responsibilities for the Statement and Modern Slavery are designated as:

1. Developing and Updating the Statement: Designated Modern Slavery Lead

The Designated Modern Slavery Lead within the Council, in conjunction with Human Resources, Procurement, Communities and Legal Services, monitors and updates the Statement in line with national guidelines and corporate priorities.

## 2. Risk Assessments and Prevention: Appointing a Designated Modern Slavery Lead

The Designated Modern Slavery Lead within Community Safety is responsible for:

- Working with Managers to identify high risk activities and appropriate actions relating to modern slavery and human trafficking;
- Ensuring appropriate information and training for staff and councillors;
- Ensuring that this Statement and resulting actions are embedded within the Council's Safeguarding Policies and Procedures and Strategic Plans.

## 3. Early Identification and Notification: Duty of Managers

Managers will notify any suspected modern slavery concerns encountered in the course of their work, to the Designated Modern Slavery Lead and ensure that staff complete all relevant training.

## 4. Identifying and Reporting Concerns: All Staff and Councillors

As with all safeguarding concerns, all staff and Councillors are required to share these in order that they can be investigated and action taken as required.