

Report for:	Shadow Executive
Meeting Date:	10th March 2020

Title of Report:	Modern Slavery Statement
Shadow Portfolio Holder	Isobel Darby
Responsible Officer	Rebecca Carley
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Recommendations:	<ol style="list-style-type: none"> 1. To agree the Modern Slavery Statement for Buckinghamshire Council 2. To agree the process for annual review and publication of the document 3. To note the likely legal duties in relation to modern slavery and exploitation
Corporate Implications:	No direct financial implications of this decision. Legal Services has been consulted and confirm agreement to the wording of the modern slavery statement.
Options: (If any)	The Council could choose not to have a Modern Slavery Statement. However, this is already considered good practice and there is likely to be a future requirement for statutory agencies to comply with the duty.
Reason:	The recommendations are to comply with best practice to publish a Modern Slavery Statement; and also to be prepared for the anticipated requirement to publish a statement being extended to local authorities.

1. Purpose of Report

- 1.1 To seek agreement of the Modern Slavery Statement for Buckinghamshire Council and the process for future annual review.

2. Background

- 2.1 The Modern Slavery Act became law in March 2015. All local authorities have a role to play in supporting the four key priority areas outlined in the Government's Modern Slavery Strategy;
 - Pursue - prosecuting and disrupting individuals and groups responsible for modern slavery
 - Prevent - preventing people from engaging in modern slavery crime

- Protect - strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime
 - Prepare - reducing the harm caused by modern slavery through improved victim identification and enhanced support and protection.
- 2.2 Under the Modern Slavery Act (2015) local authorities, specified as First Responder organisations, have a Duty to Notify the Home Office if they identify a potential victim of Modern Slavery. First Responders must submit referrals into the National Referral Mechanism (NRM) or for any victims who do not wish to be referred into the NRM, First Responders must submit a Duty to Notify form (MS1) to the Home Office. If the victim does not consent to go through the NRM then further responsibilities may exist through other legislation that may impact local authorities e.g. the Care Act (2014) and the Housing Act (1996).
- 2.3 The Act also requires certain organisations to publish a statement on the steps they are taking to prevent modern slavery in their operations and supply chains. The requirement applies to commercial organisations and charities who meet the following criteria:
- it is a 'body corporate' or a partnership, wherever incorporated or formed
 - it carries on a business, or part of a business, in the UK
 - it supplies goods or services
 - it has an annual turnover of £36 million or more
- 2.4 At present there is no legal obligation for local authorities to publish an annual modern slavery statement. However, it is considered best practice and the Local Government Association encourages councils to do so, noting that they “can show leadership in promoting a human rights approach towards procurement.” ([Tackling Modern Slavery: A Council Guide, LGA 2014](#)). In Buckinghamshire, statements have been published by Bucks County Council, Aylesbury Vale and Wycombe District Councils, Oxfordshire Health NHS Foundation Trust and by the Clinical Commissioning Group. In addition, the report of the [Independent Review of the Modern Slavery Act 2015](#) (published May 2019) recommended that the duty to publish an annual statement should be extended to local government, agencies and other public authorities if their annual budget exceeds £36 million. In response, the Government noted that it was minded to agree this recommendation, subject to further more detailed consultation.

3. Proposed Modern Slavery Statement

- 3.1 A draft modern slavery statement has been prepared for the Buckinghamshire Council which builds on the legacy of previous statements prepared by councils in Buckinghamshire. The statement is attached at Appendix 1 and has been consulted upon with safeguarding partners and work stream leads.
- 3.2 The proposed statement highlights the key areas of Procurement and Staff training;
- 3.3 Procurement - One of the central elements of the statement is our procurement of goods and services. The Government has produced [guidance](#) which advocates a “risk-based approach to tackling modern slavery in government supply chains and contains guidance that can be applied to any organisation in the public sector.” Modern slavery is already specifically included within our terms and conditions for all new contracts, and within our procurement strategy. Our intention is to utilise this guidance to develop a risk based approach to our contracts. This would be based on factors such as industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates type of commodity and supplier location. Once mapped and identified we can

ensure those with a higher risk of modern slavery are effectively managed by contract managers through monitoring and regular audits. The guidance recommends that where modern slavery may be identified within existing contracts, commissioners work with the provider to stop the exploitation, rather than terminating the contract (which would move the problem and damage openness and honesty within the sector).

- 3.4 Staff training - Another key area of focus within the proposed Modern Slavery Statement is training and awareness of staff. In Buckinghamshire, a partnership training strategy has been developed that identifies the most appropriate training route for professionals and community representatives. The partnership has worked with the Willow Project to offer training for front line workers and their managers to myth bust and increase understanding of exploitation. To date, the Willow Project has delivered training to over 850 professionals countywide. This includes professionals from existing county and district councils and we are currently reviewing attendance to ensure key service areas who have not already received training are prioritised as we become a unitary authority. A training package has also been developed by Procurement for both contract management and procurement exercises that highlights the potential risk of modern slavery and signs to look out for. 70% of contract managers and commissioners have received this training to date. In addition, a variety of training is offered to increase understanding of exploitation, such as the Exploitation Hub Roadshows. These are aimed at social workers, partners and staff and provide a basic understanding of different forms of exploitation and signs to look out for.
- 3.5 Another 2 priority areas for partnership working are shared intelligence and support for victims:
- 3.6 Shared intelligence - In addition to training staff we are working to gather and share intelligence across Buckinghamshire. One such example is Hotel Watch; a national initiative which links local hotels with police and local authorities to tackle exploitation. Its intention is to reduce the risk of hotels being used for the purposes of exploitation, encourage information sharing and increase understanding by the hotel sector. Upon agreement to the scheme, local hotels are offered awareness raising materials, tools and advice and training opportunities to increase understanding of exploitation, know how to spot the signs and how to report concerns. Test purchasing operations are used to test whether hotels respond and take action- it can be used as a learning exercise to identify training gaps. The project currently runs across Buckinghamshire and although originally centred on child exploitation, is now being broadened to encompass other areas of exploitation such as county lines, modern slavery and human trafficking. It is also proposed to extend the scheme with the intention of delivering to other businesses that may come across exploitation such as late night eateries.
- 3.7 Support for victims – In addition to the specialist Missing & Exploitation Hub for children at risk of exploitation, Buckinghamshire is also privileged to have a dedicated support service for adult victims of exploitation. Commissioned by the Office of the Police and Crime Commissioner (PCC), the Thames Valley wide Willow Project launched in September 2018. The service provides prevention work, crisis intervention and ongoing support to victims and their families. The contract has recently been retendered by the Thames Valley OPCC and from April 2020 there will be an overarching Adult Exploitation Service incorporating Restorative Justice, ISVAs (Independent Sexual Violence Advisors) and the Willow Project under one new commissioned service.
- 3.8 There is a clear pathway for all Modern Slavery referrals into Adult Social Care with officers trained in the Safeguarding and Locality Teams. Information on referrals is

routinely reported to the Safeguarding Adults Board. There is also a clear pathway for all referrals into Children's Social Care with officers trained in the MASH and Locality Teams. Where it is considered that a child is at risk of exploitation, referrals are made to the specialist Missing & Exploitation Hub who are equipped to work with those Children.

4. Financial Implications

4.1 There are no financial implications. Training for staff is already incorporated into our business planning process.

5. Legal Implications

5.1 Legal Services has been consulted and confirm agreement to the wording of the modern slavery statement.

6. Other Key Risks

6.1 None identified

7. Dependencies

7.1 Key dependences are with the Procurement work stream in relation to evidencing compliance.

8. Consultation

8.1 Consultation has been undertaken with the unitary workstream lead officers for the following areas; housing, human resources, legal, procurement, licensing and environmental health.

8.2 In addition both the Buckinghamshire Safeguarding Adults Board and the Buckinghamshire Safeguarding Children Partnership have been consulted, along with Children's Social Care and Adults Social Care (Multi Agency Safeguarding Hub); and any comments taken into account.

8.3 As a result minor changes have been made to the statement to ensure it adequately reflects the risk of modern slavery to both children and adults, and to ensure it demonstrates the actions undertaken through the procurement process to address this issue.

9. Communications Plan

9.1 A communications plan is not required; however it is considered best practice that the Modern Slavery Statement will be published on the council's website.

10. Equalities Implications

10.1 It is viewed that an equality impact assessment is not required for the statement, and confirmation is currently awaited on this. However, should it be deemed that an assessment is required this will be completed by February 2020.



11. Data Implications

11.1 A Data Protection Impact Assessment is not required for the Modern Slavery Statement. Details of individuals referred through the NRM process and anonymised MS1 forms would be recorded by Social Care using their existing policies and procedures.

12. Next Steps

12.1 As considered previously by the Shadow Executive at an informal meeting, the next steps will be to:

- Formally agree the Modern Slavery statement and publish on the Buckinghamshire Council’s website.
- Forward plan the annual review and new statement approval by the Cabinet Member in February/March in subsequent years.

Background Papers	All background papers are included as hyperlinks within the document above
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