

Modern Slavery Charter (MSC) Action Plan

Action	Detail	Owner	Tracking	Deadline	Progress Note
1	Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Karen Middlebrook	Complete	28/02/2019	<p>09/10/18 - Report prepared for strategic leadership and discussed with Assistant Chief Executive re wider workforce training.</p> <p>31/01/2019 – All relevant staff now have access to the online training and 7 out of the 11 members have completed the course and passed the online exam.</p> <p>01/05/2019 - All relevant officers have now completed the course and passed the exam. Will seek to renew the training on an 3-yearly cycle.</p>
2	Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.	Karen Middlebrook / Legal	On track	30/06/2019	<p>31/01/2019 - For all tenders undertaken above the EU threshold, the Council is mandated to the use the Selection Questionnaire (SQ) set by Central Government. One of the sections within this SQ is compliance with the Modern Slavery Act. For these types of tender, anyone failing to comply with the Act will not be shortlisted.</p> <p>The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act. The use of this tool has identified some suppliers, where direct engagement is now taking place through the Contract Managers within service areas to put them in a compliant manner.</p> <p>Further work is required by Legal to strengthen the Council's Terms and Conditions in this regard.</p> <p>Processes also require development in relation to contracts that are below threshold or where they are a call off from a framework agreement.</p> <p>10/02/19 – All letters sent to identified suppliers.</p> <p>01/04/19 – Final response reference compliance. All links have been provided to TISC. Await data to be updated.</p> <p>24/05/19 – Review of TISC following update of data at year end. New suppliers identified whose compliance cannot be verified. Work to identify contract managers and issue letters.</p>
3	Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	Karen Middlebrook / Sam Barstow	Complete	31/05/2019	<p>31/01/2019 - If the Council receives an abnormally low tender it would challenge this in accordance with Regulation 69 and this is detailed in the Council's tender template documentation for above threshold tenders. Working relationships within the Council have been strengthened with Procurement and Community Safety to try and tie this link. A list of high risk industries has been gathered and an understanding between the 2 teams that where an abnormally low tender is received in any of these industries, dialogue to take place to determine an agreed course of action. Further guidance to be developed and consistently provided.</p>

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4	<p>Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.</p> <p>Article 11 of the Human Rights Act 1998 means everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of their interests. It is also unlawful for an employer to offer a benefit to leave a trade union, treat you unfairly because you are in a trade union, refuse to employ or dismiss your employment for being part of a trade union.</p> <p>Your procurement and contract processes should ensure that suppliers comply. You may wish to engage local trade unions in raising awareness of the freedom to join a trade union and the benefits of doing so.</p> <p>Trade unions in the workplace help bring about change through negotiation and also offer their members advice, support and representation if they are having a problem with their employer.</p>	Karen Middlebrook / Sam Barstow	Update Required	30/06/2019	31/01/2019 - Work ongoing to streamline standard wording around Safeguarding within the Council's template tender documentation. Consideration to be given to how we include this detail within this section.
5	<p>Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery</p> <p>Councils have whistle-blowing policies, and these can be modified and publicised to ensure that staff know they can report concerns of modern slavery through this mechanism as well.</p>	Karen Middlebrook / Sam Barstow	Complete	01/10/2018	13/09/18 -The Whistleblowing policy has been updated to include explicit reference to modern slavery. The Council's whistleblowing and serious misconduct policy is publicised and available on the internet and clear reference is made within the policy to modern slavery.
6	<p>Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery</p> <p>In contracts, you can require suppliers to adopt a whistle-blowing policy so there are mechanisms there for staff to raise concerns. Whistle-blowers are protected by law and shouldn't be treated unfairly or lose their job because they have raised concerns that are in the public interest.</p>	Karen Middlebrook / Sam Barstow	Update Required	30/06/2019	31/01/2019 - Work ongoing to streamline standard wording around Safeguarding within the Councils template tender documentation. Consideration to be given to how we include this detail within this section.
7	<p>Review its contractual spending regularly to identify any potential issues with modern slavery.</p> <p>Your Council may already have boards or audit that review spending, and modern slavery should be added to one of the issues for them to be aware of. Are you contracting in high-risk sectors such food processing, fishing, agriculture, construction, domestic and care workers and car washes?</p>	Karen Middlebrook / Sam Barstow	Complete	Nov-18	<p>01/06/18 - The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act. The use of this tool has identified some suppliers, where direct engagement is now taking place through the Contract Managers within service areas to put them in a compliant manner.</p> <p>The Council's Modern Slavery Lead is a member of the Council's Commissioning Board and guidance has been developed for Commissioning Officers or those with relevant responsibilities.</p> <p>01/11/18 - Non compliant supplier identified - lack of MS statement</p> <p>01/01/19 - Non compliant list reviewed to ensure current contractor targeted of 17, 8 are current suppliers</p> <p>29/01/19 - Draft email for non-compliant companies agreed</p> <p>31/1/19 - sent to relevant contract managers</p> <p>08/02/19 - Various letters issued to supplier</p> <p>27/03/19 - Further chaser to final non-compliant supplier</p> <p>11/04/19 - Review of compliant supplier. 7 of the 8 have now demonstrated compliance following contact.</p> <p>20/05/19 - Review of compliant supplier. All 8 have now demonstrated compliance.</p>

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8	Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	Karen Middlebrook / Sam Barstow	Complete	Jan-19	04/03/19 - The Council has made systematic contact with non-compliant companies as identified through TISC-report. In many cases companies are found to be compliant however publications are not linked or verified so work is ongoing to support suppliers. 10/04/19 - Work around initial compliance is nearing completion. Officers will seek to make contact with companies in order to request they link their business with TISC report to ensure stronger compliance within their own supply chains.
9	Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.	Sam Barstow	Complete	Sep-18	A system is now in place to support referrals regarding companies of concern.
10	Report publicly on the implementation of this policy annually	Sam Barstow	Complete	Sep-18	Arrangements have been made for a report to Cabinet in June 2019 and then shifting to April thereafter.