

Appendix 1

Modern Slavery Act Transparency Statement for the Financial Year Ending 2019/20

Commitment

This Statement sets out West Lindsey District Council's (WLDC) commitment to understanding and addressing all potential modern slavery risks related to its business and its planned actions to ensure that there is no slavery or human trafficking in its own business or supply chains. This Statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020. It also relates to actions to be taken during the financial year 1 April 2020 to 31 March 2021.

The Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor of other bodies, and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as required by section 52 of the Modern Slavery Act 2015. The Council is absolutely committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community, and ensuring these are free from slavery and human trafficking. This Statement sets out the Council's existing policies and practices and specific actions in response to the Modern Slavery Act.

Organisation Structure and Responsibilities

This statement covers the full activities of WLDC as determined by the Council's Organisational Structure.

Modern Slavery Transparency Statement: Executive Director of Operations

The Executive Director of Operations is responsible for the Council's Modern Slavery Statement.

Developing and Updating the Statement: Lead Safeguarding Officer/HR

The Lead Safeguarding Officer, in conjunction with HR, monitors and updates the Modern Slavery Statement in line with national guidelines and organisation development priorities.

Risk Assessments and Prevention: Lead Safeguarding Officer and Safeguarding Coordinator

are responsible for:

- working with Service Managers to identify high risk activities and appropriate actions relating to modern slavery and human trafficking;
- ensuring appropriate information and training for staff and councillors;
- ensuring that this Statement and resulting actions are embedded within the Council's Safeguarding Policies and Procedures and Strategic Plan.

Early Identification and Notification: Team Managers

Team Managers will notify any suspected modern slavery concerns encountered in the course of their work, via the Safeguarding report a concern mechanism. They will ensure that they and their staff complete all relevant training.

Investigations: Safeguarding Coordinator

The Safeguarding Coordinator will lead on collating initial information where there is the potential of an investigation in relation to any confirmed or suspected incidents of modern slavery and will be responsible for the appropriate reporting of these

incidents in line with the Council's Early Help, Safeguarding Children and Adults and Domestic Abuse Policy and Procedures.

Identifying and Reporting Concerns: All Staff and Councillors

As with all safeguarding concerns, all staff and councillors are required to share these in order that they can be investigated and action taken as required.

Scope

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

Constitution, Financial Procedures and Procurement Regulations

The Council's constitutional arrangements are regularly reviewed and updated to take account of legislative requirements and best practice. Financial and Contract Procedure Rules are clearly articulated to support best practice and prevent financial abuse and ensure transparency and probity in all matters.

Corporate Strategy

The Council's Corporate Plan states its aim to support the most vulnerable people and to grow the local economy. It prioritises resources to services which seek to deliver these ambitions and is therefore well paced to act, and to refer, any incidents it becomes aware of. The Council's Corporate plan also 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 People Strategy explains how it does this.

HR / Employment Policies and Practices

The Council has a robust and ongoing Policy Review Programme with input from HR Advisors, team Managers, Team Leaders, Employees and Unions, reporting to the Joint Consultative Committee and Management Team. The Programme reviews all HR policies on a rolling programme, ensuring that these comply with national legislation and guidance. This includes Recruitment and Whistleblowing.

Recruitment

The Council's recruitment processes are transparent and reviewed regularly. Robust procedures are in place for vetting new employees and confirming their identities and qualifications, and ensuring that they are paid directly into an appropriate, personal bank account.

Agency Workers

The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency before accepting workers from them.

Pay

The Council operates a Job Evaluation Scheme which ensures that all employees are paid fairly and equitably. In 2015/16 the Council introduced the Living Wage.

Employee Code of Conduct

The Employee Code of Conduct is reviewed updated regularly. On renewal, this is circulated to all staff who are asked to sign a copy to confirm that they are aware of and work within the Code. The Code 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. Breaches are investigated and may lead to disciplinary action or, in extreme cases, dismissal.

Councillor Code of Conduct

All Councillors are expected to demonstrate the highest standards of conduct and behaviour, in line with a formal Code of Conduct. Breaches are investigated by the Council's Monitoring Officer.

Councillors Declarations of Interests

All Councillors must record and declare personal and prejudicial interests.

Complaints and Whistleblowing

The Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing procedure aims to make it easy for employees to make disclosures, without fear of retaliation.

Safeguarding Policy

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, which includes information relating to Modern Slavery and Human Trafficking. The Council works within local multi-agency partnerships to protect and safeguard people. The policy is reviewed on an annual basis to ensure it is robust and clearly provides details of reporting mechanisms, internally and externally, regarding suspected or confirmed instances of Modern Slavery.

Councillors Induction and Training

Councillors complete induction training on election, including Equality and Diversity Training. Safeguarding training is also provided.

Training

The Council has a programme of induction and ongoing mandatory training that all employees must complete, including Safeguarding Awareness Training and modern slavery and human trafficking. This enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking. Training on Trafficking, Exploitation and Modern Slavery is also included in year 3 of the training programme to be undertaken by all Council employees in line with the Lincolnshire Safeguarding required training.

Contractors and Service Providers

The Council is committed to ensuring that its contractors adhere to the highest standards of ethics. The Council expects its key contractors to have safeguarding policies, procedures and training in place.

Partnership Working

The Council works in partnership with a wide range of agencies to prevent neglect and abuse, to detect and report occurrences and to support victims.

Awareness Raising

The Council will promote the annual Modern Slavery Awareness Day held annually in October through an awareness campaign to all employees.

Review

The statement will be reviewed annually and minor housekeeping amendments approved by the Director of Resources in consultation with the Chairman of the Corporate Policy and Resources Committee and the Chairman of the Joint Staff Consultative Committee. The actions contained within this will be adopted formally each September, to align with the review of the Safeguarding Policy.

Approval

This statement has been approved by the Council's Management Team and will be reviewed and updated annually.

Any major policy changes to be agreed by Prosperous Communities Committee; Governance and Audit Committee to be responsible for any actions/ audits on this subject.