

Suffolk County Council

Annual Slavery and Human Trafficking Statement 2021-22

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](#)

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.

1. Partnership Working

Partnership working is key to preventing Modern Slavery and supporting those that are most vulnerable in our communities. In Suffolk, the Safer & Stronger Communities Board¹ (SSCB) has Modern Slavery as one of its key priorities. This is a priority for all Community Safety Partners across Suffolk.

1.1 Modern Slavery Network

Activity Carried Out 2020-21

A new Modern Slavery Network which was formed in June 2021. This aims to share best practice across the Suffolk System, share data and information, develop training and awareness raising campaigns and communicate to wider partners about developments from central government.

The Modern Slavery Network is also working closely with two other priorities of the SSCB, a) Violence Against Women and Girls (including exploitation through prostitution) and b) Criminal Exploitation (including trafficking, forced or compulsory labour through organised crime relating to drug markets), both of which have strong synergies with Modern Slavery. This will reduce duplication but also strengthen the system responding to these issues through greater partnership working.

Activity Planned for 2021-22

1. The Modern Slavery Network is currently developing a new strategy which will be launched in January 2022
2. The network is also developing an action plan which will focus on four key themes: a) Identifying Victims, b) Supporting Victims, c) Preventing Exploitation and d) Protection & Justice.

¹ For more information please visit: [Safer Stronger Communities Board webpage](#)

3. To prepare for the expected revised guidance from the Local Government Association due spring 2022 including any subsequent activity/delivery.

1.2 Community Safety Partnerships

We work closely with all Community Safety Partnerships in Suffolk who are part of the SSCB governance structure. Community Safety Partnerships (CSPs) are made up of representatives from the 'responsible authorities' (the police, local authorities, fire and rescue authorities, the probation service, and health), who work together to protect their local communities from crime, and help people feel safer. There are three Community Safety Partnerships in Suffolk, each have Modern Slavery actions/activities within their action plans.

Activity Carried Out 2020-21

1. In October 2021 the CSP promoted the national anti-slavery day. This included several social media posts (reaching over five thousand people) by all partners to raise awareness of Modern Slavery in communities, linking to the national charity Unseen where people could learn about spotting the signs of Modern Slavery and report concerns.
2. In May 2021 the CSP created a local Modern Slavery awareness week using social media which used the hashtag #spotthesignsinsuffolk
3. The production of two Modern Slavery training films in Suffolk. These videos will be used for training and awareness raising with practitioners and partners. These were funded by the council, Police and Crime Commissioner and West Yorkshire Modern Slavery Transformation Fund.

Activity Planned for 2021-22

1. The annual Anti-Slavery Day and Modern Slavery awareness raising week will be recognised and promoted annually across partners.

1.3 Criminal Exploitation

Multi Agency Criminal Exploitation (MACE) panels were introduced in June 2021. There are three MACE panels across Suffolk with the objectives of protecting young people from harm due to exploitation and to disrupt perpetrators.

Activity Planned for 2021-22

1. MACE panels continue to be developed as the systems and process are adapted. Work is underway to better understand referrals being made through the National Referral Mechanism (NRM) and how this information can inform our approach locally. The National Referral Mechanism is a framework for identifying

victims of human trafficking and ensuring they receive the appropriate protection and Government funded support. It is also the mechanism through which the Government collects data about victims which helps build a clearer picture of human trafficking in the UK. And how this information can inform our approach locally.

2. Criminal Exploitation Hubs were launched in May 2021 and build on the success of the Suffolk Gangs Against Exploitation Team. Working with key partners, voluntary groups, communities, children, and families to support, disrupt and empower children and communities from the risk of exploitation. Work is currently being undertaken to share information from the MACE panels and the Criminal Exploitation Hubs to ensure those working on the ground in communities with vulnerable individuals are sighted on potential risk relating to Modern Slavery.

1.4 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](#)

2. Training

An e-learning module is currently available for operational staff. The objective is to ensure staff are confident in identifying modern slavery and trafficking and in what action they should take.

Activity Carried Out 2020-21

1. A new e-learning module for SCC staff and wider partners is currently being developed and will be launched in January 2022 to replace the current e-learning module. This e-learning module will cover what Modern Slavery is, how to spot the signs and how to report. The training is intended for all staff and will raise awareness of Modern Slavery across SCC and its partner organisations. The training is interactive, references external resources for further reading and uses videos and graphics to engage the user. The e-learning module will remain flexible so the content can be updated as new guidance and best practise is developed.

Activity Planned for 2021-22

1. When the new e-learning module is live, the new e-learning module will be promoted through internal council channels and more widely with external

partners. The training will be updated when required and promoted each year for the Modern Slavery Awareness Day in October.

2. The Council's Volunteer Policy is currently being reviewed and revised to enable signs of modern slavery and human trafficking to be identified and reported. This will be updated in the 'what we expect of you' section of the Volunteer Policy.

3. Policies

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

3.1 Pay

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

Activity Carried Out 2020-21

1. The NJC Job Evaluation Scheme has undergone a review to ensure it reflects recent changes in legislation.
2. Staff across all directorates have undertaken training and development, to raise awareness of pay parity and fairness for all roles across the Council. This highlighted any areas of concern where pay does not meet the required levels of the National Minimum Wage levels.
3. The Council's Pay Policy Statement² was updated in March 2021, to reflect changes regarding exit pay caps, and to clarify processes, including reference to all staff being on or above the National Minimum Wage.

3.2 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. SCC 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.

Our 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.

Activity Carried Out 2020-21

² [Suffolk County Council Pay Policy Statement 2021-22 \(pdf\)](#)

1. The Contract Management Minimum Standards (Basic Ask) have been updated to include the key risks that contract managers should consider and mitigate when contract managing. One of the key risks is Modern Slavery.
2. Our Annual Social Value Ask is currently being updated, one of the updates includes 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.

Activity Planned for 2021-22

1. To implement the light touch risk check to identify any corporate activities that may be high risk in relation to any form of slavery or human trafficking. The risk check has been developed but not yet implemented, due to prioritising the COVID response.
2. Procurement staff have sessions planned with Suffolk County Council, Public Health & Communities Team to further develop assessing risk and understand the wider work of the council and external partners relating to tackling Modern Slavery. The procurement team will suggest changes required to the e-learning module when required.

3.3 Recruitment/Agency Workers

Suffolk County Council uses a specified and reputable employment agency for the recruitment of agency workers³. All new employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with appropriate legislation.

Activity Carried Out 2020-21 [recurring yearly]

1. 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.
2. 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.

3.4 Whistleblowing

Suffolk County 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

^{3 3} For further information, visit: [Opus People Solutions](#)

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.

Activity Carried Out for 2020-21 [recurring yearly]

1. The Whistleblowing Policy⁴ 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.

3.5 Employee Code of Conduct

Suffolk County Council's Code of Conduct⁵ 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.

Activity Carried Out 2020-21

1. Suffolk County Council's Employee 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.

4. Effectiveness

This Annual Statement reports progress against actions the Council has taken in the year 2020-21 and sets out actions it proposes to take in the forthcoming year.

Below are the actions that the Council agreed for 2020-21 and updates of what activity has been undertaken:

Priority Action 1: 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:

1. Progress: A new e-learning module is being launched in January 2022 for all council staff and will also be made available to other partner organisation who are currently tackling Modern Slavery in partnership settings.

⁴ For further information, visit : [Whistleblowing Policy](#)

⁵ For further information, visit: [Suffolk County Council – Employee Code of Conduct](#)

2. Progress: To identify where specific training may be required to improve NRM referrals and Duty to Notify (From 1 November 2015, specified public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking)

Priority Action 2: Review current guidance, resources and tools used to facilitate procurement and contract management to include guidance regarding modern slavery and human trafficking.

1. Progress: The Contract Management Minimum Standards (Basic Ask) have been updated to include the key risks that contract managers should consider and mitigate when contract managing. One of the key risks is Modern Slavery.

Priority Action 3: 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.

1. Progress: Our Annual Social Value Ask is being 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.

Priority Action 4: Ensure that all the County Council's wholly owned companies have their own Annual Slavery and Human Trafficking Statement or policy and publish it on their website.

1. Progress: All of the Council's wholly owned companies have a Slavery and Human Trafficking Statement, 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](https://concertus.co.uk/modern-slavery-statement)
 - [opuspeoplesolutions.co.uk modern slavery statement \(pdf\)](https://opuspeoplesolutions.co.uk/modern-slavery-statement)

Priority Action 5: As part of the process for developing the 2021-22 Annual Statement, develop a framework of priorities to help inform further actions against Modern Slavery and human trafficking.

1. Progress: A cross-directorate group of Modern Slavery leads is established within the council to update the Annual Modern Slavery Statement each year.