

Standards Committee 5 June 2018

MODERN SLAVERY TRANSPARENCY STATEMENT - REVIEW

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

Wards affected: All

PROPOSED DECISION AND RECOMMENDATION TO COUNCIL

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

Reason for Decision

Preparation and publication of a voluntary Statement will continue to 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. A Statement was approved by Standards Committee on 8 February 2017 and its publication was supported by Council. The Statement has now been reviewed.

Executive Summary

3. This report sets out the reasoning for continuing to publish 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 then Corporate Governance Group, 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 is 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 has led 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.
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 underpins the Council's strong corporate commitment to eradicating slavery and trafficking.
9. The revised Statement is attached as Appendix 1. Officers involved in the services covered in the Statement have been consulted. Minor changes

reflect the fact that as well as being an employer, WDC is also the procurer/commissioner of services, that there is a declaration of interest system in place for employees as well as elected members, and that whilst Audit Committee as well as Standards Committee was initially anticipated to take part in the annual review, this has not yet occurred, but other committees can become involved if necessary. The fact that the Council no longer has a managed service contract in place for agency staff is also reflected. In terms of how complaints officers can help to identify possible issues from complaints received, and handle them appropriately, additional training has been requested and will be provided.

Conclusion

10. Preparation publication and review of the Statement will evidence that whilst no Statement or systems can ever completely mitigate the risk of these practices coming to light, the Council continues to take seriously its role in preventing modern slavery, and has put in place steps which are as robust as possible to prevent it.

Next Steps

11. Following full Council's support, the Statement will be finalised and published and a further review will take place next year.

Background Papers

None.