

Appendix 1

Draft Modern Anti-Slavery and Human Trafficking Statement

Shropshire Council

MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT AND POLICY

1. Background

- 1.1 In 2013 the National Crime Agency estimated there were 10,000 to 13,000 victims of modern slavery and human trafficking in the UK.
- 1.2 In 2015 3,266 victims were referred via the ***National Referral Mechanism***. The National Referral Mechanism (NRM) is a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support. (see appendix attached for more details)
- 1.3 Forms of Modern Slavery and Trends from the National Returns – England & Wales are identified as:
 - 1.3.1 Sexual Exploitation; 42% of trafficking relates to sexual exploitation;
 - 1.3.2 Domestic servitude; 24% of reported victims are children;
 - 1.3.3 Forced Labour; 36% of all victims of modern slavery, one fifth are children;
 - 1.3.4 Criminal Exploitation; victims are forced to engage in criminal activity including benefits or financial fraud and the drugs trade. Cannabis cultivation is the most common form of exploitation in the drugs trade. 81% in this sub category are children and most are from Vietnam.
 - 1.3.5 Other forms of exploitation; organ removal, forced marriage, illegal adoption.
- 1.4 Indicators of Modern Slavery may include:
 - 1.4.1 People with no legal documents;
 - 1.4.2 People having old or untreated injuries;
 - 1.4.3 People who are malnourished/unkempt, withdrawn or appear to have a fearful presentation;
 - 1.4.4 Adults having multiple unrelated children;
 - 1.4.5 High levels of security; and or
 - 1.4.6 Poor quality of residence.

- 1.5 The **Duty to notify** for Local Authorities, Police, the Gangmasters Licensing Authority and the National Crime Agency commenced in November 2015, in cases when it is suspected that someone is the victim of human trafficking or slavery [Modern Slavery Act 2015]. Guidance on referral can be found at www.legislation.gov.uk/uksi/2015/1743/pdfs/uksi_20151743_en.pdf. It should be noted that there is an option to make a report on an anonymous person, or with their details if consent is given, which will then include the offer of further Home Office support.
- 1.6 In November 2017 the Department of Education issued Statutory guidance for local authorities on the **Care of unaccompanied migrant children and child victims of modern slavery**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/656429/UASC_Statutory_Guidance_2017.pdf
- 1.7 This guidance sets out the steps local authorities should take to plan for the provision of support for looked-after children who are unaccompanied migrant children, and who may be victims, or potential victims, of modern slavery including trafficking.
- 1.8 For detailed guidance on how to identify and protect trafficked children before they become looked-after, read '**Safeguarding children who may have been trafficked**'.
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

2. Statement

- 2.1 Shropshire Council's policy recognises that modern slavery is a crime and a violation of fundamental human rights and that it can take various forms such as slavery, servitude, forced and compulsory labour and human trafficking. All these forms have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 2.2 The Council has a zero tolerance towards any form of modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. The Council will endeavour to implement and enforce effective systems and controls to ensure modern

slavery is not taking place anywhere in its business or in any of its supply chains.

3. Policy

- 3.1 The Policy applies to all persons working for the Council or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 3.2 The Policy also applies to the Council's supply chains who we expect to meet the disclosure requirements under The Modern Slavery Act 2015. We also include in our contracting processes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

4. Responsibility for the policy

- 4.1 The Council's Members and Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The Council's Service Managers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure that they are effective in countering modern slavery.
- 4.3 Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

5. Standards

Shropshire Council will meet the following standards and also expects those with whom it does business, to meet these standards:

- 5.1 To support every individual's human right to live free from abuse, servitude and inhumane treatment.

- 5.2 To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business and supply chains.
- 5.3 To promote ethical business and operational practices in services delivered to it.
- 5.4 To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously.
- 5.5 To take appropriate steps to address actual instances of slavery and human trafficking.

6. Compliance with the policy and standards

- 6.1 All employees must read, understand and comply with this policy.
- 6.2 All employees must ensure that when contracting with any supply chains specific anti-slavery and human trafficking prohibitions are included in the contract.
- 6.3 The prevention, detection and reporting of modern slavery in any part of the Council's business or supply chains is the responsibility of all those working for the Council or under its control. Employees are required to avoid any activity that might lead to, or suggest a breach of this policy.
- 6.4 Employees must notify their manager or call the confidential whistle blowing helpline as soon as possible on 01743 252627 if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.5 Employees must raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible opportunity to the Council's nominated person for the National Referral Mechanism (NRM) (*Position and contact to be confirmed pending decision*)
- 6.6 Employees should note that where appropriate, and with the welfare and safety of local workers as a priority, the Council will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chain.
- 6.7 If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier or our supply chains constitutes any of the various forms of modern slavery,

raise it with their manager or talk to the Council's nominated person for the NRM.

7. Procurement

- 7.1 Shropshire Council's approach to procurement requires contractors to comply with this Modern Anti-Slavery Statement and policy and is included within the Councils contracting processes (see point 2.4) Where contractors annual turnover is over £36M they are required to implement due diligence procedures in relation to preventing modern slavery and human trafficking in their own supply chains.

8. Safeguarding

- 8.1 Shropshire Council works with a wide range of agencies to safeguard children, young people and adults with care and support needs who are at risk of abuse and neglect.
- 8.2 This should be read in conjunction with [West Midlands Safeguarding Children Procedures](#) and these procedures should be followed when considering children and young people who may have been trafficked. A child is defined according to the Children Acts 1989 and 2004 as anyone who has not yet reached their 18th birthday.
- 8.3 Trafficking of children is defined as the "recruitment, transportation, transfer, harbouring, and/or receipt of a child for the purpose of exploitation" (Article 3c of the United Nations Palermo Protocol 2000). Therefore any child moved for exploitative reasons is considered to be a trafficking victim. This is because it is not considered possible for children to give informed consent.
- 8.4 If any employee identifies a child, young person or adult with care and support needs who they think may be experiencing Modern Slavery, it must be reported to the First Point of Contact Team on 0345 678 9021 immediately who will pass the information to the relevant Safeguarding Team.

9. Whistleblowing

- 9.1 The Council's whistle blowing policy encourages all its employees, councillors, contractors, their agents and /or sub-contractors consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on

behalf of the council, or supply chain. The policy is designed to make it easy to make disclosures without fear of discrimination and victimisation.

10. Communication and awareness of this policy

- 10.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, is available via the Council's Leap into Learning portal and will form part of the induction process for all individuals who work for the Council, and regular training will be provided as necessary.
- 10.2 The Council's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

11. Breaches of this policy

- 11.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 11.2 The Council may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

Annex - Useful Telephone numbers and who to ring

If in doubt ring the Whistle Blowing Helpline ☎01743 252627

Situation	Telephone Number	Contact
Contact Whistleblowing helpline If it concerns any aspect of service provision, conduct of officers and others acting on behalf of the council, or supply chain.	☎01743 252627	Whistle Blowing Helpline
Contact FPOC If in relation to vulnerable adults/ children.	☎0345 678 9021	First point of contact (Safeguarding)
Contact HR if it is about breaches regarding council employees	☎01743 252488 Email (monitored daily) Ask.hr@shropshire.gov.uk	Human Resources ASC Business partner

Contact NRM officer If you have concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier that may have national consequences	 Sarah Hollinsbland-Bland 01743 255863	National Referral Mechanism – This needs to be confirmed following policy decision
Contact procurement number if in relation to suppliers	 01743 252993	Commissioning Development & Procurement Manager