

READING HEALTH AND WELLBEING BOARD

DATE:	11 OCTOBER 2019	AGENDA ITEM:	11
TITLE:	MODERN DAY SLAVERY TRANSPARENCY STATEMENT 2019-20		
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ORGANISATION:	READING BOROUGH COUNCIL		

1. PURPOSE OF THE REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out the policy for Reading Borough Council with regard to Modern Day Slavery. Our Modern Slavery Transparency Statement outlines the approach we've taken, and continue to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

We are proposing a zero tolerance approach to any form of modern slavery (slavery, servitude, human trafficking and forced labour).

1.2 LIST OF APPENDICES

- Appendix 1: Modern Day Slavery Transparency Statement 2019/20
- Appendix 2: Equality Impact Assessment

2. RECOMMENDED ACTION

- 2.1 Agree that the Reading Borough Council Modern Slavery Transparency Statement 2019/20 is adopted.
- 2.2 Agree a zero tolerance approach to any form of modern slavery (slavery, servitude, human trafficking and forced labour).

3. POLICY CONTEXT

- 3.1 This statement constitutes our actions to ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement is for the financial year ending 31 March 2020 to meet the requirements of Section 54 of the Modern Slavery Act 2015.
- 3.2 Reading Borough Council is committed to improving its practices to identify and combat this crime. 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.

- 3.3 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.
- 3.4 This statement covers the activities of Reading Borough Council. The statement covers direct employees of the Council, agency workers and services delivered on behalf of the Council by third party organisations and in the council's supply chains.

4. THE PROPOSAL

- 4.1 It is proposed that Reading Borough Council adopt the attached Modern Slavery Transparency document as required in legislation. This statement commits the council to ensure that it takes a "whole council" approach to this issue.
- 4.2 Reading Borough Council should continue to be an active member of the Berkshire-wide anti-slavery network and work in an ongoing way to deliver its safeguarding functions in this regard.
- 4.3 The option of not adopting a Modern Slavery Transparency Statement would mean the council is failing to meet a legislative requirement and failing the most vulnerable people in its Borough.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The Council's responsibilities are to prevent and take action against identified slavery and human trafficking and this supports meeting the priorities set out in the Corporate Plan 2018-21:

- 1. Protecting and enhancing the lives of vulnerable adults and children
- 2. Keeping Reading's environment clean, green and safe
- 3. Ensuring the Council is *Fit for the Future*

- 5.2 The proposal to adopt the Modern Day Slavery Statement contributes to meeting the priorities set out in Reading's Health and Wellbeing Strategy.

The statement also applies to one of the underpinning principles of that strategy - To improve the health of the poorest fastest.

6. COMMUNITY ENGAGEMENT AND INFORMATION

- 6.1 Section 138 of the Local Government and Public Involvement in Health Act 2007 places a duty on local authorities to involve local representatives when carrying out "any of its functions" by providing information, consulting or "involving in another way".

7. EQUALITY IMPACT ASSESSMENT

- 7.1 The local authority, as a public body, is under a legal duty to comply with the public sector equality duties set out in Section 149 of the Equality Act (2010). In order to comply with this duty, the Council must positively seek to prevent discrimination, and protect and promote the interests of vulnerable groups. Many of those who would benefit from Public Health funded services in Reading will be in possession of 'protected characteristics' as set out in the Equality Act.
- 7.2 An Equality Impact Assessment is relevant to the decisions regarding the Modern Day Slavery Statement, and has been completed.

8. LEGAL IMPLICATIONS

- 8.1 There is a legal requirement on the local authority to develop this statement to meet the requirements of Section 54 of the Modern Slavery Act 2015.
- 8.2 Legal advice has been sought and complied with relating to the Modern Day Slavery Statement.

9. FINANCIAL IMPLICATIONS

- 9.1 There are no financial implications to be considered in the adoption of the Modern Day Slavery Statement.

10. BACKGROUND PAPERS

- 10.1 Risk Assessments and Prevention: Designated Modern Slavery Lead
- 10.2 Modern Slavery Act 2015, Section 54
<http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>
- 10.3 The Designated Modern Slavery Lead within Community Safety is responsible for:
- Working with Team Leaders 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 Plans

APPENDIX 1:
Reading Borough Council
Modern Slavery Transparency Statement
For the financial year 2019-20

Introduction

This Statement constitutes Reading Borough Council's actions to ensure there is no slavery or human trafficking in its own business and its supply chains.

This statement is for the financial year commencing the 1 April 2019 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As a public sector body and a member of the Berkshire-wide anti-slavery network, the Council is committed to improving its practices to identify and combat this crime.

The Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor with 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 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 covers the activities of Reading Borough Council. The Statement covers direct employees of the Council, agency workers and services delivered on behalf of the Council by third party organisations and in the Council's supply chains.

Our Structure, our business and our supply chains

Reading Borough Council is a principal local authority for the purposes of the Local Government Association (LGA) 1972.

Reading Borough Council aims to be "An efficient and high performing council, delivering high quality, value for money services".

The Council Plan 2018-2021 advises that by working together with our partners and local communities, we want Reading to have:

- Economic success
- Improvement in access to decent housing to meet local needs
- Protecting and enhancing the lives of vulnerable adults and children
- An environment that is clean, green and safe
- The promotion of great education, leisure and cultural opportunities for people in Reading.
- A Council which is fit for the future

The Council is currently split into three directorates.

- DEGNS - Economic Growth & Neighbourhood Services
- DACHS - Adult Care & Health Services
- DOR - Directorate of Resources.
- Children's services sit in a separate company- Brighter Futures for Children

Reading Borough Council has responsibility for providing a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. The council manages a wide range of services which are delivered directly and through external contractors.

1702 people work for the Council, with an annual budget of £111million, making it one of the largest employers in Reading. The services provided by the Council range across a large number of areas such as social care (adults and children), education, children centres and nurseries, highways (roads and footpaths), street lighting, trading standards, community safety, libraries, economic development, tourism, countryside & parks, leisure and waste management.

The Council procures goods and services from various suppliers and this is governed by its Financial Regulations and Procurement Strategy.

Policies

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant with legislation and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

Council Plan 2018-2021

The Council Plan is a key document that describes the Council's priorities, resources and how progress is monitored. The Plan also shows how we will work closely with our partners in district and parish councils, the voluntary sector and health services to ensure we maximise our resources and provide better joined-up services.

For more information about the Council Plan 2018-2021 go to:

http://www.reading.gov.uk/media/4621/Shaping-Readings-Future---Our-Corporate-Plan-2018-21/pdf/CouncilCorporate_Plan_refresh_130619website.pdf

Safeguarding

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. The Council has a comprehensive Safeguarding 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.

ADULTS

<http://www.sabberkshirewest.co.uk/practitioners/berkshire-safeguarding-adults-policy-and-procedures/>

CHILDREN

www.readinglscb.org.uk

HR / Employment Policies and Practices

The Council remains committed to advancing equality, eradicating unfair treatment, and promoting good relations across and between all our communities.

We have clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation.

The Council has procedures and policies in place on all major employment issues. For example - disciplinary, grievance, harassment and bullying. There is a employee Code of Conduct, Confidential Reporting Procedures as well as other policies that support fair treatment of employees including; attendance management and ill health capability, performance capability, performance management, recruitment & selection etc.

Our management guidance supplements the above to make sure the policies are applied consistently and fairly to employees and the service in different circumstances. Policies are reviewed and reissued at least every three years to ensure they are fit for purpose.

Recruitment

The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensure they are able to confirm their identities and qualifications. Salaries are paid directly into an appropriate, personal bank account.

To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

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 use a job evaluation scheme, thereby ensuring that all employees are paid fairly and equitably. All new and changed jobs are evaluated by a panel of trained evaluators including trade union representatives.

Employee Code of Conduct

The Council's Code of Conduct for Employees makes clear 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. The code also applies to contractors, agency staff, volunteers and those on student / work experience placements working on behalf of the Council.

Confidential Reporting

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 procedure is designed to make it easy for employees to make disclosures, without fear of harassment or victimisation.

Procurement 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. From April 2016, all tender processes require bidders to provide confirmation that they are compliant with the Modern Slavery Act 2015.

Equality and Diversity

The Council's Equality and Diversity Policy is a declaration of its commitment to making equality an integral part of the Council's business embedding equality and diversity into our everyday business. We expect our Councillors, managers, employees and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers.

As a major employer and provider of services we are committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services.

Partnerships

Through its Community Safety function, the Council along with Berkshire's Modern Slavery Partnership which brings together public, private and voluntary organisations to disrupt perpetrators and support victims of human trafficking & modern day slavery in Reading, Berkshire and further afield. We strive for a community wherein awareness of all forms of human trafficking and modern day slavery is commonplace and that across all sectors people work collectively to eradicate its existence in our community.

The Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes the Reading Safeguarding Adults and Children Boards.

Training and Awareness

The Council has a programme of induction and ongoing mandatory training that all employees must complete, including Safeguarding Awareness Training for the all council employees paid or voluntary . 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. E-learning training on Modern Slavery is available to all employees and partners training@reading.gov.uk

The content includes:

- What is modern slavery
- Risk occupations, environments, sectors and case studies.
- How the crime can be identified
- What can be done to flag potential concerns
- How to support potential victims
- Who to speak to for support and guidance
- The National Referral Mechanism and the Duty to Notify

The Council recognises that certain employees within the organisation should be required to complete training on modern slavery. To date, this has focussed on safeguarding roles. We are currently reviewing training; consideration will be given to prioritising staff responsible for supply chain management, working in HR and Procurement within the Council to complete training on modern slavery.

Performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and / or human trafficking is not taking place within our business of supply chains through:

- Investigating all allegations, complaints, whistleblowing reports received from employees, the public or law enforcement agencies regarding modern slavery and human trafficking.
- Undertaking a number of community awareness programme for adults and children.
- Requiring all staff working in supply chain management, Procurement and HR to have completed training on modern slavery.
- Reviewing and evaluating high risk supply chains, occupations and contracted services as part of on-going contract management activity.

Working with suppliers and due diligence

The nature of global supply chains for goods and services is increasing complex. Modern Slavery can be found anywhere in the chain but it tends to be much worse the further down the value chain, where there is little visibility and where the poorest and most vulnerable work.

Human rights due diligence is also a key concept in the UN Guiding Principles on Business and Human Rights (UNGPs). The UNGPs specify that due diligence processes should “include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed”.

Home Office - Transparency in Supply Chains etc., A practical guide (2017)

Reading Borough Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of modern slavery are referred to the Police and the Designated Modern Slavery Lead within Community Safety, who is the Council’s direct link to the Thames Valley Constabulary and Local Serious and Organised Crime Boards.

The Council works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Any investigation and/or victim support in relation to modern slavery is conducted through the Berkshire Modern Slavery Partnerships Multi Agency Tactical Response Agreement.

Review and Approval

This statement has been approved by the DACHS DMT, and the Corporate Management Team. The Statement will be reviewed on a regular basis. Responsibilities for the Statement and Modern Slavery are designated as:

Modern Slavery Transparency Statement: Portfolio Holder Seona Douglas Director of Adult Care and Health Services. The Portfolio Holder is responsible for the Council's Modern Slavery Statement.

Developing and Updating the Statement: Designated Modern Slavery Lead

- The Designated Modern Slavery Lead within Community Safety, in conjunction with HR, Commissioning, Safeguarding and Legal, monitors and updates the Statement in line with national guidelines and organisation development priorities.

Risk Assessments and Prevention: Designated Modern Slavery Lead

The Designated Modern Slavery Lead within Community Safety is responsible for:

- Working with Team Leaders 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 Plans.

Early Identification and Notification:

Team Managers will notify any suspected modern slavery concerns encountered in the course of their work to the Designated Modern Slavery Lead within Community Safety and use the relevant directorate's Escalation Policy.

Identifying and Reporting Concerns: All Staff and Councillors

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

Appendix 2 - Equality Impact Assessment

Provide basic details

Name of proposal/activity/policy to be assessed

Modern Day Slavery Transparency Statement 2019-20

Directorate: Adult Care & Health Services

Service: Public Health

Name of person doing the assessment

Name: Marion Gibbon

Job Title: Interim Consultant in Public Health

Date of assessment: 18 March 2019

Scope your proposal

What is the aim of your policy or new service/what changes are you proposing?

As part of the public sector and a member of the Berkshire-wide Modern Slavery Partnership, the Council is committed to improving its practices to identify and combat this crime.

The Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor with 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 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 covers the activities of Reading Borough Council. The Statement covers direct employees of the Council, agency workers and services delivered on behalf of the Council by third party organisations and in the Council's supply chains.

Who will benefit from this proposal and how?

This proposal will benefit the Council and its partners and ensure that modern day slavery and human trafficking are not countenanced, that they are committed to prevention and taking action against identified slavery and human trafficking as an employer, commissioner and contractor with other bodies.

What outcomes does the change aim to achieve and for whom?

The outcome of this change is that modern day slavery or human trafficking are prevented and where identified action will be taken to ensure that Reading Borough Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of modern slavery are referred to the Police and the Designated Modern Slavery Lead within Community Safety, who is the Council's direct link to the Thames Valley Constabulary and Local Serious and Organised Crime Boards.

The Council works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Any investigation and/or victim support in relation to modern slavery is conducted through the Berkshire Modern Slavery Partnerships Multi Agency Tactical Response Agreement.

Who are the main stakeholders and what do they want?

The main stakeholders are communities and individuals who benefit from the services and activities provided by Reading Borough Council. Other stakeholders include public bodies in Reading such as the NHS, Police, Fire and Rescue Services; the voluntary sector, church and faith groups who work in partnership with the aim of preventing and taking action against identified slavery and human trafficking for the Reading population.

Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc.)

The Council's Equality and Diversity Policy is a declaration of its commitment to making equality an integral part of the Council's business embedding equality and diversity into our everyday business. We expect our Councillors, managers, employees and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers. This policy has been considered in the drawing up of the Modern Day Slavery Transparency Statement 2019-20 which was first developed in 2018

As a major employer and provider of services we are committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services.

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, and feedback.

No

If the answer is **Yes** to any of the above you need to do an Equality Impact Assessment.

If **No** you **MUST** complete this statement

An Equality Impact Assessment is not relevant because

Signed (completing officer) Marion Gibbon

Date 18 March 2019

Signed (Lead Officer) Seona Douglas

Date 18 March 2019

Assess the Impact of the Proposal

Describe how this proposal could impact on Racial groups

Is there a negative impact?

No

Describe how this proposal could impact on Gender/transgender (cover pregnancy and maternity, marriage)

Is there a negative impact?

No

Describe how this proposal could impact on Disability

Is there a negative impact?

No

Describe how this proposal could impact on Sexual orientation (cover civil partnership)

Is there a negative impact?

No

Describe how this proposal could impact on Age

Is there a negative impact?

No

Describe how this proposal could impact on religion or belief?

There is no evidence that this proposal would impact differently on different faith groups.

Is there a negative impact?

No

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you **MUST** assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

Tick which applies (Please delete relevant ticks)

1. **No negative impact identified** **Go to sign off**

2. **Negative impact identified but there is a justifiable reason**

You must give due regard or weight but this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties that you must comply with.

Reason

3. **Negative impact identified or uncertain**

What action will you take to eliminate or reduce the impact? Set out your actions and timescale?

The general equality duty requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations - when making decisions and setting policies.

How will you monitor for adverse impact in the future?

- As with all safeguarding concerns, all staff and Councillors are required to report concerns in order that they can be investigated and action taken as required. There will be regular monitoring and review as required.

Signed (completing officer): Marion Gibbon

Date 18 March 2019

Signed (Lead Officer): Seona Douglas

Date 18 March 2019