

Appendix C

Modern Slavery and Human Trafficking Statement

February 2021

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1. Introduction

- 1.1 This statement sets out West Suffolk Council's approach to understanding potential modern slavery risks related to its activities and to putting in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own activities and in its supply chains, as well as supporting efforts to eliminate modern slavery and human trafficking in the wider community.
- 1.2 As part of local government, West Suffolk Council recognises its responsibilities to take a robust approach to modern slavery and human trafficking.
- 1.3 The council is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that supply chains are free from slavery and human trafficking.

2. Definition of modern slavery

- 2.1 Modern slavery includes a range of types of exploitation, many of which occur together. These include, but are not limited to, the following types. All statistics relate to the UK.
 - Sexual exploitation: 22 per cent of all reported trafficking victims in the UK are victims of sexual exploitation (please see the Home Office document 2020 UK Annual Report on Modern Slavery: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/927111/FINAL-2020_Modern_Slavery_Report_14-10-20.pdf This includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images or videos.
 - Domestic servitude: this involves victims being forced to work in usually private households, performing domestic chores and childcare duties. 11 per cent of all potential modern slavery victims in 2016 were subjected to domestic servitude (please see the GOV.UK document Modern Slavery: A briefing, 2017: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638368/MS - a briefing NCA v2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638368/MS_-_a_briefing_NCA_v2.pdf)
 - Forced labour: This can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars). 36 per cent of modern slavery victims were subjected to forced labour.
 - Criminal exploitation: This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker. Cannabis cultivation is the most common cause of criminal exploitation, with more than half of referred victims of exploitation being adults and 43

per cent being exploited as children. This is thought to be the result of an increase in 'county lines' cases. Please see the Home Office document National Referral Mechanism Statistics: UK, End of Year Summary 2019:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf

- Other forms of exploitation include organ removal, forced begging fraud, marriage and illegal adoption.
- In 2019, 10,627 potential victims of modern slavery and human trafficking were referred, representing a 52 per cent increase from 2018. Just over half of the victims referred were adults, while 43 per cent were exploited while under the age of 18. 32 per cent of the victims were female.

3. Organisational structure and supply chains

- 3.1 This statement covers the activities of West Suffolk Council.
- 3.2 The council will carry out, in 2021 to 2022, a risk assessment of its corporate activities (recruitment, procurement and landlord responsibilities) in order to assess whether or not particular activities are high risk in relation to slavery or human trafficking.

4. Responsibilities

- 4.1 Responsibility for the organisation's anti-slavery and human trafficking initiatives sits as follows:

Producing and revising the council's modern slavery and human trafficking statement in line with current legislation and guidance.	Assistant Director, HR, Legal and Democratic Services
Including the council's approach to eliminating modern day slavery and human trafficking in its procurement policies, procedures and practices.	Assistant Director, Resources and Performance
Supporting the assessment of risk of modern slavery and human trafficking in the council's operations.	Internal Audit Manager
Ensuring staff are appropriately trained and equipped to minimise the risk of modern slavery and human trafficking through the council's corporate responsibilities, and to spot signs and report concerns through the appropriate routes.	Assistant Director, HR, Legal and Democratic Services

Engaging in partnership working across the local area to eliminate modern slavery and human trafficking, for example through the Community Safety Partnership.	Assistant Director, Families and Communities
Referring concerns raised by officers.	Safeguarding Officer

5. Relevant policies

5.1 The council has adopted the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy**

The council encourages all its workers, customers and other business partners 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 slavery or human trafficking. The council's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct**

The council's code makes clear to employees the actions and behaviour expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.

- **Procurement policy and procedures (currently being revised)**

The council's procurement policy is currently being revised and will underline the importance of eliminating modern slavery and human trafficking through the council's contracts and supply chains. For contracts over £10,000, the council already invites potential suppliers to self-declare that they meet the relevant criteria in the supplier selection stage; the winning supplier is required to submit evidence.

- **Recruitment and agency workers policy**

The council 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. New employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines as appropriate.

- **Safeguarding children and vulnerable adults policy**

Our safeguarding policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery.

6. Performance

6.1 The council considers its own corporate activities to be currently low risk. However, the council:

- requires all HR professionals to be suitably qualified in relation to recruitment procedures. Further, all recruiting managers are supported by HR staff and training is offered in recruitment and interviewing techniques
- has in place procurement procedures written and amended in light of the act
- keeps under review supply chain and contract procedures.

7. Training

7.1 The council's modern slavery training falls into three parts:

- **Recruitment and agency staff**

The council ensures all HR professionals are suitably qualified in relation to recruitment procedures and all recruiting managers are supported by HR staff, with training offered in recruitment and interviewing techniques.

- **Procurement and contract management**

Officers will continue to be trained in procurement and contract management as relevant. Training to support the implementation of the revised procurement policy will include coverage of modern slavery and human trafficking.

- **Spotting and reporting the signs of modern slavery**

All staff are required to complete the modern slavery and human trafficking e-learning module when starting work for the council. This is designed to raise awareness and to help recognise individuals' roles in identifying and reporting concerns.

The council also provides additional in-depth training for staff involved directly in working with communities.

8. Awareness-raising programme

8.1 As well as training key staff, the council will raise awareness of modern slavery issues by circulating information through intranet links and messages and inclusion of information in briefings of operational staff. This will be done in conjunction with the council's community safety partners.

8.2 The information available to staff will explain:

- the basic principles of the Modern Slavery Act 2015
- the importance of eliminating modern slavery in procurement

- 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 person within the council
- what external help is available, for example through the Modern Slavery Helpline.

9. Approval

- 9.1 This statement has been approved by the portfolio holder who will review and update it in response to changes in legislation or guidance, or changes in the risk environment or local circumstances.