

Ethical Employment Policy

On 27th November 2017 the Authority signed up to the Welsh Government's [Code of Practice Ethical Employment.pdf](#) [Code of Practice Ethical Employment in Supply Chains](#) to show our commitment to the development of more ethical supply chains in delivering our contracts. We appointed the Council's Leader, Cllr David Simpson, as our Anti-Slavery and Ethical Employment Champion in April 2018.

The Code covers the following employment issues:-

- ❖ Modern Slavery and Human rights abuses
- ❖ Blacklisting
- ❖ False self-employment
- ❖ Unfair use of umbrella schemes and zero hours contracts
- ❖ Paying the Living Wage

Our Action Plan [Code of Practice Commitment](#) was published in April 2018 and sets out the steps we will take to comply with the 12 commitments designed to eliminate modern slavery and support ethical employment practices in our supply chains. We will expect our suppliers to sign up to the Code.

The Welsh Government have produced an e-learning module on the [Wales Gov/Toolkit/Code of Practice Ethical Employment](#) and a suite of resource toolkits to support organisations in complying with the Code.

The Welsh Government have also produced an [animation](#) on the Code.

In 2018 the Procurement service ran two Awareness Raising Sessions for contract managers and will continue to run these sessions as required.

Modern Slavery and Human Rights Abuses

As part of the Local Government sector, the Authority recognises that it has a responsibility to take a robust approach to slavery and human trafficking [Modern-Slavery-Act 2015](#) was introduced to criminalise slavery, forced servitude and human trafficking in the UK, we expect our suppliers to acknowledge their responsibility, observe best practice and continue to seek improvements throughout their supply chains.

We have processes in place to support survivors of Modern Slavery.

Pembrokeshire County Council	Document Control no: 074
	Page 1 of 3
Ethical Employment Policy	Published: April 2019

- We will notify the Home Office of potential victims.
- As a First Responder under the Modern Slavery Act 2015, we will refer potential victims to the National Referral Mechanism, (NRM).
[duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery](#)
- We will refer all child victims to Independent Child Trafficking Advocates, (ICTAs).

We abide by policy and guidance statements by the **Mid and West Wales Safeguarding Board** <http://cysur.wales/home/modern-slavery/>

Employment Practices

The NJC 2019 Pay Agreement has brought local government employees in line with the National Living Wage (LW)¹ of £9.00 per hour. We will encourage our contractors to aspire to the LW.

We will ensure that false self-employment is not undertaken and that zero hours contracts are not used unfairly. We have agreed to the principles outlined in the [guidance-on-the-use-of-non-guaranteed-hour-arrangements-in-public-services.pdf](#) and regularly review the use of non-guaranteed hour's arrangements in the Authority.

We will mitigate any risk of unethical employment by regularly assessing the eligibility of all self-employed claims against HMRC guidelines and ensure that umbrella schemes and agencies are registered with appropriate regulation bodies

Our policies ensure that staff can freely join trade unions, we expect our contractors to ensure that Trade Union Representatives can access members and contracted workers and to expect any request for trade union recognition to be respected.

We have measures in place through our contract quality assurance teams to ensure that all outsourced services comply with the [2014 Code of Practice on Workforce Matters \(2-Tier Code\)](#) and that trade union recognition rights are transferred as a given under [TUPE 2006 Regulations](#). We recognise that we are expected to make an annual statement to the Welsh Government to that effect.

¹ Resolution Foundation livingwage.org.uk/calculation

Pembrokeshire County Council	Document Control no: 074
	Page 2 of 3
Ethical Employment Policy	Published: April 2019

We will where-ever possible directly engage with workers in our supply chain to identify and address issues of illegal or unethical employment practices including use of blacklisting. The Authority encourages all its employees, customers, contractors, consultants, casual, volunteers and agency workers to report any concerns related to the direct activities, or the supply chains of, the Authority through our [Whistleblowing Policy](#) this includes any circumstances that may give rise to an enhanced risk of slavery, human trafficking or unethical employment practices.

We will also refer to our [Code of Conduct](#) in procurement information and encourage all our contractors or partnership organisations to respect the Code.

The Authority's Procurement service will actively seek to identify high risk areas in existing contracts and we will include a copy of this Policy statement in all tenders to inform our supply chain.

We will produce and publish an annual written statement in line with commitment 11 of the Code which fulfils the requirements of Section 54 of the Modern Slavery Act 2015.

Pembrokeshire County Council	Document Control no: 074
	Page 3 of 3
Ethical Employment Policy	Published: April 2019