

# **Modern Slavery Commitments**

**The City of Edinburgh Council**

**September 2018**

# Modern Slavery Commitments

## Our commitment

The City of Edinburgh Council (the Council) commits to work with fairness and integrity in all aspects of commercial activity and as such has a zero-tolerance approach to slavery and human trafficking. Our Modern Slavery Commitments (the Commitments) set out what we the Council commits to do to combat and prevent human trafficking and slavery in the Council's corporate activities.

The objective of the Commitments is to confirm the effective steps the Council is taking to tackle modern slavery in its supply chain.

The Leader, Depute Leader, Councillors, Executive Directors, Heads of Service and all Staff pledge to adhere to these Commitments.

**Andrew Kerr, Chief Executive**  
**September 2018**

# Modern Slavery Commitment 1

## Training

The City of Edinburgh Council (“the Council”) will train its corporate procurement team to understand modern slavery.

The Council recognises its duty to train relevant staff and raise awareness of modern slavery and acknowledges that staff understanding of the issues is key to the successful implementation of the Commitments. The Council therefore commits to train its Commercial and Procurement Services team to ensure staff understand the issues, the risks and appropriate action.

## **Modern Slavery Commitment 2**

### **Modern Slavery Act compliance**

The City of Edinburgh Council will 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.

The Council will require contractors to comply with all relevant provisions of the Modern Slavery Act 2015 including the provisions promoting transparency. Section 54 of the Modern Slavery Act relates to transparency in supply chains and requires certain businesses to produce an annual statement on the steps they are taking to prevent modern slavery in their own business and in their supply chain. The Council will seek compliance with the Act from its contractors.

## **Modern Slavery Commitment 3**

### **Abnormally Low Tenders**

The City of Edinburgh Council will challenge any tenders which the Council believes to be abnormally low which should help to highlight contractors practicing modern slavery.

Where the Council considers a tender submitted is abnormally low then under Regulation 69 of the Public Contracts (Scotland) Regulation 2015 the Council must require a tenderer to explain the cost element of their tender. Abnormally low tenders may indicate exploitation of workers and the Council will continue to challenge such procurement submissions.

## **Modern Slavery Commitment 4**

### **Membership of Trade Unions**

The City of Edinburgh Council will 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.

All workers in the UK have a right to join a trade union and it is unlawful for employers to treat trade union members unfavourably because of their trade union membership. The Council will continue to highlight this to its contractors.

# **Modern Slavery Commitment 5**

## **Whistleblowing System**

The City of Edinburgh Council will publicise its Multi-Agency Human Trafficking and Exploitation Protocol

To promote compliance with modern slavery legislation the Council has a Multi-Agency Human Trafficking and Exploitation Protocol. This Protocol outlines for staff the actions to be taken when there is a concern that a person is, or appears to be, a victim of an offence of human trafficking, modern slavery and / or exploitation.

## **Modern Slavery Commitment 6**

### **Encouraging Contractors to adopt a Whistleblowing Policy**

The City of Edinburgh Council will positively encourage its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.

The Council strives to uphold the highest standard of conduct and ethics and positively encourages its contractors to do the same. The Council therefore positively encourages its contractors to adopt a whistle-blowing policy to provide a mechanism for modern slavery issues to be flagged whilst ensuring whistleblowers are protected and supported.



## **Modern Slavery Commitment 7**

### **Contractual Review**

The City of Edinburgh Council will regularly review its contractual agreements to identify any potential issues with modern slavery.

As part of its continued contract management and monitoring process, the Council will review its contractual agreements and spend on high risk sectors to identify any potential issues with modern slavery and take immediate appropriate action.

## **Modern Slavery Commitment 8 Notification to Contractors**

The City of Edinburgh Council will, where appropriate, highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.

The Council will, as a way of tackling the risk of modern slavery direct its contractors to Scottish Government approved guidance and support.

## **Modern Slavery Commitment 9 Referral**

The City of Edinburgh Council will, where appropriate, refer for investigation contractors identified as a cause for concern regarding modern slavery.

Where the Council identifies a contractor / contractors as a cause for concern regarding modern slavery, the Council will follow the reporting procedures as outlined in its Multi-Agency Human Trafficking and Exploitation Protocol

# **Modern Slavery Commitment 10**

## **Reporting to Committee**

The City of Edinburgh Council will report to Committee on the implementation of this policy annually.

To ensure the Council remains vigilant against modern slavery, to ensure transparency, and to ensure appropriate action is taken and lessons learned, the Council will report to Committee on the implementation of the Commitments.

# **Modern Slavery Commitment 11**

## **Cooperation with Agencies**

The City of Edinburgh Council will encourage close cooperation with Police Scotland and other relevant Scottish and UK Government Agencies.

The Council acknowledges the importance of working with partners to tackle modern slavery and commits to working with Police Scotland and governmental agencies as appropriate. The Council will continue to participate in the Public Protection Framework's Human Trafficking and Exploitation sub-group.

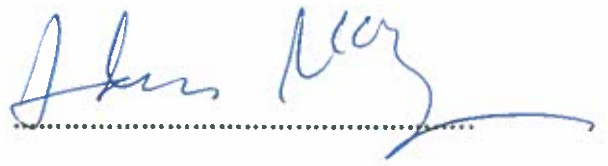
## **Modern Slavery Commitment 12**

### **Notification to Committee**

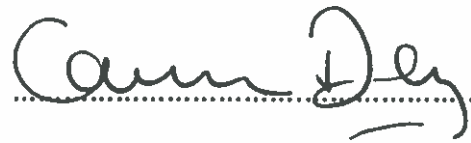
The Convenor and Vice Convenor of the Governance, Risk, and Best Value Committee will receive reports on cases identified in the procurement process and the actions taken, at the appropriate time.

Reports will be shared with the Convenor and Vice Convenor of the Governance, Risk, and Best Value Committee containing details of cases concerning modern slavery identified in the procurement process and the actions taken. The information will be shared at the appropriate time with reference to obligations re confidentiality in live criminal investigations and the Council's requirements under relevant legislation.

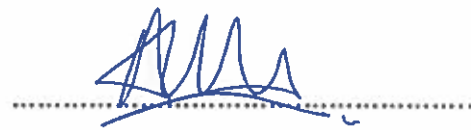
Council Leader, Councillor Adam McVey

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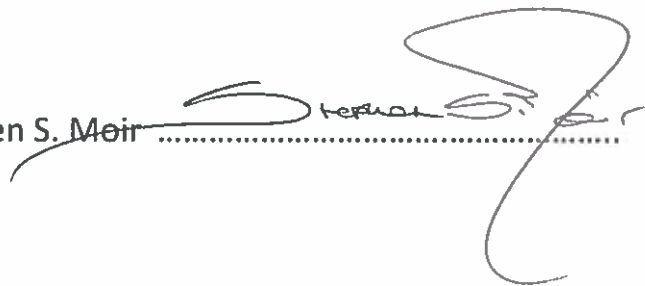
Council Depute Leader, Councillor Cammy Day

A handwritten signature in blue ink, appearing to read "Cammy Day", written over a horizontal dotted line.

Chief Executive, Andrew Kerr

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Executive Director of Resources, Stephen S. Moir

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