

Suffolk County Council

Annual Slavery and Human Trafficking Statement 2020-21

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 actions to understand all potential modern slavery risks related to its 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 supply chains. It provides an overview of actions and activities during 2019-20 and highlights priority actions for 2020-21.

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 absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring 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 year and activity planned for the year ahead.



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 **Deputy Chief Executive**.

Definition of Modern Slavery

Modern Slavery is a term the government has 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:

- a) *Slavery*: Where someone exercises over another person powers associated with the right of ownership.

- b) *Servitude*: Where someone is obliged to provide services through the use of coercion, including the obligation to live on another person's property.
- c) *Forced or Compulsory Labour*: Where work or service is exacted from someone under threat or coercion and for which that person has not volunteered.
- d) *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:

- a) 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;
- b) 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:

- a) If that individual intends to exploit the other person during or after travel, or;
- b) 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](#)

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.

Policies

Set out below are the key relevant policies currently operated by Suffolk County Council that it was agreed would be included in this, the first annual review of the Slavery and Human Trafficking Statement: Against each is an update of activity planned for 2020-21.

Pay¹: Suffolk County Council operates the NJC Job Evaluation Scheme which ensures that all employees are paid fairly and equitably and is recognised by employers and trades unions nationally.

¹ [Suffolk County Council Pay Policy Statement 2020-21 \(pdf\)](#)

Activity Planned for 2020-21

- At the time of publication of this Statement, the NJC Job Evaluation Scheme is undergoing a review to ensure it reflects recent changes in legislation.
- Staff across all directorates will undertake training and development, to raise awareness of pay parity and fairness for all roles across the Council. This will highlight any areas of concern where pay does not meet the required levels of the National Minimum Wage levels.
- The Council's Pay Policy Statement will be updated in 2020, to reflect changes regarding exit caps, and to clarify processes, including that appropriate reporting checks are in place to ensure that all staff are on or above the National Minimum Wage.

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

Activity Planned for 2020-21

- Actions are underway to improve awareness of modern slavery and human trafficking with both the Council's own procurement, commissioning and contract management staff, and its supply chains.

Recruitment/Agency Workers: Suffolk County Council uses only a specified and reputable employment agency for the recruitment of agency workers². All new employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with appropriate legislation.

Activity Planned for 2020-21

- 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*.
- The Council will also introduce a recruitment policy which will 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.

Safeguarding Children and Vulnerable Adults: 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 trafficking or modern slavery. Guidance is available on the Suffolk Safeguarding Partnership website: [Suffolk Safeguarding Partnership](#)

Whistleblowing³: Suffolk County Council encourages all its employees, customers and other partners to report any concerns related to the direct activities of the Council, or to its supply chains. 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.

² For further information, visit: [Opus People Solutions](#)

³ For further information, visit: [Suffolk County Council - Fraud and Corruption](#)

Activity Planned for 2020-21

- The Whistleblowing Policy has been reviewed and updated by the Head of Internal Audit, to now include a specific reference to human trafficking as one of the things to which the policy may apply.

Employee Code of Conduct⁴: Suffolk County 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.

Activity Planned for 2020-21

- At the time of publication of this Statement, the Council's Employee Code of Conduct is being revised and updated, and will be republished in due course.

Training: An e-learning module is currently available for operational staff. The objective of this is to ensure that staff are confident as to how to identify modern slavery and trafficking, the action they should take if they find someone who is a victim of modern slavery and trafficking and who to contact if there are any concerns they wish to raise.

Activity Planned for 2020-21

- At the time of publication of this Statement, the Council's corporate e-learning course on Human Trafficking and Slavery is being revised and updated. The Council's Localities & Partnerships Community Safety Team, in conjunction with Suffolk Constabulary and the three Suffolk Community Safety Partnerships are planning an 'awareness week' for modern slavery from 12 October 2020, incorporating Anti-Slavery Day on 18 October, and it is hoped that re-release of the e-learning course may be a part of this.
- The Council's Volunteer Policy will be reviewed and revised so that it will enable signs of modern slavery and human trafficking to be identified and reported.

Effectiveness

This Annual Statement reports progress against actions the Council has taken in the year 2019-20 and sets out actions it proposes to take in the forthcoming year.

Below are the actions that the Council agreed for 2019-20 and updates of what activity has been undertaken:

- **Action:** Consider how modern slavery and human trafficking awareness training can be rolled-out across the Council to those in appropriate posts, and how practical learning can be more widely shared:
 - **Progress:** The Council's corporate e-learning course on Human Trafficking and Slavery is being revised and updated, and will be available in due course.
 - **Progress:** Suffolk Fire & Rescue Service will identify Slavery Safeguarding Leads (SSL) and ensure appropriate staff know their duty to inform and understand the role of the SSL.

⁴ For further information, visit: [Suffolk County Council - Fraud and Corruption](#)

- *Action:* Review current guidance, resources and tools used to facilitate procurement and contract management to include guidance regarding modern slavery and human trafficking.
 - *Progress:* All procurement and contract management guidance, resources and tools have been reviewed. Actions are underway to improve awareness of modern slavery and human trafficking with both the Council's own procurement, commissioning and contract management staff, and its supply chains. This will be completed during 2020-21.
- *Action:* 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.
 - *Progress:* A light touch risk assessment is being implemented in 2020-21.
- *Action:* Ensure that all of the County Council's wholly-owned companies have their own Annual Slavery and Human Trafficking Statement or policy and publish it on their website.
 - *Progress:* All of the Council's wholly-owned companies have completed Annual Slavery and Human Trafficking Statements, and have published them on their websites:
 - [vertas.co.uk modern slavery statement \(pdf\)](https://vertas.co.uk/modern-slavery-statement)
 - [concertus.co.uk modern slavery statement \(pdf\)](https://concertus.co.uk/modern-slavery-statement)
 - [opuspeoplesolutions.co.uk modern slavery statement \(pdf\)](https://opuspeoplesolutions.co.uk/modern-slavery-statement)
- *Action:* As part of the process for developing the 2020-21 Annual Statement, develop a framework of priorities to help inform further actions against modern slavery and human trafficking.
 - *Progress:* As agreed by the Council's Corporate Leadership Team, priorities for the 2020-21 Annual Statement have been compiled by a cross-directorate group of modern slavery leads.