

Co-operative Party Modern Slavery Charter

Contracts Team advice: 7 November 2018

Updated: March 2019

At the Cabinet Meeting on 18 September 2018, Cabinet noted and agreed a Modern Slavery motion referred from Council Assembly which called on Cabinet to adopt the Co-operative Party's Charter against modern slavery to ensure our procurement practices do not support slavery and to consider the wider impact of modern slavery on the borough and work to ensure that all forms of modern slavery are eliminated in Southwark.

Action 1: Formalise and publicise the adoption of this Charter

1. Approach the Co-op contact, Emma Hoddinott, <https://party.coop/local/councillors/modern-slavery-charter/#intro> to get a copy of the Charter Terms which can be personalised with the name of the council and signed on behalf of Cabinet (Corporate Governance and Ian Smith) **Corporate Governance has asked for a copy so it can be uploaded onto our website.**
2. Upload the signed charter to the Modern Slavery information on the Source and on the council's website (in Key Documents with the Anti Slavery and Human Trafficking Policy and Statement) (Corporate Governance and IT) **Waiting for response from Co-op**

Action 2: Implement the charter obligations

	Charter obligation	Responsibility	Actions & Current Position
1.	Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Procurement Advice Team	Incorporate training requirement into annual reviews and work plans for appropriate staff
2.	Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-	Contracts Team	Review existing templates for Modern Slavery clauses and termination provisions

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	compliance.		All current services and works contract templates and the Conditions of Grant Funding have been reviewed. The requirement to comply with MSA is already included in all services contracts and in the Conditions of Grant Funding. A specific termination provision is included within the higher value services contract, the lower value contracts rely on a general right to terminate for material breach. All works contracts are in the process of being updated and MSA compliance and a specific right to terminate will be included. This updating process is due to be completed by the end of March.
3.	Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	Contracts Team	<p>Build into tender evaluation documentation/guidance (contracts)</p> <p>Specific reference to MSA has been included in existing advice on the Source in relation to abnormally low tenders in EU procurement.</p> <p>The Source • Award Criteria</p> <p>Advice will also be included to clients in the guidance to be distributed relating to the updating of the works</p>

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		Procurement Advice Team	contracts advise clients (procurement)
4.	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.	Contracts Team	Build into terms and conditions Provision now included in our over EU services contract template, and will be included in all works template conditions and Conditions of Grant Funding. Contract condition felt disproportionate for lower value, under EU threshold services contracts where many consultants do not have any or limited employees.
5.	Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	Monitoring Officer	Whistleblowing policy, Modern Slavery Policy and Statement on the Source and website. Publicise in Director of Law and Democracy Bulletin To be actioned for next Bulletin
6.	Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.	Contracts Team	Build into template terms and conditions for services and works Provision now included in our over

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			EU services contract template and Conditions of Grant Funding, and will be included in all works template conditions. Contract condition felt disproportionate for lower value, under EU threshold services contracts where many consultants do not have any or limited employees.
7.	Review its contractual spending regularly to identify any potential issues with modern slavery.	Procurement Advice Team/Financial Governance – Jo Anson??	Put appropriate systems in place or use current transparency/contract register/SAP information
8.	Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	Ian Smith/Monitoring officer/procurement advice team?	Set up a system for contract officers to identify concerns, report them and then for suppliers to be notified and referred to relevant agencies
9.	Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.	Ian Smith/Monitoring officer/procurement advice team?	A continuation of the system set up under (8)
10.	Report publicly on the implementation of this policy annually.	Ian Smith	Set up timetable and standard report and process. Cabinet requires an annual report