

**Modern Slavery Act Transparency Statement 2018/19**

This statement sets out City of Lincoln Council's roles and responsibilities in identifying and reducing risks relating to modern slavery across its business areas and to put in place steps that are aimed at ensuring that there is no modern slavery or human trafficking in its own business, and its supply chains.

This statement relates to actions and activities during the financial year 1st April 2018 to 31st March 2019.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Council is absolutely 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 list below sets out practices already in place at the Council which provides the starting point for addressing the requirements of the Modern Slavery Act.

**Corporate Plan 2014-2017**

The Council's Corporate Plan has been reviewed through the year and new Council Plan 2017-20 next year. Therefore, the priority to develop our standards and ethics through a number of supporting initiatives including our Living Wage commitment, which was first adopted in late 2013 remains.

**Policies**

The Council has a wide range of published policies and procedures covering the extent of its responsibilities. These are subject to regular review to take into account national and local policy changes and new or revised legislation. Any impact on the workforce is considered within HR policies and procedures.

**HR Policies and Procedures**

The Council takes a robust approach to reviewing and updating its suite of HR policies and supporting procedures which are published on the Council's website.

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

**Officer's Code of Conduct**

The Council's Officer 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.

**Recruitment**

The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures

They are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

### **Agency Workers**

The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

### **Pay**

The Council operates a Job Evaluation Scheme which ensures that all employees are paid fairly and equitably. In addition to this, the Council, in 2013/14, introduced the Living Wage.

### **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 retaliation.

### **Councillors Code of Conduct**

The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. Breaches are investigated by the Monitoring Officer.

### **Councillors Declarations of Interests**

The Council expects all Councillors to record and declare pecuniary and non-pecuniary interests. Registers are published and reviewed annually.

### **Councillors Induction and Training**

Councillors complete induction training on election which includes equality and diversity. A wide variety of additional training is offered which includes Safeguarding.

### **Safeguarding**

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. The Council has a policy which all staff and councillors are expected to read and work within. The Council works within multi-agency partnerships to protect and safeguard people. The council has a designated Safeguarding lead and also has a Vulnerable Adults Panel and a Protecting Vulnerable People Group that oversees policy and training requirements.

### **Training**

The Council has a comprehensive programme of training for employees with some aspects being mandatory for all to complete regardless of their job role. This includes Equality & Diversity and Safeguarding Awareness training. Training enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and trafficking.

**Contractors and Service Providers**

The Council expects its key contractors to have safeguarding policies, procedures and training in place.

**Employee Representatives**

The Council recognises and proactively works with trade union organisations.

**Partnership Working**

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

**High Risk Areas**

The Council has determined that there are no areas of its business that are considered to be at high risk of slavery or human trafficking. However all policies and procedures will be kept under review and staff and member training programmes maintained to ensure this position is