



CAERPHILLY COUNCIL MODERN SLAVERY STATEMENT

1. Overview

Caerphilly Council delivers a wide range of statutory and discretionary public services, provided directly through our own workforce, and through private and third sector organisations.

In November 2017, Caerphilly Council's Cabinet signed up to the Welsh Government's Code of Practice ('the code'): 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 or Un-ethical employment practices in its own business or supply chains.

Caerphilly Council is fully committed to providing visibility to its Modern Slavery statement and ensuring transparency in our supply chains. In accordance with the Modern Slavery Act 2015, the Council recognises the responsibility it has as an employer to be aware of the potential for instances of Modern Slavery and to report such instances or concerns to the relevant bodies.

2. What is Modern Slavery?

Modern Slavery can take the following forms:-

- Forced prostitution
- Child trafficking
- Criminal exploitation
- Domestic servitude
- Forced labour
- Organ harvesting
- Sexual exploitation

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.

Instances of Modern Slavery in Wales are increasing. In 2017, the UK National Referral Mechanism (NRM) received 193 referrals of potential victims where the referral was subsequently sent to a police force from crime recording considerations in Wales; this represents a 57% increase on 2016 referral totals and 3.7% of all UK referrals to the NRM.

There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support.

3. Our Policies

Caerphilly Council's **Corporate Plan 2018-23** puts tackling poverty and deprivation at the forefront of priorities. The Council is an accredited Living Wage employer and we encourage where appropriate our suppliers and contractors to pay the 'real' Living Wage. Other key strategies and policies include:

- **Programme for Procurement 2018-2023** – The Council will use its procurement processes to foster positive social change where appropriate. The strategy sets out a clear vision and objectives that are required to be implemented to foster fair working conditions for all, this includes the adoption and delivery of the Code of Practice and the associated Caerphilly Code of Practice Commitments – Action Plan.
- **Whistleblowing Policy** - If you are a volunteer, supplier or contractor working on Council premises, such as (but not limited to) builders, drivers and suppliers, you should raise your concerns under the Council's Corporate Complaints Policy, which is available on the Council's website.
- **Code of Conduct Policy** has been devised to provide employees with guidance on a range of issues which will help them to maintain and improve the high standards of conduct within local government. In performing their duties, employees must act with integrity, honesty, impartiality and objectivity. All employees are required to act in accordance with the principals set out in the Code.
- **Corporate Complaints Policy** enables members of the public to address concerns or raise complaints in relation to Council services.
- **Recruitment and Selection Policy** – the Council has robust recruitment processes in place. Procedures adopted by the Council requires appointees to provide evidence of their entitlement to live and work in the UK.
- **Agency Worker Usage Policy & Procedure** – takes full account of relevant legislative and best practice principals, and is periodically reviewed in line with changes in employment legislation.
- 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**.

4. Our Supply Chain

The Council spend in the region of £196m annually with approximately 5000 suppliers who provide a range of goods, works and services. Over 99% of existing expenditure is with UK based companies. However, the Council recognises that our supply chains are spread across the world and that parts of the supply chain could be engaged in Modern Slavery. The Council actively monitors our direct suppliers and will require those 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. In line with commitment six (6) of the code the Council will ensure that our supply chain are aware of our commitments to tackle modern slavery and human trafficking and that they understand their obligations as a supplier or contractor of the Council.

The Council undertakes due diligence when awarding opportunities to new suppliers and regularly reviews our existing suppliers through contract management arrangements. Due diligence and reviews include:

- Mapping the supply chain in high risk areas to assess risks
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Encouraging suppliers to sign up to the code to help ensure that ethical employment practices are carried out throughout the supply chain.
- Signpost suppliers to information or practical advice and guidance on how to sign up and implement the code.

5. Employee Training

As part of employees' continuous professional development within the Corporate Procurement Unit Modern Slavery and Ethical Employment Practices are highlighted as part of the PDR process. Employees are encouraged to complete the Chartered Institute of Purchasing & Supply (CIPS) Ethical Employment training on an annual basis and Welsh Governments e-Learning training.

Welsh Government's e-Learning Ethical Employment in Supply Chains training will be made available via the Councils Intranet Site accessible to all staff.

6. CoP Commitments Action Plan – Progress to date

The Council has:

- ✓ Adopted Welsh Government's Code of Practice: Ethical Employment in Supply Chains.
- ✓ Appointed an Anti-Slavery and Ethical Employment Champion – Councillor Colin Gordon, Cabinet Member for Corporate Services.
- ✓ Commenced a review of all Procurement documentation to include a copy of the code as standard documentation.
- ✓ Ensured that all Invitations to Tender (ITT) have the necessary request for suppliers/contractors to commit to the Code of Practice.
- ✓ Adopted Welsh Governments European Single Procurement Document (ESPD) which includes selection criteria in relation to Modern Slavery Act 2015.
- ✓ Ensure all contracts stipulate 30 days payment terms on receipt of valid invoice and ensure that where possible on new contracts all sub-contractors have equal payment terms. In addition apply reduced payment terms to SME's to 10 days on receipt of valid invoice.

- ✓ Provided guidance and training for all employees within the Corporate Procurement Unit.

7. CoP Commitments Action Plan – Progress required

The Council will take the following action in our efforts to fulfil the commitments as part of the code.

- Update Whistleblowing Policy
- Continue to review and update the Council's tender documentation to ensure ethical employment issues are fully addressed. This will include clauses to:
 - Check that suppliers/contractors who have a turnover above £36million have a Modern Slavery statement.
 - Include the Code of Practice: Ethical Employment in Supply Chains as part of our tender documents.
- Complete a review and update the Council's standard terms and conditions to ensure employment practices are considered as part of the procurement process.
 - 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.
- In line with commitment seven (7) of the code, ensure that the Council carries out a regular review of expenditure and undertakes a risk assessment. We will:
 - 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 Tier 1 suppliers to raise awareness of Modern Slavery and Unethical employment practices to prevent it from occurring.
- Update the Modern Slavery Statement annually and report progress on the Action Plan at the end of each financial year and report to Corporate Management Team.
- Publish our Modern Slavery statement annually on the Councils website and via Transparency in Supply Chains (TISC) website.

8. Supporting Resources

Welsh Government Code of Practice: Ethical Employment in Supply Chains:

English: <https://gov.wales/topics/improvingservices/bettervfm/code-of-practice/?lang=en>

Cymraeg: <https://gov.wales/topics/improvingservices/bettervfm/code-of-practice/?skip=1&lang=cy>

Welsh Government e-Learning Ethical Employment in Supply Chains training:

English: <https://learning.wales.nhs.uk/course/view.php?id=1050>

Cymraeg: <https://learning.wales.nhs.uk/course/view.php?id=1051>

Transparency in Supply Chains - <https://tiscreport.org/>