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## Swindon Borough Council

### Modern Slavery and Human Trafficking Statement: 2016/17

#### Introduction

Swindon Borough Council fully supports the implementation of the Modern Slavery Act 2015. The Act consolidates slavery and trafficking offences, it provides more support for victims and introduces tougher penalties and sentencing rules.

This statement is made in accordance with Section 54 of the Act and sets out the actions taken to understand the potential risks relating to modern slavery in the business carried out by the Council. It also identifies the steps taken by the Council to ensure there is no slavery or human trafficking in its business or supply chain.

As part of the public sector, Swindon Borough Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Council is committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

#### Organisation structure

Swindon Borough Council is a unitary authority providing all local government services for its 180,000 plus citizens, from social care and schools to waste collection. The Council manages a wide range of services delivered both directly by the Council and through external contractors, with a large and diverse supply chain.

Although the Council is in the UK it is appreciated that suppliers may be based elsewhere. Should the Council look to procure or import products or services from outside the EU, which could pose an increased risk of slavery or human trafficking, it would look for additional assurances to take account of the potential risks.

#### Responsibility

Swindon Borough Council is committed to ensuring that there is no modern slavery or human trafficking in any part of our business including our supply chains. The Council has a range of policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in our operations.

Responsibility for human rights is cross Council. Modern slavery risk analysis is carried out by the Community Safety Partnership and feeds in to the Swindon and Wiltshire Anti-Slavery Partnership Executive Board which is chaired by the Police. This Board has several sub-groups that concentrate on key areas such as victims, communications and intelligence.

Policies are developed by relevant officers of the Council and are then agreed by Councillors. A number of these (see below) relate to modern slavery.

#### Relevant policies

The Council has the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - the organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential phone line (01793 463943).

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- **Employee Code of Conduct** - the Council's Code makes clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour when undertaking its business and managing its supply chain.
- **Procurement Toolkit** - suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment/Agency workers** – the Council's process for recruiting staff includes a check of the prospective employee's right to work in the UK. Employees are also paid in accordance with evaluated job descriptions within an agreed salary scale. The Council uses Pertemps as its preferred supplier of agency staff, requirements regarding employee checks are included in that contract.
- **Equality and Diversity strategy** - the Council recognises, and will challenge practice, where people may experience discrimination and less favourable treatment or privilege. This includes in the areas of age, disability, race, colour, ethnic or national origin, gender or marital status, gender identity, religion or belief, sexual orientation, and financial or economic status, homelessness or lack of a fixed address, political view or trade union activity.
- **Swindon and Wiltshire strategy to reduce domestic abuse** – the strategy is the overarching document which sets out a common understanding and commitment from key stakeholders to prevent and tackle Domestic Abuse. It promotes working together in a planned and coordinated way that will drive activities in partnership.
- **Child Sexual Exploitation and Safeguarding Polices** – identify the risk of abuse and exploitation and set out the Council's response to these.

### **Due diligence**

To comply with the Modern Slavery Act 2015 the Council include professional and technical ability questions within our procurement selection process for all Tenders above the EU threshold. As part of the selection stage of a tender process, all relevant commercial organisations, must confirm they are compliant with the reporting requirements contained within the Modern Slavery Act 2015.

In addition, included within the Council's standard contract terms for requests for quotations/tenders are contractual obligations on the supplier requiring them to comply with applicable obligations in the field of environmental, social and labour law provisions listed within the Public Contracts Directives.

### **Investigations**

The Council would refer suspected or known cases of slavery or trafficking to the relevant Police authority.

The Council actively works to ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain roles such as agricultural pickers (fruit etc.), car washes; mail bars, cannabis growing, gypsies and travellers, cleaning and care work.

As part of its safeguarding responsibility the Council has previously commissioned safeguarding training for colleagues across the authority to help identify any signs of potential safeguarding incidents and the relevant referral pathways. The Council expects any employee who may witness or suspect wrongdoing to report their concerns to their manager, the Police and the relevant safeguarding board.

### **Performance indicators**

The Council does not have any performance indicators specifically relating to modern slavery.

### **Training and awareness-raising programme**

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The Council has run weeks of action such as media campaigns regarding modern slavery and related issues. Training around sexual exploitation, domestic abuse, adults and children is also undertaken by relevant staff.

A live test day for running a reception centre has also been carried out. This included covering the following key areas: the safeguarding and protection of vulnerable victims; recognising that victims may not meet standard vulnerability criteria but are vulnerable in these circumstances and will be treated as such; the provision of health and well-being support in the Reception Centre and sign posting to and working with multiple agencies to provide support; bringing offenders to justice; learning from this and improving our response and understanding in partnership across agencies and looking towards the longer term and how to prevent and deal with future cases.

### **Corporate Management approval**

This statement has been approved by the organisation's Corporate Management Team who will review and update it annually.

**Chief Executive / Corporate Director:**

*Cherry JRC Jones*

**Date: 14<sup>th</sup> September 2018**