

Anti-Slavery and Human Trafficking Policy

24/07/2023

1. Document Control

Version Control

Issue Number	Issue Author	Issue Date	Reason for Issue
0.1	M Elsom	01/06/2020	Initial draft for review
1.1	M Elsom	12/06/2023	Amended including feedback from consultees

Approval Control

Issue Number	Approval Authority	Name	Approval Date	Due for Review
1.0	PSPS Board	PSPS Board	June 2020	June 2023
2.0	PSPS Board	PSPS Board	24/07/2023	July 2026

Policy Governance

Responsible	PSPS Chief Executive
Accountable	PSPS Board of Directors
Consulted	PSPS Board of Directors, Chief Executive, Head of HR and OD, Head of Procurement and Contracts, Chief Finance Officer
Informed	PSPS Board, PSPS Employees

2. Policy Overview

Policy Aim

To define PSPS' approach to preventing slavery and human trafficking.

Introduction – Modern Slavery Act 2015

Section 54 of the Modern Slavery Act 2015 requires every organisation with a turnover of £36m or more to produce a slavery and human trafficking statement each financial year.

PSPS' turnover is below this threshold and as such an annual statement is not legally required of the company.

The intention of the Act is to ensure that slavery and human trafficking are not taking part in supply chains. This does not mean that organisations must guarantee that the entire supply chain is slavery free, but it does require organisations to set out the steps taken in relation to any part of the supply chain (that is, organisations should capture all the actions it has taken).

Policy Commitment

Public Sector Partnership Services is committed to ensuring that slavery and human trafficking is not taking part in any of its supply chains, and this policy sets out the Company's approach to meeting this commitment.

This policy applies to all persons working for PSPS or on the Company's behalf in any capacity, including employees at all levels, Board Directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

PSPS Ltd strictly prohibits the use of modern slavery and human trafficking in its operations and supply chains. The Company is committed to implementing systems and controls aimed at ensuring modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour, and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Responsibilities

Role	Responsibility
Modern Slavery Policy	<p>The Company Board are accountable for this Policy.</p> <p>The Chief Executive is responsible for this Policy.</p>
Developing and Updating the Statement	<p>The Head of Corporate Services, in conjunction with the Safeguarding Officer and HR, monitors and updates the Modern Slavery Statement in line with national guidelines and organisation development priorities.</p>
Risk Assessments and Prevention	<p>The Head of Corporate Services, in conjunction with the Safeguarding Officer, is responsible for:</p> <ul style="list-style-type: none"> • working with Heads of Department to identify high risk activities and appropriate actions relating to modern slavery and human trafficking. • ensuring appropriate information and training is available for staff. • ensuring that this policy and resulting actions are embedded within the Company's Policies and Plans.
Early Identification and Notification	<p>Heads of Department will notify any suspected modern slavery concerns encountered in the course of their work, to the Head of Corporate Services or the Safeguarding Officer. They will ensure that they and their staff complete all relevant training.</p>
Investigations	<p>Upon notification by the Chief Executive, the Head of Corporate Services, and/or the Safeguarding Officer, HR will appoint an appropriate investigating officer to establish the facts and assess whether a modern slavery incident has occurred within PSPS. For supply chain concerns, a colleague in Procurement and Contracts will either lead the investigation or closely support any appointed investigating officer.</p>
Identifying and Reporting Concerns	<p>All staff and Board Directors are required to share concerns in order that they can be investigated, and action taken as required.</p>

3. Scope

The following policies and procedures are key in meeting the requirements of the Modern Slavery Act:

Financial Regulations

The company's constitutional arrangements are regularly reviewed and updated to take account of legislative requirements and best practice. Financial and Contract Procedure Rules are clearly articulated to support best practice and prevent financial abuse and ensure transparency and probity in all matters.

People Plan

Our People Plan, supported by other company policies in relation to employment and practices, outlines PSPS' commitment to enabling a positive culture, rewarding and recognising people, raising skills and standards, attracting and retaining brilliance, and supporting the health and wellbeing of employees.

HR / Employment Policies and Practices

PSPS is committed to robust and ongoing policy reviews, with input from HR Advisors, Senior Managers, Team Leaders, Employees, and Unions, ensuring that they comply with national legislation and guidance. This includes Recruitment and Whistleblowing.

Recruitment

The company's recruitment processes are transparent and reviewed regularly. Robust procedures are in place for vetting new employees and confirming their identities and qualifications and ensuring that they are paid directly into an appropriate, personal bank account.

Agency Workers

PSPS uses only reputable employment agencies to source labour and verifies the practices of any new agency before accepting workers from them, including ensuring that agencies undertake appropriate vetting checks before supplying individuals to work.

Pay

The company ensures that all employees are paid fairly and equitably.

Employee Code of Conduct

The Employee Code of Conduct Policy is reviewed and updated regularly. The Code makes clear to employees the actions and behaviours expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour. Breaches are investigated and may lead to disciplinary action or, in extreme cases, dismissal.

Board Director Code of Conduct

All Board Directors are expected to demonstrate the highest standards of conduct and behavior and legal responsibilities and duties as set out in the Companies Act 2006. Any alleged breaches would be investigated by an external third party, such as Solicitors or Auditors. Each issue would be considered on a case-by-case basis.

Board Directors' Declarations of Interests

All Board Directors must record and declare personal and prejudicial interests on a regular basis. Compliance is undertaken on an annual basis as part of internal audit arrangements.

Whistleblowing

The Company encourages all employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the company. PSPS' whistleblowing Policy aims to make it easy for employees to make disclosures, without fear of retaliation.

Safeguarding Policy

PSPS 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 company has a comprehensive policy which all staff and board directors are expected to read and work within, which includes information relating to Modern Slavery and Human Trafficking. The policy is reviewed regularly to ensure it is robust and clearly provides details of reporting mechanisms, internally and externally, regarding suspected or confirmed instances of Modern Slavery.

Training

The company has a programme of induction and ongoing mandatory training that all employees must complete, including Safeguarding Awareness Training. This enables all employees including those in community facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

Training on Trafficking, Exploitation and Modern Slavery is included in the training programme to be undertaken by all relevant employees.

Contractors and Service Providers

PSPS is committed to ensuring that its contractors adhere to the highest standards of ethics. The Council expects its key contractors to have safeguarding policies, procedures and training in place.

High Risk Areas

The nature of PSPS' operation means it is exposed only to very low risk with regards to Modern Slavery and Human Trafficking.

4. Commitment Statement

At PSPS we expect everyone working with us, or on our behalf, to support and uphold the following measures to safeguard against modern slavery:

- A zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to demonstrate their compliance with the Modern Slavery Act 2015.
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to comply with the Modern Slavery Act 2015.
 - A Modern Slavery clause as standard in our terms and conditions requiring a supplier, and/or any of its officers, employees, agents, or sub-contractors, to comply with the Modern Slavery Act 2015.
 - To meet suppliers at their premises, for key contracts and where relevant, to allow for a full assessment of the Company's culture and operating practice.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with the Modern Slavery Act 2015.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminate such relationships.

5. Review

It is recommended that this Policy be reviewed at least once every 3 years.