

Modern Slavery Statement

Financial Year: 1 April 2019 to 31 March 2020

Overview

Flintshire County Council delivers a wide range of statutory and discretionary public services, provided directly through its own workforce, and through over 4,500 private and third sector organisations.

In June 2018, the Council signed up to the Welsh Government's Code of Practice: Ethical Employment in Supply Chains. The Code's 12 commitments include tackling Modern Slavery and Human Trafficking. This Statement sets out the action that the Council has taken, and will take, to ensure that there is no Modern Slavery and Human Trafficking in its own business or supply chains.

The Council is fully committed to providing visibility to its Modern Slavery Statement and ensuring 'Transparency in Supply Chains'. To this end the Council is working in partnership with Welsh Government, the wider public sector, suppliers, service providers and other to address Modern Slavery challenges and drive collaborative action with a view to reducing risks and incidence of Modern Slavery.

What is Modern Slavery?

In the UK, the Modern Slavery Act 2015 defines criminal offences of slavery, servitude and forced or compulsory labour and of human trafficking, and includes measures for the protection of potential victims.

Slavery is any system in which principles of property law are applied to people, allowing individuals to own, buy and sell other individuals.

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic servitude, and forced labour, criminal activity or has their organs removed to be sold. In 2017 National Crime Agency recorded 193 reported Modern Slavery cases, an increase on 57% on 2016.

There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they are unable to speak the language, have their travel and identity documents removed and are told that if they try to escape, they or their families will be harmed.

The Council's Policies

Flintshire County Council's Corporate plan puts tackling poverty and inequality at the heart of the Administration's priorities. The other key strategies and policies include:

- The **Council's Corporate Procurement Strategy** sets a clear vision and the key organisational outcomes that implementation of the Strategy is

looking to deliver. This includes delivery of the Code of Practice and the elimination of Modern Slavery, so that Flintshire Council plays a leading role in making Wales hostile to Modern Slavery.

The Council's other key Policies in this area include:

- The Council's **Draft Social Procurement Policy** which sets out the Council's commitment to Ethical Employment and the delivery of Community Benefits. The Council wants to work with organisations that share its values;
- The **Whistleblowing Policy** enables Council staff and employees of the Council's contractors / suppliers to report unethical employment practices to the Council;
- **The Officer's Code of Conduct** makes it clear to employees in scope of the actions and behaviour expected of them when representing the Council. In performing their duties, they must act with integrity, honesty, impartiality and objectivity. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing its supply chain;
- **Recruitment and Selection policy** - the Council aims at all times to recruit the person who is most suited to the particular job. The Council has robust recruitment processes, which includes right to work checks compliant with Home Office guidance to ensure that preferred candidates have the right to work in the UK;
- **Agency workers** – the Council contracts with a managed service provider, Matrix SCM to source agency workers and temporary staff. Matrix SCM have their own Modern Slavery Statement which sets out their zero tolerance approach to Modern Slavery;
- The trafficking of children is a crime and is child abuse. The Council works closely with partners to ensure that any suspected case of this form of abuse is dealt with in line with the **All Wales Child Protection Procedures**.

The Council's Supply Chains

The Council spends over £150 million annually with over 4,500 suppliers who provide a broad range of goods and services. Over 99% of the Council's spend is with UK based companies. However, the Council recognises that its supply chains spread across the world, and that parts of the supply chain could be engaged in Modern Slavery. The Council has limited resources to monitor and manage its supply chains and so will focus on its direct suppliers and will require its suppliers to ensure that their supply chain is free from Modern Slavery.

The high-risk sectors for Modern Slavery include agriculture, leisure, hospitality, catering, cleaning, clothing, construction and manufacturing. A review of Council spend has shown that for the majority of the high-risk areas the Council provides the service in-house, utilises national frameworks and/or local suppliers. The risk of Modern Slavery and human trafficking by its direct suppliers is considered low.

The Council will ensure that its direct suppliers are aware of its commitment to tackle Modern Slavery and human trafficking and that they also understand their obligations as a supplier or contractor of the Council.

The Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers through its contract management arrangements. The due diligence and reviews include:

- Mapping the supply chain in high risk areas to assess risks (geographical and product) of Modern Slavery and human trafficking;
- Evaluating the Modern Slavery and human trafficking risks of each new supplier;
- Conducting supplier assessments on an annual basis to create a risk profile focusing on financial stability and also covering insurance and compliance with various employment policies including the Welsh Government's Code of Practice: Ethical Employment in Supply Chains;
- Taking steps to improve sub-standard supplier practices, including the provision of advice to suppliers and requiring them to implement Action Plans; for example to demonstrate compliance with safer recruitment guidelines;
- Participating in collaborative initiatives focused on human rights and socially responsible procurement policies in general and Modern Slavery and human trafficking in particular;
- Invoking sanctions in respect of suppliers who fail to meet its expectations or to improve their performance in line with an Action Plan, which includes a provision to terminate the business relationship;
- All invitations to tender for business with Flintshire County Council over £1 million there will be an expectation for the supplier to be signed up to the Welsh Government's Code of Practice: Ethical Employment in Supply Chains. This will also be encouraged on all other tenders.

Employee Training

The Council is committed to developing and delivering tailored training to its employees, including the Commissioning and Procurement Team, in order to raise awareness of Modern Slavery, human rights abuses and blacklisting. Corporate training will be included as part of the rolling programme of training on the Contract Procedure Rules and general Procurement Rules.

The Council will publicise what the Council is doing to tackle Modern Slavery to all staff and highlight the <https://www.gov.uk/government/collections/modern-slavery> site to all its employees.

The Modern Slavery Training addresses:

- The Council's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low

wages or wages below a country's national minimum wage or the provision of products by an unrealistic deadline;

- How to assess the risk of slavery and human trafficking in relation to various other aspects of the business, including resources and available support;
- How to identify the signs of slavery and human trafficking;
- The initial steps to be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to relevant parties within the Council (Multi-Agency Safeguarding Hub);
- The external help that is available, including the Modern Slavery Helpline, Gang masters and Labour Abuse Authority (GLAA) and the Labour Market Enforcement Unit;
- The messages, business incentives or guidance that can be provided to suppliers and other business partners and contractors to implement anti-slavery policies;
- The steps the Council should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios or to implement changes in business practices arising from an Action Plan, including the termination of the business relationship.

What The Council has done

The Council has:

- Signed up to the Code of Practice: Ethical Employment in Supply Chains;
- Appointed Anti-Slavery and Ethical Employment Champion – Councillor Billy Mullin;
- Established a Joint Procurement Board, one of whose tasks is to oversee the implementation of the Code of Practice;
- Started the process of reviewing its supply chains to identify high risk areas;
- Commenced a review of contract and tender clauses;
- Developed a draft Social Procurement Policy which is being consulted upon;
- Updated its Whistleblowing Policy;
- Promoted e-learning training on Modern Slavery and Blacklisting;
- Reviewed CIPS Training on Ethical Procurement, and will develop more tailored training to reflect the Code of Practice commitments;
- All Category Management Teams have undertaken Welsh Government's Code Of Practice: Ethical Employment Training
- Established a Corporate Safeguarding Panel; Modern Slavery is a standing agenda item;
- Appointed two Specific Point of Contacts (SPOCS) – One for Adults and one for children. They are the Council's point of contacts for responding to Modern Slavery and trafficking issues;

- raised awareness of Modern Slavery and human trafficking through social media messages and workforce news items.

What The Council will do

Flintshire Council will take the following action in its efforts to ensure that there is no Modern Slavery or Human Trafficking in its supply chains.

Ref	Action	Lead
Commissioning and Procurement		
1	<p>Complete a review and update the Council's tender documentation to ensure Modern Slavery and Human Trafficking issues are fully addressed. This will include clauses to:</p> <ul style="list-style-type: none"> • Check that contractors who have a turnover above £36million have a Modern Slavery Statement; • Include the Code of Practice: Ethical Employment in Supply Chains as a part of its tender documents. 	Joint Procurement Service
2	<p>Complete a review and update the Council's standard T&Cs to ensure employment practices are considered as part of the procurement process.</p> <ul style="list-style-type: none"> • Review supplier contracts and map supply chains through due diligence – with an option to include sanctions or a termination clause if Modern Slavery is suspected; • Ensure absence of undue time and cost pressures which could result in unethical treatment of staff; • Embed a zero-tolerance approach to Modern Slavery. 	Joint Procurement Service
3	<p>In line with clause 7 of the Code of Practice ensure that the Council carries out a regular review of expenditure and undertakes a risk assessment. The Council will:</p> <ul style="list-style-type: none"> • Identify any high risk suppliers and monitor for human rights abuses and unethical employment practices which will become a standard agenda item in contract meetings and reviews; • Investigate any supplier identified as high-risk through direct engagement with staff; • Work with its Tier 1 suppliers to raise awareness of Modern Slavery to prevent it from occurring. 	Joint Procurement Service

4	<p>Utilising the Code of Practice – Ethical Employment in Supply Chains - develop a Modern Slavery Communication Strategy to ensure awareness is raised across the Council and with partners.</p> <ul style="list-style-type: none"> • Share learning and best practice across the Council, with other public sector bodies, partners and look to learn from their experiences. 	Chief Officer Governance
5	<p>Training</p> <ul style="list-style-type: none"> • Modern Slavery overview to be provided in through e-learning; • Keep records of who has undertaken training; • The Council shall continue to identify staff requiring training in ethical employment practices – and seek to build capacity - including those in Human Resources and front-facing members of staff working in the Community. 	Joint Procurement Service and Human Resources
6	Update the Modern Slavery Statement annually and report progress on this Action Plan.	Chief Officer Governance
7	Publish its Modern Slavery statement annually on its website and on TISC.	Chief Officer Governance
8	<p>Develop measures to identify Key Performance Indicators which will include:</p> <ul style="list-style-type: none"> • The number of staff trained; • A review of the system for supply chain verification; • Development of the process for the evaluation of existing suppliers. 	Chief Officer Governance
9	<p>The Council shall seek to ‘go the extra mile’ and participate in campaigning and collaborative Human Rights initiatives aimed specifically at Modern Slavery and Human Trafficking.</p> <p>Consideration will be given to participation in proactive initiatives – supporting victims of Modern Slavery and encouraging others to do so – and lobbying for better victim support.</p>	Chief Officer Governance
10	Consider the commissioning of an independent review and scrutiny of the progress made in the development of the Council’s Modern Slavery Statement.	Chief Officer Governance

This Statement has been approved by Flintshire County Council's Cabinet and will be reviewed and updated annually.

Signed by.....

Name.....

Position within Organisation.....

Date signed off.....

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