

# **Modern Slavery Act 2015 Statement**

Through our Corporate Plan 'Living Well' objective, South Cambridgeshire District Council has committed to ensuring that our new and established communities provide thriving, healthy, safe and attractive places to live.

The Council's commitment to ensuring that there is no modern slavery or human trafficking in any part of our business including our supply chains forms a key component in achieving this objective.

Pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 South Cambridgeshire District Council is required to produce a slavery and human trafficking statement each financial year.

Our statement for 2018/19 sets out what steps the council has taken, and will be taking, to ensure that modern slavery is not occurring within the council and inside our supply chains. It also addresses the partnership role that the council has within the district.

## Within South Cambridgeshire District Council

South Cambridgeshire District Council has a range of policies and processes which help to ensure that we are acting ethically and with integrity to prevent slavery and human trafficking.

#### **Recruitment and Selection**

South Cambridgeshire District Council's Recruitment and Selection policy and procedures are designed to recruit staff in a fair and consistent way that supports equality of opportunity. Our recruitment processes are open and robust with procedures for checking that interview attendees are eligible to work in the UK and for requesting and following up applicant references.

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

#### **Job Evaluation**

The Council is committed to ensuring that its pay strategy is (fair and) equitable, affordable, transparent and easily understood, enabling the organisation to attract, retain and develop a skilled and flexible workforce.

Our staff salaries are evaluated using the National Joint Council (NJC) Job Evaluation Scheme which is based on the principles of joint ownership, openness and transparency and equality.

#### Whistleblowing

The Council encourages staff, contractors and elected Members who have serious concerns about any aspect of the Council's activities, to come forward and voice those concerns.



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Our Whistleblowing Policy was been prepared in consultation with staff and with the help of the independent charity, Public Concern at Work. It commits the Council to ensuring that whistleblowers will suffer no recrimination or victimisation as a result of raising a genuine concern about malpractice.

#### Safeguarding

Through our Safeguarding Policy, South Cambridgeshire District Council is committed to safeguarding and promoting the welfare of children and adults at risk of harm and their families. We take our responsibilities seriously and expect all staff, partners and contractors to share this commitment. We ensure our procurement and contracting policies and procedures adequately reflect our safeguarding responsibilities and that all incidents of poor practice, allegations and suspicions are reported, taken seriously and responded to swiftly and appropriately by the appropriate agency.

The Council has signed an agreement with Cambridgeshire County Council to work within their Adult Safeguarding policy guidelines and procedures. These highlight Modern Slavery as a form of abuse and neglect from which individuals should be safeguarded. Safeguarding training is mandatory for all members of staff at South Cambridgeshire District Council who are likely to come into contact with vulnerable residents and there is a safeguarding lead within each of the council's service areas.

#### Equality and diversity

South Cambridgeshire District Council is committed to equality of opportunity in our approach to service delivery, employment and community leadership. We are also committed to identifying, understanding and eliminating all barriers that prevent access to services, information and employment by people with one or more protected characteristic.

#### **Policy Framework**

We will ensure, as part of their ongoing review, that key policies reference and address modern slavery issues where appropriate.

## South Cambridgeshire District Council's supply chains

In all of our procurement activity, South Cambridgeshire District Council aims to be consistent with the highest standards of integrity and ensure fairness in allocating contracts. Equality and diversity, social responsibility and safety are important criteria in the provision of goods and services procured.

Suppliers to South Cambridgeshire District Council must abide by all employment legislation, regulation and codified guidance. The Council examines, as appropriate, suppliers' past records in respect of their treatment of staff and their conduct in relation to modern day slavery and human trafficking. Where there are questions over the conduct of a supplier then these shall be investigated and the appropriate action taken.



Specifically:

- Key contractors must have safeguarding policies, procedures and training in place.
- The Council requires its larger contractors to undertake regular audits of its safeguarding policies, procedures and training, reporting the outcome to the Council.
- OJEU tender processes shall require potential suppliers to confirm that they are meeting the requirements under the Modern Slavery Act 2015.
- Any supplier engaged by South Cambridgeshire is contracted to do so in line with the Authority's safeguarding, equality and diversity, whistleblowing policies and its Member and Officer codes of conduct.
- Should the council look to procure or import products or services from outside the EU which would pose an increased risk of slavery or human trafficking, we would undertake further consideration of supply chains in order to account for potential risks.
- The Council would expect all suppliers of goods and services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the council's expectations. We would request that our suppliers ensure the same of their own supply chains.

### Actions going forward:

- Consideration of the inclusion of standard modern slavery and human trafficking terms and conditions into the council's contracts.
- A review of the council's existing contracts list to determine whether any additional action is required.

# South Cambridgeshire District Council as a partner and leader

South Cambridgeshire District Council is part of the South Cambridgeshire Crime and Disorder Reduction Partnership, which works with Cambridgeshire Constabulary and other agencies to protect people living in the district who are vulnerable to modern slavery and trafficking.

Significant work has been carried out already. At the end of 2015, for example, a Modern Day Slavery awareness event held at the district council's offices was attended by almost 100 local parishes and Councillors.

In 2017/18, following a successful and well-attended community event at the end of 2016/17, the Partnership provided localised marketing information to ensure residents, communities, parishes and voluntary sector could recognise and report incidents or concerns about modern day slavery and human trafficking. During 2018/19, we are looking to deliver an educational performance addressing an aspect of Modern Slavery, whilst Modern Slavery is identified as a priority within the Police Control Strategy.

The UK Anti Slavery Day is held annually in October. In 2018/19 the Council will use this day to raise awareness of modern slavery and to inspire others to eliminate it. We will use this opportunity and others to raise awareness of modern slavery issues with staff using established internal communication channels, including posters, emails and information on our intranet.