

# Modern Slavery and Human Trafficking Statement

This is Worcester City Council's modern slavery and human trafficking statement, made under section 54(1) of the Modern Slavery Act 2015

## The Modern Slavery Act 2015 defines slavery as:

- a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

## The Act defines Human Trafficking as:

- a person commits an offence if the person arranges or facilitates the travel of another person with a view exploiting that person.
- a person is exploited if one or more of the following apply in relation to the person - slavery, servitude and forced or compulsory labour.

## Our responsibilities

- As part of the public sector, we recognise our responsibility to take a robust approach to preventing slavery, exploitation and/or human trafficking.
- We recognise our responsibilities as an employer and procurer/commissioner of services and acknowledges its duties as a City 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 and to take action and work with other responder agencies under the Civil Contingencies Act 2004.
- We are committed to doing all that we can to prevent slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and/or human trafficking.
- The statement below sets out practices already in place at Worcester City Council following the introduction of the Modern Slavery Act 2015.

## Corporate Policies

- The Council has a 5-year City Plan which sets out its priorities for the delivery of services in the city and ensures these are delivered through good governance.

- We also have a range of specific policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in all of its operations. We have a robust ongoing policy review programme to ensure that the Council's policies and procedures remain compliant and fit for purpose.

## **Meeting the requirements of the Modern Slavery Act**

The following Council policies and procedures are instrumental in meeting the challenges and risks of modern slavery and human trafficking.

- **Employee Code of Conduct**

Our Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the Council. We strive to maintain the highest standards of employee conduct and ethical behaviour, including managing its supply chain.

- **Recruitment**

Our recruitment processes are transparent and are reviewed regularly. This includes having robust procedures in place for the vetting of new employees. Checks are undertaken to confirm identities and qualifications. Salaries are also paid into a personal bank account.

Where agency workers are used, these are procured via a third party company which in turn has its own Modern Slavery statement and vets workers to ensure there is no modern slavery or human trafficking in the supply chain.

- **Whistleblowing**

We encourage all our employees, customers and business partners to report any concerns related to the direct activities, or the supply chains of the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Council's Whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via their manager or the Council's Monitoring Officer.

- **Corporate Complaints System**

We operate a complaints procedure to deal with complaints about the Council's services. This can be used to report community concerns, such as

overcrowding or issues which might reveal slavery or human trafficking which may merit an investigation or reporting to a partner agency.

- **Equality and Diversity Performance**

We have an Equality, Diversity and Inclusion Strategy. This enables the Council to explicitly evidence that equalities are embedded in its work and that it is, as a minimum, complying with the 'Public Sector' Equality duty in the delivery of all of the Council's services.

We also carry out Equality Impact Assessments (EIA) when looking at the effect a policy, project or decision is likely to have on different people.

- **Safeguarding**

We embrace our responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. We work within multi-agency partnerships to protect and safeguard people.

- **Code of Conduct for Members**

Our Code of Conduct for Members in our Constitution expects all our Members to demonstrate the highest standards of conduct and behaviour when representing the City Council.

All Members are offered training on the Code of Conduct and ethical behaviour.

- **Due Diligence of suppliers**

We understand the important role that procurement plays. It enables and rewards good employment practices and does not encourage the use of modern day slavery practices. Our procurement rules emphasise fairness, transparency and equal treatment and our processes for the selection of suppliers include a focus on social value and ethical practice.

The Council has resolved to be a Living Wage employer and is actively looking to implement the Living Wage policy in its procurement practices on a case by case basis.

We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain.