

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