

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

## Introduction

Warwickshire County Council is 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 is published in response to the Modern Slavery Act 2015.

This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022. We remain dedicated to improving our policies and procedures to tackle modern slavery and human trafficking and will continue to do so in the current financial year.

## 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](#).

## 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.

The Homes for Ukraine scheme provided some level of risk as vulnerable refugees were being placed with members of the public. Disclosure and Barring Services (DBS) checks and home inspections are carried out for every member of a sponsor family to mitigate this.

## 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 Monitoring Officer who is currently the Assistant Director for Governance & Policy in the first instance.

### Children in Employment:

All school-age children who work part-time must be registered with Warwickshire County Council. Information about child labour can be found on our [website](#), including information on the law around child working hours, information for children, parents and employers, and how to report concerns about children in employment.

### Strategies and Initiatives:

The Warwickshire Exploitation Strategy 2020-2023 ensures that Warwickshire County Council relevant staff and partners have an understanding of exploitation, the impact it has on children, young people, adults with care and support needs, and the wider community. It exists to improve the lives of those who are at risk. It is overseen by the Warwickshire Safeguarding Partnership. The approach to tackling the problem is multi agency and collaborative to ensure those at risk are protected from harm. The scope of this strategy crosses the domains of sexual exploitation, missing children, gangs, criminal exploitation, organised crime, cuckooing, trafficking, hate crime and prevent/extremism.

## 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](#).

### 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.

### Employer and Employee Responsibilities Code:

The Council's Code 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 age, 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. A reference is also requested and followed up. Our Terms of Employment allow employees to terminate employment and to join unions. They also outline our procedures around overtime working.

### Bullying and Harassment:

Our Bullying and Harassment policy and procedure prohibits harassment, intimidation and discrimination and outlines procedures to deal with such instances.

### 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. Our contract with external agencies prohibits attempts to restrict the freedoms of temporary workers, and the use of worker-paid recruitment fees.

### 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.
- a review of contract terms and conditions and appropriate clauses for inclusion to ensure compliance with the Modern Slavery Act. Such terms and conditions are also applicable to sub-contractors in the supply chain.
- 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 developed and rolled out 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.

An e-Learning module has been made available to all staff entitled "Modern Slavery and Human Trafficking". It includes information and guidance on what modern slavery and human trafficking are, forms they might take, legal protections and obligations, how to identify and raise concerns about modern slavery or human trafficking, risks to children and adults, and further resources.

Awareness has also been raised with all social care employees of the legal duty that the Council has under the Modern Slavery Act to notify the Home Office of any individual encountered in England and Wales who the Council believes is a suspected victim of slavery or human trafficking. This contains information on First Responders and the National Referral Mechanism.

## 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.

## Approval for this Statement

This statement has been approved by the Council's Cabinet. It will continue to be reviewed and provided annually.

Signature:

Date: