

## **City of York Council**

### **Modern Slavery Act Transparency Statement 2017/18**

This statement sets out City of York Council's commitment to understanding and addressing all potential modern slavery risks and includes details of practices already in place and planned actions to ensure there is no slavery or human trafficking (defined by reference to the Modern Slavery Act 2015) in either its own business or associated supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

The Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and buyer of goods and services 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 committed to preventing slavery and human trafficking in its activities and to ensuring that its supply chains are free from slavery and human trafficking. This statement sets out the Council's existing policies and specific actions in response to the Modern Slavery Act 2015.

#### **Organisation**

This statement covers the full activities of City of York Council as determined by the Council's organisational structure.

#### **Council Plan & People Plan**

The Council Plan clearly states our aim to support and develop the people it employs, growing their knowledge and skills, now and for the future.

#### **Policies**

The Council and its strategic partnerships regularly review strategies and policies with input from employees, team leaders, management teams, HR, unions and members (portfolio holder). This is 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 2015:

#### **Constitution, Financial Regulations and Contract Procedure Rules**

The Council's constitutional arrangements are regularly reviewed and updated to take account of legislative requirements and best practice.

#### **Employee Code of Conduct**

The Council's Employee Code of Conduct 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 and, if appropriate, remedial action taken.

### **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 uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

### **Pay**

The Council operates a job evaluation scheme which ensures that all employees are paid fairly and equitably. In addition to this, the Council has introduced the living wage.

### **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 is designed to make it easy for employees to make disclosures, without fear of retaliation.

### **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 Code of Conduct. Breaches are investigated by the Monitoring Officer.

### **Councillors' Declarations of Interests**

The Council expects all Councillors to record and declare personal and prejudicial interests.

### **Councillors' Induction and Training**

Councillors induction training on election, includes equality and diversity training and Safeguarding training.

***ACTION: include an update on Modern Slavery and Human trafficking in the members training programme.***

### **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. The policy includes details of reporting mechanisms regarding suspected or confirmed instances of Modern Slavery.

***ACTION: review Safeguarding Policy to include clear cross reference to this statement***

### **Training**

The Council has a programme of training that all employees should complete, including safeguarding awareness training. Particularly, in adults and children's social care the training enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and trafficking.

***ACTION: ensure training on Modern Slavery is included in the staff training programme***

### **Contractors and Service Providers**

The Council expects its key contractors to have safeguarding policies, procedures and training in place including policies and statements required by the Modern Slavery Act 2015.

***ACTION: review the information provided to and required from key contractors in relation to Modern Slavery***

***ACTION: review the Council's standard terms and condition for the procurement of goods and services to include Modern Slavery provisions***

***ACTION: work with current suppliers to make them aware of the provisions of the Modern Slavery Act 2015***

### **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 recognises the importance of promoting awareness of Modern Slavery among all employees.

***ACTION: develop awareness campaigns/events/programmes with various staff groupings and include Modern Slavery on the agenda of relevant standing groups.***

### **High Risk Areas**

The Council recognises that high risk areas will require most surveillance and due diligence.

***ACTION: the Council commits to working with service managers to review work areas and identify any potential risk of slavery and human trafficking, and develop any appropriate steps to manage that risk.***

### **Approval and review**

This statement has been approved by the Council's Management Team and the Executive Member for Housing & Safer Neighbourhoods and will be reviewed and updated annually. The statement, and any actions included with it, will be reported to the Audit and Governance Committee each year for monitoring and assurance purposes.