

Wandsworth Borough Council

Statement on Slavery and Human Trafficking (2018-19)

Introduction

Wandsworth Borough Council is committed to eliminating acts of modern slavery and human trafficking within its business and in its supply chains, sub-contractors and partners.

The Modern Slavery Act 2015 was designed to eliminate slavery, servitude, forced or compulsory labour and human trafficking ('modern slavery') in organisations and their supply chains by:

- increasing transparency as to what steps, if any, any organisation is taking to combat slavery and trafficking;
- consolidating criminal offences for slavery and trafficking;
- remedying victims;
- providing for greater identification and reporting of slavery and trafficking; creating new civil sanctions; and
- creating an Independent Anti-Slavery Commissioner

One of the main provisions of the Act, section 54 that requires every organisation carrying on a business in the UK with a total annual turnover of £6m or more to produce a modern slavery statement. The statement must cover the prior financial year, be refreshed annually, and Government guidance is that it should be published within six months of the end of that financial year. It should describe what action the organisation has taken to ensure their supply chains are free from modern slavery and must be published on the organisation's website with a link from its homepage.

The Wandsworth Borough Council Modern Slavery statement

This Statement is made in pursuant of Section 54, Part 6 of the Modern Slavery Act 2015 which requires the Council to incorporate policies and monitoring procedures within their business practices which sets out the steps the Council will take to eradicate slavery and human trafficking.

The statement will inform our residents, suppliers, staff and the public about the Councils' policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains and the steps taken to identify, prevent and mitigate the risks.

This is the Councils' first voluntary Statement to be published and relates to activities during the financial year 1 April 2018 to 31 March 2019.

Our Council area

Wandsworth has a population of 315,000 and is currently going through an exciting phase of urban renewal, the most prominent of which is Nine Elms, one of Europe's biggest regeneration areas. Both councils are responsible for providing a wide range of public services and facilities to residents, visitors and businesses.

Our organisation

In October 2016 the London Borough of Richmond upon Thames and Wandsworth Borough Council launched a shared staffing arrangement (SSA), the first of its type at this scale in local government. This single workforce serves both councils and half a million Londoners. While the SSA operates as one support organisation, both Councils continue to be separate sovereign bodies, maintaining their distinct identities and developing policies and priorities that matter to their local residents.

Our vision

This Statement sets the Council actions to understand all potential modern slavery risks related to its activities and to put in place steps to eliminate acts of modern slavery and human trafficking within its business and in its supply chains, sub-contractors and partners.

As part of local government, the Council recognises its responsibilities to take a robust approach to slavery and human trafficking.

Responsibility

Local authorities play a key role in tackling modern slavery. Their role can be separated into four distinct areas:

- identification and referral of victims
- supporting victims, either through safeguarding children and adults with care and support needs and/or through housing/ homelessness services
- community safety services and disruption activities
- ensuring that the supply chains councils procure from are free from modern slavery

As well as producing a modern slavery statement, public authorities (including London Borough Councils) have a duty to notify the Secretary of State of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. This 'duty to notify' provision is set out in Section 52 of the Modern Slavery Act 2015.

Managing the Councils' supply chains is the direct responsibility of the Head of Procurement, who reports to the Assistant Director (Financial Services), who reports to the Director of Resources and then the Chief Executive. During 2018-19, the Councils anticipate spending in excess of £600 million on goods, services and works. This includes existing contracts and those currently or programmed to be procured.

The Head of Community Safety provides the Council's single point of contact for the identification and referral and support of victims of modern slavery and trafficking and the disruption activities as well as supply chains.

The Council provides advice and training to staff who may in the course of their employment with the Council, come across situations and people that cause concern. Key indicators of trafficking include:

- People not in possession of their own passport, identification or travel documents or these documents in possession of someone else
- The person acts as if they were instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- The person was recruited for one purpose and forced to engage in some other job
- Have transport costs been paid for by facilitators, whom they must pay back through working or providing services
- The person receives little or no payment for their work
- Someone else in control of their earnings
- The victim does not have freedom of movement?
- The person is withdrawn or appears frightened
- The person or their family have been threatened with harm if they attempt to escape
- The person is under the impression they are bonded by debt, or in a situation of dependence

- The person has been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities
- The person cannot freely contact friends or family
- They have limited social interaction or contact with people outside their immediate environment

The initial point of contact for all modern slavery crimes is the local police force. Staff with any information about modern slavery crimes, those who are committing such crimes or where victims are at risk that requires an immediate response dial 999.

In addition, support services are available for those who feel they are being exploited or have been trafficked and need help, as well as members of the public who wish to report a suspicion.

This includes for advice if you suspect an incident and for statutory reporting, through the Police and Crimestoppers helplines for emergency and non-emergency cases, and contact details for the Modern Slavery Helpline: [+44 \(0\) 800 0121 700](tel:+44208000121700) www.modernslaveryhelpline.org and Modern Slavery Human Trafficking Unit (MSHTC): [+44 \(0\) 844 778 2406](tel:+44208447782406) www.nationalcrimeagency.gov.uk.

In addition for survivor support for the Council works with local organizations to provide support, for adults the Salvation Army: [+44 \(0\) 300 303 81 51](tel:+44203003038151), www.salvationarmy.org.uk and for Survivor support for children through Childline: [+44 \(0\) 800 1111](tel:+44208001111) www.childline.org.uk and NSPCC: [+44 \(0\) 808 800 5000](tel:+44208088005000), www.nspcc.org.uk.

Definition of modern slavery

Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:

- Sexual exploitation
- Domestic servitude
- Labour exploitation
- Forced criminality
- Organ harvesting
- Debt bondage
- Forced marriage
- Finance exploitation

Our own business

The SSA has procedures in place that help mitigate the risk of modern slavery in our own business:

- Robust recruitment policy and processes that are fully compliant with UK employment legislation, including pre-employment checks, document checks and referencing;
- The ability to report suspicions of slavery through our whistleblowing procedures ensuring that staff and members can raise their concerns confidentially; and
- A responsibility to develop, implement and monitor policies and processes to safeguard the welfare of vulnerable adults and children and works within multi-agency partnerships to protect and safeguard people.

Our supply chain due diligence and its effectiveness

The Council uses a category management approach to help minimise market risks concerning slavery and human trafficking within its large and complex supply chains. Category managers undertake market risk assessment to identify spend categories and source countries that have a higher risk of modern slavery in the production of goods and services.

Spend categories that present risks of human rights abuses

The principal categories that the Councils deem as carrying material risks of human rights abuses are uniforms, other garments, services such as social care, cleaning and security services and construction. The Councils believe the corresponding source countries to be as follows:

<i>Category</i>	<i>Country</i>
Uniforms and other garments	India, Bangladesh, China, Thailand
Social care services	United Kingdom
Cleaning services	United Kingdom
Security services	United Kingdom
Construction	United Kingdom

The SSA’s supplier relationship and contract management teams employ best practice to ensure that effective contract management is applied to Tier One suppliers and their supply chains to deliver the Council’s requirements in the most cost-effective manner. This includes the identification and management of risks in relation to modern slavery and human trafficking and is done by:

- Increasing openness, transparency and efficiency in the management of supply chains
- Improving ability to identify strengths, weaknesses, opportunities and threats in supply chains
- Improving communications with suppliers
- Enhancing relationships with suppliers

Contract managers are responsible for ensuring that suppliers comply with the terms of each contract. The Procurement team is continuing to review how modern slavery can be better incorporated into the contract management process.

Policies

The Council has a number of policies already in place that either mention modern slavery or are related to the raising of awareness and prevention of modern slavery:

- Officer guide to procurement provides advice and guidance on the identification and prevention of modern slavery within supply chains.
- Recruitment – Processes and policies for vetting new employees and confirming their identities and qualifications and ensuring they are paid into an appropriate bank account.
- Agency workers approach - They are recruited from reputable employment agencies the Council undertake rigorous checks along the same lines as for employee recruitment.
- Employee Code of Conduct – to ensure everyone is aware of the actions and behaviours expected of them when they are representing the Council.

- Councillors Code of Conduct – All Councillors are expected to demonstrate the highest standards of conduct and behaviour in line with a formal Code of Conduct.
- Councillors Declaration of Interests - all Councillors must record and declare personal and prejudicial interests.
- Whistleblowing – the Council’s Whistleblowing Procedure makes it easy for employees, customers and other business partners to report any concerns related to any direct activities or the supply chains of the Council. It makes it easy for employees to make disclosures without fear of retaliation.
- Safeguarding Policies – it is the Council’s responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults with care and support needs and protect them from harm. The safeguarding policies relating to children differ substantially to adult policies.

Training

The SSA approach to providing training and development resources and support concerning the Modern Slavery Act 2015 has included:

- A Safeguarding Adults Board conference with a focus on raising awareness on Modern Slavery. This was attended by Safeguarding Board Members, partner organisations and key staff involved in the support of vulnerable parts of the community.
- In addition, through the Safeguarding Adults Board a number of partners were trained as trainers to support the roll out of the key messages from the conference. To support this, work a package of E-Learning material was developed with a focus on Human Trafficking and Modern-Day Slavery. The flexible e learning resource provides an overview of modern-day slavery and the many forms it can take, whether labour, and criminal exploitation or sexual. The course highlights the key indicators that might reveal a victim of modern slavery. It is aimed at anyone who needs to comply with the Act or works with potential victims.
- The Wandsworth Safeguarding Childrens Board has also developed an awareness raising training course: Modern slavery and human trafficking – The Impact on children. The course which highlights the issues of modern slavery and human trafficking, aims to equip staff working with children and young people with the skills and knowledge to effectively safeguard children and young people and engage with parents and communities to ensure support and future protection for those affected by trafficking and modern slavery. It is provided for professionals who work with children, young people and vulnerable parents.

Our goals for 2019-20

The focus for the next 12 months with regards to the Modern Slavery Act 2015 will be as follows:

- Facilitate training for the SSA Procurement team on implementing supply chain due diligence, followed by a wider programme of staff awareness raising to support Modern Slavery Act implementation;
- Update standard tender questions to require bidders to evidence their compliance with the Modern Slavery Act, where any bidder who fails to evidence their compliance may be excluded from participating further in the tender process;
- Incorporate within the Council’s standard contract terms clauses that specify the supplier’s contractual obligations concerning Modern Slavery;
- Continue to work with suppliers to improve the transparency of end to end supply chains and to better understand higher risk spend categories; and

- Continue to work in partnership with a wide range of agencies to reduce the risk of human rights abuse, to detect and report occurrences and to support victims.
- To review relevant organisational policies and strategies to ensure that they underpin the objectives of the Council in supporting the victims of modern slavery and human trafficking.
- Carry out an assessment of the Council's approach to the identification of and support for victims of modern slavery and human trafficking, mapping the findings against nationally recognised good practice to identify areas for improvement.

This Statement has been subject to Scrutiny by Council Committee and approved and published by the Executive of Wandsworth Borough Council.

The performance against the Statement will be reviewed annually and reported to the Council's Executive each year for monitoring and assurance purposes.

[Signed]

[Signed]

[Name]

[Name]

[Date]

[Date]

The statement was approved by the Executive on date ____