

## **Suffolk County Council**

### **Annual Slavery and Human Trafficking Statement 2022/23**

#### **Introduction**

Suffolk County Council recognises its responsibility to take a robust approach to slavery and human trafficking.

This annual statement sets out Suffolk County Council's ambitions to understand all potential Modern Slavery risks related to its activities, and to put in place steps to ensuring that there is no slavery or human trafficking in the council's activities and supply chains.

The overall aim of the Modern Slavery Act 2015 is to pursue organised criminals and opportunistic individuals involved in the modern-day slave trade and human trafficking, and to prevent people from engaging in, or becoming victims of, Modern Slavery and Human Trafficking crime.

The Council is committed to preventing Slavery and Human Trafficking in its corporate activities, and to ensure that supply chains are free from Slavery and Human Trafficking.

Publication of this annual statement is part of that commitment, and highlights activity undertaken over the past 12 months.



Cllr Matthew Hicks Leader of the Council



Nicola Beach Chief Executive

## **Review of the Slavery and Human Trafficking Statement**

Suffolk County Council will review and update this statement annually. This will be the responsibility of the Public Health and Communities, Community Safety Lead.

### **Definition of Modern Slavery**

Modern Slavery is a term used in the Modern Slavery Act to encapsulate the offences of slavery, servitude and forced/compulsory labour, and human trafficking.

Guidance issued by the Home Office in support of the Act, gives the following more precise definitions:

1. Slavery: Where someone exercises over another person powers associated with the right of ownership.
2. Servitude: Where someone is obliged to provide services using coercion, including the obligation to live on another person's property.
3. Forced or Compulsory Labour: Where work or service is exacted from someone under threat or coercion and for which that person has not volunteered.
4. Human Trafficking: Where the movement of an individual is arranged or facilitated, with a view to that person being exploited, even if they have given their consent to travel.

However, Modern Slavery includes numerous types of exploitation, many of which may occur together, and may not be limited to the definitions above.

Under Section 1 of the Modern Slavery Act a person will commit an offence if they:

1. Hold another person in slavery or servitude and the circumstances are such that they know or ought to know that the person they hold is in slavery or servitude, or;
2. Require another person to perform forced or compulsory labour and the circumstances are such that they know or ought to know that the person is being required to perform such labour.

Under Section 2 of the Act, a human trafficking offence will have been committed if an individual has arranged or facilitated the travel of another person with a view to that person being exploited. This includes:

1. If that individual intends to exploit the other person during or after travel, or;
2. If that individual knows or ought to know that the other person is likely to be exploited by someone else.

Guidance on the Modern Slavery Act is available at: Home Office Statutory Guidance: Modern Slavery - How To Identify and Support Victims [Home Office Statutory Guidance: Modern Slavery - How To Identify and Support Victims](#)

## **Organisation and Supply Chains**

Suffolk County Council provides a wide range of statutory and discretionary services for its residents, businesses, visitors and the wider public. Consequently, it purchases a wide range of goods and services.

This Statement covers all activities of the Council, including but not limited to all direct employees, agency workers, and services delivered on behalf of the Council by third-party organisations and in the Council's supply chains.

This statement is about understanding potential Modern Slavery risks related to the council's activities and to put in place steps that are aimed at ensuring that there is no Slavery or Human Trafficking in its own activities and in its supply chains, as well as supporting efforts to eliminate Modern Slavery and human trafficking in the wider community.

## **Partnerships**

Partnership working is key to preventing Modern Slavery and supporting those that are most vulnerable in our communities. In Suffolk, the Safer & Stronger Communities Board (SSCB) has Modern Slavery as one of its key priorities. This is a priority for all Community Safety Partners across Suffolk.

A number of activities have been undertaken in 2022/23 including the development of the Modern Slavery Strategy, Action Plan and Referral Pathways. For further details of activity carried out 2022/ 23 and planned 2023/24 see Appendix 1

Suffolk's multi-agency safeguarding policies set out the responsibilities of the Council and its partners to identify signs of potential abuse amongst children and vulnerable adults, which may include signs of Human Trafficking or Modern Slavery. Guidance is available on the Suffolk Safeguarding Partnership website: [Suffolk Safeguarding Partnership Modern Slavery](#)

## **Suffolk County Council Policies**

Set out below are the key relevant policies currently operated by the Council.

### **Pay**

The Council operates the National Joint Council (NJC) Job Evaluation Scheme which ensures that all employees are paid fairly and equitably and is recognised by employers and trades unions nationally.

The NJC Job Evaluation Scheme has undergone a review to ensure it reflects recent changes in legislation [Suffolk County Council Pay Policy Statement 2023/2024](#)

## **Procurement**

Contracts are awarded in accordance with the Council's specific requirements for the management of Health and Safety, Risk, Business Continuity, Diversity and Equality.

The Council's procurement webpages include a Modern Slavery webpage, outlining how to report concerns of Modern Slavery, information and resources and our supplier's obligations under the Modern Slavery Act.

The Council's tender documentation outlines Whistleblowing procedures and how to report concerns of Modern Slavery. Our contract terms include clauses to mitigate the risk of Modern Slavery in our supply chains.

For further information on Activity Carried out and Planned see **Appendix 1**.

## **Recruitment/Agency Workers**

The Council uses a specified and reputable employment agency for the recruitment of agency workers: All new employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with appropriate legislation.

The Council will continue to regularly review and update its list of preferred suppliers for the recruitment of agency workers. It will maintain process checks to ensure that each supplier complies with regulations under the Modern Slavery Act 2015

The Council introduced a recruitment policy which set out a transparent and robust process checking a person's 'right to work' in respect of all roles and for ensuring pay rate parity for roles of similar nature. This will continue to be reviewed and updated where required.

## **Whistleblowing**

The Council strongly encourages all its employees, customers and other partners to report any concerns related to the direct activities of the Council, its supply chains, or the behaviour/actions of colleagues or customers. This includes any circumstances that may give rise to an enhanced risk of Slavery or Human Trafficking. The Council's whistleblowing procedures are designed to make it easy for workers to make disclosures, without fear of reprisal.

The [Whistleblowing Policy](#) has been reviewed and updated by the Head of Internal Audit, to now include a specific reference to Human Trafficking and will be reviewed as required to reflect the duties incumbent on Suffolk County Council.

## Suffolk County Council Code of Conduct

The Council's [Code of Conduct](#) makes it clear to employees the actions and behaviour expected of them when representing the Council. As an employer, the Council strives to maintain the highest standards of employee conduct and ethical behaviour. Paragraph 5 of the Council's Code of Conduct requires all staff to use best endeavours to ensure the health and safety of colleagues and customers in their vicinity or sphere of influence. This includes reporting relevant concerns in a prompt and direct manner. Paragraph 6 also details workers preparedness to highlight any concerns in regard to standards and whistleblowing relating to Modern Slavery including Human Trafficking.

The Council's Code of Conduct has been revised and updated to specifically include Modern Slavery, detailing that workers must give a high standard of service to the public, and must report any breach of procedures or conduct.

All of the Council's wholly owned companies have a Slavery and Human Trafficking Statement, and have published them on their websites:

- a) [Vertas Modern-Slavery-Act-V9-01092023.pdf \(vertas.co.uk\)](#)

## 2024-25

The Modern Slavery Statement will be updated annually subsumed as business as usual.

A cross-directorate group of Modern Slavery leads has been established within the Council to update the Annual Modern Slavery Statement co-ordinated by Public Health & Communities, Community Safety Modern Slavery Leads.

## Sources of further information

- a) [2021 UK annual report on Modern Slavery](#)
- b) [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) \(October 2023\)](#)
- c) [LGA: Tackling Modern Slavery - A Council Guide \(pdf\) \(November 2022\)](#)
- d) [LGA: Councillor guide to tackling modern slavery \(September 2019\)](#)
- e) [LGA: Modern Slavery Transparency Statements Portal](#)
- f) [UK Government Modern Slavery Statement](#)
- g) [UK Government: Collection of Modern Slavery Documents and Material](#)
- h) [Suffolk Safer Stronger Communities Board webpage](#)

## Appendix 1

Activity	Carried out 2022/23	Planned 2023/24
<b>Modern Slavery Network</b>	<p>Membership of the Modern Slavery Network increased during 2023 and now includes Department for Work and Pensions (DWP) and Norfolk and Waveney ICB Safeguarding Leads SCC Trading Standards and the charity Migrant Help who provide advice, guidance, and support to victims of Modern Slavery and Human Trafficking. The aim of the network is to share best practice across the Suffolk System, share data and information, develop training and awareness raising campaigns and communicate to wider partners on policy developments from central government.</p>	<p>Suffolk Local Authority network members have undertaken <a href="#">Maturity Matrix</a> Self Assessments informed by the <a href="#">Local Government Association (LGA): Council guide to tackling Modern Slavery</a> revised guidance. This guide and Maturity Matrix self-assessment informed revision and focus for the county-wide Modern Slavery Action Plan.</p>
	<p>The Modern Slavery Network developed a new strategy. The network also developed an action plan which focuses on four key themes:</p> <ul style="list-style-type: none"> <li>a) Identifying Victims</li> <li>b) Supporting Victims</li> <li>c) Preventing Exploitation</li> <li>d) Protection &amp; Justice</li> </ul> <p>To prepare for new guidance from the Local Government</p>	<p>Develop referral pathways and establish collaborative approaches for housing and supporting victims of Modern Slavery, in line with the LGA publication <a href="#">Supporting modern slavery victims: guidance and good practice for council homelessness services   Local Government Association</a>. This will include partnership working with Local Authority Housing and Homelessness teams and Migrant Help as part of the Modern Slavery Victim Care and Coordination Contract (MSVCC) <a href="#">New</a></p>

	<p>Association (due for publication in Autumn 2022)</p> <p>Updated Modern Slavery and NRM Flowcharts for First Responders, Non -First Responder organisations hosted on the Suffolk Safeguarding Partnership Modern Slavery webpage alongside updated guidance for members of the public.</p> <p>Modern Slavery, Human Trafficking and NRM Flowcharts updated for First Responders, Non – First Responder organisations and members of the public.</p>	<p><a href="#">victim care contract   The Salvation Army</a></p> <p>Revise Modern Slavery and Human Trafficking NRM Flowcharts for First Responder and Non-First Responder organisations.</p> <p>Standardised Modern Slavery and Human Trafficking information on public facing webpages across Modern Slavery Network member organisations including NRM Flowcharts for First Responder and Non-First Responder organisations and information, advice and guidance for members of the public.</p>
<b>Community Safety Partnerships</b>	<p>The annual Anti-Slavery Day and Modern Slavery Awareness week will be recognised and promoted annually across partners using the hashtag <b>#SuffolkLooksCloser</b></p> <p>18th October 2023, the Modern Slavery Network promoted national Anti-Slavery Day. This included several social media posts by all partners to raise awareness of Modern Slavery in communities using the Suffolk hashtag <b>#SuffolkLooksCloser</b>. There were a total of 3,181 social media interactions, the campaign linked to the national charity Unseen where people could learn how to spot the signs of Modern Slavery and confidentially report concerns.</p>	<p>Agile approach to raising awareness of Modern Slavery and Human Trafficking trends in Suffolk via Social Media to be developed by Modern Slavery Network to enhance established campaigns.</p> <p>Annual Suffolk Modern Slavery Awareness Week <b>#SuffolkLooksCloser</b> and National Anti-Slavery Day to be business as usual across Network partners.</p>

	<p>June 2022 the Modern Slavery Network created a local Modern Slavery Awareness Week with a focus on Labour Exploitation and Rural Communities including how to spot the signs and indicators, how to report concerns and where to seek support. Community engagement events were held across Suffolk and social media posts using the hashtag <b>#SuffolkLooksCloser</b>, with a reach of 26,248.</p>	
<b>Criminal Exploitation</b>	<p>Multi Agency Criminal Exploitation (MACE) panels were introduced in June 2021 in West, South and East Suffolk. Processes to maximise opportunities to disrupt children and young adults from becoming harmed and improvements in case management systems now allow places and spaces of concern to be flagged.</p>	<p>Continue to embed understanding of the National Referral Mechanism (NRM) duties and protocols across the System reflective of responsibilities and legislative changes. Modern Slavery, Human Trafficking and National Referral Mechanism (NRM) awareness is embedded into the multi-agency Criminal Exploitation training delivered as part of the Countywide Criminal Exploitation Work Programme 2021-24. This includes training on the Home Office Child Exploitation Disruption Toolkit. <a href="https://publishing.service.gov.uk">Child exploitation disruption toolkit (publishing.service.gov.uk)</a></p> <p>The ambition for Suffolk is to embed submission of good quality multi-agency NRM referrals to the Single Competent Authority (SCA) and understanding of the requirement to update those</p>



		referrals as appropriate prior to Conclusive Grounds Decision. This is reflected in the Modern Slavery Action Plan.
<b>Training</b>	<p>Production of two Modern Slavery training films for Suffolk frontline workers</p> <p>New E-learning modules have been developed for SCC staff and partner organisations with the aim of identifying Modern Slavery and Trafficking at the earliest opportunity and being clear on what action should be taken.</p> <p>Modern Slavery, Human Trafficking and NRM embedded in the Criminal Exploitation training and awareness raising.</p> <p>The E-Learning module has been embedded into a wider Modern Slavery one-hour virtual workshop delivered by SCC Modern Slavery Leads to MSN partner organisations.</p> <p>Bespoke Modern Slavery and Human Trafficking awareness raising workshops for Integrated Care Board (ICB) Care Fairs recruitment staff delivered by SCC Modern Slavery Lead and Suffolk Police Modern Slavery and Vulnerable</p>	<p>Develop training resource package to accompany films.</p> <p>Modern Slavery, Human Trafficking and NRM continues to be embedded in the Criminal Exploitation training and awareness raising.</p> <p>The E-learning module remains flexible so the content can be updated annually as new statistics, guidance and best practice is developed.</p> <p>Embedded E-Learning module one-hour workshops continue be delivered by SCC Modern Slavery Leads accessible to System partners.</p> <p>Modern Slavery, Human Trafficking and NRM continues to be embedded in the Criminal Exploitation training and awareness raising</p>

	Communities Co-ordinator.	
<b>Volunteer Policy</b>	The Council's Volunteer Policy has been reviewed and revised to enable any signs of Modern Slavery and Human Trafficking to be identified and reported. This has been updated in the 'what we expect of you' section and the 'Employer Supported Volunteering' section of the Volunteer Policy. <a href="#">SCC Volunteer Policy v3 14.10.2022.pdf</a>	
<b>Procurement</b>	<p>The Council's Annual Social Value Ask was updated, to include an ask of our suppliers to mitigate the risk of Modern Slavery in their supply chains including using Modern Slavery clauses in their contracts, risk assessing their suppliers regarding the risk of Modern Slavery, raising awareness with their staff and ensuring their staff and those they work with are aware how to report concerns regarding Modern Slavery.</p> <p>Briefing held in December 2021 by the Public Health and Communities Team for procurement staff to raise awareness and help develop understanding regarding the risks of Modern Slavery.</p>	Review current guidance, resources and tools used to facilitate procurement and contract management to include guidance regarding Modern Slavery and Human Trafficking.

	<p>Light touch risk check piloted to support commissioners to identify Modern Slavery risks in their commissioning decisions and to put in place appropriate mitigations to reduce the risk of Modern Slavery occurring.</p>	<p>Develop a light-touch and user-friendly risk assessment to identify any corporate activities that may be high-risk in relation to any form of slavery or human trafficking.</p> <p>The risk check and guidance regarding Modern Slavery to be added to the online internal guidance on MySCC for commissioners, procurement, and contract managers.</p> <p>Review the impact of the pilot after 6 months to identify any changes to be made to improve the effectiveness of the risk check.</p> <p>Review annually and update if required the Modern Slavery Procurement Webpage.</p>
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