

Commercial and Procurement



Modern Slavery Policy

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Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. To tackle these crimes, the Modern Slavery Act 2015 was introduced.

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015:

- 'slavery' is where ownership is exercised over a person
- 'servitude' involves the obligation to provide services imposed by coercion
- 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered them self voluntarily
- 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

This document sets out the policy on the Authority's zero-tolerance approach to modern slavery, human trafficking and all forms of servitude and forced and compulsory labour in all our own business and relationships, and in any of our supply chains.

Scope

This Policy applies to all staff, volunteers and Members of the Authority.

Service Policy

The Authority is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, in any of our supply chains and to be sufficiently trained to identify risks when performing our front line services. This overarching commitment is supported at the highest level and interdepartmental collaboration is used to ensure a harmonised and effective approach.

Our Customers – Working with charitable organisations and our wider business and supply community to facilitate positive action on modern slavery.

Our People - Helping to protect our own employees, volunteers and job applicants from becoming victims of modern slavery through fair recruitment practise, pay and conditions, and having support mechanisms in place such as access to whistleblowing, and an employee assistance programme. It will

also teach everyone that works for us to spot signals of possible modern slavery as they perform their roles.

The Code of Conduct, for our staff, is an endorsement of the Nolan Principles - Principles of Public Life which outlines the ethical standards those working in the public sector are expected to adhere to.

The Authority will from the date of this policy publish annually a Transparency in Supply Chains statement

Legal consequences

This policy is in accordance with the Crown Commercial Service Procurement Policy Notice 05/19.

The Procurement Regulations published by the government have been amended to enable Contracting Authorities to make certain modern slavery offences under the Act as grounds for exclusion of bidders from public procurements.

Further information

1. Section 54 of the Act makes provision for new business measures, which requires companies with an annual turnover above £36m, and carrying out a business, or part of a business in the UK, to develop a Modern Slavery statement, also known as a Transparency in Supply Chains statement, which is to be updated and published annually.
2. Following consultation in 2019, Section 54 of the Act will include provision for all public sector authorities to publish their own annual Modern Slavery statements as of 1 April 2021, and applying to actions taken in the previous financial year. The statement must set out the organisation structure and supply chains, evidence the Authority's own policies, preventative and monitoring measures, set out how risks are identified and addressed within its supply chains as well as plans for continuous improvement.
3. The requirements of the statement are set out as six discretionary areas of reporting in sections 54(5) (a) to (f) of the Act and are mandatory inclusions;
 - a. the organisation's structure, its business and its supply chains;
 - b. its policies in relation to slavery and human trafficking;
 - c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
 - d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
 - e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
 - f. the training about slavery and human trafficking available to its staff.

Training

All staff

4. Mandatory online safeguarding training is provided for all staff, which includes a section on modern slavery. The Authority is in the process of expanding the training for all frontline staff whose work

may bring them into contact with potential victims of slavery. The training will develop knowledge of how to spot the signs of exploitation providing scenario based questions to improve understanding of what it looks like in real life as well as the law around modern slavery. The training will also provide information and learning on what to do if a member of staff comes into contact with a potential victim and explain the internal safeguarding process of how to escalate to the Designated Safeguarding Team who will be the central point for making onward referrals. The training also explores the risks to individuals who have been trafficked and enslaved and find out what support is available through a multi-agency approach and different pathways to refer.

5. Records of who has completed the training will be held in the Authority's learning management system and retained in accordance with the privacy notice on learning and development. The Authority will aim to achieve completion of the training by 85% of staff within three months of the training being made available, taking into account new starters and leavers, and long term sick leave of staff.

Commercial and Procurement Team

6. Specific training will be provided for members of the Commercial and Procurement Team to further develop their skills and knowledge of how modern slavery risks can be addressed during the pre-procurement/specification, selection, award stages of a procurement process and throughout the contract management phase to ensure that all suppliers that we engage with are;
 - fully compliant with the Modern Slavery Act 2015;
 - clear, transparent, accountable and auditable;
 - free from ethical ambiguities
7. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Governance

8. The Authority's annual statement shall be developed by the Head of Commercial and Procurement in conjunction with the Safeguarding Manager, Human Resources Business Manager and the Assistant Director of Corporate Services. The statement must be approved by the Authority prior to publication each year. Publication of the statement must be no later than six months after the end of the financial year.

Compliance with this Policy

9. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone within the Authority. Individuals are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
10. The Authority encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken.
11. Individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
12. If it is suspected that a breach of this Policy has occurred or that it may occur, the individual must report to either their Line Manager or their Human Resources Business Partner or report it in accordance with the Speak Up Policy as soon as possible.
13. If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with the Head of Commercial and Procurement or in their absence Assistant Director Corporate Services as soon as they become aware.

Publication

14. Each Modern Slavery statement must be approved by Corporate Management Board, and the Authority, dated with the financial year it refers to and be made public on the Authority's website and include a link to the statement in a prominent place on the website's home page.

Supporting Information

Details	Link to material
Crown Commercial Service Procurement Policy Notice (PPN) 05/19	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833280/Modern_Slavery_PPN_05_19_FINAL.docx.pdf
Section 54 of the Modern Slavery Act 2015	http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted
Nolan Principles - Principles of Public Life	https://www.gov.uk/government/publications/the-7-principles-of-public-life
Statutory Guidance regarding modern slavery: how to identify and support victims	Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland (publishing.service.gov.uk)

Document Audit Information	
Senior Officer Accountable	Tina Butler
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