



Committee and Date

West Mercia Energy Joint  
Committee

25<sup>th</sup> September 2017

Item

9

Public

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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### 1. Summary

- 1.1 This report is to present to the Joint Committee the Anti-Slavery and Human Trafficking Policy for WME for approval.

### 2. Recommendations

- 2.1 The Joint Committee are asked to approve the WME Anti-Slavery and Human Trafficking Policy.

## REPORT

### 3. Risk Assessment and Opportunities Appraisal

- 3.1 The recommendations contained in this report are compatible with the provisions of the Human Rights Act 1998.
- 3.2 There are no direct environmental, equalities or climate change consequences arising from this report.

### 4. Financial Implications

- 4.1 There are no direct financial implications arising from this report.

## 5. Background

- 5.1 The Modern Slavery Act 2015 is aimed at combating crimes of slavery and human trafficking and recognises that businesses have a role to play in tackling these crimes. Section 54 of the Act requires any commercial organisation with a turnover of over £36m p.a. to publish an annual statement for each financial year to detail what steps the organisation has taken to ensure that human trafficking is not taking place in any of its supply chains or its business (this does not mean the organisation must guarantee the entire supply chain is slavery free); or make a declaration that no such steps have been taken. The aim is to ensure that businesses are transparent about what they are doing to tackle modern slavery and human trafficking.
- 5.2 Public bodies have been checking their supplier's compliance with the Act via their procurement processes and as a result, over recent months WME, as a supplier have received requests from several customers for a copy of our Anti-Slavery and Trafficking Statement as part of their procurement checks. Whilst it was initially ambiguous as to whether the Act included Local Government entities as "commercial organisations" required to publish the Section 54 statement, subsequent Home Office Guidance and proposed additional legislation (not yet in force) have sought to clarify that the intention is for public bodies to be caught by Section 54, and, in any event, it is considered good practice for Local Government entities to comply with the requirement.
- 5.3 The Act does not mandate what a slavery and human trafficking statement must contain, or require that it take any particular form. As guidance only, the Act sets out the following information that may be included in a slavery and human trafficking statement. That is, information about:
- The organisation's structure, its business and its supply chains.
  - Its policies in relation to modern slavery.
  - 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 it has taken to assess and manage that risk.
  - Its effectiveness in ensuring slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
  - The training about slavery and human trafficking available to its staff.
- Any statement will, of course need to be tailored to the specifics of the business and the risk profiles of its supply chains.
- 5.4 A Section 54 Statement must be published at the end of the relevant financial year and specify the steps taken within the previous financial year to ensure that no slavery or human trafficking is taking place in any part of its business or in its supply chains. Organisations are encouraged to do this within 6 months of the end of the relevant financial year. At the end of the current financial year, WME will document in a Section 54 Statement for the financial year 2017/2018, the steps that it has taken, such as the adoption of the Policy recommended in this report. This Statement will be brought to the Joint Committee for approval prior to publication on WME's website.

- 5.5 To assist in demonstrating to our Customers WME’s commitment to improving our practices to combat the risk of slavery and human trafficking in our business and our supply chains, the Anti-Slavery and Human Trafficking Policy will be published on our website. The policy is designed to assist WME in complying with the Act and to address issues of slavery and human trafficking in its business and supply chains and embed processes and guidance for employees into the business. WME can therefore demonstrate a proactive approach to the matter in the conduct of its business, independently of the Member Authorities individual approaches.
- 5.6 WME will continue to review its policies, procedures and approach to supply chain transparency and modern slavery, including the ongoing review of procurement procedures relevant to modern slavery, and develop, if not already in place, appropriate procedures taking into account any risks areas within the business and supply chains. WME is already taking steps to identify our supplier’s compliance with the Modern Slavery Act 2015 (as it applies to them) and obtain their Section 54 Statements in order to provide reassurance to those Customers who are carrying out due diligence on their own supply chains, and this will be supplemented in due course by the publication of WME’s own Section 54 Statement for the current financial year.

**List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)**

None

**Member**

Councillor P Price of Herefordshire Council (chair of the Joint Committee)

**Appendices**

Appendix 1 - WME Anti-Slavery and Human Trafficking Policy