

## Appendix 1

### **Oxford City Council Draft Modern Slavery Act and Transparency Statement 2018**

This statement sets out the action that Oxford City Council (“the Council”) has taken 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 or its supply chains. This statement relates to actions and activities during the financial year 2017 to 2018.

The Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council’s responsibility as an employer, it acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015 (“the Act”).

The Council also notes its responsibility under the National Referral Mechanism (NRM) as a ‘First Responder’.

The Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

The statement sets out practices already in place at the Council, and any actions it has committed to in response to the introduction of the Act.

Section 54 of the Modern Slavery Act states that an organisation’s slavery and human trafficking statement might include information on:

- its structure, business and supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps that it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
- the training about slavery and human trafficking available to its staff.

This statement has been approved by the Council’s City Executive Board. It will continue to be reviewed and updated annually.

## **Structure and Business**

Oxford City Council is a district council serving approximately 160,000 residents. It works closely with Oxfordshire County Council and nearby districts to achieve the aims set out in its Corporate Plan 2016-2020.

The Council's Corporate Plan priorities include improving quality of life for older people and protecting children, families and adults at risk of exploitation and crime. The Council employs a Human Exploitation Coordinator who leads on the area of Modern Slavery.

Oxford City Council only operates within the United Kingdom.

## **Supplier Selection**

Since 1 October 2015, commercial organisations that carry on a business or part of business in the UK, supply goods or services and have an annual turnover of £36 million or more have been required under Section 54 of the Act to prepare a slavery and human trafficking statement as defined by Section 54 of the Act.

*The Council expects that the practices of companies and organisations in its supply chain, operating within the EU, to adhere to Article 4 of the European Convention on Human Rights, concerning the prohibition of slavery and forced labour.*

*Should the Council look to procure or import products or services from outside the EU which could pose an increased risk to slavery or human trafficking, it would undertake further consideration of supply chains in order to take account of potential risks.*

*The Council expects all suppliers of goods or services to the organisation who meet the requirements of the Modern Slavery Act 2015 to have their own policy relating to working practices or modern slavery. The Council also ensures that Suppliers tendering for Official Journal of the European Union (OJEU) contracts to comply with the requirements of Modern Slavery Act 2015, as mandatory selection criteria.*

## **Corporate Procurement Strategy 2016-2019**

The Council procures goods and services from various suppliers and this is governed by our procurement strategy. The Council's approach to ethical procurement is formalised under Appendix 2 of the [Corporate Procurement Strategy](#).

## **Safeguarding Policy**

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and 'adults with needs for care and support'. The Council has a comprehensive Safeguarding Children and Vulnerable Adults Policy working within multi-agency partnerships to protect and safeguard people.

Safeguarding is embedded in the following Oxford City Council strategies:

- Corporate Plan 2016/20
- Children and Young Peoples Strategy

- Community Safety Plan 2017/18
- Housing Strategy 2015/18
- Leisure and Wellbeing Strategy 2015/20

### **Recruitment**

The Council has robust procedures for vetting new employees, which ensure they are able to confirm their identities, eligibility to work in the UK, their qualifications and that 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 and has verified the practices of the service provider. Where the need arises to source resources from alternative agencies, the practices of that agency will be verified before any workers are accepted from that agency.

### **Pay**

The Council's Pay Policy Statement is available on our website [here](#). The Council is an accredited Living Wage Employer and has paid the voluntary Oxford Living Wage (95% of the voluntary London Living Wage) or more to its employees since 2009. This is also the minimum rate paid to agency staff and we encourage other employers to pay the voluntary living wage.

### **Employee Code of Conduct**

The Council's Employee Code of Conduct makes clear to employees 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.

### **Whistleblowing**

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

### **Members' (Councillors) Code of Conduct and Ethical Framework**

The Members' Code of Conduct sets out the rules governing the behaviour of councillors of Oxford City Council. Breaches of the Code are investigated by the Monitoring Officer.

### **Partnerships**

The Council works in partnership, at a strategic and operational level, with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims.

Oxford City Council's Assistant Chief Executive represents the Council on the Oxfordshire Safeguarding Children Board (OSCB). We have representation at strategic level on the OSCB & the Oxfordshire Safeguarding Adults Board (OSAB) and operationally at the Safeguarding Board sub-groups. The Council is represented at a strategic partnership level on the Health and Wellbeing board, Health Improvement Board and Children's Trust.

The Council chairs and administers the Sex Workers Intervention Panel (SWIP). The SWIP is a multi-agency panel with representatives from statutory and non-statutory agencies working in partnership as one team to reduce harm to and exploitation of sex workers.

The Council is a member of a multiagency group to protect homeless people from exploitation.

Oxford City Council chairs the Oxford Community Safety Partnership. The partnership's priorities include violence against women and girls, and modern slavery, trafficking and child sexual exploitation.

The Council is represented on the Oxfordshire Modern Slavery Network, a group of frontline organisations that share information and coordinate activities to address modern slavery.

The Council's Community Safety Team works closely with the police to disrupt serious and organised crime groups in the city, including those involved in exploitation and slavery.

### **Contractors and Service Providers**

The Council seeks to develop long-term relationships with our suppliers based on the principles of fair, open and honest dealings at all times. Suppliers are required to demonstrate compliance with these ethical standards by providing safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. Serious violations will lead to the termination of the business relationship. (Should this not be included in the procurement section?)

### **Training Staff**

Modern Slavery is identified under The Care Act 2014 as one of ten categories of abuse. It features in both OSCB and OSAB training which is available to all Council employees.

Safeguarding training is divided into three levels:

- Awareness briefings
- Generalist level training
- Specialist level training

The level of training required has been identified for each post within the Council and employees must complete the appropriate level of training for their post. All posts require safeguarding training at "awareness" level as a minimum, and all new employees must complete an awareness briefing as part of their induction or the higher level training where required.

The awareness briefing is aimed at all officers to enable them to identify abuse and to give them the tools and knowledge to be able to report concerns, including modern slavery and trafficking.

Information on the NRM and statutory Duty to Notify responsibilities is available on the Council's intranet page 'Keeping People Safe'.

**Councillors**

Induction material on equality and diversity and safeguarding is provided to Councillors on election, and safeguarding awareness briefings are given to all Councillors.

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