

Isle of Wight Council Modern Slavery statement

Section 54 of the Modern Slavery Act 2015 requires large employers to produce a modern slavery statement each financial year. This statement sets out The Isle of Wight Council's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020

The Isle of Wight Council (IWC) reiterates its commitment to understanding modern slavery risks and ensuring that there is no modern slavery in its own business and supply chains. The initiatives that are implemented by the IWC include the implementation training for staff and due diligence of suppliers.

The council has a robust ongoing policy review programme which has input from employees, team leaders, management teams, Human Resource Service, trade union and elected members. The policy review programme is an ongoing key piece of work in the Human Resource Service work plan to ensure that the council's policies and procedures remain compliant and fit for purpose.

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

Due diligence processes for slavery and human trafficking

Employee code of conduct

The council's employee code of conduct makes clear the actions and behaviours expected of staff when representing the council. The council uses its best endeavours to maintain the highest standards of employee conduct and ethical behaviour and any breaches are investigated. The code of conduct can be found on the Council's intranet:

<http://wightnet.iow.gov.uk/documentlibrary/author/edit.aspx?guid=34a6e1>

Recruitment

The council's recruitment processes are transparent and include robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

Agency workers

The council has a managed service contract in place for the provision of temporary agency staff with an umbrella Agency. Where staffing is required from alternative agencies, the council will verify the practices of any new agency it is using before accepting workers from that agency. If the agency worker is being procured through the procurement team, this would happen as standard as part of the procurement process. If the agency appointment is below the threshold where a formal

procurement process is required, the service area should ensure that this is checked.

Pay

The council has evaluated its roles and through its Human Resource policies and ensures that all employees are paid fairly and equitably.

Whistleblowing

The council publishes a “whistle blowing policy which encourages and enables staff to come forward and make disclosures, without fear of reprisal or victimisation. This complies with the Public Interest Disclosure Act 1998. The policy can be found on the Council’s intranet:

<https://wightnet.iow.gov.uk/documentlibrary/view/employee-code-of-conduct3>

Corporate complaints policy

The council operates a complaints procedure to deal with complaints about its services, and this can be used to report community concerns such as overcrowding or issues which might reveal slavery or trafficking and which merit investigation or reporting to a partner agency.

Councillors’ code of conduct

The council expects all councillors to demonstrate the highest standards of conduct and behaviour. All councillors are required to abide by a formal member code of conduct. Allegations of breaches are sent to the Monitoring Officer. Both the code and complaints process are in the council’s constitution.

Councillors’ declarations of interests

Under the member code of conduct, all elected councillors must record and declare disclosable pecuniary interests, and non-disclosable pecuniary interests.

Councillors’ induction and training

Councillors complete induction training on election, including equality and diversity training.

Safeguarding

The council understands its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. The council has a comprehensive 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. On the Council’s intranet are the following safeguarding documents:

Safeguarding children policy:

<http://wightnet.iow.gov.uk/documentlibrary/view/safeguarding-children-policy>

Safeguarding statement:

<http://wightnet.iow.gov.uk/documentlibrary/view/safeguarding-statement>

Safeguarding adults' multi agency policy, guidance and toolkit:

<https://wightnet.iow.gov.uk/documentlibrary/view/4lsab-multi-agency-safeguarding-policy>

Partnership working

The council works in partnership with a wide range of agencies with the aim of preventing abuse from taking place and where it is detected, to report the instances of neglect and abuse through via approved channels and to support victims

Training staff on anti-slavery measures

- The Isle of Wight Council has published this modern slavery statement on their website along with a statement detailing what Modern Slavery is and what to look out for.
- The Isle of Wight Council also has a link to the Home Office Guidance to Modern Slavery on its website:

<https://wightnet.iow.gov.uk/documentlibrary/view/modern-slavery-statement>

- The IWC requires some groups of staff to undertake training on modern slavery, specifically those working directly with supply chains.

Awareness-raising programmes

As well as formal requirements for training of some categories of staff, the Isle of Wight Council has also raised awareness of modern slavery issues among the wider workforce. This has been done by circulating a message to all staff through corporate communication channels and on the internal intranet site, drawing their attention to Modern Slavery and the training which is available.

Due diligence of suppliers

The Isle of Wight Council's procurement templates ensure that all companies complete either an Invitation to Tender or Supplier Selection Questionnaire confirming that they have not been convicted of any offence under section 1, 2 or 4 of the Modern Slavery Act 2015, as dictated by the Public Contracts Regulations 2015. Within the tender process, the potential bidders, if proposing to sub-contract any of the work required as a part of the contract are required to demonstrate a satisfactory methodology and track record of delivering and managing a supply chain. They are also required to outline their organisations' policy regarding the selection, use, co-ordination (on site and in advance of project commencement) and management of sub-contractors. This is done for all suppliers where the contract value is over £25k.

Currently in terms of reviewing the Council's exiting suppliers, contract monitoring and management is done within each service area. There will be a contractual obligation on the suppliers to notify the Council if their circumstances change from their initial declaration. The Council continues with the process of rolling out a contract monitoring system which will result in a consistent approach to a core set of contract monitoring measures. This will make provision to prompt an annual

declaration from the supplier to confirm they still meet the minimum due diligence criteria for their contract.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015

SignedClaire Shand
Director of Corporate Services