

Forest Heath & St Edmundsbury councils



West Suffolk

working together

Modern Slavery and Human Trafficking Statement

March 2017



Forest Heath
District Council



St Edmundsbury
BOROUGH COUNCIL

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Modern Slavery and Human Trafficking Statement

1. Introduction

- 1.1 This statement sets out the West Suffolk Councils' actions to understand all potential modern slavery risks related to their activities and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in their own activities and in their supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2020.
- 1.2 As part of local government, West Suffolk Councils recognise their responsibilities to take a robust approach to slavery and human trafficking.
- 1.3 The councils are absolutely committed to preventing slavery and human trafficking in their corporate activities, and to ensuring that supply chains are free from slavery and human trafficking.

Definition of modern slavery

- 1.4 Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to¹:
 - Sexual exploitation: 42% of all reported trafficking victims in the UK are victims of 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. 24% of reported victims in the UK are children.
 - Forced labour: This can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars). One fifth of all reported forced labour victims are children – an increase of 24% since 2012. Three quarters of all reported forced labour victims are male.
 - 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.
 - Other forms of exploitation include organ removal, forced begging fraud, marriage and illegal adoption.

2. Organisational Structure and Supply Chains

- 2.1 This statement covers the activities of the West Suffolk Councils:

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/344453/Reference_briefing_final.pdf

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- Forest Heath District Council
- St Edmundsbury Borough Council

2.2 The councils currently operate in the following countries:

- England – provision of local government services in West Suffolk

2.3 The councils will conduct dynamic risk assessment of their activities in assessing whether or not particular activities are high risk in relation to slavery or human trafficking. Any concerns should be raised initially with the officer responsible for Safeguarding.

High-risk activities

2.4 The following activities are considered to be at high risk of slavery or human trafficking:

- We consider we have no high risk activities.

Responsibility

2.5 Responsibility for the organisation's anti-slavery initiatives is as follows

- **Policies:** The Assistant Director (HR, Legal and Democratic Services) is responsible for reviewing this policy and the Procurement Officer is responsible for keeping under review contract procedures where a risk is identified in the supply chain. This policy will be reviewed on a 3 year cycle or when legislation changes.
- **Risk assessments/Investigations/due diligence:** It is the responsibility of the Procurement Officer to ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking, and explain their specific role.
- **Responsibility:** It is the responsibility of the officer responsible for safeguarding to ensure any risks or issues identified outside of the supply chain are dealt with appropriately and in a timely fashion and in accordance with safeguarding procedures.

3. **Relevant Policies**

3.1 The council operates the following policies that describe their approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations

- **Whistleblowing policy** - The Councils encourage all their 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 councils' whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

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- **Employee code of conduct** - The councils' code makes clear to employees the actions and behaviour expected of them when representing the council. The councils strive to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- **Supplier Selection** - The councils are committed to ensuring that suppliers adhere to the highest standards of ethics. Since 1 October 2015, commercial organisations that carry on a business or part of business in the UK, supply goods or services and have an annual turnover of £36 million or more have been required under Section 54 of the Act to prepare a slavery and human trafficking statement as defined by section 54 of the Act. The organisation requires in scope suppliers tendering for OJEU contracts to comply with the requirements of Modern Slavery Act 2015, as a mandatory selection criteria.

The councils allow potential suppliers to self-declare that they meet the relevant criteria in the supplier selection stage; the winning supplier is required to submit evidence.

If a supplier seriously misrepresents any factual information in filling in the Selection Questionnaire, and so induce an authority to enter into a contract, there could be significant consequences. The supplier may be excluded from the procurement procedure, and from bidding for other contracts for three years. If a contract has been entered into, the supplier may be sued for damages and the contract may be rescinded. If fraud, or fraudulent intent, can be proved, the supplier or supplier's responsible officers may be prosecuted and convicted of the offence of fraud by false representation, and the supplier must be excluded from further procurements for five years.

- **Recruitment/Agency workers policy** - The councils use 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.

4. **Performance**

4.1 The councils consider it is low risk on the basis that we have no suppliers from outside the UK or staff working abroad. However, the councils

- require all HR Professionals to be suitably qualified in relation to recruitment procedures. Further all recruiting managers are supported

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by HR staff and training is offered in recruitment and interviewing techniques.

- has in place procurement procedures written and amended in the light of the Act; and
- keeps under review supply chain and contract procedures.

5. **Training**

5.1 The councils will seek to develop an on-line/e-learning package for staff including those regularly awarding OJEU contracts, those in roles involving significant contact with the public, and HR professionals working within the council, providing training on modern slavery in the next two years.

5.2 The councils' modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate 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, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

6. **Awareness-Raising Programme**

6.1 As well as training key staff, the councils will raise awareness of modern slavery issues by circulating information through intranet links and messages.

6.2 The information available to staff will explain:

- the basic principles of the Modern Slavery Act 2015;
- 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; and
- what external help is available, for example through the Modern Slavery Helpline.

Cabinet Approval

This statement has been approved by the Cabinet who will review and update it annually.

Revisions

Date of review or revision	Reason	Author
March 2017	New Policy (legislation)	Karen Points
	Approved by Cabinet	