

Cabinet

5 September 2024

Modern Slavery Statement

Recommendations

That Cabinet:

1. Approves the Council's updated Modern Slavery and Human Trafficking Statement for the financial year 2023/24.
2. Authorises the Executive Director for Resources to publish the Council's Modern Slavery and Human Trafficking Statement on the Central Government Register alongside the estimated income for the Council in the year covered by the statement.

1. Executive Summary

- 1.1 The Modern Slavery Act 2015 is a piece of legislation designed to combat modern slavery and human trafficking. Section 54 of the Act requires certain organisations to develop a Modern Slavery and Human Trafficking Statement (Statement) each year. The Statement must set out what steps the organisation has taken during the previous financial year to ensure modern slavery is not taking place in any part of its business or supply chain.
- 1.2 The organisations required to develop a Statement include commercial organisations which supply goods or services and have a total turnover of not less than £36m. Whilst it has previously not been clear whether this requirement applies to local authorities, the Council has taken the view that it could and has therefore published a Statement since 2018.
- 1.3 There is a central register for organisations to publish their Statements which was launched in March 2021 and whilst it is not currently mandatory to publish Statements on the registry it is strongly encouraged. The Council has published its Statement on the registry since 2021.
- 1.4 The Central Government Registry also asks for the turnover of budget of the organisation in the year covered by the Statement. The Council's confirmed turnover for the financial year covered by the Statement (2023/24) is over £500 million.

2. Changes to the Statement since last year

- 2.1 The High-Risk section has been amended to include the following activities:
 - 2.1.1 Social Care Commissioning
 - 2.1.2 Changes to legal migration rules and in particular visa sponsorships for skilled workers.
- 2.2 The Responsibility (Investigations/due diligence) section has been amended to include reference to the Care and Commissioning team and that as part of the Monitoring Officer's review of information and guidance an explanation of help and support will be provided along with signposting to relevant information.
- 2.3 The Relevant Policies section has been updated to reflect that the Council's Whistleblowing Policy was reviewed in 2023.
- 2.4 The Training section has been updated to include details about how awareness is raised with all social care staff and to refer to additional training and awareness that is delivered by the NRM Coordinator. This section has also been updated to refer to recent training that has been delivered to whistleblowing advisors and general awareness is provided to staff periodically.
- 2.5 The Partnerships section has been updated to include the anti-slavery charity Unseen UK who work with survivors, businesses, governments, police and the NHS to tackle slavery.

3. Development of Key Performance Indicators

- 3.1 Statutory Guidance issued under section 54(9) of the Modern Slavery Act 2015 which was last updated in December 2021 suggests that Key Performance Indicators (KPIs) could be used to measure the performance of any anti-slavery actions undertaken. The Guidance states that whilst there is no requirement to introduce new KPIs, those organisations that do will choose their own based on what is most effective and efficient for them. The Guidance also notes that carefully designed KPIs could help an organisation to demonstrate as clearly as possible if they are making progress over time in preventing modern slavery in their business or supply chains.
- 3.2 It is proposed that prior to next year's Statement being produced, officers give further consideration to whether KPIs should be introduced and if so what KPIs would best demonstrate whether progress is being made to prevent modern slavery in the Council's business or supply chains.

4. Proposed amendments to legislation

- 4.1 Proposed amendments to the legislation were proposed in a Modern Slavery Bill published in June 2021 with the aim of increasing the accountability of the companies and any other organisations operating in the UK to drive modern slavery and human trafficking out of their supply chains. It included the proposed introduction of two offences. The bill was not taken forward in the King's Speech in October 2023, did not appear in the parliamentary session that followed, nor was it mentioned in the King's Speech in July 2024. It therefore remains to be seen whether the proposed amendments will be put forward in a new bill in a future parliamentary session.

5. Financial Implications

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

6. Environmental Implications

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

7. Timescales associated with the decision and next steps

- 7.1 Once the Statement is approved it will be published on the Council's website and the Central Government Registry within 6 months of the end of the Council's financial year.
- 7.2 The legislation states that the Statement: "if the organisation is a body corporate other than a limited liability partnership, must be approved by board directors (or equivalent management body) and signed by a director (or equivalent)". As an executive function, Cabinet currently approves the Statement and it is signed by the Leader.

Appendices

Appendix 1 – Updated Modern Slavery and Human Trafficking Statement for the financial year 2023/24.

Background Papers

None.

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The report was circulated to the following members prior to publication:

Local Member(s): N/A this is a countywide matter

Other members: Chair, Vice Chair and Spokespersons of the Resources and Fire & Rescue Overview and Scrutiny Committee