

LGA Transparency Statement on Modern Slavery and Human Trafficking

Date created: January 2019
Responsible Officer: HR & Payroll Officer

Date of review/revision	Amendments made

Date for next review: September 2019

This statement applies to all employees of the Local Government Association and Improvement & Development Agency for Local Government.

This statement sets out the Local Government Association's (LGA) actions in working to understand all potential modern slavery risks related to its organisation and to put in place steps that are aimed at ensuring that there is no modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st April 2018 to 31 March 2019.

The LGA recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking. The organisation supports the Modern Slavery Act 2015 and opposes modern slavery and human trafficking. It is committed to ensuring that such practices have no place within its supply chain or other activities.

In addition to the LGA's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of modern slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

In its capacity to provide guidance to the local government sector the LGA worked closely with the Anti-Slavery Commission to produce its [Tackling modern slavery: a council guide](#) and also produced guidance to help councils produce their own transparency statements: [Modern Slavery: Transparency in supply chains statements](#). It also hosts a portal of for council transparency statements which reside a on a dedicated Modern Slavery webpage <https://www.local.gov.uk/topics/community-safety/modern-slavery>.

The LGA Chairman, Lord Porter, also sits on the Prime Minister's Tackling Modern Slavery and People Trafficking Implementation Taskforce.

For the purposes of this document we have followed the Government's six areas of activity set out in; [Transparency in supply chains: a practical guide](#)

Definition of Modern Slavery

The term 'Modern Slavery' captures a whole range of types of exploitation, many of which occur together. These are defined by [Unseen UK](#) to include but are not limited to:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties.
- **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars).
- **Criminal exploitation:** This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- **Human trafficking:** this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

- **Other forms of exploitation:** organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Organisational structure and supply chains

This statement covers the activities of the Local Government Association and the Improvement and Development Agency (and for the purposes of this document be referred to as the 'LGA'). The LGA operates in the United Kingdom, with a small presence in Belgium, and works on behalf of councils to ensure local government has a strong, credible voice with national government. We are the national voice of local government, working with councils to support, promote and improve local government. The LGA is a membership organisation with 415 authority members in 2018/19 - <https://www.local.gov.uk/about/who-we-are-and-what-we-do>

Relevant Organisational policies

Within our own business

We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business. These include:

- **Whistleblowing policy:** The organisation encourages all its employees and those employed on a contract for service or through an agency to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. <https://local.gov.uk/sites/default/files/documents/whistleblowing-policy-pdf-7cd.pdf>
- **Recruitment/Agency workers guidance documents:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Robust recruitment procedure:** For both substantive staff and agency workers. This process is compliant with UK employment legislation and includes a number of pre-employment checks, for example "right to work" document checks, obtaining references and understanding any employment gaps. DBS checks are undertaken for relevant posts.
- **Awareness-raising:** The organisation has raised awareness of modern slavery issues within the organisation by circulating the e-Learning module on Modern Slavery to all LGA employees, covering the basic principles of the Modern Slavery Act 2015

For our supply chain

- **Procurement policy:** The policy sets out the LGA's overarching approach to its procurement of goods and services. Accompanying documents include a Suitability Assessment Questionnaire for suppliers to complete in OJEU procurements.

In the standard selection questionnaire (SSQ) for OJEU procurements, used to shortlist suppliers for tender when the restricted process is adopted, we ask organisations whether they are required to produce a Modern Slavery Statement and provide a link to the statement on their website if they are in-scope.

For our members

As referenced above the LGA works to provide guidance to the local government sector and has produced its [Tackling modern slavery: a council guide](#) and also produced guidance to help councils produce their own transparency statements: [Modern Slavery: Transparency in supply chains statements](#) It also hosts a portal of for council transparency statements which reside on a dedicated Modern Slavery webpage <https://www.local.gov.uk/topics/community-safety/modern-slavery>.

Assessing and managing risk

Whilst the LGA has produced guidance on Modern Slavery in the supply chain for councils our own spend categories and supply chains are much smaller and distinctly different to the councils we advise.

As an organisation a large portion of our non-core staff expenditure goes on bought in services from small to medium sized companies (SME) and professional organisations. None of these services are flagged as high risk categories in any of the literature or guidance.

We additionally spend a portion of our budget on the day-to-day costs of running a business and carrying out our support offer around the country, these include facilities management, catering, security and cleaning. We are also in the process of refurbishing one of our London offices.

Following the guidance we have adopted a risk-based approach to supply chain assessment to ensure we focus attention on the perceived higher risk categories in our supply chain. We have identified the features which match the high risk industries in our supply chain:

- Complex employment relationships; a reliance on agency, outsourced or subcontracted workers
- Reliance upon low-skilled or unskilled labour;
- High numbers of temporary, seasonal, or agency workers;
- Dangerous or physically demanding work

Due Diligence

Human rights due diligence is not about the risk to the organisation, it is about the risk to the people involved in providing services and producing goods in the supply chain.

The most effective way to apply limited resources to due diligence and to ensure action is targeted at those spend categories taking into consideration; the industry, its geographical source and the nature of the supplier relationship. To this end we decided to focus on our major suppliers of:

- Construction (refurbishment of London office)
- Catering
- Facilities Management including maintenance and cleaning

Supplier Assessment

The Modern Slavery Unit (MSU) in the Home Office has devised a web-based Supplier Risk Assessment Tool to support public bodies to assess their own supply base for modern slavery risks. The tool asks suppliers a number of questions about their business and the processes they have in place to manage modern slavery risks in their supply chains. It provides automated recommendations on how to improve their anti-modern slavery processes and flags up any issues to the recipient.

As a means of carrying out due diligence on the key suppliers identified in the higher risk categories the LGA asked a handful of suppliers to volunteer to be assessed using the Modern Slavery Assessment Tool (MSAT).

Responding to an incident of modern slavery

Due diligence is the process of identifying human rights risks in an organisation's supply chain, preventing them from occurring or mitigating those risks and reducing their impact. It includes planning remedial or corrective action if such an incident is discovered.

Going beyond the LGA's legal 'duty to notify' any incidents of Modern Slavery, the LGA is committed to following government guidance, wherever practicable:

- to engage and work with suppliers to mitigate any issues
- make staff aware of the Modern Slavery Helpline as their first port of call
- adopt an approach that would produce the safest outcome for the potential victims, using any leverage we may have as a public sector membership organisation.

Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that Modern Slavery is not taking place within our business or supply chains by:

- Investigating allegations or complaints, received from employees, the public, or law enforcement agencies regarding modern slavery and human trafficking.
- Requiring all staff working in supply chain management, procurement and HR to have completed training on modern slavery.
- Reviewing and evaluating high risk supply chains, periodically using the modern slavery assessment tool to monitor supply chains as part of on-going contract management activity throughout the life of the contract to measure progress.
- Updating our suite of contract clauses so they include provisions of the Modern Slavery Act in line with our pre-procurement clauses.

Training/Awareness

The LGA has raised awareness of modern slavery issues by circulating the e-Learning module on Modern Slavery to all LGA employees. This module covers the basic principles of the Modern Slavery Act 2015 and provides an overview on:

- the legislation and reference to Section 54 of the act (transparency in supply chains)
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline.

Aims for our continuous improvement

The LGA's focus for the next 12 months with regards to the Modern Slavery Act 2015 are as follows:

- To review and revise its suite of standard terms and condition templates for the procurement of goods and services to ensure appropriate contractual provisions are in place. These provisions will require suppliers to comply with the Modern Slavery Act 2015 and to have in place such policies and procedures and to take all necessary measures to ensure that nothing relating to dealings in respect of the LGA, or otherwise within a supplier's business and supply chain, involves slavery or human trafficking. Similar amendments to the LGA's standard purchase order terms will be implemented.
- To review the supplier selection processes to embed anti modern slavery and human trafficking criteria into the evaluation of potential suppliers (for example in Request for Proposal and Invitation to Tender documents) and requiring such organisations to provide evidence of appropriate policies and procedures. This will inform, on a case by case basis, the LGA's decision whether to engage further with potential suppliers of goods and service.

This statement was approved on 23 January 2019 by the LGA's Leadership Board. The board will review and update it annually.

A handwritten signature in black ink that reads "Mark Lloyd". The signature is written in a cursive style and is underlined.

Mark Lloyd
Chief Executive