

Modern Slavery Act 2015 - Sutton Council Transparency Statement 2019/20

This statement sets out Sutton 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 in its own business, and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty as a Borough 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.

The Council is 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.

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.

This statement has been approved by Helen Bailey, Chief Executive under delegated Authority and is reviewed annually as required by legislation.

Helen Bailey Chief Executive,
Sutton Council

Structure and Business

Sutton Council is a local authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. Its [structure](#) is shown here.

The Council's five year corporate plan, [Ambitious for Sutton 2018-23](#) includes supporting our residents, businesses and staff.

Supply Chains

From April 2016, all tender processes will require bidders to provide confirmation that they are compliant with the Act. In addition, before being added to the finance system, all new suppliers will have provided confirmation of compliance.

The Council procures goods and services from various suppliers and this is governed by our [Commissioning Framework](#). 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.

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 embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of vulnerable children and 'adults at risk'. 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.

Recruitment - The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which 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 a National Framework Agreement to supply temporary and interim staff. Suppliers listed on the Framework have had their practices verified to ensure that

they are complying with good practice and employment legislation.

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 this will be extended to relevant contracted staff as those contracts 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. Section Five of the Council's Constitution sets out further details in relation to Member Conduct and the Standards complaints process.

Councillors' Declarations of Interests - The Council requires all Councillors to record and declare pecuniary and other interests.

Partnerships

Modern slavery and the victims involved are diverse and can include those exploited through county lines, forced labour and prostitution. When reflecting on Sutton's picture, modern slavery and human trafficking do not appear to be prominent issues however it is clear such issues are underreported across London but continues to grow month on month.

The Police South Area Basic Command Unit (BCU) which consists of the boroughs of Sutton, Croydon and Bromley are leading across the Metropolitan Police Service and are the first to introduce a dedicated Vulnerability Team as of September 2019 who will be dedicated in their response to such offences.

The South Area BCU Vulnerability Team will work closely with a range of partners including the London Borough of Sutton to identify and safeguard the victims of such offences.

Training

Staff - The Council has a programme of mandatory training that all employees must complete. The corporate induction programme provides an overview of safeguarding responsibilities for all staff. Further safeguarding training is also available for staff who will regularly come into contact with vulnerable residents e.g. Social Works, Benefits Assessors and Housing Officers.

Councillors' Training - Induction material on Equality and Diversity and Safeguarding is provided to councillors on election, and face to face training is available on an annual basis.