

Modern Slavery and Human Trafficking Statement

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 2018 to 31st March 2019 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. 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). [¹ESPO produces its own Modern Slavery and Human Trafficking Statement.](#)

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.

¹ ESPO is the trading name of a joint committee of local authorities (the county councils of Leicestershire, Lincolnshire, Cambridgeshire, Norfolk, Warwickshire, and the city council of Peterborough) who, through Leicestershire County Council and in accordance with an agreement between the member authorities, procures services and goods which it supplies to member authorities and other contracting authorities, as defined in the Public Contracts Regulations 2015.

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 Commissioning Support 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.
- **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 works with suppliers to ensure that 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](#)

- **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 acquired through a managed service provider who verifies the practices of any new agency it is using before accepting workers from that agency.

- **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. In relation to new suppliers, the following question is included in the standard Selection Questionnaire issued as part of the procurement process:

Section 7	Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015	Assessment
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 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, 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 and Procurement 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).

Currently, only HR and Commissioning Support Unit employees have been required to familiarise themselves with this information however this requirement will be rolled out to all relevant Council employees over the next 12 months.

The Council have also contributed to the establishing of a website for the LLRMSAG – this will include 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.

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: 1st August 2019