

## **Modern Slavery and Human Trafficking Statement – 2022-23**

This statement sets out Leicestershire County Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities during the financial year 1st April 2022 to 31st March 2023 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As part of the public sector, Leicestershire County Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We have a zero-tolerance approach to any form of non-ethical practices. The Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. The Council also works with local safeguarding boards to share best practice and to enable effective communication between relevant bodies, including law enforcement, local authorities, health care bodies and local groups.

### **Organisational Structure and Supply Chains**

This statement covers the activities of Leicestershire County Council. The Council manages a wide range of services which are delivered both directly by the Council and through external organisations. There is also reference within [this statement](#) to the organisation ESPO (Eastern Shires Purchasing Organisation).

### **Countries of operation and supply**

Leicestershire County Council only operates within the United Kingdom. Due to the nature of the Council's business, the risk of slavery and human trafficking is considered low, however the Council remains vigilant to any potential risks.

### **High-risk activities**

The Council considers that, due to the nature of its business and the policies/processes (see below) that are in operation, there are no areas of its business that are at high risk of slavery or human trafficking.

### **Responsibility**

Responsibility for the Council's anti-slavery initiatives is as follows:

- Policies: These are developed by officers employed by the Council and are then agreed by the relevant board or committee.
- Risk assessments: These will be undertaken by officers within the relevant service area with support from Human Resources and the Commissioning Support Unit as required.
- Investigations/due diligence: Any concerns regarding modern slavery or human trafficking should be raised with the Director of Law and Governance in the first instance.

## Relevant Policies

The Council has the following policies in place to support its commitment to identifying and preventing slavery and human trafficking in its operations:

- **Whistleblowing Policy and Procedure**

The Council encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's [Whistleblowing Policy and Procedure](#) is designed to make it easy for workers to make disclosures, without fear of retaliation. Similarly the Council has a [Supplier's Whistleblowing Procedure](#) to enable suppliers to raise any concerns they may have.

- **Employee Code of Conduct**

The Council's [Code of Conduct](#) makes clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour. Any breaches are investigated and action taken as necessary. The Code also covers the policies on Declaration of Personal Interests, and on the receipt of Gifts and Hospitality

- **Expectations of Suppliers**

The Council, in conjunction with ESPO, has implemented a Supplier Code of Conduct to help ensure that suppliers of both organisations adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Council is committed to better understand our supply chains and working towards greater transparency and responsibility towards people working in them, and works with suppliers to ensure they meet the required standards. However, serious violations of these expectations will lead to the termination of the business relationship.

### [Doing business with the council](#)

Suppliers struggling to identify their Modern Slavery risks can use the Government tool MSAT ([Modern Slavery Assessment Tool](#)). The tool uses several questions to assess supplier risk and gives tailor made recommendations.

- **Recruitment**

The Council's recruitment processes are transparent and reviewed. They include robust procedures for vetting new employees, which ensures they are able to confirm their 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. References are also requested and followed up.

- **Agency Workers**

The Council recruits its employees via its in-house recruitment function, East Midlands Shared Services. Where agency workers are required, these are ordered in accordance with the terms of a framework agreement developed and managed by ESPO. A comprehensive procurement process was applied to select the providers available through the framework during which the practices of these agencies were verified.

- **Pay**

The Council use a job evaluation scheme, thereby ensuring that all employees are paid fairly and equitably. All new and changed jobs are evaluated by a panel of trained evaluators.

### **Due Diligence**

Leicestershire County Council undertakes due diligence when considering taking on new suppliers through our procurement processes The Council’s procurement activity is governed by the Public Contract Regulations 2015, and we use the standard supplier questionnaire developed by CCS (Crown Commercial Services) which includes a section on the supplier’s approach to the Modern Slavery Act, slavery and human trafficking in the supply chain. Suppliers with an annual turnover of £36m or more, fail the assessment process if they do not comply with the Act by failing to publish a Modern Slavery statement:

<b>Section 7</b>	<b>Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015</b>	<b>Assessment</b>
7.1	Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?	Yes ___ N/A ___
7.2	If you have answered yes to question 1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?	Yes ___ Please provide the relevant url to view the statement No ___ Please provide an explanation

An approach is being consistently developed whereby existing suppliers are regularly reviewed using a risk-based approach - for contracts held by Leicestershire County Council. This is based on whether contracts/services are assessed as high value, high risk, business critical, and is the responsibility of the allocated contract manager. This will include:

- Broad mapping of the supply chain to assess a particular product/service area for potential of modern slavery and human trafficking;

- Completion of due diligence in the form of supplier assessments completed on an annual basis (for high value, high risk, business critical contracts) – this will include checking financial stability, ensuring necessary insurances/warranties are in place and ensuring adherence to policy requirements, for example recruitment policies are robust (and which may also include the inclusion of slavery and human trafficking where risks are identified);
- Each contract should have an up-to-date risk register, maintained by the Contract Manager, which would highlight the potential for slavery and human trafficking where identified as a risk and any mitigation;
- Regular contract management reviews with suppliers to assess quality and performance where any potential risk can be discussed and intelligence shared;
- Where contract management identifies poor performance, Contract Managers can invoke action plans and/or sanctions to ensure improvement, with the ability to terminate the business relationship if necessary;
- Key performance indicators (KPIs) for suppliers will be reviewed in light of the introduction of the Modern Slavery Act 2015.

## **Partnerships**

Leicestershire County Council is part of the Leicester, Leicestershire and Rutland Modern Slavery Action Group (LLRMSAG). This is a multi-agency group which is split into two sub-groups in order to fulfil two purposes – the first sub-group is the Tactical and Enforcement Group which seeks to establish and maintain an effective multi-agency response to reduce and respond to modern slavery related offences across Leicester, Leicestershire and Rutland (LLR). Core attendees at this meeting are first responders (which includes the Council), and other organisations with law enforcement powers.

The other sub-group of the Action Group is the Training and Awareness Group, which seeks to; improve understanding of the roles and responsibilities within organisations when dealing with instances of slavery and trafficking; to improve public understanding of slavery and trafficking (including the signs to look for); and promoting training within organisations particularly around recognising and responding to slavery and trafficking.

Leicestershire County Council is represented by a number of officers on both groups, including:

- Trading Standards
- Children’s Safeguarding Team
- Communications and Media Team
- Commissioning Support Unit
- Community Safety Team
- Learning and Development Team

The Council has been involved in awareness raising around Modern Day Slavery through its social media forums such as Twitter etc.

## Training and Awareness-Raising

The Council recognises that certain employees within the organisation should be required to complete awareness training in relation to modern slavery and human trafficking. The Council has published an awareness-raising document which is available to all employees and covers the following:

- The basic principles of the Modern Slavery Act 2015;
- How to identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available (e.g. the Modern Slavery Helpline).

Training is available for all Council staff via the Learning Hub. This includes Modern Slavery Awareness hosted by Leicestershire Police and Modern Slavery First Responders which provides guidance on how to spot the signs of Modern Slavery and what to do when you come across a potential victim of Modern Slavery.

The Council have also contributed to the establishing of a website for the LLRMSAG – this includes information for professionals and members of the public around modern day slavery. The information for professionals includes training packages for staff, information on reporting modern day slavery and contact details for supporting organisations.

The Learning and Development Team (LD Team) of the County Council have been engaged to discuss the inclusion of Modern Day Slavery in all training delivered around safeguarding. A representative from the LD Team also attends the Training and Awareness Sub-Group of the LLRMSAG.

## The Future

As part of the public sector, Leicestershire County Council recognises the responsibility we have to embed social value into our business activities. This includes working towards eradicating modern slavery and human trafficking in our business and supply chains. We remain committed to this and will continue to work over the next 12 months to make further improvements. We will continue to work with our suppliers, customers, staff and other stakeholders to share best practice and to encourage more commitment to eradicating slavery and human trafficking from all supply chains.

This statement has been approved by Cabinet. It will be reviewed and updated on an annual basis.

**Designated member's signature:**

**Designated member's name:**

Nicholas Rushton CC

**Date:** 7 December 2022

