

TELFORD & WREKIN COUNCIL**CABINET - 2 FEBRUARY 2017****MODERN SLAVERY ACT – ANTI SLAVERY POLICY AND STATEMENT FOR 2017/18****REPORT OF ASSISTANT DIRECTOR OF GOVERNANCE, PROCUREMENT AND COMMISSIONING & ASSISTANT DIRECTOR OF CUSTOMER AND NEIGHBOURHOOD SERVICES****LEAD CABINET MEMBER – CLLR PAUL WATLING****PART A) – SUMMARY REPORT****1. SUMMARY OF MAIN PROPOSALS**

The Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Modern Slavery Act 2015 states that any commercial organisation with a minimum turnover of £36 M is required to produce a Modern Slavery Act Annual Statement and have an Anti-Slavery Policy. It is recognised as good practice for all Councils to also follow this requirement. This report presents both documents for consideration by Members.

In addition to the Council's responsibility as an employer, it also acknowledges its duty as a 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.

2. RECOMMENDATION

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| 2.1 | Cabinet to note the contents of this report and approve the Anti-Slavery Policy and the Modern Slavery Act Annual Transparency Statement for 2017/18 |
| 2.2 | Managing Director and Leader to agree and sign the Modern Slavery Act Annual Statement for 2017/18 |

3. SUMMARY IMPACT ASSESSMENT

COMMUNITY IMPACT	Do these proposals contribute to specific Co-Operative Council priority objective(s)?	
	Yes	Protecting our vulnerable adults and children and ensuring the borough is a safe place to live.
	Will the proposals impact on specific groups of people?	
	No	
TARGET COMPLETION/DELIVERY DATE	To be ready for publication by April 2017	
FINANCIAL/VALUE FOR MONEY IMPACT	The costs associated with developing the Anti Slavery Policy and any training required for Council Officers to raise awareness of the Policy will be met from within existing budgets. There are no further financial implications arising from this report MB 12 01 17	

LEGAL ISSUES	Yes	<p>It is a legal requirement under s.54 of the Modern Slavery Act 2016 for certain commercial organisations whose annual turnover is £36m or above, to prepare a slavery and human trafficking statement for each financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any parts of its own business.</p> <p>The anti-slavery statement will need to be reviewed and approved every financial year. A failure to do so will constitute an offence and the Secretary of State may seek an injunction in the High Court requiring an organisation to comply.</p> <p>There will be ongoing obligations as set out in the proposed anti-slavery statement to ensure training, prevention and detection measures are in place to avoid breach of the statement.</p> <p>Public Authorities including local authorities will also be required under the Modern Slavery Act to notify the government where they have reasonable grounds to believe that a person may be a victim of slavery or human trafficking. The Council should conduct due diligence on businesses before allowing them to become or continue to be our suppliers. For example, as part of the supplier selection procurement process, the Council has provided in its standard Selection Questionnaire, a modern slavery section which requires our potential supplier to confirm whether it is compliant with the annual reporting requirements within the Modern Slavery Act, if applicable.</p> <p>VK 12 01 17</p>
OTHER IMPACTS, RISKS & OPPORTUNITIES	Yes	<p>As part of Local Government, the Council has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also has a duty as a 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 in Safeguarding vulnerable adults and children, especially around child exploitation and human trafficking.</p>
IMPACT ON SPECIFIC WARDS	No	Borough-wide impact

PART B) – ADDITIONAL INFORMATION

4. INFORMATION

- 4.1 Slavery is not traditionally associated with our modern age however, Modern Slavery is now a major crime affecting a significant amount of people in the UK. We know from our Independent Modern Slavery Commissioner that modern day victims are in situations of exploitation which can be hidden in car washes, nail bars, fields, factories, the private care sector and private homes.

- 4.2 The Modern slavery Act 2015 states that organisations with a turnover in excess of £36 M should have an anti-slavery policy and produce annual a statement showing how they are recognising and helping prevent modern slavery. Attached at Appendix 1 is the proposed Anti-Slavery Policy and Appendix 2 is the proposed Annual Statement for the Council for 2017/18.
- 4.3 The Council has a duty in its professional capacity to ensure officers are able to recognise the indicators of modern slavery, know the signs to look out for and within the supply chain, the potential for modern slavery linked to the services or goods being provided. It's also key that officers know how to respond if modern slavery is suspected.
- 4.4 By February 2017 there will be short Ollie course available to all officers to make them aware of modern slavery, there will also be quarterly 'pop up' with multi choice questions to remind teams what to look for and how to report any concerns. Officers will also share the policy and statement with both the Adults and Children's Safeguarding board.
- 4.5 A designated web page will be placed on the Open Council section of our website which will hold the statement, our policy and provide useful links to other relevant legislation and duties such as the Prevent Duty and to our obligation regarding child employment.
- 4.6 The Procurement Planning document has been amended to add in a specific check list to ensure the procuring officer has considered any potential for modern slavery. At tender evaluation stage there is also the option for officers to investigate further should an Abnormally Low Tender be received which could be an indication of modern slavery in service delivery or the wider supply chain.
- 4.7 The prevention, detection and reporting of modern slavery in any part of the Council's business or supply chains is the responsibility all employees. If there are any concerns or suspicions, employees should notify their line manager and inform Family Connect in the first instance. Family Connect will then ensure we meet our duty 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 in Safeguarding vulnerable adults and children, especially around child exploitation and human trafficking.

5. IMPACT ASSESSMENT – ADDITIONAL INFORMATION

This statement sets out Telford & Wrekin's Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business, and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty as a 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.

The Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. This is managed by officers being made aware of the potential for modern slavery risks through awareness training and when procuring goods or services, officers will ensure that as part of tender evaluation and ongoing contract

management they will consider the potential and likelihood of modern slavery through a clear understanding of the supplier's:

- Structure, business and supply chains;
- Policies in relation to slavery and human trafficking;
- Due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- Business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps that it has taken to assess and manage that risk;
- 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; and
- Training about slavery and human trafficking available to its staff.

6. **PREVIOUS MINUTES**

7. **BACKGROUND PAPERS**

Report prepared by Sarah Bass Strategic Procurement & Jas Bedesha Community Safety, Cohesion & Environmental Enforcement.