

ETHICAL EMPLOYMENT IN
SUPPLY CHAINS POLICY

NEATH PORT TALBOT COUNTY
BOROUGH COUNCIL

Introduction

Neath Port Talbot County Borough Council (“the Council”) spends in excess £140 million a year every year on goods, services and works involving local, national and international supply chains.

It is therefore vital that, at every stage, there are good employment practices which can empower and reward workers, help to improve the quality of life for people here in Neath Port Talbot and elsewhere and in turn result in better quality goods and services and works, which can ultimately benefit the Neath Port Talbot locality.

This Ethical Employment Policy demonstrates our continuing commitment to provide high quality services that meets the needs and aspiration of Neath Port Talbot citizens and to ensure that those in our supply chain contribute to the wellbeing of our residents and those working and living in Wales and those involved in our supply chains.

In developing this Ethical Employment Policy we have taken into account information that has been gathered from a variety of sources and we have also built on the work that has been undertaken to date in the field of corporate procurement to ensure that our procurement process are conducted in a transparent and proportionate manner and ensure equal opportunity for all and with maximum competition.

The publication of the Ethical Employment Policy is not the end of the process but just the beginning. We welcome views and comments through the life of the Ethical Employment Policy and will consider them, along with those received through other engagement activities when reviewing the objectives and during the formal review of the Ethical Employment Policy.

As the Council’s Anti-Slavery and Ethical Employment Champion, I am proud that this policy sets out the commitment that the Council will embark on to ensure a more ethical supply chain in our delivery of services. As a Council we are strongly committed to the wellbeing of all those who deliver services to the public, whether they are employed directly or through contractual arrangements and these principles will assist in ensuring fair treatment for everyone involved in the demanding job of providing good public services in times of financial austerity.

Councillor Doreen Jones

Anti-Slavery and Ethical Employment
Champion

Description of the Authority

Neath Port Talbot County Borough is located on the coast between Swansea and Bridgend and covers an area of over 44,217 hectares. As of the 2011 census it has a population of 139,812 and 62,957 dwellings. It also shares boundaries with Carmarthenshire County Council, Powys County Council, Brecon Beacons National Park and Rhondda Cynon Taf County Borough Council. The main urban areas are in Port Talbot, Neath and Pontardawe. The valley areas comprise the Afan, Amman, Dulais, Neath, and Swansea Valleys with extensive upland areas between. The valleys intersect the urban areas and are defined by spectacular scenery and a network of close-knit communities

Neath Port Talbot has the 8th highest population density of the 22 local authorities across Wales. There are 14 areas in the county borough within the top 10% of the most deprived communities in Wales.

It is expected that the population will grow by 7,000, an increase of about 5%, by 2021. Whilst the under-65 population is expected to remain stable, the increase anticipated in the over-65 population is significant.

According to the 2011 Census, black and minority ethnic groups account for 2.1% of the population compared to 4% in Wales.

Data from schools indicates that the proportion of pupils from ethnic minority backgrounds (non-white British) is 4.6% compared to the Wales average of 8.2%. There are two authorised gypsy traveller caravan sites in the county borough with an estimated population of 236. At the 2011 Census, of those people indicating a religion, faith or belief, 57.7% described themselves as Christian, 33.8% indicated that they have no religion, 7.3% did not state a religion and those remaining were Buddhist (0.2%), Hindu (0.1%), Jewish (0%), Muslim (0.4%), Sikh (0.1%), other (0.4%).

There are an estimated 41,828 children and young people aged from 0 to 25 years living in Neath Port Talbot. More than 300 disabled children live in Neath Port Talbot and 731 children with educational statements attend our schools.

Structure of the Council

Within Neath Port Talbot there are 42 electoral divisions returning 64 elected members and we operate a cabinet style of local government with a Leader who is supported by 9 cabinet members (the Executive). There are 5 Scrutiny Committees which scrutinise and monitor the performance and decisions of the Cabinet and make reports and recommendations which advise the Cabinet and the Council, as a whole, on its policies, budget and service delivery.

The Cabinet Member for Corporate Services and Equality is the portfolio holder for this area of work.

The importance given this policy is reinforced by the fact that these policies and plans are amongst the limited number that require approval by the Council's Cabinet, which is of course always subject to full scrutiny by our Cabinet Scrutiny Committee.

A senior management group consisting of the Chief Executive and Corporate Directors oversees the strategic management of the Council's business. Heads of Service have individual operational responsibility for services as well as providing strategic support to senior management.

Ethical Employment Policy

At the centre of the Ethical Employment Policy is a focus on guaranteeing good employment practices for the millions of employees involved in public sector supply chains.

By way of a Code of Practice from Welsh Government, all public sector organisations in Wales, businesses and third sector organisations in receipt of Welsh public sector funding are expected to sign up to the code. Other organisations and businesses based in Wales are encouraged to sign up to the code.

This Ethical Employment Policy covers six key subjects, containing 12 commitments, ranging from unlawful and unethical practices to good and best practice.

The first subject is Modern Slavery, estimated to affect fifty million people worldwide including in the UK and Wales. The Ethical Employment Policy will enable staff to spot and deal with allegations and to identify and assess spend areas at higher risk of modern slavery and human right abuses.

The second area in the Ethical Employment Policy is Blacklisting, when workers are discriminated against if they join a Union or raise Health and Safety concerns. This Ethical Employment Policy contains a commitment to ensure suppliers are not using blacklists and sets out how to avoid companies that have not taken the issue seriously.

The next three areas relate to terms and conditions of employment, including Zero hours contracts, Umbrella Schemes and False Self-Employment. The Ethical Employment Policy will help staff to differentiate between fair and unfair practices.

The final area relates to the Living Wage and contains a commitment to consider paying all staff a Living Wage as a minimum.

In addition to the 12 Commitments covering the six key subjects referenced above the Council must also comply with the duty contained in Section 26 of the Counter-Terrorism and Security Act 2015 relating to terrorism and extremism. This Ethical Employment Policy contains a commitment to ensure suppliers are not using their supply chains to fund and/or support terrorism and/or extremism.

Ethical Employment Policy Objectives

The Welsh Government sets out a number of obligations that they expect the public sector to comply with.

In reviewing these objectives we have been mindful of the various external pressures we continue to experience, information received as a result of dialogue with stakeholders, generally and specifically in relation to the objectives, as well as planned work in service areas over the coming years.

As a result we have developed objectives that will not only allow us to focus our energies on those areas that matter most to people but also where we are certain that measurable outcomes will be delivered.

Additionally, we have identified similarities of purpose across our key plans and as such we are working toward providing a more rounded view of what we want to achieve both individually and in partnership.

We are aware that through service improvements we enable people to achieve successful outcomes in their own lives.

Set out overleaf are the commitments that the Council will sign up to. Appendix 1 is the Council's Action Plan to demonstrate how these commitments will be implemented and ultimately measured.

It should be noted that in entering into these commitments and the principles set out in the Action Log, it will not be the policy of the Council to actively enforce these principles on behalf of third parties to our contractual arrangements but merely as a tool to determine that our contractors and suppliers are working to the principles and legal obligations set out in our contractual arrangements which will be considered as part of usual contract monitoring processes.

Our Commitments

The Council will implement the following Commitments (as derived from the Code of Practice Ethical Employment in Supply Chains):

Commitment 1

Produce a written policy on ethical employment within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation and we will review it annually and monitor its effectiveness. As part of this we will appoint an Anti-Slavery and Ethical Employment Champion.

Commitment 2

Produce a written policy on whistle-blowing to empower staff to raise suspicions of unlawful and unethical employment practices, and which places a responsibility on staff to report criminal activity taking place within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation. We will review the policy annually and monitor its effectiveness. We will also provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.

Commitment 3

Ensure that those involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.

Commitment 4

Ensure that employment practices are considered as part of the procurement process. We will

- Include a copy of our Policy on ethical employment (Commitment 1) in all procurement documentation.
- Include appropriate questions on ethical employment in tenders and assess the responses provided.
- Incorporate, where appropriate, elements of the Code as conditions of contract.
- Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.

Commitment 5

Ensure that the way in which we work with our suppliers does not contribute to the use of illegal or unethical employment practices within the supply chain. We will:

- Ensure that undue cost and time pressures are not applied to any of our suppliers if this is likely to result in unethical treatment of workers.

- Ensure that our suppliers are paid on time – within 30 days of receipt of a valid invoice.
- Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.

Commitment 6

Expect our suppliers to sign up to this Ethical Employment Policy to help ensure that ethical employment practices are carried out throughout the supply chain.

Commitment 7

Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:

- Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and / or services where there is a risk of modern slavery and / or illegal or unethical employment practices within the UK and overseas.
- Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.
- Work with our suppliers to rectify any issues of illegal or unethical employment practice.
- Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings / reviews.

Commitment 8

Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:

- Avoid, or facilitate avoidance of, the payment of tax, National Insurance contributions and the relevant minimum wages.
- Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.
- Avoid Health and Safety responsibilities.

Commitment 9

Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of discrimination. We will:

- Not make use of blacklists / prohibited lists.
- Ensure that our suppliers do not make use of blacklists / prohibited lists.
- Not contract with any supplier that has made use of a blacklist / prohibited list and failed to take steps to put matters right.
- Ensure that Trade Union representatives can access members and contracted workers.

Commitment 10

Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same. We will:

- Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.
- Consider becoming an accredited Living Wage Employer.
- Also encourage our suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.

Commitment 11

Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains. We will:

- Ensure that the statement is signed off at senior management / board level.
- Publish the statement on our website. If this is not possible, we will provide a copy to anyone within 30 days of a request being made.

Commitment 12

Ensure all those undertaking work on an outsourced contract are treated fairly and equally. We will:

- Ensure that public sector staff who are transferred as part of a public service which is outsourced to a third party retain their terms and conditions of employment.
- Ensure that other staff working on an outsourced public service are employed on terms and conditions that are comparable to the transferred public sector staff.

Commitment 13

In order to ensure compliance with the duty contained in Section 26 of the Counter-Terrorism and Security Act 2015, the Council will ensure that any of its Suppliers agree to comply with any requirements of the Council as set out in the Prevent Strategy and Guidance and Channel Guidance in order to ensure that due regard is given to the need to prevent people from being drawn into terrorism and /or extremism.

Appendix 1

Action Plan for Implementation

Code of Practice Commitment	Action Required	Target date for Implementation	How we will measure each Commitment	Lead Officer
1. 1. Produce a written policy on ethical employment within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation and we will review it annually and monitor its effectiveness. As part of this we will: 1.1. Appoint an Anti-Slavery and Ethical Employment Champion.	An Ethical Employment Policy will need to be written, which is the basis of this document 1.1 An Anti Slavery and Ethical Employment Champion will be appointed.	To be approved and implemented by January 2019	A policy will be produced and distributed to all staff members, which shall be reviewed on an annual basis. 1.1 The Cabinet Member for Corporate Services and Equality has been appointed as Anti-Slavery and Ethical Employment Champion	Head of HR and Head of Legal Services
2. Produce a written policy on whistle-blowing to empower staff to raise suspicions of unlawful and unethical employment practices, and which places a responsibility on staff to report criminal activity taking place within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation. We will review the policy annually and monitor its effectiveness. We will also: 2.1. Provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.	Whistleblowing Policy in place. Communicate Whistleblowing Policy on an annual basis	Completed Ongoing	A policy will be produced and distributed to all staff members, which shall be reviewed on an annual basis with statistics being identified on the use of the policy in accordance with the policy	Head of HR/Head of Finance and Head of Legal Services
	2.1 Whistleblowing policy will be suitable for individuals outside of organisation to raise suspicions of unlawful and unethical employment practices	2.1 Completed		

3. Ensure that those involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.	<p>Training on modern slavery being provided to all employees within the Council on a staged basis developed as a result of the Modern Slavery Act 2015</p> <p>Procurement Strategy Group set up to ensure that good working practices are carried out throughout the Council</p>	<p>Ongoing</p> <p>Ongoing. First meeting of Procurement Strategy Group to take place in November 2018</p>	<p>A record will be kept of all officers who are involved in procurement processes and will be updated as and when training has been given. All such officers will undergo training prior to April 2019.</p> <p>Where concerns are identified by officers, advice notes on matters will be distributed to all staff members so they are aware of good working practices.</p> <p>Regular updates on training will be provided to the Procurement Strategy Group to feedback to requisite officers.</p>	Head of HR Head of Legal Services
4. Ensure that employment practices are considered as part of the procurement process. We will:				Head of Legal Services
4.1. Include a copy of our Policy on ethical employment (Commitment	4.1 Reference to all Council's Policies and the	4.1 Ongoing	Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.	

<p>1) in all procurement documentation.</p> <p>4.2. Include appropriate questions on ethical employment in tenders and assess the responses provided.</p>	<p>requirement for compliance therewith is included in conditions of contract issued in a procurement exercise conducted by the Corporate Procurement Unit. Once the Ethical Employment Policy has been drafted and approved, it will be incorporated into the conditions of contract.</p> <p>The Council's Contracts Procedure Rules are currently being reviewed and will include reference to these requirements.</p> <p>4.2 Questions on blacklisting and Modern Slavery are already included in tenders being issued by the Corporate Procurement Unit</p> <p>Ensure that all Sections that conduct tender exercises adopt the same practice as the Corporate Procurement Unit. The Council's Contracts Procedure Rules are currently being reviewed and will include reference to these requirements.</p>	<p>4.2 Ongoing</p> <p>Update of Contract Procedure Rules to take place by April 2019</p>	<p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	
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	<p>4.3. Incorporate, where appropriate, elements of the Code as conditions of contract.</p> <p>4.4. Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</p>	<p>4.3 Conditions of Contract already incorporate elements of the Code as appropriate and will be reviewed to ensure appropriateness each time a tender is issued</p> <p>4.4 Abnormally low bids are already investigated during a tender exercise in compliance with the Public Contracts Regulations 2015, which already include questions specifically in relation to the effect on workers and compliance with legislation.</p> <p>The Council's Contracts Procedure Rules are currently being reviewed and will include reference to these requirements to facilitate awareness to other Sections.</p>	<p>4.3 Ongoing</p> <p>4.4 Ongoing</p> <p>Update of Contract Procedure Rules to take place by April 2019</p>	
5.	<p>Ensure that the way in which we work with our suppliers does not contribute to the use of illegal or unethical employment practices within the supply chain. We will:</p> <p>5.1. Ensure that undue cost and time pressures are not applied to any</p>	5.1 This will be highlighted by the relevant Technical	<p>Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.</p> <p>5.1 Ongoing</p>	Head of Legal Services

<p>of our suppliers if this is likely to result in unethical treatment of workers.</p>	<p>Officers when working with the Service area concerned and will be factored into the revised Contracts Procedure Rules to ensure compliance by all Sections.</p>		<p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	
<p>5.2. Ensure that NPT suppliers are paid on time – within 30 days of receipt of a valid invoice.</p>	<p>5.2 This is already a condition of contract and systems are in place to achieve this.</p>	<p>5.2 Ongoing</p>		
<p>5.3. Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</p>	<p>5.3 This will be addressed as and when required as part of the procurement process. Abnormally low bids are already investigated during a tender exercise in compliance with the Public Contracts Regulations 2015 The Council's Contracts Procedure Rules are currently being reviewed and will include reference to these requirements</p>	<p>5.3 Ongoing Update of Contract Procedure Rules to take place by April 2019</p>		
<p>6. Expect our suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain.</p>	<p>We will raise awareness of what we have committed to do as a Council and encourage our suppliers to do the same where possible. Our commitment</p>	<p>Ongoing</p>	<p>Statistics will be gathered for the number of suppliers who sign up to this Code of Practice and for those that do not an explanation to be</p>	<p>Head of Legal Services</p>

	<p>to the Code will form part of the procurement process by including it in the tender documentation</p>		<p>provided to explain the reasoning so that the Council can consider why this might be the case and looking at its tendering obligations accordingly.</p>	
<p>7. Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:</p> <ul style="list-style-type: none"> 7.1. Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and / or services where there is a risk of modern slavery and / or illegal or unethical employment practices within the UK and overseas. 7.2. Investigate any supplier identified as high risk, by direct engagement with workers wherever possible. 7.3. Work with our suppliers to rectify any issues of illegal or unethical employment practice. 	<p>7.1 We will identify those products and/or services at potentially high risk. Establish a process to assess the contracts and work practices via a pilot to assess a sample of suppliers to attempt to identify and prohibit any examples of Modern Slavery or unethical employment practices</p> <p>7.2 As and when required.</p> <p>7.3 As and when required.</p>	<p>7.1 Ongoing</p> <p>7.2 Ongoing</p> <p>7.3 Ongoing</p>	<p>Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.</p> <p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	<p>Head of Legal Services</p>

7.4. Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings / reviews.	7.4 We will incorporate this into our contract management processes and monitor all high risk suppliers.	7.4 Ongoing		
8. Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:	For the purposes of clarity, the Council itself does not use 'zero hours contracts', it uses 'casual hours contracts'. The Council will, however, manage the position with regard to its contractors and its contractors' supply chains to ensure that 'zero hours contracts' are not used unfairly as stated in this Commitment No. 8.	The Welsh Government published the Principles and Guidance on the Appropriate Use of Non-Guaranteed Hours Arrangements and the Council has sought to act in line with this. The Council recently conducted an audit of practice in order to feedback to Welsh Government via the Workforce Partnership Council, and identified one gap in our practice which was to develop clear policy in relation to those engaged on non-guaranteed hours	Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same. Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.	Head of HR / Head of Legal Services

		arrangements. A policy will be put in place to achieve this in Spring 2019		
8.1. Avoid, or facilitate avoidance of, the payment of tax, National Insurance contributions and the relevant minimum wages.	8.1 This is now covered by IR35 legislation but we will incorporate this into our contract management processes and monitor all high risk suppliers.	8.1 Ongoing		
8.2. Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.	8.2 As above	8.2 Ongoing		
8.3. Avoid Health and Safety responsibilities.	8.3 Each contract contains requirements for compliance with Health and Safety responsibilities and legislation and we will incorporate this into our contract management processes and monitor high risk suppliers	8.3 Ongoing		
9. Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of discrimination. We will:	The Council encourages a healthy relationship with the recognised trade unions and is eager to work in partnership with them. The Council will not give any staff an unfair disadvantage for being involved in any activity on	Ongoing	Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same. Records will be kept of all tenders (in line with	Head of Legal Services/Head of HR

<p>9.1. Not make use of blacklists / prohibited lists.</p> <p>9.2. Ensure that our suppliers do not make use of blacklists / prohibited lists.</p> <p>9.3. Not contract with any supplier that has made use of a blacklist / prohibited list and failed to take steps to put matters right.</p> <p>9.4. Ensure that Trade Union representatives can access members and contracted workers.</p>	<p>behalf of a union.</p> <p>9.1 The Council does not use blacklists / prohibited lists.</p> <p>9.2 The Council will endeavor to ensure that we use suppliers that share this principle and contractual obligations are placed in contracts encouraging this.</p> <p>9.3 Certainty of this is part of the pre-qualification arrangements of suppliers who apply for Council contracts.</p> <p>9.4 See 9.2 above</p>		<p>the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	
<p>10. Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same. We will:</p> <p>10.1. Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.</p>	10.1 Given the current budget position this can only be considered if the funding implications are met in full by Welsh	Ongoing	<p>Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.</p> <p>Records will be kept of all tenders (in line with the requirements of the</p>	Head of HR / Head of Legal Services

	<p>Government.</p> <p>10.2. Consider becoming an accredited Living Wage Employer.</p> <p>10.3. Also encourage our suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.</p>	<p>10.2 Given the current budget position this can only be considered if the funding implications are met in full by Welsh Government.</p> <p>10.3 There will be an obligation on all Suppliers to pay the National Minimum Wage as a contractual legal obligation.</p>	<p>Public Contract Regulations 2015) that will allow such issues to be identified.</p>	
<p>11. Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains.</p> <p>We will:</p> <p>11.1. Ensure that the statement is signed off at senior management / board level.</p> <p>11.2. Publish the statement on our website. If this is not possible, we</p>	<p>11.1 Statement contained in draft Recruitment and Selection Policy to be taken to Cabinet once approved by Trade Unions</p> <p>11.2 Approved Statement will be published on</p>	<p>11.1 Approval of draft statement by March 2019</p> <p>11.2 Publication of statement</p>	<p>Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.</p> <p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	<p>Head of HR/Head of Legal Services</p>

	will provide a copy to anyone within 30 days of a request being made.	Council's website	following approval by March 2019		
12. Ensure all those undertaking work on an outsourced contract are treated fairly and equally. We will:	<p>12.1. Ensure that public sector staff who are transferred as part of a public service which is outsourced to a third party retain their terms and conditions of employment.</p> <p>12.2. Ensure that other staff working on an outsourced public service are employed on terms and conditions that are comparable to the transferred public sector staff.</p>	<p>12.1 TUPE legislation is adhered to and provision is contained in tender documentation where TUPE is to apply</p> <p>12.2 The Council agrees with the principle that a body that provides a Service on its behalf should employ staff on terms and conditions of work similar to those staff that have been transferred out of the Authority's employment. At the same time, the Council first needs to respect and commit to the requirements of employment law when transferring staff out of its employment.</p>	<p>12.1 Completed</p> <p>12.2 Completed</p>	<p>Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the same.</p> <p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	Head of HR
13. In order to ensure compliance with the duty in Section 26 of the Counter-Terrorism and Security Act 2015, the Council will ensure that any of its Suppliers agree to comply with any requirements of the Council as set	The Council will ensure that	1. a clause is inserted in all contracts requiring all suppliers to comply at all	Ongoing	Random checks on tender exercises will be carried out by officers on tenders to ensure compliance with the	Head of Legal Services and Assistant Chief

<p>out in the Prevent Strategy and Guidance and Channel Guidance in order to ensure that due regard is given to the need to prevent people from being drawn into terrorism</p>	<p>times with the Prevent Strategy and Guidance and Channel Guidance, to attend any training so organised by the Council (and at no cost to the Council) in respect of such guidance and to make any referrals to appropriate organisations, ensuring at all times those supplying services to the Council assist in allowing the Council to meet its statutory obligations under Section 26 of the Counter Terrorism and Security Act 2015, and</p> <p>2. a pre-qualification question is included in procurement documentation to ensure that any bidder that declares it has used its supply chains to fund and/or support terrorism and/or extremism and fails to satisfy the Council that mitigating action has been undertaken to prevent recurrence will not be permitted to bid in such tender.</p> <p>3. the Council's Contracts</p>		<p>same.</p> <p>Records will be kept of all tenders (in line with the requirements of the Public Contract Regulations 2015) that will allow such issues to be identified.</p>	<p>Executive and Chief Digital Officer</p>
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	Procedure Rules (currently being reviewed) will include reference to these requirements to facilitate awareness to Council officers.		
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