

Modern Slavery Update

Report number:	OAS/WS/22/013	
Report to and date(s):	Overview and Scrutiny Committee	21 September 2023
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Decisions Plan: This item is not included in the Decisions Plan.

Wards impacted: ALL

Recommendation: It is recommended that Overview and Scrutiny Committee:

1. Note the content of this report.
2. Note the actions that are in progress to achieve the standards as outlined by the LGA in 2023.

1. Background

- 1.1 At its meeting in July 2023, Members of the Overview and Scrutiny Committee requested an update on the council's actions towards meeting its Modern Slavery duties.
- 1.2 Modern Slavery had been included as an item on the Committee's forward work programme since November 2020. The item had not been considered in that time due to the fact that local authorities are awaiting further guidance from central government relating to the preparation and publication of Modern Slavery Statements.
- 1.3 In September 2020, the Home Office announced that changes would be made to strengthen the Modern Slavery Act 2015, including new reporting requirements for Modern Slavery statements ([New tough measures to tackle modern slavery in supply chains - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-tough-measures-to-tackle-modern-slavery-in-supply-chains)). As of August 2023, this guidance has not been published. Organisations are therefore being advised by government to continue to report under the current requirements [Publish an annual modern slavery statement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/publish-an-annual-modern-slavery-statement)
- 1.4 With the above in mind, and subject to future government guidance, the Council's published statement is set out as stated in February 2021 [Modern Slavery and Human Trafficking Statement \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk/modern-slavery-and-human-trafficking-statement).
- 1.5 To support councils to meet their duties, in early 2023 the Local Government Association (LGA) published guidance and a matrix which sets out the ideal standards in local authority modern slavery provision. This report provides an assessment of how the council measures up against these standards. It should be noted that the LGA guidance is written to support unitary and upper tier authorities, as well as districts, so in some instances Suffolk County Council is the more appropriate lead authority, with support from West Suffolk.

2. Modern Slavery – assessment against the LGA guidance and matrix

- 2.1 The LGA Modern Slavery Guidance sets out best practice standards with regards to local authority modern slavery provision. Specifically, it highlights the importance of a 'public health' approach to modern slavery – which highlights in particular the need for:
 - a. a multi-agency approach - meaning councils should work alongside the police, fire and rescue services, VCS organisations, local businesses and health services, as well as national government, to raise awareness of and prevent modern slavery;

- b. a data led approach; and
- c. a prevention focused approach, which in turn has three tiers of prevention:
 - primary prevention, which seeks to prevent modern slavery from happening in the first place;
 - secondary prevention, which requires authorities to intervene early when the problem starts to prevent it from becoming established; and
 - tertiary prevention, which makes sure an ongoing problem is well managed to avoid it becoming a crisis and to reduce its harmful consequences.

2.2 The matrix provides a framework for councils to assess current progress and plan future activity on modern slavery – this is set out in four levels: basic first steps, early progress, substantial progress and mature. This is set into two sections:

- a. How the council manages modern slavery work, with the themes:
 - a. Leadership
 - b. Resources and capacity.
- b. Council activity, with the themes:
 - Identifying and supporting adult victims
 - Identifying and supporting child victims
 - Identifying and supporting child victims
 - Disruption and prevention
 - Procurement and commissioning.

2.3 A high-level assessment on how West Suffolk measures up in terms of its activities and signposting for Suffolk County Council activities has been undertaken against the broad framework laid out by the matrix. The outcomes of this assessment are set out in **Appendix A** to this report.

2.4 In summary, this assessment finds that the council is working to or above the standards expected, with particular progress in governance, cross-council coordination and partnership working. Actions to ensure continued improvement include:

- Develop an evaluation process for the West Suffolk Council training and ensure that the programme continues to be updated with new guidance as required.
- To try and gain a clear understanding of the impact and effectiveness of staff training and awareness of Modern-Day Slavery amongst staff.

- To use internal communications to increase awareness of pathways for referrals and reporting concerns through the national referral mechanism (NRM) or MASH (Multi-agency safeguarding hub).

3. Alternative options that have been considered

- 3.1 None - update requested by Committee.
- 3.2 The council has proactively assessed its progress against the LGA guidance and liaised with partners as appropriate. The council will continue to monitor any changes to government guidance and legislation to ensure that it continues to meet its statutory and best practice guidance.

4. Consultation and engagement undertaken

- 4.1 Staff from different departments have been engaged in the development of the council's approach to Modern Slavery and consultation has been undertaken with partners such as the Community Safety Partnership (CSP) and Suffolk County Council.

5. Risks associated with the proposals

- 5.1 None – will be kept under review in light of any changes to statutory and or best practice requirements.

6. Implications arising from the proposals

- 6.1 Financial – None under existing guidance.
- 6.2 Legal compliance – ensuring compliance with statutory duties.
- 6.3 Personal data processing – ensuring that any enforcement or reporting action is undertaken with due regard to GDPR.
- 6.4 Equalities – supports the council to meet its statutory equality duties.
- 6.5 Crime and disorder – supports the council to meet its statutory community safety duties.
- 6.6 Safeguarding – linked with the council's approach to safeguarding (as set out in the self-assessment in **Appendix A**).
- 6.7 Environment or sustainability – None.
- 6.8 HR or staffing – None – current requirements met within existing resources (subject to review).
- 6.9 Changes to existing policies – None at this stage, subject to review in light of changing reporting requirements.

- 6.10 External organisations (such as businesses, community groups) – activity is undertaken in partnership with other organisations in line with the self-assessment in **Appendix A**.

7. Appendices referenced in this report

- 7.1 Appendix A – West Suffolk Council LGA self-assessment and matrix.

8. Background documents associated with this report

- 8.1 West Suffolk Council Modern Slavery and Human Trafficking Statement [Modern Slavery and Human Trafficking Statement \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk/modern-slavery-and-human-trafficking-statement)

Appendix A

West Suffolk Council LGA Modern Slavery Assessment

Progress level:

1. Basic – Some consideration of modern slavery issues, but processes underdeveloped.
2. Early progress – Modern slavery processes established or in the process of being established, regular oversight and some awareness.
3. Substantial progress – Modern slavery processes refined as practice develops, clearly understood and joined up mechanisms.
4. Mature – Modern slavery is embedded across teams; oversight is established, and scrutiny is regular.
0. Not lead authority – West Suffolk Council is not the responsible authority for this area or action.

Theme	Key Element	Progress level	Current position or status
Leadership	Strategy and planning	3.Substantial progress	Statement has been agreed since 2021 and it is fully joined up with other relevant council policies, such as Safeguarding and Procurement. There is a shared understanding of modern slavery terminology across the council and training and awareness programmes are established. Modern slavery is also part of annual strategic assessments to ensure monitoring and evaluation.
	Governance	4. Mature	Modern slavery is embedded into work of relevant portfolio holders and subject to routine oversight by partnership boards
	Councillor engagement	3. Substantial progress	No mandatory training undertaken by Councillors. However, a review of the councillor training package is underway – new councillor training planned following local elections – and modern slavery sits within the Families and Communities portfolio. Modern slavery is included in the annual Community Safety Partnership (CSP) report to Overview and Scrutiny Committee each year.
Resources and capacity	Funding and staffing	In between 2 and 3	While there is no specific funding available, with modern slavery work undertaken by staff as part of their existing roles, there are opportunities to apply for funding through CSP, Police and Crime Commissioner and external funding opportunities – for example the WSCSP recently funded a Modern Slavery initiative (GO Bags).

Theme	Key Element	Progress level	Current position or status
			Modern slavery sits within the Families and Communities Team, with one officer dedicated to supporting this work. The council also works closely with the police’s dedicated Team and link in with them for joint visits and enforcement for example recent licensing visits to car washes.
	Cross-council coordination	3.Substantial progress	Council lead officer for modern slavery appointed and known across teams. Council’s lead officer sits on the council’s Tactical Enforcement Group (chaired by Andy Newman) that looks at all types of enforcement and can raise concerns or issues there.
	Training and awareness	3. Substantial progress	Training approaches are increasingly consistent, tailored and specific to the council, covering: basic awareness and indicators; understanding of National Referral Mechanism (NRM) process, and pre and post NRM challenges; NRM referrals; trauma informed practice; Equality, Diversity and Inclusion (EDI) or cultural competence, and council processes. Training appropriately distinguishes between child and adult victims of modern slavery. However, there is no assessment on modern slavery training effectiveness – this is hard to measure, but it could be linked to the volume of referrals made by staff, as this would suggest that there is increased awareness. Area for future action: develop an evaluation process for the WSC training – and ensure the training continues to be fully up to date with new guidance as required. Engaging with SCC training for bite size refresher training for key roles in between the mandatory 2 yearly i-learn package.
	Data and intelligence	0. Not lead authority	Dataset held by appropriate designated officer. However, the council does not lead on the data collection and mapping, as this is done through the countywide group as well as attendance at tasking meetings and annual strategic assessments (therefore reflected in local joint strategic needs assessments).
	Partnership working	3.Substantial progress	Processes and pathways being developed with range of partner organisations not just statutory agencies: police, health, Voluntary and Community Sector (VCS), Modern Slavery Victim Care Contact (MSVCC) or anti-trafficking sector, community groups; Gangmasters and Labour Abuse Authority (GLAA) or HM Revenue and Customs nationally.

Theme	Key Element	Progress level	Current position or status
			Coordinated activity between council lead officers with links into modern slavery network, countywide strategy and action plan and wider council working group. Regular evaluation and impact monitoring of modern slavery activity is systematically embedded to inform ongoing development of strategy and action plan – coordinated by Community Safety Partnership.
	Monitoring and evaluation	2.Early progress	Modern slavery training is mandatory. Monitoring approaches are being developed – but as this is an e-learning package, it is not subject to a specific evaluation form (as with all other e-learning training). Clear referral pathways are part of the training. Reminders of our duty are included in other statutory training, such as safeguarding. Currently record numbers of completed training and number of referrals completed.
Identifying and supporting adult victims	Service design	0. Not lead authority	The council has not designed services around support for adult victims - we are a referral partner; however, victim support is provided predominantly externally through Migrant Help for Eastern Region MS Victim Care Contract (commissioned by The Salvation Army and then sub commissioned to Migrant Help).
	Multi-agency working	2.Early progress	Work with Unseen to provide additional training and support. Established partnerships around NRM mass referrals.
	Referral pathways	2-3	There are two internal pathways agreed (NRM and MASH). We need to ensure that regular reminders are made to staff of these pathways intermittently.
Identifying and supporting child victims	Service design	0. Not lead authority	While children’s safety is reflected in safeguarding and procurement, this is predominantly an external service (through SCC).
	Multi-agency working	3. Substantial Progress	Council brought into reactive partnership or Multi Disciplinary Teams (MDT) and Multi Agency Child Exploitation (MACE) meetings. Modern Slavery is included in safeguarding processes and arrangements – safeguarding partners included in MACE, MDT’s and countywide groups.
	Referral pathways	2-3	There is a dedicated referral process with confirmed pathways, but they are transitional or adaptable and able to affect change rapidly.

Theme	Key Element	Progress level	Current position or status
Disruption and prevention	Awareness and overall approach to disruption and prevention	2-3	Modern slavery is a priority area, but this is an area that needs ongoing focus to ensure that the awareness is retained.
	Operational disruption activity and partnership working	3.Substantial progress	GLAA is on the modern slavery county network group. A few initiatives for victim support – for example, “go bag” initiatives. Extensive work with partners and officer works with internal enforcement group.
	Preventative activity	0. Not lead authority	Council works with Suffolk County Council in collating awareness raising in different languages -specifically for Ukrainians; part of the modern slavery awareness-raising week every year.
Procurement and commissioning	Training and awareness raising	0-1	Some limited awareness amongst staff about procurement and commissioning processes. No specific training provided for procurement staff, but this is covered in the generic MDS training that all staff undertake every 2 years. Safeguarding training is also provided – this has a modern slavery element.
	Policies and procedures	2-3	Modern slavery considerations introduced into procurement: contract selection, contract management and Key Performance Indicators, remediation plans in place. Safeguarding issues are fully embedded in procurement.
	Supply chain mapping and activity	3.Substantial progress	Supply chain mapping of safeguarding issues, including modern slavery, undertaken at strategic level allocating resources and extra due diligence to high-risk sectors, goods and services and countries identified in the process.