



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in SF2 - Civic Offices, Shute End, Wokingham RG40 1BN on **FRIDAY 14 OCTOBER 2022 AT 12.15 PM**

Susan Parsonage
Chief Executive
Published on 6 October 2022

Note: Non-Committee Members and members of the public are welcome to attend the meeting or participate in the meeting virtually, in line with the Council's Constitution. If you wish to participate, either in person or virtually via Microsoft Teams, please contact Democratic Services. The meeting can also be watched live using the following link:

<https://youtu.be/5SWSrsHC9KQ>

Please note that other people may film, record, tweet or blog from this meeting. The use of these images or recordings is not under the Council's control.



WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, learn, work and grow and a great place to do business

Enriching Lives

- Champion outstanding education and enable our children and young people to achieve their full potential, regardless of their background.
- Support our residents to lead happy, healthy lives and provide access to good leisure facilities to complement an active lifestyle.
- Engage and involve our communities through arts and culture and create a sense of identity which people feel part of.
- Support growth in our local economy and help to build business.

Safe, Strong, Communities

- Protect and safeguard our children, young and vulnerable people.
- Offer quality care and support, at the right time, to prevent the need for long term care.
- Nurture communities and help them to thrive.
- Ensure our borough and communities remain safe for all.

A Clean and Green Borough

- Do all we can to become carbon neutral and sustainable for the future.
- Protect our borough, keep it clean and enhance our green areas.
- Reduce our waste, improve biodiversity and increase recycling.
- Connect our parks and open spaces with green cycleways.

Right Homes, Right Places

- Offer quality, affordable, sustainable homes fit for the future.
- Build our fair share of housing with the right infrastructure to support and enable our borough to grow.
- Protect our unique places and preserve our natural environment.
- Help with your housing needs and support people to live independently in their own homes.

Keeping the Borough Moving

- Maintain and improve our roads, footpaths and cycleways.
- Tackle traffic congestion, minimise delays and disruptions.
- Enable safe and sustainable travel around the borough with good transport infrastructure.
- Promote healthy alternative travel options and support our partners to offer affordable, accessible public transport with good network links.

Changing the Way We Work for You

- Be relentlessly customer focussed.
- Work with our partners to provide efficient, effective, joined up services which are focussed around you.
- Communicate better with you, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.
- Drive innovative digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.

For consideration by

Rachel Bishop-Firth, Executive Member for Equalities, Inclusion and Fighting Poverty

Officers Present

Rob Bradfield, Head of Procurement, Contracts and Commercialisation

Callum Wernham, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT	
IMD 2022/14	None Specific	MODERN SLAVERY STATEMENT	5 - 14

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Agenda Item IMD14

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: 2022/14

TITLE	Modern Slavery Statement
DECISION TO BE MADE BY	Executive Member for Equalities, Inclusion and Fighting Poverty - Rachel Bishop-Firth
DATE, MEETING ROOM and TIME	14 October 2022 SF2 at 12:15PM
WARD	None Specific;
DIRECTOR / KEY OFFICER	Deputy Chief Executive - Graham Ebers

PURPOSE OF REPORT (Inc Strategic Outcomes)

Certain commercial organisations must publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

A commercial organisation is required to publish an annual statement if all the criteria below apply:

- It is a 'body corporate' or a partnership, wherever incorporated or formed
- It carries on a business, or part of a business, in the UK
- It supplies goods or services
- It has an annual turnover of £36 million or more

Organisations are responsible for determining whether the legislation applies to them.

It is proposed that Wokingham Borough Council voluntarily publishes a modern slavery statement to evidence ethical leadership; and the appended document puts forward the proposed position on the recommended areas (guidance from Home Office):

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

RECOMMENDATION

That the Executive Member for Equalities, Inclusion and Fighting Poverty:

- 1) Approve the Modern Slavery Statement as set out in appendix 1 to the report;
- 2) Notes that if approved the statement is then to be published on the Council's web page and the Home Office registry of modern slavery statements – to be published by October 2022.

SUMMARY OF REPORT

The Modern Slavery Statement follows guidance set out by the Home Office & reflects the position within Wokingham Borough Council.

The statement (appended) sets out the position around modern slavery under the following headings:

Introduction

Organisational Structure and Supply Chains

Assessing and Managing Risk

Procurement

Due Diligence

Organisational Policies

Corporate Strategy for Procurement, Commissioning and Contract Management

Equality Plan

Safeguarding Policies

Whistleblowing Policy

Recruitment Policies

Conduct Policy

Training

Performance Indicators

Review arrangements

Background

Section 54 of the Modern Slavery Act 2015 requires certain organisations to develop a slavery and human trafficking statement each year. The slavery and human trafficking statement should set out what steps organisations have taken to ensure modern slavery is not taking place in their business or supply chains.

The Home Office has published guidance on the requirement and development of Modern Slavery Statements. Other local authorities that have published statements include neighbouring authorities such as West Berkshire Council, Oxfordshire Council, Bracknell Forest Council; with over 160 Councils having published statements to date.

It is proposed that Wokingham Borough Council voluntarily publishes its Modern Slavery Statement to display ethical leadership in this area. The statement will require an annual update, and visibility on both the Councils web page & Home Office registry.

Business Case (including Analysis of Issues)

No business case – the modern slavery statement will display ethical leadership on the issues, supporting the ambition to eradicate this issue from the Councils supply chain.

The statement will require an annual review & update, to follow 6 months after financial year end.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe funding pressures, particularly in the face of the COVID-19 crisis. It is therefore imperative that Council resources are focused on the vulnerable and on its highest priorities.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	No effect	No effect	n/a
Next Financial Year (Year 2)	No effect	No effect	n/a
Following Financial Year (Year 3)	No effect	No effect	n/a

Other financial information relevant to the Recommendation/Decision

N/A

Cross-Council Implications

Ownership of the Modern Slavery Statement & action relevant actions will be owned centrally and delivered through a hub and spoke approach to include all relevant Council Services.

Public Sector Equality Duty
Due regard has been given to WBC's duties under the Equalities Act.

SUMMARY OF CONSULTATION RESPONSES	
Director – Resources and Assets	No comment
Monitoring Officer	To be updated at meeting
Leader of the Council	To be updated at meeting

Reasons for considering the report in Part 2
N/A

List of Background Papers
Modern Slavery Statement (appended)

Contact Rob Bradfield	Service Business Services
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Wokingham Borough Council's Modern Slavery Statement

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Introduction

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims of modern slavery can be any age, gender, nationality and ethnicity. It takes many forms and is a hidden crime that happens in every country of the world, including the UK.

Wokingham Borough Council is committed to preventing and acting against modern slavery and human trafficking in its corporate activities and in the wider community. This statement sets out the actions that Wokingham Borough Council has taken and the policies and procedures it has adopted to understand modern slavery risks related to its activities and to help ensure slavery and human trafficking is not taking place within the organisation or through its partnerships and supply chains.

Organisational Structure and Supply Chains

Wokingham Borough Council is a unitary authority, and provides a range of services itself, in partnership with third party organisations and through its supply chains. The Council owns 4 companies:

The Council owns 4 companies in the housing group:

- WBC (Holdings) Limited which provides governance over the housing group on behalf of the Council as Shareholder.
- Berry Brook Homes Limited, Wokingham Housing Limited and Loddon Homes Limited who act as either housing providers or developers.

The Council is a joint owner with the Royal Borough of Windsor & Maidenhead of an adult social care company called Optalis Limited. This statement does not cover these companies.

The Council has official trade unions and staff representation (via the Corporate Works Council) and staff networks (equalities networks) that are part of the Councils approach to combatting modern slavery & other policy matters.

Assessing and Managing Risk

The Council has assessed the risk of Modern Slavery across its services. The council procures a wide range of goods, works and services across a wide range of areas including

construction, facilities management, social care, cleaning, supply of IT services & equipment. These goods, works and services are procured from a wide variety of businesses & voluntary sector organisations.

We have implemented standard controls across all our procurement and employment processes. These include standard terms regarding Modern Slavery in our contracts. Through research we have identified high risk areas and implemented additional mitigating actions for these areas, including lower paid & regulated activities.

Procurement

The Council undertakes appropriate due diligence in its procurement process and acts in accordance with the Public Contract Regulations 2015. In accordance with Cabinet Office procurement policy note 08/16, the council excludes bidders where it is aware that they have committed offences under the Human Rights Commission (or comparable body), on grounds of unlawful discrimination.

The Council expects contractors will perform its obligations in accordance with all applicable equality law; the Council's equality & diversity policy; and other requirements under applicable equality law; whilst promoting & raising awareness with the Council's supply chain.

Due Diligence

The Council's due diligence includes:

- Taking appropriate measures in the selection (through procurement) of suppliers and contractors whilst ensuring T&Cs around compliance are being met through appropriate contract management.
- Reinforcing the adherence to the Modern Slavery Act duties by working towards incorporating these into the relevant Council policies.
- Undertaking a thorough recruitment and selection process for all employees.

- Delivery of training and awareness raising for staff and partner organisations to develop understanding of modern slavery and human trafficking.
- Reporting quarterly on the number of referrals to the National Referral Mechanism (NRM), number of MS1/Duty to Notify and number of intelligence reports submitted for our Wokingham Borough Local Police Area (LPA).

Organisational Policies

The council has a robust policy framework which supports enactment of the council's commitment to preventing modern slavery and human trafficking. All policies are regularly reviewed to ensure they remain compliant and fit for purpose.

Corporate Strategy for Procurement, Commissioning and Contract Management

The council's procurement strategy provides a council-wide approach and ownership of procurement and sets out the organisation's commitment to equality, diversity and inclusion.

Equality Plan

The Council's Equality Plan 2021-2025 describes how equality, diversity and inclusion are essential to the way the council operates as a community leader, a service provider and an employer.

Safeguarding policies

The [Berkshire Safeguarding Adults Policies and Procedures](#) and the Berkshire West [Safeguarding Children Partnership Procedures Manual](#) detail how the council, together with partners, protects adults and children who may have increased risk and vulnerability to exploitation, including slavery and trafficking.

Whistleblowing Policy

The council's Whistleblowing policy and guidance encourages staff to [raise any serious concerns](#) regarding council activity, including circumstances that could give rise to an enhanced risk of slavery or human trafficking. The policy applies to all council employees, former employees, agency staff and contractors engaged by the council. Although not

covered by the policy the whistleblowing hotline/reporting mechanism is utilised by members of the public and appropriate action taken.

Recruitment Policies

The council's Recruitment Policy, Equality Opportunities Policy, Safer Recruitment Guidance and Young People at Work Policy all establish a robust framework to ensure the council protects staff and clients. The council's recruitment policy applies to the recruitment of all staff, including agency staff.

Conduct Policy

All staff are expected to give the highest possible standard of service to the public. They should conduct themselves with integrity, impartiality, and honesty. Where an employee has witnessed misconduct e.g. fraudulent activity, violence towards a client; he or she will have a duty to report such an incident.

Training

The council's mandatory programme of induction and refresher training includes 'joint safeguarding awareness', equality and diversity at work, and employee conduct modules. This ensures that all staff are made aware of different forms of abuse and exploitation, potential signs of abuse and how to report any concerns.

Regular, targeted Modern Slavery Awareness training is provided for council and partner staff who work in the community. This training aims to increase awareness of modern slavery and enable staff working in our communities to recognise the signs of modern slavery and understand the National Referral Mechanism process. Staff within these teams are also encouraged to discuss and review risks regarding modern slavery and exploitation at regular colleague meetings.

Performance Indicators

The Council currently receives reports on the number of referrals to the NRM, including the number of MS1/ Duty to Notify and number of intelligence reports submitted for our Wokingham Borough LPA.

The number of reports received regarding individuals known to Adult or Children Services are monitored and reviewed by the relevant services and Safeguarding Boards.

We continue to review (annually) the work that has been undertaken to ensure the Council is satisfied that modern slavery and human trafficking is not taking place in any part of our organisation.

As a result, further performance measures will be produced where it is felt that it is realistic and measurable to evidence our effectiveness of the steps we have taken.

Review arrangements

Wokingham Borough Council has committed to reviewing its approach to modern slavery annually, taking into account guidance from the Home Office & ensuring it remains robust; the annual Modern Slavery Statement will reflect the updated position taken by the Council.

Signed

Chief Executive:

Susan Parsonage

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Executive Member for Equalities, Inclusion and Fighting Poverty:

Rachel Bishop-Firth

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Date:

Approved as an Individual Executive Member Decision on the xxx