



## Standards Committee

Date: 8 February 2017  
Time: 6.15 pm  
Venue: Committee Room 1  
District Council Offices, Queen Victoria Road, High Wycombe Bucks

### Membership

Chairman Councillor C Etholen  
Vice Chairman Councillor Mrs J A Adey

Councillors: S Broadbent, M Clarke, A R Green, Mrs W J Mallen, R Raja and J A Savage

Independent Members: G Houalla and M Pearce

Parish Council Members: Parish Councillor Mr A Cobden and Parish Cllr Mr B Swain

---

## Agenda

Item		Page
1	<b>Apologies for Absence</b> To receive any apologies for absence.	
2	<b>Declarations of Interest</b> To receive any disclosure of disclosable pecuniary interests by Members relating to items on the agenda. If any Member is uncertain as to whether an interest should be disclosed, he or she is asked if possible to contact the District Solicitor prior to the meeting.  Members are reminded that if they are declaring an interest, they should state the nature of that interest whether or not they are required to withdraw from the meeting.	
3	<b>Minutes of Previous Meeting</b> To confirm the minutes of the previous meeting held on 15 November 2016.	1 - 3
4	<b>Modern Slavery Transparency Statement</b>	4 - 10

<b>Item</b>		<b>Page</b>
5	<b>Quarterly Complaints Update</b>	11 - 13
6	<b>Supplementary items (If Any)</b> If circulated in accordance with the five clear days' notice provision.	
7	<b>Urgent Items (If Any)</b> Any urgent items of business as agreed by the Chairman.	

**For further information, please contact Jemma Durkan 01494 421635,  
[committeeservices@wycombe.gov.uk](mailto:committeeservices@wycombe.gov.uk)**

## Standards Committee Minutes

Date: 15 November 2016

Time: 6.00 - 6.35 pm

**PRESENT:** Councillor C Etholen (in the Chair)

Councillor Mrs J A Adey, Councillor S Broadbent, Councillor M Clarke, Councillor A R Green, Councillor K Ahmed and Councillor A D Collingwood

Parish Council Members: Parish Councillor Mr A Cobden

Independent Members: Mr G Houalla and Mr M Pearce

### **9 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Mrs W Mallen, Councillor R Raja and Councillor Savage.

### **10 DECLARATIONS OF INTEREST**

No declaration of interests were received.

### **11 MINUTES OF PREVIOUS MEETING**

**RESOLVED:** That the minutes of the meeting held on 7 June 2016 be confirmed as a correct record and signed by the Chairman.

### **12 MODERN SLAVERY TRANSPARENCY STATEMENT**

The Committee considered a report which set out the reasons for publishing a voluntary Modern Slavery Statement.

Members were informed that a key provision in the Modern Slavery Act 2015 requires larger commercial organisations with a turnover in excess of £36 million to publish a "slavery and human trafficking statement". Although it is not a statutory duty for the Council to provide a Statement, it is considered good practice to publish a voluntary Statement as an example of the Council's commitment to help prevent slavery, servitude and forced or compulsory labour and human trafficking entering its supply chains.

It was reported that one other local authority, East Lindsey DC, has published a voluntary statement and the Corporate Governance Group concluded that it would be good practice for Wycombe District Council to publish a Statement. It was noted that the Council already has numerous strands of preventative work in place and these measures would provide evidence of the Council's commitment. Council services were therefore collaborating to prepare a draft Statement.

The Committee discussed the report and received clarification on a number of queries:

- As well as other areas, procurement would be a key area of the Statement and would evidence work already being undertaken.
- Enforcement was the role of the Police and other enforcement agencies. However it was important for the Council, as a matter of good governance, to take steps to prevent modern slavery entering its supply chain.
- Forced marriage is an aspect of modern slavery.
- The cost of the work to undertake the Statement was not known; however it was emphasised that good practice was already being undertaken and officers would provide evidence for the Statement.
- The Statement would provide positive steps in partnership working and the Council would need to make sure that the mechanisms were in place to report any suspected illegal activity.

Once finalised the Statement would be published and updated annually and would include any further steps taken.

It was suggested that the draft Statement be presented to the next Committee meeting for consideration before publication.

**RESOLVED:**

- (i) That the report be noted and;
- (ii) the draft Modern Slavery Statement be brought to the Standards Committee with a further report for consideration at the next meeting.

**13 COMMITTEE ON STANDARDS IN PUBLIC LIFE - ANNUAL REPORT 2015-16**

The Committee was provided with information regarding the Annual Report 2015-16 of the Committee on Standards in Public Life (CSPL) and its work programme for the forthcoming year.

It was reported that two new appointments had been made to the CSPL, namely Jane Ramsey and Dr Jane Martin, who were replacing retired members and would take on the post for a five year term.

Highlights in the annual report included information on a review of the offence of Misconduct in Public Office on which the CSPL has strongly encouraged the discussion of sanctions and consequences in the event of any transgression. Local government standards continue to be monitored by the CSPL and it will maintain a

watching brief on the need for a mandatory code of conduct, strong local leadership, effective independent persons and concern at the lack of sanctions.

The perceived lack of effective sanctions has been particularly highlighted by the CSPL as a nationwide issue and will continue to be an issue to which the CSPL will be giving its attention. Standards training for members on the 29 November will include some national case studies where conduct had fallen short of criminal action but weaknesses in the current regime may have been identified.

It was noted that further reports regarding the CSPL would continue to be brought to the Standards Committee for consideration.

**RESOLVED:** That the report be noted.

#### **14 QUARTERLY COMPLAINTS UPDATE**

A report was submitted which provided an overview of recent complaint cases regarding Member conduct since June 2016.

It was noted that since the last meeting there were no outstanding complaints and no complaints had been concluded. One new complaint had been received but this was subsequently withdrawn by the complainant. There were no current outstanding complaints.

The continuing small number of complaints suggests that ethical standards continue to be taken seriously by local Councillors.

Members noted that the update Standards training would be taking place on the 29 November.

**RESOLVED:** That the report be noted.

---

Chairman

#### **The following officers were in attendance at the meeting:**

Julie Openshaw - District Solicitor  
Jemma Durkan - Senior Democratic Services Officer

# Agenda Item 4

## **MODERN SLAVERY TRANSPARENCY STATEMENT**

Officer contact: Julie Openshaw District Solicitor and Monitoring Officer  
julie.openshaw@wycombe.gov.uk 01494 421252

Wards affected: All.

## **PROPOSED DECISION AND RECOMMENDATION TO COUNCIL**

To approve the attached statement and recommend to Council that it supports its publication.

### **Reason for Decision**

Preparation and publication of a voluntary Statement will evidence that the Council takes seriously its role in preventing modern slavery, and has put in place robust steps to prevent it.

### **Corporate Implications**

1. The Modern Slavery Act 2015 came into force on 26 March 2015 and is aimed at preventing slavery, servitude and forced or compulsory labour and human trafficking, and protecting victims and it sets up an Independent Anti-Slavery Commissioner. A key provision in Section 54 places larger commercial organisations under a duty to publish a “slavery and human trafficking statement” (referred to in this report as the Statement) for each financial year of its organisation. Larger commercial organisations are defined as those who have a turnover in excess of £36 million. These Statements set out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business, or that it has not taken any such steps.
2. Although this statutory duty does not apply to the Council, and this has been confirmed by the Anti-Slavery Commissioner’s Office, the nature of the Council’s business makes it good practice to publish a voluntary Statement to show that it is serious about playing an important role in preventing slavery servitude and forced or compulsory labour and human trafficking.

### **Executive Summary**

3. This report sets out the reasoning for publishing a voluntary Statement setting out the steps the Council takes to seek to prevent slavery and human trafficking being involved in its supply chains and invites the support of the Standards Committee.

### **Sustainable Community Strategy/Council Priorities - Implications**

4. Publication of a voluntary statement helps support the Council’s Corporate Plan, particularly its Cohesive Communities priority and its commitment to good governance as set out therein.

## Background and Issues

5. As set out above, the Modern Slavery Act places a duty on larger commercial organisations to publish annual Statements setting out what if any steps have been taken to seek to prevent slavery and human trafficking.

The legislation provides that Statements can include information about:

- The organisation's structure, its business and its supply chains;
  - Its policies in relation to slavery and human trafficking;
  - Its due diligence processes in relation to slavery and human trafficking and its business and supply chains;
  - The part 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;
  - 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;
  - The training about slavery and human trafficking available to its staff.
6. In September 2016, the Corporate Governance Group, which is made up of senior officers, considered the principle of a voluntary Statement, and concluded that whilst at that time only one other local authority was known at this stage to have voluntarily published such a statement (East Lindsey DC) it would be good practice to do so, as the Council should be taking a firm stance on this issue, has a number of ways in which it actively seeks to ensure such preventative work in place, and that drawing together the steps taken in order to prepare a Statement would be a relatively straightforward process, and would provide evidence of the Council's commitment in this area. The Home Office is leading on tackling modern slavery and encouraging organisations to work together effectively to combat it, and it will be no surprise if future legislation makes the publication of such statements, or some similar arrangement, mandatory.
  7. In November 2016, Standards Committee confirmed its support for the principle of a Statement, and expressed the view that following its own approval, full Council should also be invited to support it. Work has been ongoing to prepare the Statement and input from officers working on procurement, HR, fraud prevention and the partnership work done by the Communities and Environment teams has been included.

The Statement is attached as Appendix 1.

8. Whilst the Standards Committee's terms of reference do not require it to formally authorise the publication of such a statement, its support as the Committee with general responsibility for standards of conduct will clearly underpin the Council's strong corporate commitment to eradicating slavery and trafficking. The draft statement has been seen by the Leader and Chief Executive who agree to be its signatories on behalf of the Council.

## **Conclusions**

9. Preparation and publication of the Statement will evidence that the Council takes seriously its role in preventing modern slavery, and has put in place robust steps to prevent it.

## **Next Steps**

10. The statement will be finalised and published, and updated annually to include any further steps taken.

## **Background Papers**

11. None.

# Agenda Item 4

Wycombe District Council

## **Modern Slavery Act Transparency Statement 2016/17**

This Statement sets out the actions of Wycombe District Council (“WDC”) 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 1st April 2016 to 31st March 2017.

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 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 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 2016/17 following the introduction of the Modern Slavery Act 2015.

### **Organisational Structure**

This statement covers the activities of WDC across its Organisational Structure.

### **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. The Council’s Workforce Strategy, referred to below, explains how it does this.

### **Workforce Strategy**

The Workforce Strategy is reviewed bi-annually (and its action plans annually) so that it stays relevant. The Strategy is supported by other policies, available on the Council’s Intranet, which are also regularly reviewed.

The Workforce Strategy has 5 themes, each with a supporting plan:

- 1) Organisational Development
- 2) Leadership Development
- 3) Skills Development

- 4) Recruitment and Retention
- 5) Pay and Rewards

## **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 Code of Conduct**

The Council's Employee Code of Conduct has been reviewed in 2015/16 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 breaches are investigated.

## **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**

The Council has a managed service contract in place for the provision of temporary agency staff. 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: Employees**

Recruitment systems are in place to prevent forced labour. Processes are in place for employees to report any concerns on human rights.

In this connection, "forced labour" is defined as all work and service which is extracted from any person under the menace of any penalty and for which the said person has not offered her / himself voluntarily.

## **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.

## **Councillors Code of Conduct**

The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Member Code of Conduct. Allegations of breaches are initially handled by the Monitoring Officer. Both the Code and Complaints Process are in the Council’s Constitution.

## **Councillors Declarations of Interests**

The Member Code of Conduct expects all Councillors to record and declare both Disclosable Pecuniary Interests, and Non-Disclosable Pecuniary Interests.

## **Councillors Induction and Training**

Councillors complete induction training on election, including mandatory equality and diversity training. Update training is also provided where appropriate.

## **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.

## **Training**

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.

## **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. The Council is also adding a whistleblowing clause to its standard terms and conditions in Contracts. Modern slavery does not occur in a vacuum and often it is orchestrated by organised crime groups. The Council therefore reserves the right to include enhanced probity checks / requirements at both the selection and award stages of procurement procedures, to ensure there no possibility of infiltration by these groups. The Council will work with central government and other organisations to keep abreast of and comply with best practice in its procurement arrangements.

## **Partnership Working**

The Council works in partnership with a wide range of agencies with the aim of preventing abuse from taking place and where it is detected, to report via approved channels the instances of neglect and abuse and to support victims.

## **Emergency Planning**

The Council has a duty to be part of the multi-agency response to the investigations into modern slavery and trafficking by providing assistance to victims (including facilitating and staffing the place of safety) when they are taken to such a place during these investigations.

This statement has been approved by the Council's Standards Committee and is supported by Full Council, and will be reviewed and updated annually.

The Statement and any actions included with it will be reported to the Standards Committee and the Audit Committee each year for monitoring and assurance purposes.

Katrina Wood  
Leader

Karen Satterford  
Chief Executive  
[date] 2017

# Agenda Item 5

## **QUARTERLY UPDATE ON STANDARDS COMPLAINTS**

Officer contact: Julie Openshaw District Solicitor and Monitoring Officer 01494 421252 [julie.openshaw@wycombe.gov.uk](mailto:julie.openshaw@wycombe.gov.uk)

Wards affected: All.

## **PROPOSED DECISION**

To note the report.

## **Reason for Decision**

To provide the Committee with an overview of complaints about Member conduct since November 2016.

### **Corporate Implications**

1. The Localism Act 2011, Sections 26-37 and the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 set out the current legislative framework relating to standards of conduct for elected members and arrangements for handling standards complaints.
2. In order to enable Standards Committee to maintain an overview of complaints and any trends emerging, reports will be presented quarterly.

### **Executive Summary**

3. This report provides Standards Committee with an overview of recent complaint cases.

### **Sustainable Community Strategy/Council Priorities - Implications**

4. None.

### **Background and Issues**

5. Standards Committee is presented with quarterly updates on member conduct complaints.
6. Since the most recent report to committee in November 2016, at which time there were no outstanding complaints; two complaints have been concluded as set out in Appendix 1. One of these complaints, which sought to revive an earlier withdrawn complaint, was rejected prior to the preliminary Stage 1. Another complaint has been progressed to Stage 2, at which stage it was not taken forward for investigation. As the complainant did not wish to be identified (other than to the Subject Member) the identity of both the complainant and subject member (through whom the complainant might have been identified) has been anonymised on Appendix 1.

## **Options**

7. None, this report is for noting only.

## **Conclusions**

8. The continuing overall small number of complaints suggests that ethical standards continue to be taken seriously by District, Town and Parish Councillors. An update Standards training session for District Council members was delivered on 29 November, which included reference to the use of social media, and some practical examples of media reports on high profile complaints about member conduct from across the country. Approximately half of the Council's Members attended this training session. Some members who were unable to attend have asked to receive an overview of the training, and this is being arranged.
9. The Council's Social Media guidelines, issued some years ago, are being reviewed and will be updated in the near future.

## **Next Steps**

10. Further updates will be provided quarterly.

## **Background Papers**

11. None.

## Standards Complaints

Complaints submitted under Localism Act procedure:

Ref No	Date Recd	Complainant	Against Councillor:	Council	Outcome	Date completed
SC34	05/01/2017	Ms E Plowman	Cllr B Pearce	Wycombe DC	Complaint rejected at preliminary stage as previous complaint withdrawn.	20/01/17
SC35	02/12/2016	Anonymised	Anonymised	Wycombe DC	Complaint not referred for investigation. Public benefit not served by further investigation.	20/01/17