

## **Modern Slavery Act Transparency Statement for the Financial Year Ending 2017/18**

### **Commitment**

This Statement sets out East Lindsey District Council's (ELDC) commitment to understanding and addressing all potential modern slavery risks related to its business and its planned actions to ensure that there is no slavery or human trafficking in its own business or supply chains. This Statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018. It also actions to be taken during the financial year 1 April 2018 to 31 March 2019.

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 absolutely 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 sets out the Council's existing policies and practices and specific actions in response to the Modern Slavery Act.

### **Organisation Structure and Responsibilities**

This statement covers the full activities of ELDC as determined by the Council's Organisational Structure.

#### Modern Slavery Transparency Statement: Chief Executive

The Chief Executive is responsible for the Council's Modern Slavery Statement.

#### Developing and Updating the Statement: Designated Safeguarding Officer/HR

The Designated Safeguarding Officer, in conjunction with HR, monitors and updates the Modern Slavery Statement in line with national guidelines and organisation development priorities.

#### Risk Assessments and Prevention: Designated Safeguarding Officer

The Designated Safeguarding Officer is responsible for:

- working with Service 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 and Strategic Plan.

#### Early Identification and Notification: Service Managers

Service Managers will notify any suspected modern slavery concerns encountered in the course of their work, to the Designated Safeguarding Officer. They will ensure that they and their staff complete all relevant training.

#### Investigations: Safeguarding Assistant

The Safeguarding Assistant will lead on collating initial information where there is the potential of an investigation in relation to any confirmed or suspected incidents of modern slavery and will be responsible for the appropriate reporting of these incidents in line with the Council's Early Help, Safeguarding Children and Adults and Domestic Abuse Policy and Procedures.

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

As with all safeguarding concerns, all staff and councillors are required to share these in order that they can be investigated and action taken as required.

### **Scope**

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

### **Constitution, Financial Procedures and Procurement Regulations**

The Council's constitutional arrangements are regularly reviewed and updated to take account of legislative requirements and best practice. Financial and Contract Procedure Rules are clearly articulated to support best practice and prevent financial abuse and ensure transparency and probity in all matters.

### **Corporate Strategy**

The Council's Corporate Strategy clearly states its aim to support the most vulnerable people and to grow the local economy. It prioritises resources to services which seek to deliver these ambitions and is therefore well paced to act, and to refer, any incidents it becomes aware of. The Council's Corporate Strategy also clearly states its aim to support and develop the people it employs, growing their knowledge and skills, now and for the future. The Council's People Strategy explains how it does this.

### **People Strategy**

The People Strategy and its related action plans are reviewed bi-annually. The Strategy is supported by other policies, available on the Human Resources (HR) A-Z Employee Intranet pages, which are also regularly reviewed. The People Strategy has 3 themes, each with a supporting action plan: Employee Engagement; Employee Wellbeing and Safety; Employee Development.

### **HR / 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 Committee and Management Team. The Programme reviews all HR policies on a rolling programme, ensuring that these comply with national legislation and guidance. This includes Recruitment and Whistleblowing.

### **Recruitment**

The Council's recruitment processes are transparent and reviewed regularly. Robust procedures are in place for vetting new employees and confirming their identities and qualifications, and ensuring that 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 before accepting workers from them.

### **Pay**

The Council operates a Job Evaluation Scheme which ensures that all employees are paid fairly and equitably. In 2015/16 the Council introduced the Living Wage.

### **Employee Code of Conduct**

The Employee Code of Conduct is reviewed updated regularly. On renewal, this is circulated to all staff who are asked to sign a copy to confirm that they are aware of and work within the Code. The Code 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. Breaches are investigated and may lead to disciplinary action or, in extreme cases, dismissal.

### **Councillor Code of Conduct**

All Councillors are expected to demonstrate the highest standards of conduct and behaviour, in line with a formal Code of Conduct. Breaches are investigated by the Council's Monitoring Officer.

### **Councillors Declarations of Interests**

All Councillors must record and declare personal and prejudicial interests.

### **Complaints and 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 aims to make it easy for employees to make disclosures, without fear of retaliation. This is due to be updated during 2018/19.

### **Safeguarding Policy**

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, which includes information relating to Modern Slavery and Human Trafficking. The Council works within local multi-agency partnerships to protect and safeguard people. The policy is reviewed on an annual basis to ensure it is robust and clearly provides details of reporting mechanisms, internally and externally, regarding suspected or confirmed instances of Modern Slavery.

***Action for 2017/18 – Review the Council's Safeguarding Policy to include clear cross reference this Statement. Completed.***

***Action for 2018/19 – Review the Council's existing working practices regarding modern slavery and human trafficking, identifying this as a key task in the Safeguarding Strategic Plan.***

### **Councillors Induction and Training**

Councillors complete induction training on election, including mandatory Equality and Diversity Training. Safeguarding training is also provided.

***Action for 2018/19 – include an update on Modern Slavery and Human Trafficking in a Reserved Members Day.***

### **Training**

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. Training on Trafficking, Exploitation and Modern Slavery is included in year 3 of the training programme to be undertaken by all Council employees in line with the Lincolnshire Safeguarding required training.

***Action for 2017/18 – Ensure that training on Modern Slavery is included in the 5 year training programme for all staff. Completed.***

### **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. The Council requires Compass Point Business Services, Magna Vitae Trust for Leisure and Culture to undertake regular audits of these, reporting the outcomes to the Council.

***Action 2018/19 – Review the information provided to and required from key contractors in relation to Modern Slavery.***

### **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.

### **Awareness Raising**

The Council will promote the annual Modern Slavery Awareness Day held annually in October through an awareness campaign to all employees.

***Action 2017/18 – plan to deliver awareness day. Completed.***

***Action 2018/19 – continue to support national campaigns to raise awareness.***

### **High Risk Areas**

***Action for 2018/19 – support Service Managers to review their work areas to identify any potential risk of slavery and human trafficking, and develop any appropriate steps to manage that risk.***

### **Review**

This Statement will be reviewed annually. The actions contained within this will be adopted formally each July, to align with the review of the Safeguarding Policy and Strategic Plan.

The updated Statement, the actions taken and those planned will be taken with the revised Safeguarding Policy and Strategic Plan to the Council's Audit and Governance Committee annually, each June.

### **Approval**

This statement has been approved by the Council's Management Team and the Portfolio Holder for Corporate Affairs and will be reviewed and updated annually. The Statement and any actions included with it, are reported to the Audit and Governance Committee each year for monitoring and assurance purposes.

**Stuart Davy**  
**Chief Executive**  
**31 December 2017**