

Modern Slavery Act 2015 - Transparency Statement

2022/23



Introduction

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

This statement sets out Colchester City Council's actions 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 within the organisation, our sub-contractors, partners or supply chains. The statement relates to actions and activities during the financial year 1st April 2022 to 31st March 2023. It also sets out the plans for improvements in the next year.

The Modern Slavery Act 2015

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery. In broad terms:

- 'slavery' is where ownership is exercised over a person;
- 'servitude' involves coercion to oblige a person to provide services;
- 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.

Section 52 of the Act imposes a duty on public authorities, including district councils, to notify the Secretary of State of suspected victims of slavery or human trafficking. The Council is also a 'First Responder' under the National Referral Mechanism which involves making referrals in order to secure appropriate protection and support for victims.

Section 54 of the Modern Slavery Act states that the employer'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.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to preventing slavery, exploitation and/or human trafficking in all its forms. Modern slavery in its wider sense is commonly accepted to include forced or bonded labour, human trafficking, child slavery, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and forced or early marriage.

This statement has been approved by the Council's Senior Management Team and the Portfolio Holder for Communities. It will continue to be reviewed and updated annually.

Cllr Natalie Sommers

Portfolio Holder for Communities

September 2023

Structure and Business

Colchester City Council is a Local Authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. Its management structure is shown on its website [here](#).

Colchester has a rapidly growing population and economy. Over the next few years the City is anticipated to experience one of the fastest growth rates within the county, with population rising from around 195,000 to nearly 208,000 by 2025. Our current population is 192,700 (based on the 2021 census).

The Transparency Statement and the Council's approach to Modern Slavery and Human Trafficking, is reflected within the [Colchester City Council Strategic Plan 2023-2026](#) which sets out how we will play our part in making Colchester a place where people want to live, learn, work and visit.

The Strategic Plan 2023-26 outlines 14 priorities within 6 strategic themes, taking into account the impact of the Covid-19 pandemic. It sets out the key goals by which success will be measured moving forward, together with a clear set of commitments, that will be delivered in the first year of the plan. These will form the basis for the Strategic Plan action plan. The 6 strategic themes are:

- Respond to the climate emergency
- Deliver modern services for a modern city
- Improve health, well-being and happiness
- Deliver homes for those most in need
- Grow our economy so everyone benefits
- Celebrating our heritage and culture

The Strategy is supported by other policies, available on the Human Resources (HR) section of the Council's intranet, which are also regularly reviewed.

Supply Chains

Colchester City Council refreshes its modern slavery risk assessment annually. From April 2016, all tender processes have required bidders to provide confirmation that they are compliant with the Act. An 'Invitation To Tender' (ITT) Questionnaire for all potential suppliers (all industries) should be issued to all bidders as part of the modern slavery supplier risk assessment; if a company cannot confirm they have taken appropriate steps to identify risk to human rights, within

themselves and their supply chain, their bid should be excluded from the procurement. The Council also requests links to other organisations' modern slavery transparency statements in the ITT questionnaire, should the organisation be required to publish one. When assessing the modern slavery risk of products that have been procured, each component of the product is considered and Transparency in Supply Chain (TISC) statements are requested from suppliers. For prioritised suppliers, a formal written request is issued in order that the supplier provide information about their approach to tackling modern slavery, and in addition to this, a contractual clause is set out requiring suppliers to have specific approaches to tackling modern slavery in place.

Following a review our current procurement procedures relating to Modern Slavery an additional link for suppliers was included to the [Modern slavery training: resource page - GOV.UK \(www.gov.uk\)](https://www.gov.uk/modern-slavery-training).

The Council procures goods and services from various suppliers, and this is governed by our procurement strategy [Colchester City Council – Procurement Strategy](#).

Policies and Plans

Colchester City Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

- **Community Safety Partnerships Annual Partnership Plan**

The Safer Colchester Partnership's Annual Partnership Plan contains a key priority to identify and support the reporting of Hidden Harms – this includes those who are affected by slavery and human trafficking.

- **Safeguarding**

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 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 Policy, and relevant training, makes appropriate reference to the Council's role as a 'First Responder' in making referrals to the NRM (National Referral Mechanism).

- **Recruitment**

The Council has a robust and transparent recruitment and selection process that is reviewed regularly. They include robust procedures for vetting new employees, whether full or part-time, agency employees or contractors/consultants. The checks made ensures they are able to confirm their identities and qualifications, and they are paid directly into an

appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

- **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 to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council has paid the Living Wage or more to its employees since 2013. The Council became an accredited Living Wage Employer in February 2016, meaning that the approach has been extended to relevant contracted staff as those contracts have come up for renewal.

- **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 retaliation.

Councillors (Members)

- **Members' Code of Conduct and Ethical Framework**

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. The Ethical Framework within the Council's Constitution sets out further details.

- **Councillors' Declarations of Interests**

The Code of Conduct requires all Councillors to record and declare any interests (disclosable pecuniary interests, registerable and non-registerable interests).

Partnerships

Colchester City Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes Essex County Council and the Local Safeguarding Boards. It also leads the Safer Colchester Partnership (SCP)

and plays a significant role in the Colchester Against Modern Slavery (CAMS) partnership. Audits are carried out for the Essex Safeguarding Children Board and Essex Safeguarding Adults Board on alternate years. This includes appropriate reference to Modern Slavery and Human Trafficking.

Community Safety Partnership: Staff work with the Safer Colchester Partnership to share insight and co-ordinate action around issues including Modern Slavery.

Colchester Against Modern Slavery: The CAMS Partnership is taking a proactive approach to combat this issue and develop resilience against modern slavery.

The Safer Colchester Partnership, with the support of Together Free, launched the Colchester Against Modern Slavery (CAMS) Partnership in 2023. The first CAMS meeting was held 7th June at the University of Essex. 30 community leader attended from a variety of charities, community groups, Colchester City Council, Essex Police and the University of Essex. Priorities for CAMS were co-developed by participants towards a slavery-free community. CAMS also delivered the Colchester Modern Slavery Conference, 26th April. This drew together 50 participants from 25 organisations to explore best practice and potential for a localised partnership to emerge.

Contractors and Service Providers

The Council requires its key contractors to have safeguarding policies, procedures and training in place in addition to providing confirmation of compliance with the Act.

Training

Colchester City Council has developed training courses to increase understanding of all forms of modern slavery. Greater understanding empowers colleagues to develop professional curiosity, be more proactive and provide effective support to victims and thus reduce the risks they experience. This is detailed in the Safeguarding Training Plan.

- **Staff:**

The Council has a programme of mandatory training that all employees must complete. It enables officers in community-facing roles to identify and know how to report suspected incidents of abuse and neglect, including modern slavery and trafficking. Modern Slavery has been included within mandatory staff safeguarding awareness training since 2016. Additionally, a Level 3 Safeguarding course was most recently delivered to 20 Designated Safeguarding Officers in February 2022. A Modern Slavery and Human Trafficking Workshop was delivered by Essex Police MSHT Officer to 23 staff including our Designated Safeguarding Officers, Licensing and Public Sector Housing Teams in June 2022.

- **Councillors:**

E-learning training on Safeguarding is mandatory and this includes reference to Modern Slavery. A Modern Slavery and Human Trafficking Workshop was delivered by Essex Police MSHT Officer to 21 Councillors as part of their Members Briefing in March 2022.

Action Plan for 2023-24

Staff Training

Home Office First Responder Training is completed by Community Safety Team Officers and Council Safeguarding Leads on an annual basis.

A new e-learning Level 2 course was launched in May 2021 and included more detailed information on Modern Slavery to help raise awareness of modern slavery and human trafficking. It helps staff recognise their role in identifying and reporting concerns. This is mandatory for front-line staff and will continue to be promoted to build upon the 344 staff who have passed the course, and completion rates will be reported on to ensure completion by all relevant staff.

Safeguarding Training Plan includes links to Modern Slavery resources such as GLAA videos on spotting the signs of modern slavery. We will review these throughout the year to ensure they remain up to date and add any new resources as they become available.

An e-learning course for Procurement Team and Staff who commission goods/services was launched in May 2021 'Protecting Human Rights in the Supply Chain (Modern Slavery)'. 46 staff members who work in procurement/hold budgets have since passed this training. We will continue to monitor and report on completion rates and promote as appropriate.

Going forward we will continue to review information and guidance for staff relating to Modern Slavery and update our internal systems as appropriate. Colchester City Council has instigated its move to a new learning platform as of August 2023. Essential training is now available on the new platform and additional courses are being reviewed and updated in preparation to being re-launched on the new system in due course.

Awareness Raising

Internal and External Comms activity prepared for Anti-Slavery Day – 18th October 2023 and United Nation's World Day Against Trafficking– 30th July 2024. The Knife Angel, also called the National Monument Against Violence & Aggression, is coming to Colchester in October 2023.

This will provide opportunities for events and discussions around violence and aggression, both of which are used to manipulate victims of modern slavery.

The Council registered with the [Modern Slavery Statement Registry](#) in 2020. We will submit the Transparency Statement for 2023 to this site.

Partnership Work

Priorities for CAMS were co-developed by participants towards a slavery-free community. These priorities are being investigated and developed by the multi-agency partnership providing opportunities for knowledge sharing and the development of resilience to modern slavery in Colchester. The following areas have been highlighted for further discussion and investigation:

'Governance and Structure', 'Awareness Raising', 'Training', 'Survivor Care, Safeguarding and Referral Pathways', 'Data & intelligence gathering / sharing across partners', and 'Disruption'.

CAMS is also involved in organising / hosting a conference relating to Homelessness and Modern Slavery which will be held on the 10th of October 2023.

Supply Chain:

The Procurement Team and Staff who commission goods/services should continue to complete the additional training provided 'Protecting Human Rights in the Supply Chain (Modern Slavery)'. New starters should complete their training upon joining the Council, and existing council officers should retrain every 3 years.

Procurement are continuing to monitor and review their policies and procedures to further strengthen their anti-slavery commitment.

Contractors:

Following a review of how we ensure Contractors have received relevant Safeguarding training (including Modern Slavery), our Level 2 Safeguarding E-learning course is has been developed and tailored for Contractors.

Charter against Modern Slavery

[In July 2018](#) Colchester City Council agreed unanimously to adopt and apply the Co-operative Party's [Charter Against Modern Slavery](#) (as far as is legally possible).

All Suppliers to the Council will be asked to confirm that they/their organisation has, and will, take action to address risks to human rights identified within itself and its supply chain. During tender

processes, this action is to include the adoption of a whistleblowing policy that enables staff to blow the whistle on any suspected examples of modern slavery.