

### **Modern Slavery Act Statement**

This statement sets out the actions of Aylesbury Vale District Council to understand all potential modern slavery risks related to its business and the steps it has taken that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of local government, the council recognises that it has a responsibility to take a robust approach to preventing slavery, exploitation and/or human trafficking in all its forms. Modern slavery in its wider sense is commonly accepted to include forced or bonded labour, human trafficking, child slavery, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and forced or early marriage. Whilst at the present time the council is publishing this statement on a voluntary basis rather than under a statutory duty, it does so recognising that this is good practice as a public authority. The council also recognises its responsibilities as an employer and procurer / commissioner of services and acknowledges its duties as a district council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015 and to take action and work with other responder agencies under the Civil Contingencies Act 2004.

The council is absolutely committed to doing all it can reasonably do to prevent slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and/or human trafficking. The statement below sets out practices already in place at the council in 2019 to 2020 following the introduction of the Modern Slavery Act 2015.

#### **Corporate strategy**

The council's corporate strategy clearly states its aim to support and develop the people it employs, growing their knowledge and skills, now and for the future.

#### **Policies**

The council has a robust ongoing policy review programme which has input from employees, team leaders, management team, HR, trade union and members. The policy review programme is an ongoing key piece of work in the HR work plan to ensure that the council's policies and procedures 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.

#### ***Employee's code of conduct***

The council's employee code of conduct has been reviewed in 2015 to 2016 and 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 alleged breaches are investigated by line managers. The council has a process in place for employees to make declaration of outside interests where appropriate including other paid employment.

The council has a programme of mandatory training that all relevant employees and members must complete, including Safeguarding Awareness Training. Training enables officers in community-facing and regulatory roles to look out for, identify and report incidents of abuse and neglect, including modern slavery and trafficking to the relevant agencies.

#### ***Recruitment***

The council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

### ***Agency workers***

Where the need arises to source resources from alternative agencies, the council will verify the practices of any new agency it is using before accepting workers from that agency.

### ***Pay***

The council through its HR policies ensures that all employees are paid fairly and equitably.

## **Our due diligence processes for slavery and human trafficking**

### ***Whistleblowing***

The council publishes its “whistle blowing” confidential reporting policy as part of its constitution. This encourages all its employees, and others the council deals with who have serious concerns about any aspect of the council’s work to come forward and voice their concerns, and lays out a process for doing so, which complies with the Public Interest Disclosure Act 1998 so that if necessary employees may make disclosures, without fear of reprisal or victimisation.

### ***Corporate complaints system***

The council operates a complaints procedure to deal with complaints about its services, and this can be used to report community concerns such as overcrowding or issues which might reveal slavery or trafficking and which merit investigation or reporting to a partner agency.

### ***Safeguarding***

The council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. The council has a comprehensive 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.

### ***Contractors and service providers***

Where the council awards a new contract for goods services or works in which there is a significant risk of modern slavery abuse the council will seek reassurance that the contractor has policies, procedures and training in place to detect and deter such abuse. There is a risk assessment process relating to larger contracts included within the procurement process.

### ***Approval***

This statement has been approved by the Council’s [Standards Committee \(on 5 June 2018\)](#) and is supported by [Full Council \(on 16 July 2018\)](#), and will be reviewed and updated annually.

The statement and any actions included with it will be reported to the Standards Committee and where appropriate other committees each year for monitoring and assurance purposes. **(Update upon approval).**