

South Lakeland District Council

Modern slavery statement

November 2018



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Introduction

This statement constitutes our actions to ensure there is no slavery or human trafficking in our business and supply chains. This statement is for the financial year ending 31 March 2019 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As part of the public sector we are committed to improving our practices to identify and combat this crime. The council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor of other bodies, 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 and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community, and ensuring these are free from slavery and human trafficking.

This statement covers the activities of South Lakeland District Council. The statement covers direct employees of the council, agency workers and services delivered on behalf of the council by third party organisations and in the council's supply chains.

Our structure, our business and our supply chains

The council Cabinet has overall responsibility for services in South Lakeland and works within the overall policies and budget agreed by Council - a meeting of all elected members. Cabinet makes recommendations to Council on key items of policy and the annual budget. The council has 51 elected councillors and the Cabinet comprises the Leader who is appointed by council, and 6 Cabinet Portfolio Holders appointed by the Leader.

South Lakeland District Council is the district authority for South Lakeland with responsibility for providing a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. The council manages a wide range of services which are delivered directly and through external contractors. South Lakeland District Council only operates within the United Kingdom.

Just over 400 people work for the council, making it one of the largest employers in the District. The jobs they do range across a large number of services such as housing, local planning, economic development, street cleansing, parks, recycling and waste management.

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

Policies

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

Council Plan

The Council Plan is a key document that describes our priorities, resources and how we will monitor progress. Our Customer Connect Programme aims to support and develop the people it employs, growing their knowledge and skills, now and for the future.

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.

Human resources/Employment policies and practices

The council has a robust and ongoing Policy Review Programme with input from HR Advisors, Senior Managers, Team Leaders, Employees and Unions, reporting to the Joint Consultative Panel and Corporate Management Team. The Programme reviews all HR policies on a rolling programme, ensuring that these comply with national legislation and guidance.

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.

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.

Procurement contractors and service providers

The council is committed to ensuring that its contractors adhere to the highest standards of ethics. The council expects its key contractors to have safeguarding policies, procedures and training in place. All tender processes require bidders to provide confirmation that they are compliant with the Modern Slavery Act 2015. In addition, before being added to the finance system, all new suppliers will have provided confirmation of compliance.

Equality and diversity

The council's Equality Policy is a declaration of its commitment to making equality an integral part of the council's business. This includes a commitment to use our influence and purchasing power to help make equality a reality for all and to take action to eradicate discrimination and inequality when delivering services, when employing others to deliver services on our behalf and when providing funding to others to provide services.

Partnerships

Through its Community Safety function, the council takes a leading role in disrupting perpetrators and supporting victims of human trafficking & modern day slavery in our area and further afield. We strive for a community wherein awareness of all forms of human trafficking & modern day slavery is commonplace and that across all sectors people work collectively to eradicate its existence in our community.

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 the Cumbria Safeguarding Children and Adults Boards and Safer Cumbria.

Training and awareness

The council has a programme of induction and ongoing mandatory training that all employees must complete, including Safeguarding Awareness Training. This enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

Procurement

Suppliers and contractors for South Lakeland District Council must:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015
- Warrant that none of its officers, employees or other persons associated with it:

1. has been convicted of any offence involving slavery and human trafficking; and
 2. having made reasonable enquiries, so far as it is aware has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- Implement due diligence procedures for its subcontractors servants agents and suppliers and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.
 - Notify the council as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this Contract.

Due diligence

We adhere to Section 52 of the Modern Slavery Act - Duty to Notify.

Incidents of modern slavery are referred to the police.

The council works to ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Responsibilities and reporting concerns

This statement has been approved by the council's Corporate Management Team and the Portfolio Holder for Health and Wellbeing. This statement will be reviewed annually, and adopted formally each March. Responsibilities for the Statement and Modern Slavery are designated as:

Modern Slavery Transparency Statement: **Health and Wellbeing Portfolio Holder**

- The Portfolio Holder is responsible for the council's Modern Slavery Statement

Developing and Updating the Statement: **Designated Modern Slavery Lead (TBC)**

- The Designated Modern Slavery Lead within Community Safety, in conjunction with HR, Procurement, Safeguarding and Legal, monitors and updates the Modern Slavery Statement in line with national guidelines and organisation development priorities.

Risk Assessments and Prevention: **Designated Modern Slavery Lead**

- The Designated Modern Slavery Lead within Community Safety is responsible for:
 - working with Operational Managers to identify high risk activities and appropriate actions relating to modern slavery and human trafficking;
 - ensuring appropriate information and training for staff and councillors;
 - ensuring that this Statement and resulting actions are embedded within the council's Safeguarding Policies and Procedures.

Early Identification and Notification: **Operational Managers**

- Operational Managers will notify any suspected modern slavery concerns encountered in the course of their work, to the Designated Modern Slavery Lead within Community Safety. They will ensure that they and their staff complete all relevant training.

Identifying and Reporting Concerns: **All Staff and Councillors**

- As with all safeguarding concerns, all staff and councillors are required to share these via the council's safeguarding processes in order that they can be investigated and action taken as required.

For further information regarding this statement and our work on Modern Slavery, contact:

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