

Preston City Council
Modern Slavery Act Statement
2019 to 2020

Introduction

This statement sets out the actions of Preston City Council to understand all potential modern slavery risk relating to its business and the steps it has taken that are aimed at ensuring that there is no slavery or human trafficking in its business or supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of the public sector, Preston City Council recognises that it has a responsibility to take a robust approach to preventing slavery, exploitation and/ or human trafficking. Preston City Council recognises that it has responsibilities as an employer and procurer/ commissioner of services and acknowledges its duties as a City Council to notify The Secretary of State of suspected victims of slavery or human trafficking as introduced by Section 52 of the Modern Slavery Act 2015 and to take action and work with other responder agencies under the Civil Contingencies Act 2004. Preston City Council is committed to doing all that it can to prevent slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and/ or human trafficking. The statement below sets out practices already in place at the Council in 2019 to 2020 following the introduction of the Modern Slavery Act 2015.

Organisational Structure

Preston City Council is a District Council, working alongside Lancashire County Council as part of a two-tier local government system. The Council spends more than £82 million a year providing a range of public services from pest control to planning. It is one of the largest employers in the area with 629 employees.

Corporate Policies

Preston City Council has a range of policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in all of its operations. The Council has a robust ongoing policy review programme to ensure that the Council's policies and procedures 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.

- **Employee Code of Conduct**
 Preston City Council's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour, including when managing its supply chain.
- **Recruitment**
 Preston City Council's recruitment processes are transparent and are reviewed regularly. This includes having robust procedures in place for the vetting of new employees. Checks are undertaken to confirm identities, qualifications and salaries are paid into a personal bank account. Where agency workers are used, these are procured via a third – party company which in turn has its own Modern Slavery statement. The third party company will vet employment agencies to ensure they are reputable before accepting workers from that agency.
- **Whistleblowing**
 Preston City Council encourages all its employees, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's Whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via their manager or the Council's Monitoring Officer (currently the Head of Legal and Democratic Services).
- **Corporate Complaints System**
 Preston City Council operates a complaints procedure to deal with complaints about its services. This can be used to report community concerns such as overcrowding or issues which might reveal slavery or human trafficking which may merit an investigation or reporting to a partner agency.
- **Equality and Diversity Performance**
 Preston City Council records its performance within the context of the Corporate Plan – Achieving Preston's Priorities. This enables the Council to explicitly evidence that equalities are embedded in its work and that it is, as a minimum, complying with the Public Sector' Equality duty in the delivery of all of the Council's services.
- **Safeguarding**
 Preston City 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 works within multi-agency partnerships to protect and safeguard people.

- Code of Conduct for Members.
Preston City Council's Code of Conduct for Members expects all Members to demonstrate the highest standards of conduct and behaviour when representing the City Council. All Members have undergone training on the Code of Conduct, and ethical behaviour.

Due Diligence of suppliers

Preston City Council understands the important role that procurement plays. It enables and rewards good employment practices and does not encourage the use of modern day slavery practices. The Council is committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain.

The Council's due diligence measures include:

- Working with partners to develop an understanding of the risks
- Taking appropriate measures in the selection of suppliers to enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act.
- Inclusion of appropriate clauses in contracts to require suppliers to comply with the requirements of the Modern Slavery Act; these will be applicable to sub-contractors in the supply chain.
- Monitoring the performance of suppliers against the contract requirements, particularly in areas of identified high risk.
- Training and awareness raising for employees dealing with procurement and contracts. Wherever possible, following good practice guidance that is available in relation to modern slavery.

Training and awareness – raising.

Preston City Council recognises that employees within the organisation need to be trained on modern slavery in order to raise awareness and increase compliance with the Modern Slavery Act 2015.

A training package on modern slavery has been developed on MiPod which is the Council's 24/7 interactive site. This is soon to be rolled out to all employees and the completion of it is compulsory. The training will ensure that all employees will have a general awareness when it comes to identifying slavery and will include the following:

- The basic principles of the Modern Slavery Act 2015.
- How employees can identify slavery including warning signs and indicators.

- What colleagues can do to raise concerns about potential slavery.
- What external help is available and details of the National Referral Mechanism (NRM).

Promoting and Communicating Modern Slavery issues

Preston City Council has made information available to all employees outlining the Council's duties, potential warning signs and what action to take if they have any concerns. An internal communications campaign has also been implemented in order to raise awareness of modern slavery, what it is, and how it might impact on the day to day work of Council employees.

Declaration

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Preston City Council's modern slavery and human trafficking statement for the financial year ending 31 March 2020



Signed

Adrian Phillips

Chief Executive.



Signed

Matthew Brown

Leader