

Pembrokeshire County Council Modern Slavery Statement

Overview

The Council delivers a variety of statutory and discretionary public services, delivered by a combination of a directly employed workforce, third and private sector organisations

In April 2018 the Council signed up to the Welsh Government's Code of Practice for Ethical Employment in Supply Chains. The code covers 12 commitments including Modern Slavery and Human rights abuses, blacklisting, false self-employment, unfair use of umbrella schemes and zero hours contracts.

This statement sets out the action the council has taken and will take to ensure no unethical practices and modern slavery in its own business and supply chain.

Modern Slavery

Modern Slavery offences can include:

Labour exploitation - 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.

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.

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.

Human Trafficking - people are tricked, threatened or coerced into situations that allow them to be exploited. These individuals are then sold on, either remaining within their country or being shipped across borders.

Debt Bondage - Victims are forced to work to pay off debts that realistically they never will be able to.

Instances of Modern Slavery offences are increasing. There were 251 referrals in Wales of potential victims to the National Referral Mechanism (NRM) in 2018, this is a 30% increase on 2017. This represents 4% of all UK referrals to the NRM.

Policies

The Council have a variety of Policies in place to address issues raised by the Ethical Code of Practice, these include:

Code of conduct – The purpose of this code of conduct is to guide the Authority and employees in the work we do and the decisions and choices we have to make at a local and regional level. It provides employees with general principles of conduct that underpin public life including Integrity, Openness, Honesty and Objectivity.

Whistleblowing Policy – This policy outlines the procedure that you should take if you have any concerns that something happening in the workplace is putting anyone in danger or is illegal or unethical. This policy applies to employees, contractors, consultants, officers, casual and agency workers who are working for or on behalf of the Council.

Recruitment and Selection Code of Practice - This document sets out the Council's corporate policy framework for recruitment and selection. This ensures that all appointments are compliant with legislation especially the Equalities Act.

Corporate Complaints Policy – This covers the procedures for raising an issue with the Council about its services.

Ethical Employment Policy – This policy covers the employment practices and Modern Slavery and Human Rights Abuses. We abide by policy and guidance statements of the Mid and West Wales Safeguarding Board.

Supply Chain

The Council have an annual third party spend in the region of £178M. This is with approximately 4800 suppliers.

The high risk area for modern slavery offences are construction, manufacturing, clothing, cleaning, leisure, hospitality, catering.

Due diligence is taken when awarding contracts in order to mitigate the risks of any issues with regards to Modern Slavery in high risk areas.

The Council monitors its suppliers in these areas to ensure they comply with the Ethical Code of Practice. This is carried out during its contract monitoring arrangements.

This refers to employment practices inc false self-employment, working conditions, statutory rights of the employee, zero hours contracts and access to Trade Unions.

All terms and conditions include reference to compliance with the Modern Slavery Act.

Employee Training

An online training course covering Modern Slavery and Human Trafficking has been developed. This is available for all staff to complete.

All Procurement Staff have to complete the CIPS course on Ethical Procurement and Supply. This covers the following issues: fraud, bribery and corruption, human rights abuses, the impact of procurement on the environment.

Code of Practice Commitments Action Plan – Progress to Date

- ✓The Council signed up to the Ethical Code of Practice on the 16th April 2018
- ✓The Leader was designated as the Anti-Slavery and Ethical Employment Champion.
- ✓An Ethical employment policy has been produced.
- ✓The Whistle-blowing policy has been reviewed and updated to include a mechanism for people outside the organisation to raise suspicions of unlawful and unethical employment practices.
- ✓An online Modern Slavery course has been developed for all staff to undertake.
- ✓A Sustainable Risk Assessment is carried out on procurement over £25k, this addresses ethical employment issues.
- ✓All payment terms and conditions state that payment should be made within 30 days on receipt of a valid invoice. These terms should also be passed down to any sub-contractors.
- ✓All third party expenditure has been assessed and the relevant contracts with a risk of ethical employment issues have had their terms and conditions amended to include a modern slavery clause.
- ✓All contract monitoring documentation has been amended to ensure that ethical employment issues including false self-employment, umbrella schemes, zero hours contracts and access to Trade Unions are addressed during annual contract monitoring.
- ✓The Modern slavery statement is available on the Councils website.
- ✓Relevant information from the Code of Practice to encourage suppliers to sign up to the code is available on the Council's website as part of the initial phase.
- ✓A review of procurement documentation has been carried out to ensure the relevant information on employment practices are considered as part of the procurement process for all activity over £25k carried out by the Procurement Service.

Code of Practice commitments Action Plan – Progress Required

The Council has considered adopting the Living Wage Foundation's Living Wage but have concluded that it is not affordable at the present time. We would encourage all our suppliers to review and make their own decision on this.

Additional Information

<https://gov.wales/ethical-employment-supply-chains-code-practice-guidance-and-training>