**Test Valley Borough Council – Modern Slavery Transparency Statement**

Introduction

Test Valley Borough Council is committed to reducing modern slavery and aims to reduce the impact on people in the borough.

This statement sets out Test Valley Borough Council’s actions to understand 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 in its own business and its supply chains.

The council recognises its responsibility to notify the Secretary of State of suspected victims of human trafficking as introduced by Section 52 of the Modern Slavery Act 2015, as well as its general responsibility to take a strong approach to any allegations of modern slavery and human trafficking.

**What is modern slavery?**

Modern slavery encompasses human trafficking, slavery, servitude and forced labour and can include:

* sexual exploitation;
* labour exploitation;
* forced criminality;
* organ harvesting;
* domestic servitude;
* debt bondage.

Anyone can become a victim of modern slavery, with particularly vulnerable groups including:

* unaccompanied, internally displaced children;
* children accompanied by an adult who is not their relative or legal guardian;
* young girls and women;
* former victims of modern slavery or trafficking.

# Partnerships

The Council works in partnership with a wide number of agencies in order to combat modern slavery, including:

* Test Valley (Community Safety) Partnership;
* Hampshire Constabulary;
* Hampshire, Portsmouth, Southampton and Isle of Wight Modern Slavery Partnership.

The Hampshire and Isle of Wight Modern Slavery Partnership’s main objectives include:

* to raise awareness of modern slavery;
* to combat modern slavery by working in partnership;
* to identify and support victims of modern slavery; and
* to pursue perpetrators of modern slavery.

The Hampshire, Portsmouth, Southampton and Isle of Wight Modern Slavery Partnership provides guidance, training and best practice to partners across the county, ensuring all organisations are equipped to tackle this issue.

At a local level Test Valley Borough Council work with Hampshire Constabulary to identify and manage any victims or perpetrators of modern slavery. Test Valley Partnership operate under the Crime and Disorder Act 1998 and the duty to prevent crime and disorder, which includes modern slavery and trafficking.

# Policies

The 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.

#  Safeguarding

The council is committed to safeguarding the welfare of children and vulnerable adults. It has a comprehensive Safeguarding Children and Adults Policy, which all staff and councillors are expected to read and adhere to. The council carries out regular safeguarding training for all staff, has safeguarding leads within departments and participates in multi-agency partnerships to protect and safeguard people.

#  Recruitment

TVBC has a robust and transparent recruitment and selection policy and procedure, designed to recruit staff in a fair and consistent way that supports equality of opportunity, and which seeks to ensure that all new workers that are recruited into the council are subject to requisite pre-employment checks.

Any offer of employment is subject to ensuring that all new employees are able to confirm their identify, qualifications and are eligible to work in the United Kingdom. All offers are also made subject to medical clearance and the receipt of two satisfactory employment references. The Council safeguards agency workers by ensuring agencies used are reputable and have appropriate policies in place to safeguard workers, including a ‘framework agreement for operational temporary staff’

#  Pay

The Council operates a job evaluation scheme to ensure employees are paid fairly and equitably, taking into account The Equality Act 2010 and the National Joint Council for Local Government Services. The Council’s pay policy is based on fairness, affordability, consistency, flexibility, market rates and to encourage and reward achievement. TVBC does generally meet the recommended pay limits under the ‘Real Living Wage’.

The Council is committed to ensuring that its pay strategy is legally compliant, transparent and easily understood, so enabling the organisation to attract, retain and develop a skilled and flexible workforce.

#  Employee Code of Conduct

The Council’s Employee Code of Conduct makes clear to employees the professional actions and ethical behaviours expected of them when working for, and representing the Council on official business. It promotes a high standard of conduct based around honesty, professionalism, conscientiousness, accountability and respect, with the aim of maintaining public confidence in services provided, with any breaches thoroughly investigated.

The Council also has a set of Values which all employees are required to comply with, based around Ambition, Integrity, Empowerment, Inclusion and Accountability. These are outlined in Appendix A, the TVBC ‘Values Tree’.

#  Whistleblowing

The Whistleblowing policy forms part of the Council’s corporate governance arrangements to ensure that employees are confident in the reporting and investigation of malpractice including fraud, corruption, and unethical conduct.

The Council encourages staff, contractors and elected Members who have serious concerns about any aspect of the Council’s activities, to come forward and voice those concerns. This includes any circumstances which may give rise to an enhanced risk of slavery, social exploitation or human trafficking. The Council is committed to ensuring that whistle-blowers will suffer no recrimination or victimisation as a result of raising a concern about malpractice.

#  Members Code of Conduct

The Members Code of Conduct emphasises Members’ responsibilities with regard to dealing with residents and all members of the community in a fair manner, putting the public interest first.

** Equality and diversity**

The Council is committed to equality of opportunity in our approach to service delivery, employment and community leadership, and is an integral part of its business processes. We are also committed to identifying, understanding and eliminating all barriers that prevent access to services, information and employment by people with one or more protected characteristic.

# Supply Chains

It is a priority for the Council to ensure ethical trading, responsible sourcing and prevention of modern slavery and human trafficking throughout its supply chains. In all procurement activity the Council aims to be consistent with the highest standards of integrity and ensure fairness in allocating contracts. Equality and diversity, social responsibility and safety are important criteria in the provision of goods and services procured.

The council is committed to undertaking due diligence to ensure that people who provide products and services used by the Council are treated fairly, their fundamental human rights protected and respected and suppliers for contracts which may be impacted by safeguarding issues.

The process addresses the requirements under Modern Slavery Act 2015 related to safeguarding for contracts, where the subject could be impacted by safeguarding issues, via standard questions which are required for high value contracts: -

* Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?
* If you have answered yes to question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?

The council procures goods, services and works from various suppliers which are governed by the Council’s Contract Standing Orders and related Terms and Conditions. The council is also aligned to integrating the policies of the National Procurement Strategy for Local Government in England 2018.

Council suppliers are required to abide by all employment legislation, regulation and codified guidance. Specifically Key contractors must have safeguarding policies, procedures and training in place.

In addition to complying with the required statutory standards for safeguarding and modern slavery, the council may impose additional, specialist safeguarding clauses in contracts where it is deemed relevant.

Should the council have serious concerns around a supplier’s policies and the safety of those working for them, this should be immediately referred to the council’s procurement officer.

Any violations or safety concerns will be reported to the appropriate authorities including:

* Hampshire Constabulary -<https://www.hampshire.police.uk/>
* Hampshire County Council Children/Adults Services - <https://www.hants.gov.uk/socialcareandhealth>
* The Home Office -<https://www.gov.uk/government/collections/modern-slavery>
* Hampshire and Isle of Wight Modern Slavery Partnership - <http://www.modernslaverypartnership.org.uk/>
* Banardos -<https://www.barnardos.org.uk/>

# Training

All council staff must attend mandatory face to face Safeguarding Training as part of their initial induction programme, and all staff are required to complete an e-learning package on safeguarding children and vulnerable adults every three years. All staff are also encouraged to familiarise themselves with the Safeguarding Policy itself, discussing any concerns with Safeguarding leads. Policies and details of Safeguarding leads can be accessed in the Council’s intranet, Trout Face.

Councillors are also offered face-to-face training and access the e-learning package to assist them in carrying out their duties both within the Council, as well as when out working in the community for their constituents.

# Review

Pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, the Council is required to produce a slavery statement each financial year.

This Transparency Statement will be reviewed and updated regularly, and in the event of legislative or policy changes by the Council’s Communities Team, in consultation with the Community Safety and Safeguarding Leads, Procurement Officer, HR and Legal & Democratic Teams, under the direction of the Portfolio Holder for Leisure and Communities.

# Reporting of concerns

All Modern Slavery concerns raised by council staff, councillors and volunteers will initially be reported via the Council’s internal Safeguarding Report process. When applicable, the Safeguarding Officer may then decide to report to, or take advice from, the HPSIOW Modern Slavery Partnership or MASH, on to the National Referral Mechanism.

The advice to residents and communities if they are affected by slavery, or suspect someone is at risk, is to:

* call 999 if it is an emergency
* call 101 for non-emergencies
* call Crimestoppers anonymously on 0800 555 111
* call the Modern Slavery Helpline on 0800 012 1700
* report online via the Modern Slavery Helpline website:

<https://www.modernslaveryhelpline.org/report>