

Shropshire Council – Modern Slavery and Human Trafficking Statement (Financial Year 2022/2023)

Introduction

Shropshire Council is committed to improving our practices to combat slavery and human trafficking in carrying out our functions and providing services and in ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out the Council's actions in identifying the potential modern slavery risks related to our services and businesses. It also sets out the mitigating steps taken aimed at ensuring that there is no slavery or human trafficking in our own services, within our own supply chains and within the supply chains of contractors that we deal with.

As a Local Government organisation, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking which also includes its responsibility as local authority to notify the Secretary of State of suspected victims of slavery or human trafficking further to section 52 of the Modern Slavery Act 2015.

Modern Slavery Statutory Guidance

The Council recognises that people of all ages can be the subject of slavery (which can take various forms such as slavery, servitude, forced and compulsory labour) and human trafficking and if so, are the victims of a violation of their fundamental human rights, illegal exploitation and crime. The Council wishes to disrupt such criminal activity where possible and will report suspected criminal matters to the relevant authorities including the Gangmasters and Labour Abuse Authority (GLAA) and West Mercia Police. The Council is committed to working with partner organisations, including GLAA, West Mercia Police, Shropshire, Telford and Wrekin ICB, The Probation Service, all health providers and the voluntary and independent sector to help raise awareness and respond to the risks of modern slavery in our community.

Organisational structure and business

As a Local Government Authority, Shropshire Council provides and commissions a wide range of public services to the people of Shropshire, as well as undertaking several corporate activities for the proper operation of the Council and its administrative facilities and functions across the County. The Council only operates within the United Kingdom.

This statement covers the activities undertaken by the Council's direct employees and agency workers engaged by the Council and services delivered on the Council's behalf by third party organisations as part of the Council's supply chains.

Our supply chains

Our supply chains include: Adult and Children Social Care Providers, Housing Service Providers, Food and Catering suppliers, Clothing and Equipment suppliers, Passenger Transport Providers, Highways Maintenance & Work Contractors, Construction and Building Contractors, Property Maintenance Contractors, Waste Collection & Disposal Contractor, ICT Supplies, Systems and Services Providers and Various Professional Services Providers.

We recognise that some of these supply chains may contain higher risk activities and aim to direct resources as appropriate to address such risks.

Our policies and procedures

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies and procedures reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to take steps to ensure slavery and human trafficking is not taking place in our supply chains.

The Council's policies and procedures which assist to prevent and respond to issues around modern slavery and human trafficking in the wider community of Shropshire include:

- **The Council's recruitment and selection policies for employees**

These policies help us ensure we are recruiting the right people to the right roles within the council and includes robust processes for checking:

- the entitlement of applicants to work in the country
- gaps in employment
- qualifications (where required)
- references (one of whom must be their previous manager)
- statutory checks with the Disclosure and Barring Service and relevant professional bodies (where appropriate to do so)

These processes help prevent us from recruiting both victims and perpetrators of modern slavery and human trafficking.

- **Employee Code of Conduct**

The code makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.

- **Whistleblowing Policy**

The Council has adopted both a Staff Whistleblowing Policy 'Speaking up About Wrongdoing' and a whistleblowing policy for members of the public to encourage all its workers, customers, business partners and members of the public to report any concerns relating to unlawful activity or activity that does not meet established standards or working practices. The Council's whistleblowing procedures provide specific contact points and a Hotline number and are designed to make it easy for people to come forward and voice concerns and make disclosures, without fear of retaliation or victimisation. It is part of the Council's general contract terms that Contractors ensure their employees are made aware of the Council's whistleblowing policy

- **Safeguarding Adults process**

The Safeguarding Adults in Shropshire document explains when we expect concerns to be raised with Shropshire Council about adults with care and support when they are experiencing or at risk of abuse. The definition of abuse includes all forms of exploitation. If exploitation is identified, a safeguarding enquiry will be undertaken with the person affected which will include the development of a safety plan.

Once the enquiry is completed, if the risk remains, the person will have a Safeguarding Plan in place until the risk has been reduced or removed. Other tools available to support this work include:

- Working with Risk
- Working with People who Self-Neglect

An adult exploitation pathway pilot has been rolled out this year. Six people were supported through this process and as a result of inter-agency working, two people who were at high risk had their risk reduced to low.

A presentation was delivered to providers of Adult Social Care to help raise their awareness of the role they could play in preventing Modern Slavery.

- **Child Exploitation Pathway**

The Child Exploitation Tools and Pathway have been developed to respond to concerns when children are identified as being at risk of exploitation. The tools available to support this work include:

- Child Exploitation Initial Assessment Tool
- Child Exploitation Initial Assessment Tool Practice Guidance
- Child Sexual Exploitation Guidance for Practitioners
- Intelligence Report Form
- Childrens Threshold Document
- Joint Board Criminal Exploitation and County Lines Learning Briefing

The Child Exploitation Panel actively plans the protection of Children experiencing exploitation on case by case basis.

- **Refugees Pathway**

Safeguarding work put in place around the risks. All hosts are DBS checked. Staff team have all completed Modern Slavery Training on Leap into Learning and additional training from FLEX. (Focus on Labour Exploitation). Team members are aware of the National Referral Mechanism, (NRM) to report any instances of Modern Slavery as well how to refer in to Shropshire Council's Safeguarding team. Welfare visits are completed on arrival to new hosts and further visits made after 6 and 12 months. All hosts and guests are signposted to Shropshire Support Refugees for additional support.

- **Licensing Policies**

The following policies each incorporate specific provisions to reduce the risk of the Council granting/issuing a licence to any person/legal entity involved directly or indirectly with modern slavery or human trafficking; and with respect to exiting licence holders, to enable any such licence to be revoked should information come to light during the lifetime of any granted/issued licence that the licence holder is involved with modern slavery or human trafficking. Each of the policies are the subject of regular review and approval either by full Council, Cabinet or the Strategic Licensing Committee, which affords the opportunity to clarify/enhance the provisions aimed at reducing the risk of modern slavery or human trafficking on a 3, 4 or 5 year cyclical basis.

- Hackney Carriage and Private Hire Licensing Policy 2023 – 2027
- Statement of Licensing Policy 2019 – 2024
- Gambling Act 2005 Policy Statement 2022 – 2025
- Street Trading Policy 2023 – 2028

- **Self-Assessment and Action Plan for Serious and Organised Crime**

In response to the risks to the Council relating to Serious and Organised Crime the Council has developed a checklist together with an action plan. The checklist has been completed and evidenced in liaison with Directors, Heads of Service and key Procurement and other Officers to reach a high level, but balanced assessment of our exposure to the risks and in doing this, actions have been highlighted as part of an improvement plan for managing those risks on an on-going basis.

- **Corporate Contract for Agency workers managed service**

The Council uses only specified, reputable employment agencies to source labour and the majority of our agency placements are made through our appointed managed service provider. It verifies the practices of any new agency it is using before accepting workers from that agency. The contractual audit process with the managed service provider supplies the required evidence of panel providers abilities to comply.

- **Officers from the Health, Wellbeing and Prevention Directorate and Place Directorate**

Officers from the Health, Wellbeing and Prevention Directorate and from the Business and Consumer Protection Service and Development Management in the Place Directorate regularly undertake routine inspections and deal with a wide range of enquiries relating to commercial and domestic premises as part of their statutory intervention programmes and intelligence led enforcement activities. All officers are required to have undertaken the Modern Slavery mandatory training package and are aware of the relevant signs to identify potential aspects of modern slavery when undertaking visits and other regulatory interventions and will refer this information to the relevant authorities, including the Gangmasters and Labour Abuse Authority (GLAA), where necessary.

- **Corporate Procurement**

The Council's Procurement team works with service areas to ensure the procurement of larger value goods and services on behalf of the Council include relevant due diligence to mitigate the risk of slavery and human trafficking occurring in our supply chains. This includes tenderer's declarations during the procurement process in respect of their compliance with the Modern Slavery Act 2015 and confirmation that they are not involved in such prohibited activity.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with the Modern Slavery Act 2015 we require all tenderers to confirm that they are compliant with the annual reporting requirements under the Act, where it is applicable to them. 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. However, serious violations of the Council's supplier expectations will lead to the termination of the business relationship.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide awareness raising training to our staff and Members. We have mandated this training for our own staff and we are part way through that programme. with 63.6% of all staff having already completed the training.

Shropshire Safeguarding Community Partnership

A Modern Slavery Statement template has been produced and agreed for partnership use.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking, which will include:

- Undertaking and providing access to further awareness training for staff involved in Commissioning and Procurement Activities and to continue awareness raising in Members induction training. Continuing the roll out of mandatory training for Council Staff to ensure as much awareness as possible.
- Undertaking and providing access to mandatory awareness training for all council staff about Community Safety matters which also includes tackling modern slavery and human trafficking.
- Reviewing and updating of our mitigating activity in relation to serious and organised crime.
- Undertaking further work to strengthen our processes and awareness raising for those areas that are identified as higher risk within our supply chains.
- Developing information for Tenderers to raise their awareness of the risks of modern slavery and human trafficking in their supply chains and clarify the Council's expectations of those organisations with whom we do business.
- Embed the work from the Adult Exploitation Pathway Pilot into everyday practice.
- Arrange a discussion session for public body commissioners to raise provide an update on Modern Slavery and identify current issues for public body commissioners.
- Join the LGA Modern Slavery Network and attend meetings.
- Further develop links with the Gangmasters and Labour Abuse Authority to access national, regional and local information and awareness.
- Reviewing and, where appropriate, updating the Sex Establishments Policy, which came into effect on 1 April 2014 and currently makes no reference to modern slavery or human trafficking; the timeline for this review is dependent on the resources available and those licensing policies that are subject to legally mandated reviews will take precedence.
- Reviewing and, where relevant, updating the Better Regulation and Enforcement Policy, which came into effect on 1 September 2018 and currently makes no reference to modern slavery or human trafficking. The timeline for any formal review and approval by Cabinet will be linked to the necessity for other changes to be made to this Policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Shropshire Council's Slavery and Human Trafficking Statement. This Statement has been approved by the Council's Chief Executive and the Leader of Shropshire Council. This Statement will be reviewed and updated annually.

Signed

Lezley Picton, Leader, Shropshire Council

Date

Signed

Andy Begley, Chief Executive, Shropshire Council

Date