


# Proposed Decision to be made by the Leader of the Council on or after 9 August 2021

## Modern Slavery Statement

<b>Portfolio Holder</b>	<b>Lead Member</b>
<b>Date of decision</b>	<b>Decision Date</b>
	<b>Signed</b> 

### Decision taken

That the Leader of the Council –

1. Approves the County Council's updated Modern Slavery and Human Trafficking Statement for the financial year 2021/22.
2. Approves the publication of the Council's Modern Slavery and Human Trafficking Statement on the Central Government Registry

### 1.0 Reasons for decision

- 1.1 Making recommendations that the Leader of the Council approves the County Council's updated Modern Slavery and Human Trafficking Statement for the financial year 2021/22.
- 1.2 Making recommendations that the Leader of the Council approves the publication of the County Council's updated Modern Slavery and Human Trafficking Statement for the financial year 2021/22 on Central Government's Registry of Modern Slavery and Human Trafficking Statements for the UK.

### 2.0 Background information

- 2.1 Section 54 of the Modern Slavery Act 2015 requires certain organisations to develop a slavery and human trafficking statement each year. This includes commercial organisations which supply goods or services and have a total turnover of not less than £36m. Whilst it is not clear whether this requirement applies to local authorities, the legislation defines a

commercial organisation as a body corporate which carries on a business, or part of a business in any part of the United Kingdom. Therefore, it is likely that local authorities who provide some services directly and who have a turnover of £36m are required to publish a statement.

- 2.2 In any event, following an independent review of the Act in 2019 the Government consulted on measures to strengthen the regime and in September 2020 announced that the reporting requirements would be extended to public bodies which have a budget of more than £36m. It was also announced that a central registry for organisations to publish their statements on would be developed. This service was launched in March 2021 and whilst it is not currently mandatory to publish statements on the registry it is strongly encouraged and Central Government plans to make this a requirement under the legislation for any organisation that is required to produce a statement under section 54 of the Act.
- 2.3 As Warwickshire County Council is a body corporate that supplies services and has an annual turnover of over £36m, it is likely that it is required to produce a statement to comply with the Modern Slavery Act 2015. In any event it is good practice to do so, and Central Government will be extending this duty to all public bodies which have a budget of more than £36m in due course.
- 2.4 The Council's Modern Slavery and Human Trafficking Statement is attached at the appendix. The statement is a public facing statement and once approved, it will be published on the Council's website.
- 2.5 In light of Central Government's announcement that all organisations who are required to produce a statement will also be required to publish it on the central registry, it is recommended that the Council's Modern Slavery and Human Trafficking Statement will also be published on the Central Government registry.
- 2.6 The statement must set out what steps the organisation has taken during the previous financial year to ensure that modern slavery is not taking place in any part of its business or supply chain.

### **3.0 Conclusions**

- 3.1 The Council's Modern Slavery and Human Trafficking Statement sets out steps that Warwickshire County Council has taken to ensure modern slavery is not taking place within our business or supply chain. Since the 2020/2021 Statement, Central Government has launched a registry of organisations to share their statements: <https://modern-slavery-statement-registry.service.gov.uk/search>. It is recommended that the Council's completed statement should also be added to this site as this will soon be mandatory.

### **4.0 Analysis**

- 4.1 Internet links in last year's Modern Slavery Statement have been updated. Mentions of the Council's "Code of Conduct" have been changed and linked to the Council's "Values and Behaviours" instead. New information has been added on training about human trafficking in the supply chain available to teams.

## 5.0 Financial implications

5.1 There are no specific financial implications arising from the report. The actions and activity outlined within the Modern Slavery Statement can be delivered from within the County Council's existing resources.

## 6.0 Environmental implications

6.1 There are no specific environmental implications arising from the report.

<b>Report Author</b>	Joanna Kemp, EDI Advisor - People and Organisation Development Sioned Harper – Team Leader & Senior Solicitor – Governance Legal Team
<b>Assistant Director</b>	Sarah Duxbury
<b>Lead Director</b>	Rob Powell
<b>Lead Member</b>	LeadMember

<b>Urgent matter?</b>	No
<b>Confidential or exempt?</b>	No
<b>Is the decision contrary to the budget and policy framework?</b>	No

## Appendix A

- Modern Slavery Statement

## Members and officers consulted and informed

Portfolio Holder – Councillor I Seccombe

Corporate Board – Rob Powell

Legal – Sioned Harper

Finance –

Equality –

Democratic Services – Helen Barnsley

Councillors –

Local Member(s):

## Appendix A

### Modern Slavery Act 2015 - Warwickshire County Council's Modern Slavery and Human Trafficking Statement 2021/22

#### Introduction

Warwickshire County Council has an 'Our People' vision that it is a great place to work, where talented and diverse people are enabled to be their best and is, therefore, committed to preventing slavery and human trafficking in our corporate activities and in our supply chain management. This statement sets out Warwickshire County Council's actions to understand all potential modern slavery risks related to our services and business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own services and business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

This statement is published in response to the Modern Slavery Act 2015.

#### Organisational Structure

Warwickshire County Council is a local authority which provides a range of statutory and discretionary services delivered both directly by the Council and through external organisations. Our structure can be found on our website by clicking [here](#).

#### Supply Chains

The Council procures goods and services from various suppliers and this is governed by our [Procurement Strategy](#).

#### Countries of Operation and Supply

Warwickshire County Council only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low due to the nature of the Council's business, the Council remains vigilant to any potential risks, and through our procurement policy, strategy and guidance sets high expectations from its supply chains.

#### High Risk Activities

The Council considers that, due to the nature of its business and the policies / processes that are in operation, there are no areas of its business that are considered to be at high risk of slavery or human trafficking.

#### Responsibility

Responsibility for the Council's anti-slavery initiatives is as follows:

**Policies:** These are developed by officers in the relevant Service area and are agreed in line with the Council's scheme of delegation. Policies are reviewed to ensure that they remain relevant.

**Risk assessments:** These are undertaken by the relevant service area where there is deemed to be a risk of modern slavery or human trafficking, with support from colleagues in Human Resources and Organisational Development (HR&OD) and Procurement.

**Investigations / due diligence:** Any concerns regarding modern slavery or human trafficking should be raised with the Council's Head of Service for Governance and Policy in the first instance.

## **Relevant Policies**

Warwickshire County Council reviews its policies and procedures on an on-going basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

**Safeguarding policies:** In order to safeguard and promote the welfare of children and adults living in Warwickshire the Council's safeguarding strategy is underpinned by a range of policies and guidance. You can find these by clicking [here](#).

**Whistleblowing policy:** The Council encourages all its employees, consultants, contractors, volunteers and workers to report any concerns related to its direct activities, or the supply chains of the Council. 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. You can find the procedure by clicking [here](#) and the whistleblowing policy by clicking [here](#).

**Employer and Employee Responsibilities Code:** The Council's [Values and Behaviours](#) makes clear to our employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.

**Recruitment:** The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

**Agency Workers:** The Council uses employment agencies to source additional workforce capacity. Where agency workers are required, these are primarily engaged through the Council's managed service provider.

**Expectations of suppliers:** The Council is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with respect and dignity and act ethically and within the law in workforce matters. The Council has a dedicated [procurement website](#) and our supplier guidance contains a 'Supplier Checklist'.

## **Due Diligence**

The Council requires its contractors and suppliers to demonstrate their commitment to supporting human rights within their supply chain relating to, for example, child labour, forced labour, health and safety and working hours. The Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. This is the responsibility of the particular Council contracting managers with the support of the Council's Procurement Team. The Council's due diligence measures in place include:

- the implementation of measures in the evaluation of suppliers to enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act.
- clarity that if a supplier misrepresents any information, that the supplier may be excluded from the procurement process and from bidding for other contracts in the

future. If information comes to light after a contract has been entered into, that supplier may be sued for damages and the contract rescinded.

- inclusion of standard clauses in the Council's standard contract terms and conditions requiring the supplier to comply with the Modern Slavery Act 2015 and, where applicable, implement a due diligence procedure for its own suppliers, subcontractors and other participants in its supply chain to ensure that there is no slavery or human trafficking in its supply chain. Tenderers are also required as part of the Council's standard procurement process to make a declaration of intent to comply with the Modern Slavery Act.
- embedding a county wide approach to contract management to consider any potential risk of slavery as it relates to each contract, and through active contract management to more effectively ensure that slavery and human trafficking is not taking place in the supply chain.
- the use of new functionality within the e-tendering system to further strengthen the approach to ensuring modern slavery and human trafficking does not exist within the supply chain.

### **Training**

The Council has an e-learning package to raise awareness of modern slavery and trafficking amongst all employees and workers. This e-learning package is entitled "See Past the Obvious - Vulnerability and Serious Crime" and has been developed in partnership with the Police. It includes a light-touch, awareness raising section on Modern Slavery and Human Trafficking.

Face to face and virtual training referencing the Modern Slavery Act is available to social care employees supporting adults in Warwickshire. Mandatory Adult Safeguarding training covers the Modern Slavery Act, as well as duties to notify the Home Office of any individual encountered in England and Wales whom the Council believes is a suspected victim of slavery or human trafficking.

Training has also been developed for staff from the Contract Management and Quality Assurance Team to equip staff with the knowledge and skills to recognise what Modern Slavery looks like in the supply chain and raise awareness and respond to Modern Slavery concerns.

### **Partnerships**

The Council works in partnership with a wide range of partners and agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes district and borough councils, Warwickshire Police, Warwickshire Police and Crime Commissioner and the Local Safeguarding Boards. The Warwickshire Safeguarding website and the Council's own website have guidance, procedures and a toolkit relating to the trafficking and exploitation of children and on the duty to report. You can access the Warwickshire Safeguarding website by clicking [here](#).

### **Approval for this Statement**

This statement has been approved by the Leader of the Council, Izzi Secombe. It will continue to be reviewed annually.

**Signature:**

**Date:**

**Leader of the Council**