

Modern Slavery and Human Trafficking Statement

January 23 -December 2025

Staffordshire County Council

Introduction

Staffordshire County Council (the council) is committed to preventing slavery and human trafficking in its corporate activities, and in its supply chain management. This statement, and the publishing of it, demonstrates the council's commitment to contributing to the reduction in the crimes of modern slavery and human trafficking in Staffordshire. It sets out the steps the council has taken so far, and how we are working towards detecting and preventing modern slavery throughout our services, businesses, and supply chains. This includes our commissioning and procurement processes, working with partners, proactively encouraging the reporting of concerns regarding modern slavery, and ensuring the council's own policies and procedures are appropriate.

Statement Validity and Refresh

This statement is published in response to Section 54 of the Modern Slavery Act 2015 and this version is current as of January 2023. It will be reviewed on a biennial basis

The remit of Modern Slavery

The Modern Slavery Act 2015 places specific responsibilities on organisations to make sure slavery and human trafficking does not take place in its supply chain or in any part of its own business. Though some people may be more vulnerable to exploitation than others, it is not restricted by age, gender, or background. The term 'modern slavery' captures a whole range of exploitation, which may occur together to have a combined effect on people's rights and liberty. These include, but are not limited to:

- Child slavery - this can involve forced child labour, child trafficking, forced marriage and / or child domestic servitude.
- Criminal exploitation - exploitation of a person to commit a crime or combination of crimes.
- Domestic servitude – enforced work in a private household, usually performing domestic chores and childcare duties.
- Forced labour – people forced to work long hours for little or no pay, in poor conditions and under threat of violence to themselves or their families.
- Sexual exploitation - including sexual abuse, forced prostitution and the production of child pornography.
- Trafficking - involving the transportation, recruitment, receipt or harbouring of people for purposes of exploitation using immoral means, including violence, threats, deception, coercion, abduction, or bribery.

Organisational Structure, Business and Supply Chains

The council is a local authority and employs 4,110 staff. The council procures approximately £500 million per year on a diverse range of goods, works and services, and contracts with businesses located both within the county of Staffordshire, and outside. The procurement activity is underpinned by the council's own Procurement Regulations and UK Statute Law. Whilst the council may contract with a supplier, it is common to find a tiered chain of suppliers (sub-contractors) beyond this arrangement, all supporting the council contractual requirement.

The council only operates within the United Kingdom. There is little overseas contracting, though many of their contractor's operations and supply chains may be global, with some goods/products having raw materials sourced from foreign shores. The council operates across several sectors of Local Government, including social care & health, highways, transport, waste, and construction together with the voluntary/third sector. This means the number of supply chain contracts are vast and these are presented in the Councils [contracts register](#). The council employs a team of Procurement specialists to support its operations within Corporate Services.

Partnership Working

Staffordshire County Council works with Staffordshire Office of the Police and Crime Commissioner, Staffordshire District and Borough Council partners, and the local VCSE sector to address modern slavery in the County. This takes place through the multi-agency Victims and Witness Board and the Staffordshire and Stoke-on-Trent Anti-Slavery Partnership Operational Group. Modern Slavery is also considered as a priority within the County Council's statutory Community Safety Agreement.

Existing Organisational Policies and Procedures

The following council policies and procedures are reviewed on a regular basis to ensure that appropriate and coordinated action is taken throughout the business in respect of modern slavery: -

- Whistleblowing policy – the council's 'whistle blowing' confidential reporting policy encourages all its employees (as well as anyone else the council deals with) to come forward and voice any serious concerns about any aspect of the council's work. The policy sets out a process for raising concerns which complies with the Public Interest Disclosure Act 1998 so that employees may make disclosures, if necessary, without fear of reprisal or victimisation.
- Safeguarding – Safeguarding our most vulnerable residents is a priority for the Council, including children and vulnerable adults. There are clear and agreed policies for safeguarding that have clear pathways for all modern slavery referrals into social care and wider services.
- Employee Code of Conduct – In order to ensure the highest standards of employee conduct and ethical behaviour, the council's Employee Code of Conduct sets out the actions and behaviours expected of our employees. The council also

has a process in place for employees to make declaration of outside interests where appropriate including other paid employment.

- Corporate complaints – the council operates a robust corporate complaints process to manage any complaints about its services. This process can also be used to report community concerns that may relate to / uncover modern slavery and which merit investigation or reporting to a partner agency.
- Recruitment procedure – the council’s recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for vetting new employees and confirming their identities and qualifications, their right to work, and that they are paid directly into an appropriate, personal bank account.
- Agency / temporary staff and workers procedure - the council also uses agencies to source additional workforce and labour capacity. Where this is a requirement, these are primarily engaged through the council’s formally procured managed service provider
- Reporting – the council encourages the reporting of suspected cases of modern slavery or human trafficking, including through the council’s whistleblowing policy in relation to the local authority’s practices or that of its suppliers (see below for further information). If you suspect someone may be at risk of Modern Slavery, please telephone 101 to report it to Staffordshire Police, or if someone is in immediate danger always call 999. Crimes can be anonymously reported via Crimestoppers on 0800 555 111, or via www.modernslavery.co.uk or the hotline on 0800 0121 700.
- Pay – Staffordshire County Council supports the principles of equal pay and operates a non-discriminatory and objective job evaluation system. The County Council also takes a robust approach to ensuring that this system is applied consistently and transparently across the organisation.

Risk Assessment and Due Diligence

As part of the council’s due diligence processes, it requires its suppliers to demonstrate their commitment and approach to supporting slavery. Therefore, the council screens its suppliers as part of the procurement process. It is intended this activity will be extended to include contract management activity in the future.

The due diligence measures to detect and eliminate slavery will be developed over time to be guided by risk assessment. The nature of business carried out by the council means that the risk of slavery is considered low, it is necessary to remain vigilant to any potential risk.

Staffordshire County Council is committed to ensuring modern slavery and human trafficking is not taking place anywhere in any of its supply chains. It is developing prevention, detection, and reporting measures both at the procurement and the contract management stage. The council already scrutinises low priced tenders, applies the mandatory or discretionary exclusion criteria from Crown Commercial Service

stipulations, scores and clarifies appropriately focused slavery criteria and it reviews its contract terms and conditions for appropriate clauses for inclusion to ensure compliance with the Modern Slavery Act. The council is currently reviewing these terms and conditions to also be applicable to sub-contractors in the supply chain.

Where appropriate, the council will investigate supplier and supply-chain working conditions with support from expert independent, third parties to support y in-house operations.

Training and Awareness

Appropriate training underpins the procurement process with recognition of the Chartered Institute of Procurement and Supply's (CIPS) certificate on Ethical Procurement and Supply.

A programme of awareness training for staff identified as front-line officers to ensure that they are aware of the signs of modern slavery previously delivered, is currently being reviewed for refresher training. The council also aims to implement a general awareness training programme for other staff to raise awareness of modern slavery and trafficking.

The council supports partners and members of the public to be aware of the signs of modern slavery and human trafficking that affect people of all ages and backgrounds. This includes working with our key partners and partnerships, including relevant community safety and safeguarding boards. This includes awareness of the reporting process for concerns regarding modern slavery.

Information regarding modern slavery, including contacts for reporting concerns can be found on the council website at:

<https://www.staffordshire.gov.uk/Community/Communitysafety/Modern-Slavery.aspx>

Effectiveness

The modern slavery statement is reviewed annually to ensure it remains fit-for-purpose and is current with the agenda of Slavery. Instances of slavery within supply chains will be addressed immediately and in a manner that is proportionate and adapted to the circumstances of the case. This will include collaborating with the supplier and in accordance with the terms of the contract to address instances of modern slavery. Where an incident occurs, a remediation plan will be set in place which outlines the process for dealing with such instances and set out roles and responsibilities.

Publishing

This statement is made in relation to section 54(1) of the Modern Slavery Act 2015 and constitutes Staffordshire County Council's Modern Slavery and Human Trafficking statement. It has been approved by Council's Chief Executive and will be reviewed and updated biennially.

Signature:



Date: 23 January 2023

John Henderson CB
Chief Executive, Staffordshire County Council