

# Public Document Pack



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Os yn galw gofynnwch am - If calling please ask for  
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## CABINET

Tuesday, 31st July, 2018

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The use of Welsh by participants is welcomed. If you wish to use Welsh please inform us by noon, two working days before the meeting

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## SUPPLEMENTARY PACK

1.	<b>MODERN SLAVERY POLICY</b>
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To consider the policy.

(Pages 1 - 40)

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## CYNGOR SIR POWYS COUNTY COUNCIL.

**Cabinet**  
**31<sup>th</sup> July 2018**

**REPORT AUTHOR:** County Councillor Aled Davies  
Portfolio Holder for Resources

**SUBJECT:** Modern Slavery Policy

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**REPORT FOR:** Approval

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### **1. Summary**

- 1.1 This report seeks approval for the adoption of the Modern Slavery policy (Appendix A).

### **2. Introduction and background**

- 2.1 The Modern Slavery Policy adopts an integrated approach bringing together key areas of Safeguarding, Policy Support, Human Resources, Procurement and Civil Contingencies to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

- 2.2. The development of this policy was influenced by

- The Modern Slavery Act 2015.
- Powys County Council's Policy and Guidelines for Safeguarding Children and Adults at Risk 2016.
- Safeguarding policies and processes
- The Welsh Government's Code of Practice on Ethical Employment in Supply Chains.
- The Welsh's Government's Community Cohesion National Delivery Plan.

- 2.3 The Welsh Government's Code of Practice on Ethical Employment in Supply Chains (CPEESC) was adopted by Cabinet on 30<sup>th</sup> January 2018. (Appendix B)

### **3. The aims of the policy**

- 3.1 The aims of the policy are set out in section 3 as well as listed below:
- The Council will ensure that modern slavery and human trafficking reporting and support for victims is mainstreamed in safeguarding systems and processes

- This policy will apply to all persons working for the Council or on its behalf in our capacity including employees at all levels temporary workers, agent's contractors, third party representatives and business community partners
  - The Council will produce an annual statement outlining the approach we will be taking or have taken to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. The annual statement will be the responsibility of the Anti-Slavery and Ethical Employment Champion and published on the County Council's website.
- 3.2 Powys County Council has already appointed Councillor Aled Wyn Davies Deputy Leader and Portfolio Member for Finance as the Anti-Slavery and Ethical Employment Champion.

#### **4. Proposal**

- 4.1 That Management Team consider approving this policy, which will be underpinned by the Code of Practice on Ethical Procurement in the Supply Chain, Powys County Council's Policy and Guidelines for Safeguarding Children and Adults at Risk 2016.

#### **5. Options Considered / Available**

- 5.1 Powys County Council approve policy and Communications help raise awareness by placing an appropriate bulletin or communication on the intranet.
- 5.2 Powys County Council don't approve the policy.

#### **6. Preferred Choice and Reasons**

- 6.1 Powys County Council take the integrated approach and by approving this policy bring together key areas of Safeguarding, Policy Support, Human Resources, Procurement and Civil Contingencies to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. That further e-learning is obtained and offered to staff to raise awareness and knowledge of issues associated with Modern Day Slavery

#### **7. Impact Assessment**

- 7.1 Is an impact assessment required? Yes – appendix c attached.

#### **8. Corporate Improvement Plan**

- 8.1 The Authority's guiding principles are based on the well-being of future generations and are fully incorporated within Vision 2025 our Corporate Improvement Plan.

Our guiding principles

- Long-term - Balancing short-term needs with the need to safeguard the ability to also meet
- Prevention - Putting resources into preventing problems occurring or getting worse
- Integration (cross-cutting) - Considering how our priorities may impact upon one another, on the well-being goals and on the priorities of other public bodies
- Collaboration - Working together with other partners to deliver our priorities
- Involvement (communications and engagement) - Involving those with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area

**9. Local Member(s)**

- 9.1 The modern slavery policy will be applicable to all areas of the county as well as the authority's duty as one of the largest employers in the county and purchaser of good and services.

**10. Other Front Line Services**

- 10.1 Does the recommendation impact on other services run by the Council or on behalf of the Council? Yes

The appropriate services have involved with the report.

**11. Communications**

- 11.1 Have Communications seen a copy of this report? Yes

Communications comment:

"This policy position is of public interest and should be publicised via media and social media channels following decision."

**12. Support Services (Legal, Finance, Corporate Property, HR, ICT, Business Services)**

- 12.1 The Professional Lead Legal – Comment sought
- 12.2 Finance – The Finance Business Partner is happy to approve the policy with no financial implications involved.
- 12.3 Corporate Property (if appropriate)

12.4 HR comment sought

12.5 ICT (if appropriate)

**13. Scrutiny**

Has this report been scrutinised? No

**14. Statutory Officers**

14.1 The Head of Financial Services (Deputy S151 Officer) notes the comment of the Finance Business Partner.

14.2 The Solicitor to the Council (Monitoring Officer) – Comment sought

**15. Members' Interests**

15.1 The Monitoring Officer – Comment sought

**16. Future Status of the Report**

Members are invited to consider the future status of this report and whether it can be made available to the press and public either immediately following the meeting or at some specified point in the future.

<b>Recommendation:</b>	<b>Reason for Recommendation:</b>
<b>Powys County Council take the integrated approach and by approving this policy bring together key areas of Safeguarding, Policy Support, Human Resources, Procurement and Civil Contingencies</b>	<b>Reason for Recommendation: To implement processes eradicate any modern slavery or human trafficking in Powys County or within any part of the Council business and supply chains.</b>

<b>Relevant Policy (ies):</b>	Strategic equality plan 16-20		
<b>Within Policy:</b>	<b>Y</b>	<b>Within Budget:</b>	<b>Y</b>

<b>Relevant Local Member(s):</b>	
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<b>Person(s) To Implement Decision:</b>	
<b>Date By When Decision To Be Implemented:</b>	

Contact Officer: Betsi-Jane Ingram / Steve Evans Tel: 01597 826428 / 01597 826350 Email: <a href="mailto:Bets.Ingram@powys.gov.uk">Bets.Ingram@powys.gov.uk</a> / <a href="mailto:steve.evans@powys.gov.uk">steve.evans@powys.gov.uk</a>
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**Background Papers used to prepare Report:**

Trent and Payroll specifications.

**CABINET REPORT TEMPLATE VERSION 5**

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# Cyngor Sir Powys County Council

## Impact Assessment (IA)

*The integrated approach to support effective decision making*



This **Impact Assessment (IA)** toolkit, incorporating Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management, supporting effective decision making and ensuring compliance with respective legislation.

**Please read the accompanying guidance before completing the form.**

**Draft versions of the assessment should be watermarked as "Draft" and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

<b>Service Area</b>	Resources	<b>Head of Service</b>		<b>Strategic Director</b>	Mark Evans	<b>Portfolio Holder</b>	Aled Davies
<b>Proposal</b>		Adoption of Ethical Employment Coe of Practice					
<b>Outline Summary / Description of Proposal</b>							
<p>Modern Slavery Policy which sets out Powys County Council's aims and commitments to tackle Modern Slavery.                  The development of this policy was influenced by</p> <ul style="list-style-type: none"> <li>- The Modern Slavery Act 2015.</li> <li>- Powys County Council's Policy and Guidelines for Safeguarding Children and Adults at Risk 2016.</li> <li>- Safeguarding policies and processes</li> <li>- The Welsh Government's Code of Practice on Ethical Employment in Supply Chains (impact Assessment already presented to Cabinet 31.1.2018)</li> <li>- The Welsh's Government's Community Cohesion National Delivery Plan.</li> </ul>							

Page 7

### 1. Profile of savings delivery (if applicable)

2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL
£	£	£	£	£	£

### 2. Consultation requirements

Consultation Requirement	Consultation deadline	Feedback considered

No consultation required (please provide justification)	Westminster have consulted nationally on it. The Westminster consultation into Modern Slavery and employment in supply chain: Consultation link: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/448200/Consultation_Government_Response__final__2_.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/448200/Consultation_Government_Response__final__2_.pdf</a>	Choose an item.
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3. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
V1	Jennifer Jeffreys (CSP - Policy and Care Services) Karen Arthur (CSP - Policy and Care Services) Steve Evans (CSP - Housing Solutions) Clive Jones (CSP - Trading Standards) Fay Smith (CSP - Trading Standards) Vincent Hanly (CSP - Commercial Services) Shelley Davies (CSP - Young Peoples Partnership) Lee Anderson (CSP - Policy and Care Services) Lorna Simpson (CSP - Human Resources, Development and Health) Steve Holcroft (CSP - Human Resources, Development and Health... Lisa Hocking (CS policy) Bets Ingram (Corporate insight centre- equalities) Yvonne Owen-News (Corporate insight centre – programme office)	Powys Anti-Slavery & Ethical Employment Group.	11.04.2018

4. Impact on Other Service Areas

**Does the proposal have potential to impact on another service area? (Including implication for Health & Safety and Corporate Parenting)**  
**PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY**

Yes. It is a cross-cutting proposal. The Council's Modern Slavery Policy adopts an integrated approach bringing together key areas of safeguarding, policy support, human resources, procurement, community safety and civil contingencies. The Council's Anti-Slavery Policy covers the Code of Practice on Ethical Employment in Supply Chains and also refers to safeguarding processes and the responsibilities of the Local Authority under the Modern Slavery Act 2015.

Page 9

<b>Service Area informed:</b>	<p>Adult and Children Services, Procurement, Contracts and Commissioning, Equalities, Housing, Programme Office, Human Resources, Community Cohesion, Community Safety Partnership and Trading standards.</p>	<b>Contact Officer liaised with:</b>	<p>Jennifer Jeffreys (CSP - Policy and Care Services) Karen Arthur (CSP - Policy and Care Services) Steve Evans (CSP - Housing Solutions) Clive Jones (CSP - Trading Standards) Fay Smith (CSP - Trading Standards) Vincent Hanly (CSP - Commercial Services) Shelley Davies (CSP - Young Peoples Partnership) Lee Anderson (CSP - Policy and Care Services) Lorna Simpson (CSP - Human Resources, Development and Health) Steve Holcroft (CSP - Human Resources, Development and Health... Lisa Hocking (CS policy) Bets Ingram (Corporate Insight Centre- equalities) Yvonne Owen-News (Corporate Insight Centre – Programme Office)</p>
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**Mitigation**

<b>5. How does your proposal impact on the council's strategic vision? Council Priority</b>	<b>How does the proposal impact on this priority?</b>	<b>IMPACT</b> Please select from drop down box below	<b>What will be done to better contribute to positive or mitigate any negative impacts?</b>	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<b>The Economy</b> We will develop a vibrant economy	Already assessed as part of the Cabinet report for Code of Practice Ethical Employment in the Supply Chain	Choose an item.	.	Choose an item.
<b>Health and Care</b> We will lead the way in effective, integrated rural health and care	The Council will ensure that modern slavery and human trafficking reporting and support for victims is mainstreamed in safeguarding systems and processes. A key aim of the policy is to ensure that safeguarding practice, strategic planning and commissioning of services across all partner agencies continuously improves and promotes good outcomes for children and adults who may be at risk in their local area(s).	Neutral		Choose an item.
<b>Learning and skills</b> We will strengthen learning and skills	n/a	Choose an item.		Choose an item.
<b>Residents and Communities</b> We will support our residents and communities	N/A	Choose an item.		Choose an item.
<b>Source of Outline Evidence to support judgements</b>				
Modern slavery policy and aims				

<p>6. How does your proposal impact on the Welsh Government's well-being goals?  <b>Well-being Goal</b></p>	<p>How does proposal contribute to this goal?</p>	<p><b>IMPACT</b>  Please select from drop down box below</p>	<p>What will be done to better contribute to positive or mitigate any negative impacts?</p>	<p><b>IMPACT AFTER MITIGATION</b>  Please select from drop down box below</p>
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<p><b>prosperous Wales:</b>          An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>This policy will apply to all persons working for us or on our behalf in our capacity including employees at all levels temporary workers, agents contractors, third party representatives and business community partners. Powys County Council has already signed up to Welsh Government’s Code of Practice for Ethical Employment in Supply Chains The annual statement will be published on the Council’s website.          The Council has adopted the National Living Wage and following the acceptance of the 2018/19 budget at the Full Council meeting on 22 February 2018, it was agreed that the 2017/18 Living Wage Foundation rate of £8.45 per hour (£16,303 FTE) will remain in place from 1 April 2018. This is paid as a Living Wage Supplement, through uplift to the relevant salary points.’</p>	<p>Neutral</p>		<p>Choose an item.</p>
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	<p>The 2018 National Pay Negotiations are likely to increase the pay of the lowest paid employees to at least £8.50 per hour, thus superseding the £8.45 per hour 2017/18 Living Wage Foundation rate.</p> <p>For reference, the Council continues to pay the lowest paid staff significantly above the Statutory National Living Wage and National Minimum Wage rates.</p>			
<p><b>A resilient Wales:</b>          A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>N/A</p>	<p>Choose an item.</p>		<p>Choose an item.</p>

<p><b>A healthier Wales:</b>  A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<p>Powys County Council will ensure that modern slavery and human trafficking reporting and support for victims is mainstreamed in safeguarding systems and processes.  This policy will apply to all persons working for the Council or on its behalf in any capacity including employees at all levels, temporary workers, agents contractors, third party representatives and business community partners</p>	<p>Good</p>		<p>Choose an item.</p>
<p><b>A Wales of cohesive communities:</b>  Attractive, viable, safe and well-connected Communities.</p>	<p>A key aim of the policy is to ensure that safeguarding practice, strategic planning and commissioning of services across all partner agencies continuously improves and promotes good outcomes for children and adults who may be at risk in their local area(s).</p>	<p>Neutral</p>		<p>Choose an item.</p>

<p><b>A globally responsible Wales:</b>          A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p>	<p>Safeguarding is a key aim. Ensures that workers are free to join a Trade Union and to undertake any related activity and raise worker concerns without risk of discrimination</p> <p>Provides a mechanism for people outside our organisation to raise suspicions of unlawful and unethical Employment practices.</p> <p>Ensures that those involved in buying/procurement and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.</p> <p>Ensures that the way in which we work with our suppliers does not contribute to</p>	<p>Good</p>		<p>Choose an item.</p>
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	the use of illegal or unethical employment practices within the supply chain			
<b>A Wales of vibrant culture and thriving Welsh language:</b> A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.				
<b>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</b>	The policy will support and meet the desired outcomes of the Welsh Language Standards Regulation	Neutral		Choose an item.
<b>Opportunities to promote the Welsh language</b>	The policy will support and meet the welsh standards	Neutral		Choose an item.
<b>Welsh Language impact on staff</b>	The policy will support and meet the welsh standards	Neutral		Choose an item.
<b>People are encouraged to do sport, art and recreation.</b>	N/A	Choose an item.		Choose an item.
<b>A more equal Wales:</b> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).				

**Cyngor Sir Powys County Council**  
**Impact Assessment (IA)**

*The integrated approach to support effective decision making*



Page 17

<b>Age</b>	The aim of this proposal is to assist PCC's ability to eliminate discrimination; advance equality; and foster good relations. It is not anticipated to have any negative effect on any of the individual PCs only positive.	Neutral		Choose an item.
<b>Disability</b>		Choose an item.		Choose an item.
<b>Gender reassignment</b>		Choose an item.		Choose an item.
<b>Marriage or civil partnership</b>		Choose an item.		Choose an item.
<b>Race</b>		Choose an item.		Choose an item.
<b>Religion or belief</b>		Choose an item.		Choose an item.
<b>Sex</b>		Choose an item.		Choose an item.
<b>Sexual Orientation</b>		Choose an item.		Choose an item.
<b>Pregnancy and Maternity</b>		Choose an item.		Choose an item.

**Source of Outline Evidence to support judgements**

Modern slavery policy and strategic equality plan

7. How does your proposal impact on the council's other key guiding principles?

Page 18

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<b>Sustainable Development Principle (5 ways of working)</b>				
<b>Long Term:</b> Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.	Our approach to transparency in supply chains has always been premised on the desire to improve transparency whilst at the same time ensuring that businesses take appropriate and proportionate action to tackle modern slavery.	Neutral		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><b>Collaboration:</b> Working with others in a collaborative way to find shared sustainable solutions.</p>	<p>Modern Slavery Policy has been developed by a collaboration of various internal services: Adult and Children Services, Procurement, Equalities, Housing, Programme Office, Human Resources, Community Cohesion, Community Safety Partnership and Trading standards.</p> <p>As well as encourage our partners to play an active role.</p> <p>This collaboration extends to our external partners.</p>	<p>Good</p>		<p>Choose an item.</p>

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
Page 20 <b>Involvement (including Communication and Engagement):</b> <i>Involving a diversity of the population in the decisions that affect them.</i>	Westminster have consulted nationally on it. The Westminster consultation into Modern Slavery and employment in supply chain: Consultation link: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/448200/Consultation_Government_Response_final_2_pdf.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/448200/Consultation_Government_Response_final_2_pdf.pdf</a>	Choose an item.		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><i><b>Prevention:</b> Understanding the root causes of issues to prevent them from occurring.</i></p>	<p>The purpose of the Strategy/action plan is to prevent modern slavery.</p> <p>Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.</p> <p>It's everybody's business.</p>	Choose an item.		Choose an item.
<p><i><b>Integration:</b> Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i></p>	<p>Powys County Council's Modern Slavery Policy adopts an integrated approach bringing together key areas of safeguarding, policy support, human resources, procurement and civil contingencies</p>	Good		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><b>Preventing Poverty:</b>                      Prevention, including helping people into work and mitigating the impact of poverty.</p>	<p>This policy will apply to all persons working for the Council or on its behalf including employees at all levels, temporary workers, agents contractors, third party representatives and business community partners.</p> <p>The Council will work with suppliers to ensure that they do not compromise ethical employment practices. The Council will ensure that suppliers are paid in good time.</p> <p>The Council has adopted the principles of the National Living Wage Scheme and following the acceptance of the 2018/19 budget at the Full Council meeting on 22 February 2018, it was agreed that the 2017/18 Living Wage Foundation rate of £8.45 per hour (£16,303 FTE) will remain in place from 1 April 2018. This is paid as</p>	Neutral		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
	a Living Wage Supplement, through uplift to the relevant salary points.’  The 2018 National Pay Negotiations are likely to increase the pay of the lowest paid employees to at least £8.50 per hour, thus superseding the £8.45 per hour 2017/18 Living Wage Foundation rate.  For reference, the Council continues to pay the lowest paid staff significantly above the Statutory National Living Wage and National Minimum Wage rates.			
<b>Unpaid Carers:</b> Ensuring that unpaid carers views are sought and taken into account	We will be asking third party suppliers to sign up to the code. <b>Ask Lee/Shelley</b>	Choose an item.		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
Page 25 <b>Safeguarding:</b> Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.	A key aim of this policy is to:  Ensuring safeguarding practice, strategic planning and commissioning of services across all partner agencies continuously improves and promotes good outcomes for children and adults who may be at risk in their local area.	Good		Choose an item.

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<b>Impact on Powys County Council Workforce</b>	The policy should raise awareness of the issue internally with staff.  All members of staff have a collective responsibility to report modern slavery if he/she thinks it is taking place. Powys County Council's current Whistleblowing Policy was issued on 6 February 2017. The Policy outlines the Local Authority's commitment to conduct its business with honesty and integrity, and to encouraging a culture of openness and accountability, whilst ensuring protection to whistle-blowers.	Good		Choose an item.
<b>Source of Outline Evidence to support judgements</b>				
Powys County Council's current Whistleblowing Policy was issued on 6 February 2017				

8. Achievability of proposal?

Impact on Service / Council	Risk to delivery of the proposal	Inherent Risk
Low	Low	Low
Mitigation		

9. What are the risks to service delivery or the council following implementation of this proposal?

Risk Identified	Inherent Risk Rating	Mitigation	Residual Risk Rating
Failure to monitor or enforce	low		
Unrealistic expectations that this will eradicate modern slavery	Low		
Escalation channels are not established	Low		
Unfair accusations of unethical employment	Low		Choose an item.
<b>Overall judgement (to be included in project risk register)</b>			
Very High Risk	High Risk	Medium Risk	Low Risk
			x

10. Indicative timetable for actions to deliver change proposal, if approved

Page 28

Action	Target Date	Outcome	Decisions made
Take through governance starting with EMT	EMT on 11.7.18		
<b>Portfolio Holder decision required</b>	Yes	<b>Date required</b>	
<b>Cabinet decision required</b>	Yes	<b>Date required</b>	Awaiting date
<b>Council decision required</b>	No	<b>Date required</b>	

11. Indicative resource requirements (FTE) – link to Resource Delivery Plan

Support Requirements	2018-19				2019-20				2020-21			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4

12. Overall Summary and Judgement of this Impact Assessment?

<b>Outline Assessment (to be inserted in cabinet report)</b>	<b>Cabinet Report Reference:</b>	
Low level of risk for service areas. High level of benefit following implementation.		

13. Is there additional evidence to support the Impact Assessment (IA)?

<b>What additional evidence and data has informed the development of your proposal?</b>

14. On-going monitoring arrangements?

<b>What arrangements will be put in place to monitor the impact over time?</b>
The Council will produce an annual statement outlining the approach it will be taking or have taken to make sure that modern slavery or human trafficking is not taking place within its business or supply chain. The annual statement will be published on the Council's website. The responsibility for the production and publication of the Annual Statement will lie with the appointed Anti-slavery and Ethical Employment Champion
<b>Please state when this Impact Assessment will be reviewed.</b>
Annually.

15. Sign Off

Position	Name	Signature	Date
<b>Impact Assessment Lead:</b>	Powys Anti-Slavery & Ethical Employment Group.		11.4.18
<b>Head of Service:</b>			
<b>Strategic Director:</b>	Mark Evans		
<b>Portfolio Holder:</b>	Cllr Aled Davies		

16. Governance

<b>Decision to be made by</b>	Cabinet	<b>Date required</b>	Awaiting date
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**FORM ENDS**

# Modern Slavery Policy



Author and service: Powys Anti-Slavery & Ethical Employment Group  
Date approved by Cabinet:  
Integrated Impact Assessment (Yes)  
Publication date: July 2018  
Policy Review Date: 2 years



## **Powys County Council Modern Slavery Policy**

### **1. Introduction**

This policy sets out Powys County Council's (the Council's) aims and commitments to tackle Modern Slavery.

#### 1.2 The development of this policy was influenced by

- The Modern Slavery Act 2015.
- Powys County Council's Policy and Guidelines for Safeguarding Children and Adults at Risk 2016.
- Safeguarding policies and processes
- The Welsh Government's Code of Practice on Ethical Employment in Supply Chains.
- The Welsh's Government's Community Cohesion National Delivery Plan.

### **2. Overview**

2.1 The Council, its Cabinet and Executive Management team, are fully committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Council's Modern Slavery Policy adopts an integrated approach bringing together key areas of Safeguarding, Policy Support, Human Resources, Procurement and Civil Contingencies.

2.2 The Council's Modern Slavery Policy covers the 12 commitments of the Code of Practice on Ethical Employment in the Supply Chain (see Appendix 1) and also refers to safeguarding processes and the responsibilities of the Local Authority under the Modern Slavery Act 2015. The Council has already signed up to the Code of Practice.

### **3. Policy Aims**

3.1 The Council will ensure that modern slavery and human trafficking reporting and support for victims is mainstreamed in safeguarding systems and processes

3.2 This policy will apply to all persons working for the Council or on its behalf in our capacity including employees at all levels temporary workers, agent's contractors, third party representatives and

business community partners

- 3.3 The Council will produce an annual statement outlining the approach we will be taking or have taken to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. The annual statement will be published on the County Council's website.
- 3.4 Powys County Council has already appointed an Elected Member as the Anti- Slavery and Ethical Employment Champion.

#### **4. Modern Slavery or Human Trafficking involves**

- Recruiting vulnerable children and adults
- Moving them to another place, often another country
- Using threats, force or deception to make them do something against their will
- Exploiting them to make money or provide services for their traffickers.

#### **5. Types of Exploitation**

- Labour Exploitation
- Sexual Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

#### **6. Statistics**

- 6.1 It is estimated that there are 10,000 to 13,000 victims of Modern Slavery in the UK. In 2017, 5,145 potential victims of modern slavery were submitted to the National Referral Mechanism, (NRM), a 35% increase on 2016.
- 6.2 In Wales 193 potential victims were referred in to the NRM, an 57% increase from the referral total of 2016. The 193 referrals were 106 females and 87 males. 109 or 56% of referrals were adults and 44% of referrals were children.
- 6.3 The most common types of exploitation in 2016 in Wales were
  - 43 adult male potential victims of labour exploitation.
  - 37 minor female potential victims of sexual exploitation.

- 36 adult female potential victims of sexual exploitation.

6.4 In Wales, 29 children were potential victims of labour exploitation or domestic servitude. 42 children were potential victims of sexual exploitation, including 39 UK nationals.

## 7. Structures in Wales

Dyfed Powys Regional Anti-Slavery Group meet and plan the regional strategic delivery of anti-slavery work. The group sits under the Wales Anti-Slavery Leadership Group and the Wales Anti-Slavery Operational Group. The Welsh Government has appointed an Anti-Slavery Co-ordinator.

## 8. The Modern Slavery Act 2015

This piece of legislation was introduced to criminalise slavery, forced servitude and human trafficking in the UK.

## 9. Statutory Duties and Responsibilities

As a local authority, the Council has a number of statutory duties and responsibilities, as set out below:

9.1 Annual Statement: this is a requirement under s.54 of the Act for commercial organisations that meet criteria prescribed by regulations made by the Secretary of State. In the case of the Local Authority, The Welsh Government's Code of Practice for Ethical Employment in Supply Chains also provides for an annual statement to be made.

Powys County Council has already signed up to Welsh Government's Code of Practice for Ethical Employment in Supply Chains and will produce an annual statement that slavery and human trafficking is not taking place in the organisation or in our supply chain which is approved and signed off by the Leadership Group. The annual statement will be published on the County Council's website.

The **responsibility** for the production and publication of the Annual Statement will lay with appointed Anti-slavery and Ethical Employment Champion. Supported by Communications and Powys Anti-Slavery & Ethical Employment Group. The statement will be subject to scrutiny and to approval by Council Cabinet.

9.2 Duty to notify the Home Office of Potential Victims of Modern Slavery:

the duty to notify is set out in s.52 of the Act and requires Local Authorities to notify the Secretary of State of suspected victims of slavery or human trafficking. Guidance and notification forms have been produced by the Home Office. The County Council will notify the Home Office of potential victims.

The **responsibility** for notifying the Home office will lie with the Director for Social Services.

9.3 A Local Authority has a responsibility to refer potential victims as a first responder to a competent authority, (the Modern Slavery Human Trafficking Unit – MSHTU), via the National Referral Mechanism, (NRM). NRM forms are available and the Dyfed Powys Regional Anti-Slavery Group has produced a Victim Care Pathway with adult and child processes.

The Council, as a first responder, will refer potential victims of modern slavery into the NRM. The **responsibility** for referring potential victims via the NRM will lie with the Director for Social Services.

9.4 Independent Child Trafficking Advocates, (ICTAs): the role of ICTAs is outlined in s.48 of the Act, ‘Interim Guidance for 3 ICTA early adopter sites.’ All of Wales has been selected as an early adopter site. A Local Authority in Wales is therefore required to make a referral for any potential child victims of trafficking to the ICTA service managed by Barnardo’s. The County Council will refer potential child victims of trafficking to ICTAs.

The **responsibility** for referring child victims to the Independent Child Trafficking Advocate, will lie with the Head of Children’s Services.

## 10. **Safeguarding**

The Council is a member of the Mid-and-West Wales Safeguarding Board which has as its core aims:

- To protect children and adults in their area who may be experiencing, or at risk of abuse, neglect and other kinds of harm and;
- To prevent children and adults in their area from becoming at

risk of abuse, neglect and other kinds of harm.

10.2 Locally there is a Children's Safeguarding Local Operation Group (CYSUR) and an Adults Safeguarding Local Operation Group (CWMPAS). The Local Operation Groups (LOG's) work collaboratively, within a multi-agency context, to keep children and adults, who may be at risk, safe within their local area.

10.3 Key aims include:

- Ensuring safeguarding practice, strategic planning and commissioning of services across all partner agencies continuously improves and promotes good outcomes for children and adults who may be at risk in their local area.
- Create a forum in which shared learning, information sharing and guidance takes place within a multi-agency environment

Whilst working collaboratively will also professionally challenge and hold each other to account when safeguarding practice falls below expected standards.

10.4 Powys have representatives on the membership of the Dyfed Powys Regional Anti-Slavery Group who feed relevant information and actions to the Powys Local Operations Group (PLOG) as part of the cross cutting Adults and Children's agenda.

10.5 Powys County Council has in place a Child Protection Policy & Procedures (October 2016) for Safeguarding Children at Risk which outlines key roles, responsibilities and processes in relation to safeguarding.

Powys County Council Adult Safeguarding complies with Part 7 of the Social Services and Well Being Act (Wales) 2014.

10.6 Other relevant documents include-

Victim Care Pathway

[Duty to Notify the Home Office of Potential Victims of Modern Slavery - Form and Guidance](#)

All Wales Practice Guidance for Safeguarding Children Who May Have Been Trafficked

Operational Handbook / Child Trafficking / Wales

[National Referral Mechanism Guidance for Child First Responders](#)

[National Referral Mechanism Guidance for Potential Adult Victims](#)

## [of Modern Slavery / England and Wales](#)

All Wales Child Trafficking Protocol

All Wales Safeguarding and Promoting the Welfare of Children at Risk of or Abuse through Sexual Exploitation.

CYSUR Child Sexual Prevention Strategy

Independent Child Trafficking Advocates Guidance / Wales

Welsh Government relevant Procurement Guidance includes:

Code of Practice for Ethical employment in supply chains

Guide to tackling unfair employment practices and false self-employment

Guide to tackling modern slavery and human rights abuses

Guide to implementing the living wage through procurement

Guide to tackling blacklisting

- 10.7 The **responsibility** for safeguarding victims of Modern Slavery within Powys will remain within the Social Services Directorate of Powys County Council. This policy has already been endorsed by the Powys Local Operating Group and will also proceed to the Mid and West Wales Safeguarding Board following approval by the County Council.

### 11.1 **Survivor Reception Centres**

Survivor Reception Centres are set up and managed by the Police to gather information from survivors of incidents and could potentially be used when multiple potential victims of Modern Slavery occur in too great a number to be accommodated in existing safe houses.

- 11.2 The Police take lead **responsibility** in the planning and opening of Survivor Reception Centres. If a need arises, survivor reception centres would be scoped and identified on a case by case basis, utilising civil contingency and multi-agency partnerships at a Tactical Control Group (Silver) level. Local Authorities do not have permanent reception centre facilities suitable for victims of Modern Slavery. The Powys County Council Emergency Planning Department / Duty Emergency Planning Officer will facilitate PCC's support to the Police where required throughout the process.

### 12.1 **Code of Practice: Ethical Employment in Supply Chains**

The Welsh Government has launched a Code of Practice for Ethical Employment in Supply Chains. There is an expectation from the Welsh Government that Local Authorities will sign up to

the Code and Powys Council already has and appointed an Anti-Slavery and Ethical Employment Champion from within the Cabinet

- 12.2 Powys County Council will comply with the Code of Practice and all Services within the Council will observe the Code. The responsibility for monitoring progress against the code will lie with the Powys Anti-Slavery & Ethical Employment Group.
- 12.3 The Council will produce an Annual Statement on ethical employment in the supply chain
- 12.4 The Council will appoint an Anti-Slavery and Ethical Employment Champion
- 13.1 Powys County Council's Modern Slavery Policy also covers the twelve Commitments of the code.

## Appendix 1

### **The Twelve Commitments of the Code of Practice on Ethical Employment in the Supply Chain**

1. A written Ethical Procurement Policy and appointment of an Anti-Slavery and Ethical Employment Champion.
2. A written whistle blowing policy.
3. Training for Modern Slavery and Ethical Employment Practices.
4. Employment Practices are included as part of any procurement.
5. Ensure that organisations work in a way with their suppliers that doesn't contribute to modern slavery or unethical employment practices.
6. Expecting suppliers to sign up to the code.
7. Carrying Out regular reviews of Expenditure and undertake risk assessments against the code.
8. Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used improperly.
9. Ensure that workers are free to join a trade union and that backlisting is prohibited.
10. Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage suppliers to do the same.
11. Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains.
12. Ensure all those undertaking work on an outsourced contract are treated fairly and equally including staff transferred retaining their terms and conditions and other staff employed have comparable terms and conditions.

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