

Wycombe District Council

Modern Slavery Act Transparency Statement 2018/19

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 2018 to 31st March 2019.

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 2017/18 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 once approved by the Council's Standards Committee and supported by Full Council will be the Council's Modern Slavery Act Transparency Statements.

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. Going forward Buckinghamshire will be having its own Statement from April 2020.

Katrina Wood
Leader

John East
Acting Chief Executive
January 2020