



Exeter
City Council

Modern Slavery Transparency Statement 2018-19

Statement development and Version details

May 2019

Title	Modern Slavery Transparency Statement 2018-19
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1. Introduction

1.1 Exeter City Council recognises and accepts its responsibility as an employer to ensure, as far as it is reasonably practicable, the implementation of the Modern Slavery Act 2015. This statement sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and, its supply chains and in doing so will strive to act as an "Exemplar" within the city.

2. The Modern Slavery Act 2015

2.1 Modern slavery includes:

- **Forced labour** - Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence.
- **Debt bondage** - Victims are forced to work to pay off debts that realistically they never will be able to.
- **Sexual exploitation** - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced often under the threat of force, or another penalty.
- **Criminal exploitation** - Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.
- **Domestic servitude** - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

2.2 Section 52 of the Act imposes a duty on public authorities, including district councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.

2.3 Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the UK and have a global turnover above £36 million, to publish a slavery and human trafficking statement each financial year.

2.4 The Council engages in commercial activities by providing services (statutory and discretionary), and its annual turnover is greater than £36million. There is not currently a legal obligation on local authorities under the Act but the Council has nonetheless determined to issue this Modern Slavery Transparency Statement setting out the steps it has taken to ensure there is no slavery or human trafficking in its business or supply chains.

3. Standards

3.1 Exeter City Council will meet the following standards and also expects those with whom it does business with, to meet these standards:

- To support every individual's human right to live free from abuse, servitude and inhumane treatment;
- To promote ethical business and operational practices in corporate activity and the services delivered;
- To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains;
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously;

- To take appropriate steps to address actual instances of slavery and human trafficking.

4. Organisational structure

- 4.1 Exeter City Council is a district local authority which provides a wide range of statutory and discretionary services, delivered both directly by the Council and through external contractors.
- 4.2 The Council's Constitution can be found [here](#).
- 4.3 The Council's [Corporate Plan 2018-21](#) sets out the priorities for the next few years:
- Help deliver the emerging Exeter Vision 2040, by providing services and developments that build on Exeter's growth and success and meet local communities' aspirations
 - Focus on three strategic programmes that address the current, major challenges facing the city:
 - Tackling congestion and accessibility
 - Promoting active and healthy lifestyles
 - Building great neighbourhoods
 - Provide value-for-money services despite continuing central government budget reductions
 - Lead a well-run council

5.0 Supply chains

- 5.1 In the procurement process, Exeter City Council expects all suppliers of goods and services to comply with all applicable laws, statutes, regulations [and codes] from time to time in force [including [but not limited to] the Modern Slavery Act 2015].
- 5.3

6.0 Policies and Plans

- 6.1 Exeter City Council has a range of policies and plans in place which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations:
- [Safeguarding Policy](#) – sets out how the Council will safeguard and promote the welfare of children, young people and adults at risk who come into contact with its services and activities. The policy is supported by a suite of documents providing guidance on how to make safeguarding referrals including the duty to notify the Secretary of State of suspected victims of slavery and human trafficking.
 - [Equality and Diversity Policy](#) – sets out the Council's legal obligations under the Equality Act 2010 and the various ways the Council meets its duties. The Corporate Plan 2018-21 also includes a specific objective to promote equality and diversity and tackle social exclusion in all of our work.

- **Whistle Blowing Policy and Procedure** – is part of the Council Constitution and enables employees and others who help to deliver its services to raise concerns and provide them with protection from detriment such as victimisation or discipline.
- **Officers' Code of Conduct** – is the ethical framework that employees work to, which makes clear the actions and behaviour 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.
- **Recruitment Policy** – sets out robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications. 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.

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. The Council is a Living Wage employer.
- **Responsible Procurement Strategy** – This is expected to be finalised in September 2019. The strategy will include safeguarding requirements and include considerations managers should think about when procuring contracts.

7.0 Due diligence

- 7.1 Where turn-over is less than £36million, Exeter City Council suppliers are required to comply with this Modern Anti-Slavery and Human Trafficking Statement. Exeter City Council is investing in the process of effective risk assessment strategies.

8.0 Training

- 8.1 Exeter City Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, including modern slavery and human trafficking.
- 8.2 Induction briefings on equality and diversity and safeguarding are provided to Members following local elections.

9.0 Partnership working

- 9.1 Exeter City Council is a statutory member and leads on the management of the Exeter Community Safety Partnership (CSP). The CSP brings together statutory and third sector agencies with a shared responsibility to tackle crime, disorder and anti-social behaviour.
- 9.3 Exeter City Council is a member of the Devon Anti-Slavery Partnership which provides strategic direction and response to all threats, risks and harm identified in relation to modern slavery and human trafficking. The City Council is also a member of the Devon and

Torbay Migrant Workers Action Group which provides operational direction and response to all threats, risks and harm identified in relation to modern slavery and human trafficking.

10.0 Our commitment to combating slavery and human trafficking

- 10.1** In the next 12 months, we commit to implementing the following changes to help combat slavery and human trafficking:
1. Mandate that all suppliers of goods and services should comply with their own anti-slavery policy (where applicable) and this Modern Anti-Slavery and Human Trafficking Statement.
 2. Incorporate clauses in our contract terms and conditions setting out the requirements of contractors and subcontractors in relation to ensuring there is no slavery or human trafficking in their businesses.
 3. Ensure that all contractors and sub-contractors engaged in a ‘regulated activity’ to children and adults at risk to have safeguarding policies, procedures and training in place and that they comply with the reporting procedures in the Council’s Safeguarding Policy.
 4. Require suppliers of goods and services to implement due diligence procedures in relation to modern slavery for their own suppliers, subcontractors and other participants in their supply chains where their annual turn-over exceeds £36million.

11.0 Review and Approval

- 11.1** This Modern Anti-Slavery and Human Trafficking Statement has been approved by the Executive and adopted by Council. The Statement will be reviewed annually or sooner if required by the Corporate Safeguarding Group to reflect the council’s evolution of commitment, understanding and practice.

SIGNED SIGNED

Chief Executive for EXETER CITY COUNCIL

Leader for EXETER CITY COUNCIL