



Governance Committee

Item

22 November 2016

Report of	Head of Community Services	Author	Andrew Harley ☎ 282880
Title	Equality and Safeguarding - Annual Update Report		
Wards affected	All		

The Committee is asked to review this annual report on Equality and Safeguarding

1 Decision Required

- 1.1 Committee is asked to review progress made in meeting the Council's legal duties and objectives in regard to both Equality and Safeguarding, and to endorse the approach set out at paragraph 8 below.
- 1.2 Committee is also asked to note the proposed revisions to the Council's Safeguarding Policy which takes account of new legislation and guidance but whose approach remains the same. (See Appendix C.)

2. Reasons for Decision

- 2.1 It is important that Committee has an opportunity to review progress and activities and supports the approach set out in order to assist the Council with compliance of the relevant duties.

3. Supporting information

- 3.1 The following appendices have been included at the end of this report to assist Committee in its task:
 - Appendix A – Council initiatives in the areas of Equality and Safeguarding
 - Appendix B - Modern Slavery Transparency Statement and Associated Actions
 - Appendix C – Safeguarding Policy with revisions highlighted in bold italics

4. A Combined Approach

4.1 The Committee is being asked to review the Council's approach to both Equality and Safeguarding. There are a number of reasons for this combined approach:

- The two areas of work are mutually supportive and reinforcing.
- They both involve the principle of proportionality and having "due regard".
- Each area helps to support, and prevent harm occurring to, vulnerable groups.
- An approach that reviews these two areas together may help to deliver maximum benefit for customers, the most effective management of risk and the most efficient use of resources.

5. National and Local Developments

Equality and Diversity

5.1 During the relevant period, there have been no changes to legislation or guidance in regard to how the Council should meet its [Public Sector Equality Duty](#). Furthermore, no review has been announced, despite the statement of the Government's Independent Steering Group that "a full evaluation of the PSED will be undertaken in 2016".

5.2 Nevertheless, there have been some notable developments in policy areas relevant to Equality and Diversity:

- In April 2016, the Home Office launched a new [Resettlement Scheme](#) to support 3,000 vulnerable and refugee children and their families at risk within the Middle East and North Africa. This was followed by the announcement of a [Community Sponsorship Scheme](#) for refugees in the UK and [Online Help](#) service.
- In July 2016, the Home Office introduced a [Hate Crime Action Plan](#) which outlined actions to prevent, respond to, and support victims of Hate Crime to 2020.

5.3 In terms of central government arrangements, in July 2016, Nicky Morgan MP was replaced by Justine Greening MP as [Minister for Women and Equalities](#). Justine Greening has overall responsibility for the Government's policies on women, sexual orientation and transgender equality, and cross-government equality strategy and legislation. There is also a [Parliamentary Under Secretary of State for Disabled People](#) who is responsible for areas including cross-government disability issues and strategy, disability benefits and mental health matters.

Safeguarding

- 5.4 In the area of Safeguarding, there have been significant public policy developments. It is clear that effective safeguarding remains high on the Government's agenda.
- From 31 October 2015, a new 'female genital mutilation' [mandatory reporting duty](#) was introduced via the [Serious Crimes Act 2015](#). Although this applies to teachers, health and social care professionals (as opposed to Council staff and councillors), the importance of this issue is clear, and the Council's revised Safeguarding Policy requires all those subject to the Policy to follow reporting procedures. Multi-agency [Statutory Guidance](#) on FGM was issued in April 2016.
 - Following concerns around '[failing children's services](#)', the Government commissioned a review into the role and functions of Local Safeguarding Children Boards (LSCBs). The [Government's Response](#) to the [Wood Report](#) (published in May 2016) suggests further legislation and guidance to deliver:
 - A "new duty" requiring "more robust and much clearer arrangements" to promote effective joint working.
 - Greater flexibility in local arrangements, coupled with Secretary of State powers to intervene where these are deemed to be inadequate
 - A centralised *National Learning Framework* to replace the existing system of Serious Case Reviews
 - In January 2016, notice was given of new [Joint Targeted Area](#) inspections to assess how local authorities and partners are working together to identify and protect children. A 'deep dive' element was included in order to focus on children at risk of Child Sexual Exploitation (CSE). In March, 2016, Ofsted announced a consultation on proposals for "a more proportionate approach to... re-inspection", followed in June by a further consultation on the [future of social care inspection](#).
 - There have been a number of consultations during this period, including those on the [Definition of Child Sexual Exploitation](#) which ended in March 2016. In July, the Home Office announced a consultation to run until September on a [mandatory reporting duty](#) to report suspected abuse or neglect of a child.
 - The significance for the Council of the [Modern Slavery Act 2015](#) and the [Counter Terrorism and Security Act 2015](#) will be considered in detail at paragraph 6 below.

- 5.5 There have also been revisions to [Statutory Guidance](#) on the Care Act 2014. Following learning and feedback from the first period of implementation, the following changes are of note:
- An adult safeguarding enquiry (conducted by Essex County Council) is not generally appropriate in cases of self-neglect, and that assessment should be made on a “case by case basis” which may depend upon “the adult’s ability to protect themselves by controlling their own behaviour”.
 - Guidance adopted the new cross-government definition of domestic violence and abuse as: “any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.” This definition reflects the new offence of *coercive and controlling behaviour* introduced by the [Serious Crimes Act 2015](#).
- 5.6 In terms of Local Safeguarding Board arrangements, Phil Picton was appointed the new independent Chair of the Essex Safeguarding Children Board (ESCB) and the Essex Safeguarding Adults Board (ESAB) in June 2016.

6. Meeting the Duties

Overall Arrangements

- 6.1 Equality and Safeguarding are each integrated into the day-to-day operations of the Council. However, arrangements are also in place to ensure strategic focus and operational co-ordination. The Head of Community Services provides the strategic lead whereas the Equality and Safeguarding Co-ordinator provides the operational lead. The relevant Cabinet Portfolio is ‘Business, Leisure and Opportunities’. Appendix A provides some specific examples of where Equality or Safeguarding initiatives have taken place over the last 12-18 months.
- 6.2 In the area of Equality and Diversity, the Diversity Steering Group (DSG) provides an active forum for ‘advancing equality’ for both customers and staff. Its members are service ‘representatives’ who play a key role in reviewing progress and disseminating best practice. In a similar way, Designated Safeguarding Officers attend quarterly ‘workshops’ to review safeguarding referrals and improve processes. Each service area has between two and four officers who have an enhanced level of training to provide expertise and assistance to officers.
- 6.3 Partnership working is key to meeting the Council’s safeguarding duties. The [Safer Colchester Partnership](#) (SCP) is led by a Responsible Authorities Strategic Group (RASG) which consists of Chief Officers representing local statutory partners and organisations. It aims to achieve sustainable solutions following the identification of local needs and

priorities. It does this by delivering initiatives and engaging with local communities on issues including domestic violence and hate crime. Examples of such initiatives are included in Appendix A.

- 6.4 The Council works closely with both the Essex Safeguarding Adults Board and the Essex Safeguarding Children Board. Support from, and representation to, both the ESCB and ESAB for District Councils is by way of Board Membership. Colchester Borough Council Executive Director Pam Donnelly sits on the ESAB, whilst Maldon District Council Chief Executive Fiona Marshal sits on the ESCB. Both feedback to the Chief Executives Group and Designated Leads for the District and Borough Councils.

Equality and Diversity

- 6.4 The Equality Act 2010 imposed a Public Sector Equality Duty (PSED) upon local authorities including district councils. Under its 'general duty', the Council must "integrate consideration of the advancement of equality" into its "day-to-day business, and across all... functions". Councillors and staff must have "due regard" to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a 'protected characteristic' and those who do not
- foster good relations between people who share a 'protected characteristic' and those who do not.

The 'protected characteristics' are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The duty also covers marriage and civil partnership, but not for all aspects of the duty.

- 6.5 The Equality and Human Rights Commission's [Technical Guidance](#) to the PSED (2013) remains the best guide to the practical operation of the PSED. In addition, the Council continues to take note of the Government's [Review](#) of the PSED which endorsed the so-called "Brown Principles". These confirmed that the 'due regard' duty must be fulfilled before and at the time that a particular policy is being considered; it must be exercised in substance, with rigour and with an open mind; and that it is non-delegable.
- 6.6 The PSED 'specific duties' require us to publish information to demonstrate that we are meeting both the 'general duty', and one or more published [equality objectives](#). During the period 2015-16 we have

continued to meet both of these requirements. Information published on the Council website includes:

- [Equality Impact Assessments](#)
- The Council's [Strategic Plan](#) and its Year End Performance Report (including its Strategic Plan Action Plan).
- The Council's website pages on [Equality and Diversity](#)
- The Council's [equality information](#) section contains all required information
- Workforce statistics: [Equality monitoring information](#)
- Work undertaken by the Council's Research and Engagement team about service users, customers and the borough's population.
- The Council's independent, external accreditation as an '[achieving](#)' organisation under the Equality Framework for local government.

- .6.7 In April 2015, the Council published its new 'equality objective', which is (to):

'Ensure Colchester is a welcoming and safe place for residents, visitors and businesses with a friendly feel that embraces tolerance and diversity'.

This objective is reflected in the new [Strategic Plan 2015-18](#) within the 'Welcoming' Priority. The specific actions required to meet the objective are included within the associated Action Plan, which is subject to six monthly monitoring.

- 6.8 The Council remains committed to the use of Equality Impact Assessment process. Despite not being a legal requirement, these remain a vital framework through which the Council can continue to identify, evaluate, and mitigate against, disproportionate negative impacts upon the 'protected characteristics'. It allows us to make the right judgements on the basis of sound information and data, in an open and transparent way.
- 6.9 The Council works with a host of agencies and organisations in order to meet its duties and advance equality more generally. Many of these are included in Appendix A.

Safeguarding

- 6.10 Under Section 11 of the [Children Act 2004](#), local authorities "must make arrangements for ensuring (that)...their functions are discharged having regard to the need to safeguard and promote the welfare of children." The Act required district councils to supply information to enable the Local Safeguarding Children Board to perform its function to co-ordinate activity. There are agreed [SET Procedures](#) (covering Southend Essex and

Thurrock) for child safeguarding which district councils are required to follow, and which are integrated into the Council's Safeguarding Policy.

- 6.11 Under Section 42 of the [Care Act 2014](#), the local authority must make enquiries to co-ordinate action to support an adult who: (a) has needs for care and support (whether or not the authority is meeting any of those needs), (b) is experiencing, or is at risk of, abuse or neglect, and (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. Although Essex County Council is the *investigating authority*, the Act requires district councils to supply information to enable the Local Safeguarding Adults to perform its function to co-ordinate activity. There are also agreed [SET Procedures](#) for adult safeguarding, integrated into the Council's Safeguarding Policy.
- 6.12 The Council passes concerns to the Family Operations Hub (in regard to children) and to Social Care Direct (in regard to an adult). A secure record of contacts and referrals (via the [FORS](#) and [SETSAF1](#) forms) with any feedback received are retained in a secure area, and are reviewed at quarterly Designated Officer Workshop meetings.
- 6.13 The Council, as chair of the local Community Safety Partnership, has responsibilities under [Section 9 of the Domestic Violence, Crime and Victims Act 2004](#). During the period, the Safer Colchester Partnership has had one Domestic Homicide Review published, which can be viewed on the ESAB website [here](#). The Council has provided information to other Community Safety Partnerships in the case of two 'Serious Adult Reviews' and twelve 'Domestic Homicide Reviews'.
- 6.14 Partnership working remains key to the Council being able to meet its statutory duties more generally. On 30 November, the Safer Colchester Partnership will be hosting Colchester's *Hidden Harms Conference* for partner organisations in order to raise awareness, share approaches and deepen joint working. It will include presentations and workshops around key issues such as Gangs, CSE and Modern Slavery. The Council regularly attends the Essex County Council *Missing and Child Exploitation* (MACE) strategic meeting which facilitates the sharing of intelligence and best practice between partner agencies.
- 6.15 The local Safeguarding Boards audit the approach and performance of partners including Colchester Borough Council in regard to: (a) senior level commitment, and accountability; (b) core policies and procedures; (c) safer recruitment; (d) service development; (e) learning, development and staff support; (f) preventative work and inter-agency working; and (g) information sharing. In 2015, the Council completed remote audits for each Board by self-assessment. Over 80% of criteria were met for each audit following moderation, indicating a high level of compliance. However,

a number of actions were identified in the areas of training, multi-agency working, customer feedback and complaints, the dissemination of lessons learnt from SCRs and DHRs, and 'Early Help'. The Council monitors progress towards completing such actions.

- 6.16 Modern slavery encompasses sexual exploitation, labour exploitation, forced criminal exploitation and domestic servitude. Section 43 of the [Modern Slavery Act 2015](#) states that local authorities have a duty to co-operate with the Independent Anti-Slavery Commissioner. A Strategic Plan was published in October 2015 which identified models for "best practice within partnership working". Information on Modern Slavery (along with Domestic Abuse, Mental Capacity, Forced Marriage, FGM, and PREVENT) has been incorporated into e-learning Safeguarding Awareness training which is taken by all Council staff. As required by the Act, a Transparency Statement has been published on the Council's website. Appendix B (below) includes the published Transparency Statement (in addition to associated actions planned for the period 2016/17).
- 6.17 [Sec 26 of the Counter Terrorism and Security Act 2015](#) placed a new duty upon local authorities to have "due regard to the need to prevent people from being drawn into terrorism." [Statutory Guidance](#) to accompany the new duty was issued in April 2015: "Effective leadership" and "partnership working" are required for the Council "to demonstrate an awareness and understanding of the local risk of radicalisation". The Council is required to work with "relevant agencies" using "existing mechanisms to understand the risk". In accordance with the Guidance, concerns around radicalisation are referred by the Council to the Essex County Council's Family Operations Hub or Social Care Direct, as with other safeguarding concerns. The CSP's Responsible Authority Strategic Group has agreed a Strategy and Action Plan. The [PREVENT Strategy](#) is published on the Safer Colchester Partnership website.

7. Overview

- 7.1 The Council believes that its approach to meeting its duties in both the areas of Equality and Safeguarding is appropriate and proportionate. An intelligent approach that recognises where and how these legally distinct areas intersect can offer efficient and effective working.

8. Going Forward

- 8.1 In 2016 we propose to:
- Remain focused on continuing to integrate and embed equality considerations into the day-to-day running of Council business,

ensuring that equality considerations are always considered through the framework of Equality Impact Assessments.

- Encourage staff to make full use of the Mosaic Segmentation Tool and the new corporate complaints platform to deliver improved equality analysis. This should facilitate greater equality of access to Council services for customers.
- Further extend awareness of key safeguarding issues such as CSE, Forced Marriage, FGM, Modern Slavery and Radicalisation so that the Council can fully discharge its legal and moral safeguarding responsibilities.
- Work more closely with the Safer Colchester Partnership to promote the safeguarding agenda, especially around harms that are often hidden from view and little understood. (Planned projects include the *Hidden Harms Conference* included at 6.14, above).

9. Strategic Plan References

- 9.1 The Council's [Strategic Plan](#) is a key mechanism through which the Council monitors how it is meeting its equality and safeguarding responsibilities. In particular, it contains the Council's current 'equality objective'.
- 9.2 Progress towards the Council's Strategic Plan Action Plan is reviewed within the Council's [Year End Performance Report](#).

10. Consultation

- 10.1 Extensive consultation preceded the publication of the Council's Strategic Plan 2015-18.

11. Publicity Considerations

- 11.1 The Council's approach to Equality and Safeguarding has the potential to affect everyone who lives, works or visits the borough. It can play a key role in the daily lives of individuals and communities by helping to safeguard vulnerable groups from harm as well as tackling prejudice and advancing equality of opportunity.
- 11.2 The [equality information](#) section on the Council's website continues to provide updated information as required by legislation and guidance, along with related content of use or interest to customers, staff and councillors. This helps with openness and transparency, with everything 'in one place'. The Council's website also includes a section dedicated to

[Safeguarding children and 'adults with needs for care and support'](#) which contains key information for residents along with links for further information. Over the period, a new website has been created dedicated to the [Safer Colchester Partnership](#)

12. Financial Implications

- 12.1 The Council continues to face significant financial pressures. As part of its strategic response, the Council has sought to mainstream a “business culture” focused on commercialisation and income generation. In this context, special attention will continue to be paid to ‘advancing equality’ and safeguarding children and ‘adults at risk’. An approach that further exploits the interrelationship of these two areas may deliver greater efficiencies.
- 12.2 It is important to understand that our obligation to have “due regard” to the three aims of the ‘general duty’ does not mean that decisions which have a disproportionate impact upon one or more ‘protected characteristics’ cannot necessarily be taken. The Council must nevertheless always seek to remove or reduce negative impacts.
- 12.3 The Council’s approach must continue to be proportionate, with key decisions being given due priority. Equality Impact Assessments must remain an integral part of the decision-making process when addressing changes to policies and practices.

13. Equality, Diversity and Human Rights Implications

- 13.1 This report is an annual update about Equality and Diversity, and Safeguarding. The importance that the Council attaches to these areas helps to protect vulnerable groups from harm and exploitation and promotes the human rights of all.

14. Community Safety and Health and Safety Implications

- 14.1 The Council’s approach to Equality and Safeguarding involves working closely with partners and communities. The Community Safety Partnership plays a vital role in helping the Council to meet its legal duties around safeguarding.
- 14.2 By meeting its Public Sector Equality Duty, the Council will help to ensure that employees do not suffer discrimination, harassment or victimisation. This will in turn create a safer working environment, and one which is consistent with the Council’s Health and Safety policies.

15. Risk Management Implications

- 15.1 As an employer and provider of public services, the Council could face legal challenges from individuals or groups who have been unlawfully discriminated against, however unintended. Legal cases brought on grounds of discrimination do not have upper financial limits like those brought through employment tribunals. The Council must meet its responsibilities to ensure it does not discriminate, and this will also help to avoid the potential for significant financial claims.
- 15.2 The Council could suffer significant reputational damage should its staff or councillors fail to comply with their Safeguarding responsibilities. This paper details the Council's strategic and operational approach in this area.

Appendix A - Key improvements and initiatives 2015-16

- The Council distributed over £200,000 of Voluntary Welfare Funding to 'not for profit' organisations that help the Council to meet its equality and safeguarding objectives. In 2015-16, the following organisations received funding: Age Concern; Colchester Citizen's Advice Bureau; Colchester Community Voluntary Service (CCVS); Colchester and Tendring Women's Refuge; Emergency Nightshelter; Grassroots; Rural Community Council of Essex (RCCE); and SHAKE Colchester Furniture Project. .
- The Community Initiatives Team co-ordinated two Crucial Crew events in 2016 in order to deliver increased community safety. In June, awareness sessions were delivered to over 100 adults, and presentations covered Falls Prevention, Trading Standards and Council Zone services. In June, 2000 'Year 6' pupils attended presentations covered healthy relationships, knife crime, internet safety and drug and alcohol awareness.
- It has also worked in partnership with CCVS and other agencies to promote its [Winter Warmth Scheme](#), targeted towards older people. This included information on the Council's [Warm Homes Project](#) and its [Emergency Heater Scheme](#). The Council continues to chair the [Older Persons Forum](#), which is well attended by local partners which support and provide services to older people. The Council also continues to host and support the Migrant Agency Forum which works with Essex County Council and local organisations to "promote community cohesion through the successful integration of vulnerable migrant groups within Essex".
- The [Good Gym](#) was launched in 2016 to help promote a healthier lifestyle and reduce loneliness and isolation. Funded by the Council and CCVS, local 'runners' pay a visit to a Community Group Hub as part of their route in order to do odd jobs for vulnerable older people. "You run there, fix the problem, and run back again".
- The [SOS Bus](#) treated 825 people over the period 2015-16 with a smaller proportion requiring hospital attendance compared with the previous year. Funded by the Council and its partners, the service particularly benefits people aged 18-24. Drawing on the skills of the Emergency Doctors Medical Service, more sophisticated procedures can now be used which include the suturing and gluing of wounds, thereby bypassing the need for A&E attendance. The Bus also acts as a place of safety for vulnerable people.
- The Syrian VPR ([Vulnerable Person Resettlement](#)) Programme has continued during 2015-16. Working alongside our voluntary sector colleagues at [Fresh Beginnings](#), the Council has helped to welcome and

resettle eight families in the Colchester borough as part of its five year programme, with two more families due to arrive in September 2016. All eight families have settled in well and local communities and neighbourhoods have been welcoming and helpful. Children are attending local schools and adults are attending English classes as part of the programme. The Council has also continued to work with Fresh Beginnings on the resettlement of Afghan Nationals who had been employed as translators, and their families. To date, a total of 55 individuals have been resettled as part of this [Special Immigration Scheme](#).

- In partnership with Thurstable School, Zone Wardens have re-invented the traditional 'Tea Dance' as a multi-agency learning experience. It included group interactive singing, the use of 'Retro-boxes' and a quiz. The team implemented strategies to help ensure the safety and wellbeing of participants across a variety of different age ranges and cultural backgrounds.
- A number of initiatives that help to meet our safeguarding objectives have been co-ordinated by the [Safer Colchester Partnership](#) including support and intervention for vulnerable individuals: A Domestic Abuse Awareness Day was held in November 2015, at which 2-300 people were seen and 100 awareness packs were distributed; During 2015-16, 62 'Home Security Reports' were passed by Essex Police to the Colchester Sanctuary Scheme (which operates to protect high risk, repeat victims of domestic abuse from harm); Partnership working has also delivered a pilot 'Drive Project' for which three case workers have been recruited to work intensively with high priority perpetrators of domestic abuse to implement behaviour change.
- In September 2015, the Partnership initiated a project to help support repeat victims of ASB through local organisations including Beacon House, Open Road and Catch 22. In addition, the Keep Safe Scheme has been extended to provide additional security to over 200 vulnerable adults through more than 20 venues. Officers are working on extending the scheme to more vulnerable groups and introducing a mobile App.
- In 2015-16, [The Big Garden](#) has provided therapeutic placements for 50 volunteers many of whom have mental health support needs. In 2016, its volunteer group *The Big Friendly Gardeners*, was chosen to benefit from the Co-op's Community Token Scheme in May, June and July.
- The Council's work in supporting vulnerable groups extends beyond the borough boundaries through the [Colchester and Ipswich Museums Service](#). 'Cultural Heritage in Mind' is a project working across museums in Suffolk to offer courses targeted at people dealing with mental ill-health.

The initiative involves developing art and other skills over a seven week period to reflect upon 'place' within the community. In 2015, Museums officers received training from [Vocal Eyes](#) on making museum venues and collections more accessible for visually impaired visitors. The Museums Service is currently hosting a trainee from the British Museum's [Learning Museum](#) programme, part of the Heritage Lottery Fund's 'Skills for the Future' funding. The programme is aimed at creating a more diverse and representative museums workforce, and the diverse group of trainees not only learn many valuable skills but also assist host museums to attract visitors and participants from non-traditional museum audiences.

- Customer Services has continued to target resources towards vulnerable groups. The refurbishment of the [Library and Community Hub](#) incorporates the use of clear signage and new technology, and includes knowledgeable and dedicated staff on hand to provide one-to-one support to customers. The new 'Customer Support Team' is made up of officers dedicated to providing a holistic and specialist service to more vulnerable clients that includes administering Discretionary Housing Payments and Exceptional Hardship Payments. The team has benefited from a substantial programme of training provided by local organisations including One Support, Colchester Mind, Colchester Food Bank and Dementia Friends - to whom officers refer customers for specialist support.
- The team succeeded in securing a £10,000 funding grant from [Colchester Catalyst](#) for its [Transformation Project](#). This means that the new Library and Community Hub will include a sensory area in the children's library.
- The new Go-Online Team has assisted vulnerable groups and enabled people to become more confident in accessing Council and other services online over the past year. The [Digital Skills for Life](#) course has proved particularly popular with older people; workshops at [Beacon House](#) have targeted assistance at homeless customers; and services have been targeted at Black and Minority Ethnic customers at C CVS.
- Specific progress has been made in delivering the Council's [Homelessness Strategy](#). The Council works closely with its partners to reduce homelessness and increase support. In 2015-16, this has included: additional 'drop-in' services provided by One Support including at the Library and Community Hub (increasing the total of referrals to 260 per month); setting up a 'Bridging the Gap' service provided by [Beacon House](#) to help enable people to secure and maintain accommodation; YES ([Youth Enquiry Service](#)) joint working with Social Care to prevent homelessness.

- The Council provided 56 Disabled Facilities Grants totalling £470,587 (2015-16) for the provision of private sector housing adaptations to sustain independent living. This is targeted at people with physical or mental disabilities, across all age ranges. It is a fully assisted service with a visiting case worker and direct access to a CBH contractor.
- The Council has also provided Disabled Facilities Assistance Loans to help fund housing adaptations or alternatives that do not fall within the 'DFG' program. These are provided for sensory rooms and for assistance to move for those with physical or mental health disabilities. In addition, the Council has also provided Home Repair Loans to a value of £72,050 to remove hazards, and discretionary financial assistance where the occupier is the victim of domestic abuse or otherwise vulnerable.
- The Council's housing stock is managed by Colchester Borough Homes. Whilst it is a separate 'ALMO' organisation, it contributes significantly towards the Council meeting its equality and safeguarding duties. CBH has achieved much during this period including: an initial self-assessment towards meeting the Social Housing Equality Framework (SHEF) prior to full assessment in 2017; creating a training workshop titled 'Respect Difference' in partnership with Colchester Institute which culminated in attendees scripting and producing their own myth-busting films about social housing. For this work, CBH was shortlisted in the Excellence in Equality and Diversity category at the TPAS Central Region (Tenant Engagement) Awards in 2016.
- The Council's 'Enterprise, Skills and Employment Grant' funding has enabled a number of initiatives over the period 2015-16. This has included funding for the [Small Steps Big Change Programme](#) (a six week course providing support to women looking to start-up a business) and [Signpost](#) (which provides Digital Skills Workshops).
- Following the adoption in 2016 of a new platform to manage and analyse customer complaints, the Council now routinely collects equality monitoring information on age, sex, race and disability. As more data becomes available, it is anticipated that useful equality analysis will help deliver better equality outcomes across the 'protected characteristics'.
- As part of the Learning and Development Plan, the Council commissioned Mental Health Awareness training for managers, facilitated by the charity *Rethink*. The purpose of the training was to give managers a better understanding of mental health and illness and its impact upon staff and included practical advice on how to identify potential issues and provide support.

- [The North Essex Parking Partnership](#) recognises its responsibilities to protect staff from harassment through both its 'duty of care' and through the PSED 'general duty'. In 2016, it introduced body worn cameras for all NEPP staff to help prevent violent and aggressive behaviour. The cameras provide video and audio evidence that can be used at court.
- The Council's Licensing Team has worked hard to raise awareness of CSE for taxi drivers. In 2016, Barnardos provided specialist training to private hire and hackney carriage drivers. This has helped to ensure that drivers understand the issue, can recognise possible signs of CSE and know how to report concerns. Key safeguarding information approved by Essex Police and the local Safeguarding Boards is also provided to staff.
- The Council has implemented actions arising from various multi-agency Domestic Homicide Reviews and Serious Case Reviews over the period which have included providing specific training and advice to staff around meeting the needs of Roma Gypsies and Irish Travellers.
- Council leaders across the political parties united to denounce Hate Crime in June following an apparent rise in racially motivated attacks in the aftermath of the EU Referendum. Full Council approved the following statement: *"We are proud to live in a diverse and tolerant society. Racism, xenophobia and hate crimes have no place in our country. This Council condemns racism, xenophobia and hate crimes unequivocally. We will not allow hate to become acceptable. This Council will work to ensure local bodies and programmes have support and resources needed to fight and prevent racism and xenophobia. We reassure all people living in the Borough of Colchester that they are valued members of our community."*



Appendix B - Modern Slavery Act 2015 - Transparency Statement 2015/16

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. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

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 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 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. The below sets out practices already in place at the Council and any committed actions set for 2016/17 in response to the introduction of the Modern Slavery Act.

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 Business, Leisure and Opportunities. It will be reviewed and updated as part of the Council's annual policy review of Safeguarding.

Annie Feltham

Portfolio Holder for Business, Leisure and Opportunities

August 2016

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 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 Council's [Strategic Plan 2015-18](#) includes supporting our residents, businesses and staff. The four words that we feel sum up what we want to achieve for the borough are:

- **Vibrant** - promoting our heritage and working hard to shape our future.
- **Prosperous** – generating opportunities for growth and supporting infrastructure.
- **Thriving** - attracting business and selling Colchester as a destination.
- **Welcoming** - a place where people can grow and be proud to live.

The Council's [People Strategy 2015-18](#) has three themes: Customer, Business and Culture. 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 will require 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.

[Procurement Strategy 2015-17](#)

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 at risk'. 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.

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 this will be extended to relevant contracted staff as those contracts 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 an annual basis. 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 was incorporated into updated safeguarding awareness training for all staff in July 2016.

Councillors' Training

Induction material on Equality and Diversity and Safeguarding is provided to councillors on election, and face to face training is available on an annual basis.

Modern Slavery Act 2015 Transparency Statement Associated Actions

1. *Action for 2016/17 – Review the Strategic Plan annual action plan to ensure that the Modern Slavery Act is considered where appropriate.*
2. *Action for 2016/17 – Review relevant policies and procedures in the light of the introduction of the Modern Slavery Act and reference where appropriate.*
3. *Action for 2016/17 – Review the Procurement Strategy in the light of the introduction of the Modern Slavery Act and reference where appropriate.*
4. *Action for 2016/17 – Work with the Safer Colchester Partnership to plan and deliver a Hidden Harms Conference in November 2016 to include Modern Slavery for local partners and key Council staff.*
5. *Action for 2016/17 – Council officers to brief the Safer Colchester Partnership Strategic Group on Modern Slavery (to include legislation and the local response).*
6. *Action for 2016/17 – Review work to identify any potential risk of slavery and human trafficking, and to develop appropriate steps to manage that risk.*
7. *Action for 2016/17 – To extend induction material and face to face training for Members to include awareness of the Modern Slavery Act and the actions being taken by the Council.*

Appendix C - The Safeguarding Policy can be accessed at the base of [this page](#) of the Council's website, or by clicking the direct link [here](#).