

Modern Slavery and Human Trafficking Statement

Staffordshire County Council

Introduction

This statement sets out the steps Staffordshire County Council are taking to help detect and prevent modern slavery and human trafficking in our services, businesses, and supply chains.

Publishing this statement on a voluntary basis demonstrates our commitment to contributing to the reduction in the crimes of modern slavery and human trafficking in Staffordshire. This includes our commissioning and procurement processes, working with our partners, proactively encouraging the reporting of concerns regarding modern slavery, and ensuring our own policies and procedures are appropriate.

Modern Slavery Act 2015.

The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking does not take place within 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 labor, 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 labor – 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 harboring of people for purposes of exploitation using immoral means, including violence, threats, deception, coercion, abduction, or bribery.

Statement

This statement is made in relation to Section 54 of the Modern Slavery Act 2015 and explains the work of Staffordshire County Council to ensure there is no slavery or human trafficking within the organisation, its sub-contractors, partners, or supply chains:

- **Partnership working** – Staffordshire County Council has worked with Staffordshire Office of the Police and Crime Commissioner, our District and Borough Council partners, and the local VCSE sector to address modern slavery in the County. This has taken place through the Victims and Witness Board and the Staffordshire and Stoke-on-Trent Anti-Slavery Partnership Operational Group. Modern Slavery will be considered as part of the ongoing work taking place to review our statutory Community Safety Agreement.
- **Supply Chains** – Staffordshire County Council are committed to ensuring modern slavery and human trafficking is not taking place anywhere in any of its supply chains with prevention, detection and reporting measures being developed both at the procurement and the contract management stage. Supplier qualification and tender documents seek out supplier understanding and obligations under the Modern Slavery Act 2015, whilst clear, robust legal terms apply throughout the life of the contract. Regulated and compliant procurement processes, underpinned by the Councils own Procurement Regulations, provide rigor in supplier evaluation to assist in identifying potential issues in slavery, including scrutiny over abnormally low-priced tenders or clarification of ambiguous supplier offers. Training further underpins all processes with relevant Officers holding the Chartered Institute of Procurement and Supply's (CIPS) certificate on Ethical Procurement and Supply.
- **Awareness** – Staffordshire County Council aims to support 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 (more information below).
- **Reporting** – Staffordshire County Council encourage 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 Crime stoppers on 0800 555 111, or via www.modernslavery.co.uk or the hotline on 0800 0121 700.

Council Policies and Procedures

- **Whistleblowing policy** – Staffordshire County 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 Staffordshire County 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 services. This includes a 'Modern Slavery and Human Trafficking Good Practice Guide' for staff that has recently been developed for frontline staff working with children and young people.

- **Recruitment process** – Staffordshire County 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.
- **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.
- **Employee Code of Conduct** – In order to ensure the highest standards of employee conduct and ethical behavior, Staffordshire County Council’s Employee Code of Conduct sets out the actions and behaviors 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 Staffordshire County 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.

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 for financial year ending 31st March 2021. It has been approved by Council’s Senior Leadership Team and will be reviewed and updated as necessary for monitoring and assurance purposes.

Signature



John Henderson CB

Chief Executive, Staffordshire County Council