

City of York Council

Modern Slavery Act Transparency Statement 2018

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.

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 foundation 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 and is a member of the North Yorkshire and York Modern Slavery Partnership. 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 continues to be 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. Larger companies will be expected to demonstrate that they have a modern slavery statement in place.

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.

ACTION: actively raise awareness with strategic partners across the City and use the Councils influence where appropriate to ensure issues are resolved.

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. In some instances, detailed supply chain audits may be undertaken.

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 Executive and will be reviewed and updated annually. The statement, and any actions included with it, will be reported to the Community Safety Partnership each year for monitoring and assurance purposes.