

Modern Slavery Act 2015 – Warwickshire County Council’s Modern Slavery and Human Trafficking Statement 2023/24

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 chain. This statement also applies to Warwickshire Fire and Rescue Service which is part of the Council.

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 2023 to 31 March 2024.

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 website provides more information about our [Council's organisational structure](#).

Supply Chains

The Council procures goods and services from various supplies 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 views that, due to the nature of its business and the policies and processes that are in operation, there are a few areas of its business that are considered to be at high risk of slavery or human trafficking.

The [Homes for Ukraine](#), [Asylum Seekers](#), [Hong Kong British National \(Overseas\)](#) and [UK Resettlement](#) schemes that offer housing and support for refugees and asylum seekers provide some level of risk as vulnerable people are being placed with members of the public, hotels or in local housing. Disclosure and Barring Services (DBS) checks and home inspections are carried out for every member of a sponsor family, and dedicated housing officer liaises with families to support them in order to mitigate this risk. For those who move into independent accommodation, there is a helpline and email address supported by a bilingual team to provide ongoing support. All staff receive safeguarding training, and staff working alongside refugees and migrants on the Asylum and Resettlement Team have also undergone DBS checks as part of the recruitment process.

The [Warwickshire Investment Fund](#) (WIF) is part of the council's strategy to stimulate Warwickshire's economy, create jobs, support local businesses, and bring investment into the county. Loans and investments can be made under two pillars of the WIF:

1. The Local Communities and Enterprise Pillar; and
2. The Property and Infrastructure Pillar.

As a result of this lending activity, the Council is required to comply with additional rules in relation to the prevention of money laundering and has strengthened its anti-money laundering policy and procedure to ensure it complies with these obligations and safeguards the Council's resources. The strengthened policy and procedure include an organisational risk assessment and thorough customer due diligence for individual investments. This helps to ensure that the investment opportunities provided by the WIF are not used to launder any profits made by those involved in modern slavery and human trafficking.

The Council is responsible for commissioning care and support services for children, young people and adults. The high vacancy rate within the sector and the use of international recruitment, via the government Sponsorship Licence scheme, means that these sectors can be susceptible to modern slavery. The Council is alive to this risk and an action plan has been developed to ensure risks are monitored and mitigated. This is driven by the Quality Assurance team and the Partnership Learning & Development team who have contacted the market to understand the risk for

employment of staff on an overseas licence and complete a checklist for International Recruitment when they have direct involvement with a provider. The Council has links with the Association of Directors of Adult Social Services (ADASS) who share any indicators where a provider has had their overseas licence suspended or revoked. Contracts used include specific clauses which define and prohibit labour abuse and modern slavery. These clauses are actively monitored and managed by contract management officers and action is taken against any breaches of these clauses, including reporting activity to relevant bodies when appropriate. The Quality Assurance team has processes in place to link with safeguarding teams, Quarterly Provider Returns monitor levels of staffing, a Service Escalation Panel exists to ensure that concerns can be raised consistently and strategically, and staff in the team receive modern slavery training.

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 Legal Services, Procurement and Contract Management as appropriate.

Investigations and due diligence: Any concerns regarding modern slavery or human trafficking should be notified to the Council's Monitoring Officer who is currently the Director of Strategy, Planning and Governance as soon as is practicable. Further information and guidance on referrals are provided for Council staff on the Council's intranet and is regularly reviewed and updated.

Children in employment: All school-age children who work part-time must be registered with Warwickshire County Council. Our website provides [information about child employment](#), 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: 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. The Warwickshire Exploitation Strategy is currently under review and will be updated in due course.

Initiatives

Devolved Decision Making: Warwickshire County Council is participating in a Home Office pilot to devolve decision making for child victims of Modern Slavery. Since February 2023, all National Referral Mechanism (NRM) referrals completed by professionals for Warwickshire children are referred to a local multi-agency NRM Panel which is set up for the purpose of making decisions whether the children are victims of Modern Slavery. This helps to bring more effective and timely decision making by agencies known to the child and connecting them to local safeguarding and support. There has recently been a one-year review of the pilot scheme, which has concluded that it is working well in Warwickshire.

National Referral Mechanism Coordination: The NRM process is facilitated by a NRM Coordinator who coordinates the collection and analysis of information required by the Warwickshire Panel to enable decisions to be made on the referrals. This individual is available to support practitioners assessing and supporting victims of modern slavery, providing specialist guidance and advice, and raising service standards regarding modern slavery and use of NRM through the provision of training and awareness. The Coordinator also supports individuals in deciding whether a referral needs to be made to the Independent Child Trafficking Guardianship Service (ICTG).

Transitional Arrangements: Warwickshire County Council has transitional arrangements in place to ensure that children transitioning into adulthood who are awaiting a conclusive grounds decision or who have been deemed a victim of modern slavery continue to receive support.

Independent Child Trafficking Guardianship Service (ICTG): Warwickshire County Council partners with Barnardo's who provide the ICTG service, which offers advice, guidance, and support for children who have been exploited through trafficking and Modern Slavery, and for professionals working with them.

Child Exploitation Awareness: The [Something's Not Right Website](#) raises awareness of child exploitation in Warwickshire, how it manifests, and what people and organisations can do to keep children safe. In March 2024 as part of Children Exploitation Awareness Week, the Council arranged awareness activities and training events in a bid to help professionals, parents, carers and members of the public in recognising child exploitation and knowing how to take action when they spot it. The Targeted Youth Support service engaged children and young people with a range of activities, including quizzes, discussions, poster designs and pledging to the #HelpingHands campaign. Helping children understand what exploitation may

look like to them is an essential part of stopping it. Social media posts highlighting the different types of child exploitation were shared on the Warwickshire County Council social media pages over the week.

Decision Recommendation Tool: The Quality Assurance team has developed a Decision Recommendation Tool which allows inputters to record staffing numbers, percentages of internationally recruited staff and the volume of the market supported by the provider. The tool provides a recommended course of action that could be followed and aids with understanding the level of risk. Once the tool is completed the recommended course of action could be increased monitoring or consider decommissioning. A working group is set up for each provider considered at risk with a planned set of actions that should be followed.

Relevant Policies

Warwickshire County Council reviews its policies and procedures on an ongoing basis to ensure that 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. The policy was reviewed in 2023 and training has recently been provided to the whistleblowing advisors.

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 join unions and also to terminate employment. They also outline our procedures around overtime working.

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 contact 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 Commercial and Contracts 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, 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.

Training

The Council has an e-learning module 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 is also raised with all social care employees of modern slavery and the UK framework for tackling it, explaining specific responsibilities to different services. This includes the National Referral Mechanism, how to identify and support victims of Modern Slavery and Human Trafficking, the West Midlands local procedures for children affected by exploitation and trafficking, and the Modern Slavery helpline for the public.

As part of the new NRM Coordinator role, the NRM Coordinator delivers bespoke training and awareness raising to multi agency partners and to specific services. They also work with the Police Modern Slavery Trainer and the Independent Modern Slavery Advocate who deliver modern slavery training in collaboration to reach wider audience.

Whistleblowing training has recently been provided to the whistleblowing advisors, and general awareness raising is provided to all staff periodically.

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, Barnardo's, and the Local Safeguarding Boards. These form the [Something's Not Right](#) partnership. The Council also works in partnership with the West Midlands Anti-Slavery Network. 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. The [Warwickshire Learning and Development Partnership](#) is part of an Association of Directors of Adult Social Services funded project to support providers to understand how to recruit and manage services to meet legal recruitment requirements.

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: