

## **Modern Slavery Act 2015 - Transparency Statement 2017/18**

This statement sets out Colchester Borough 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. The 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 acknowledges its duty as a Borough 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 also a 'First Responder' under the National Referral Mechanism which involves making referrals in order to secure appropriate protection and support for victims.

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.

Section 54 of the Modern Slavery Act states that the employer's slavery and human trafficking statement might include information on:

- its structure, business and supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its 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;
- its 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
- the training about slavery and human trafficking available to its staff.

This statement has been approved by the Council's Senior Management Team and the Portfolio Holder for Planning, Public Safety and Licensing. It will continue to be reviewed and updated annually.

**Mike Lilley**  
**Portfolio Holder for Planning, Public Safety and Licensing**  
**September 2018**

## Structure and Business

Colchester Borough Council is a local authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. Its management structure is shown on its website [here](#).

Colchester has a rapidly growing population and economy. Over the next 15 years the borough is anticipated to experience one of the fastest growth rates within the county, with population rising from around 180,000 to 208,000 by 2030.

The Transparency Statement, and the Council's approach to Modern Slavery and human trafficking, is reflected within the 'Wellbeing' theme of the organisation's Strategic Plan 2018-21 and its Action Plan. The Transparency Statement supports the Council's overall [Equality Objective](#) which is 'Making Colchester an even better place to live and supporting those who need most help'.

The Council's [Strategic Plan 2018-21](#) includes key priorities set out under the following four themes.

- GROWTH
- Ensuring all residents benefit from the growth of the borough
- RESPONSIBILITY
- Encouraging everyone to do their bit to making our borough even better
- OPPORTUNITY
- Promoting and improving Colchester and its environment
- WELLBEING
- Making Colchester an even better place to live and supporting those who need most help

It is reviewed every three years (and its associated action plan annually) so that it stays relevant. The Strategy is supported by other policies, available on the Human Resources (HR) section of the Council's intranet, which are also regularly reviewed.

## Supply Chains

From April 2016, all tender processes have required bidders to provide confirmation that they are compliant with the Act. In addition, before being added to the finance system, all new suppliers will have provided confirmation of compliance.

### [Colchester Borough Council – Procurement Strategy](#)

The Council procures goods and services from various suppliers and this is governed by our procurement strategy.

## Policies

The Council reviews its policies and procedures on an ongoing basis to ensure they 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.

### **Safeguarding**

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and 'adults with needs for care and support'. The Council has a comprehensive [Safeguarding 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, and relevant training, makes

appropriate reference to the Council's role as a 'First Responder' in making referrals to the NRM (National Referral Mechanism).

### **Recruitment**

The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

### **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 to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council has paid the Living Wage or more to its employees since 2013. The Council became an accredited Living Wage Employer in February 2016, meaning that the approach has been extended to relevant contracted staff as those contracts have come up for renewal.

### **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.

### **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 (Members)**

### **Members' Code of Conduct and Ethical Framework**

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. The Ethical Framework within the Council's Constitution sets out further details.

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

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

## **Partnerships**

The Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes Essex County Council and the Local Safeguarding Boards. It also leads the Safer Colchester Partnership (SCP). Audits are carried out for the Essex Safeguarding Children Board and Essex Safeguarding Adults Board on alternate years. This includes appropriate reference to Modern Slavery and human trafficking.

## **Contractors and Service Providers**

The Council requires its key contractors to have safeguarding policies, procedures and training in place in addition to providing confirmation of compliance with the Act.

## Training

### **Staff**

The Council has a programme of mandatory training that all employees must complete. It enables officers in community-facing roles to identify and know how to report suspected incidents of abuse and neglect, including modern slavery and trafficking. Information on Modern Slavery was included within Designated Officer training in 2015 and 2017, and has been included within mandatory staff safeguarding awareness training since 2016.

### **Councillors' Training**

E-learning and face to face training on Safeguarding is made available annually and this includes reference to Modern Slavery. In addition, in 2017, a dedicated presentation on Modern Slavery was delivered to councillors by Cristina Gavrilovic (Anti-Slavery Partnership Coordinator of the Serious Crime Directorate, Kent and Essex Police).

## Partnership Working

### **Community Safety Partnership**

Staff work with the Safer Colchester Partnership to share insight and co-ordinate action around issues including Modern Slavery. This is illustrated by 'Days of Action' detailed within the Council's [Crime and Disorder Committee meeting papers](#) for 12 September 2017 (page 32).