



Modern Slavery Statement

2022 - 2023



555k
Population



724
County size in
sq miles



58.4
all crimes per
1,000 population



0.1%
Deprivation



£504m
Total Budget



2144
Number of
suppliers



4245
Number of
employees

Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. In its wider sense it is commonly accepted to include:

- sexual exploitation
- forced or bonded labour
- human trafficking
- criminal exploitation
- financial exploitation
- domestic servitude
- child slavery
- offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003
- forced or early marriage

Buckinghamshire Council has responsibilities as an employer and procurer / commissioner of services and also has duties to notify the Secretary of State of any suspected victims of slavery or human trafficking (as introduced by section 52 of the Modern Slavery Act 2015) and to take action and work with other responder agencies (Civil Contingencies Act 2004).

Publishing this statement on a voluntary basis demonstrates our public commitment to play our collaborative part in reducing modern slavery and human trafficking, including through effective partnership working (prevention, identification and support of victims, awareness raising, information sharing, disruption and enforcement).

This statement sets out the steps we have already taken and are planning to take to help detect modern slavery in our own services, businesses and our supply chains. It covers all direct employees, agency workers and externally contracted workers (e.g. consultants).

This statement covers the reporting period **April 2022 - March 2023**

Organisational Structure and Supply Chains

Buckinghamshire Council is a unitary authority, created in April 2020, covering the county of Buckinghamshire and a population of 555,000 people. The Council's vision is to make Buckinghamshire the best place to live, raise a family, work and do business. Key priorities include 'protecting the vulnerable' and 'strengthening our communities'.

The Council has an annual budget of £504 million and employs 4245 staff across 6 directorates (Adults & Health, Children Services, Communities, Deputy Chief Executive, Planning, Growth & Sustainability and Resources). As a large unitary authority, it has 147 Councillors supported through a cabinet and committee structure.

The Council purchases goods and services and works from 2144 suppliers, across a number of categories. It is recognised that the Council's supply chains are global and complex, with many high labour content contracts. Modern slavery risks are present throughout the contracting lifecycle and the Council is therefore embedding due diligence into its contract and supplier management programme.

Governance

Report on activity during the previous financial year 2022 – 2023

Actions for 2022-2023	Progress on actions taken in 2022-2023
<p>Embed the work of the Joint Modern Slavery and Exploitation Sub-Group, creating and delivering a partnership action plan.</p> <p>Review the referral pathway for adult victims of modern slavery and exploitation.</p>	<p>✓ The Joint Modern Slavery & Exploitation Sub-Group focusing on adults and children has now been in place for one year. It has multi-agency representation and has developed an action plan focusing on outcomes set out in the Safer Bucks Plan. The Group regularly reports on progress against the action plan to the Safer Buckinghamshire Board via the Priority Sponsor.</p> <p>✓ Adult Social Care has improved data monitoring and recording for modern slavery cases so that referrals via the National Referral Mechanism and Duty to Notify can be effectively tracked and audited. Further work will be undertaken to improve the referral pathway and strengthen the support to adult victims of modern slavery and exploitation. This will be carried forward as an action for the 2023-2024 period.</p>

Policies and Procedures

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act and helping the Council to ensure that it is taking reasonable action to address the risk of this crime occurring in Buckinghamshire.

✓ **Employees Code of Conduct**

The Council's Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.

✓ **Councillors Code of Conduct**

The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Member Code of Conduct. Allegations of breaches are initially handled by the Monitoring Officer. Both the Code and Complaints Process are in the Council's Constitution.

✓ **Recruitment**

The Council's recruitment processes are transparent. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

✓ **Agency Workers and Pay**

The Council has a managed service contract in place with Pertemps for the provision of temporary agency staff. Modern Slavery is included as part of Pertemps' Supplier Information Form which is sent across to all 2nd Tier Supplying Agencies to complete. The Council through its human resources policies ensures that all employees are paid fairly and equitably.

✓ **Whistleblowing**

The Council encourages all its employees, workers, consultants and agency staff to report any concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of reprisal or victimisation

✓ **Corporate Complaints System**

The Council operates a complaints procedure to deal with complaints about its services, and this can be used to report community concerns such as overcrowding or issues which might reveal slavery or trafficking and which merit investigation or reporting to a partner agency.

Safeguarding

The Council takes very seriously its responsibilities to safeguard the welfare of children and vulnerable adults and protect them from harm and develops, implements and monitors its policies and procedures accordingly. We've created a set of guidelines and rules that apply not just to employees but to volunteers and contractors and anyone else who will work in these circumstances.

There is a 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 a pathway for all referrals into Children's Social Care with officers trained in the MASH and Locality Teams. There is a clear pathway for all referrals where it is considered that a child is at risk of exploitation and a specialist Missing & Exploitation Hub equipped to work with those children.

Partnership working

The Missing and Exploitation Hub is a multi-agency team made up of partners from Children's Social Care, Thames Valley Police, Barnardo's, Health and Education as well as a Parent worker. The Hub provides consultative support to lead professionals working with children and young people who are victims of exploitation as well as offering direct intervention for children who are experiencing exploitation. The Hub will also signpost towards appropriate support for those over 18, up to the age of 25.

The Council is a member of the Safer Buckinghamshire Board. This represents the county's Community Safety Partnership (CSP) as defined under Section 5 of the Crime and Disorder Act 1998. CSPs are defined as: "An alliance of organisations which generate strategies and policies, implement actions and interventions concerning crime and disorder within their partnership area".

The Council has responsibilities under the Modern Slavery Act as a first responder and in tackling modern slavery and exploitation which are not covered in detail within this Modern Slavery Statement. The wider work we are undertaking as a council is addressed through the [Safer Buckinghamshire Strategy](#) and associated delivery plans under the Safer Buckinghamshire Partnership.

There is also a countywide Anti-Slavery and Exploitation Network (the Bucks A-SEN) which brings together over twenty separate organisations from the public, private and voluntary sector. The network meets regularly to share best practice, increase understanding, and help deliver against the priorities identified by the CSP.

The Safer Buckinghamshire Board (SBB) is the strategic board for the Safer Buckinghamshire Partnership. The Board works closely with the Health and Wellbeing Board (HWB), Buckinghamshire Safeguarding Children Partnership (BSCP) and Buckinghamshire Safeguarding Adults Board (BSAB), recognising that many agendas are shared and that all players have a role in safeguarding children and adults who are vulnerable to abuse, neglect and exploitation.

Training and Development

Report on activity during the previous financial year 2022 – 2023

Actions for 2022-2023	Progress on actions taken in 2022-2023
<p>Map training offerings and opportunities across the Partnership to understand good practice, identify gaps and ensure a breadth of exploitation topics are covered.</p> <p>Review and refresh the Exploitation Training Strategy.</p> <p>Review understanding and awareness of modern slavery for all staff, as part of safeguarding responsibilities</p> <p>Roll out e-learning to key staffing groups in agreed service areas.</p>	<ul style="list-style-type: none"> ✓ A training audit has been undertaken to map training provided by partners to their staff and training offered externally. The audit identified a comprehensive range of basic training offered across partner agencies. It also highlighted several gaps in delivery including that limited training is offered to local voluntary and community sector organisations. ✓ The previous training strategy has been reviewed and relevant areas will be carried forward and shaped into actions within the delivery plan for the forthcoming year, along with actions to address the gaps identified through the training audit. ✓ A mandatory training steering group was established to review corporate training. Following its proposals, it has been corporately agreed that modern slavery awareness training must be completed by all staff including agency and interim staff assigned for 3 months or more. This will be delivered via an e-learning package and is in place for new staff from April 2023 onwards. Existing staff are required to complete the training as part of their continuous professional development. ✓ This action has been superseded by the agreement that modern slavery training will be mandatory for all Council staff. During 2023-2024 the training will be promoted corporately with staff and specifically with key staffing groups in agreed service areas. In addition, materials will be developed to improve service area understanding of how to report modern slavery and exploitation.

The Council has a programme of mandatory training that all employees and members must complete, including Safeguarding Awareness. Bespoke Modern Slavery and Human Trafficking eLearning is now also mandatory for all staff and must be completed as part of corporate compliance training.

A Modern Slavery and Exploitation training resource specifically for Councillors is available on the Council's intranet pages.

As part of the Safer Buckinghamshire Partnership there is introductory training on modern slavery and exploitation for front line professionals. More specialised training is also available to staff within Children's Services as part of our first responder role and our local authority duty with the National Referral Mechanism (NRM).

Our Procurement team delivers a training package for both procurement exercises and for contract management which highlights the potential risk of modern slavery and signs that officers should look out for. Contract Managers are required to undertake this training module.

Managing Risk and Due Diligence

Report on activity during the previous financial year 2022 – 2023

Actions for 2022-2023	Progress on actions taken in 2022-2023
<p>Roll out risk assessment tool to be used with all contracts and supplier organisations on the Council's Contract Management Application (CMA.)</p> <p>Mandatory contract management performance indicators embedded for all qualifying contracts and supplier organisations.</p> <p>Continued promotion of accreditation schemes so that supplier organisations are expected to meet fully their industry / sector / profession requirements on modern slavery and exploitation.</p> <p>Prepare and disseminate resources and tools for providers to support due diligence around the use of agency staff.</p> <p>Deliver workshop sessions for Integrated Commissioning staff to ensure they are confident checking personnel files during monitoring visits</p>	<ul style="list-style-type: none"> ✓ The risk assessment tool is in place and used routinely for contracts and supplier organisations. It is based upon the Government's 'Modern Slavery Assessment Tool' and national guidance. ✓ We are now regularly using the new fields within CMA to capture information about supplier organisations adoption / compliance with anti-modern slavery and exploitation. However, this has not yet become mandatory. During the coming 2023-24 period this will become mandatory for all qualifying contracts and supplier organisations. ✓ We continue to provide training and support for contract managers at the Council to ensure that contract review meetings are robust and effective in relation to discussions about modern slavery and exploitation. This includes promotion of industry / sector / professional requirements on modern slavery and exploitation. ✓ Care sector specific resources have been shared with providers including training resources and frameworks designed specifically for providers. There have also been additional awareness raising sessions for providers in targeted areas such as overseas recruitment. ✓ Integrated Commissioning staff have had additional role-focused awareness raising sessions in addition to modern slavery training. Commissioners seek evidence that care providers are applying robust recruitment processes as part of their routine quality monitoring visits, and this includes checking personnel files. New commissioning staffed are trained through a shadowing process to ensure competence and confidence.

The Council's contract procedure rules provide clarity as to the requirements for commercial decisions to safeguard the Council from potential claims that put into question the integrity of the Council and its employees. The Council has standard contract terms and conditions that include an appropriate clause placing obligations on suppliers to comply with the Modern Slavery Act 2015. By including requirements within our terms and conditions we have begun to close the door on new contracts being established where there are risks of modern slavery and exploitation. This is progressive work and over time will capture all commercial relationships.

Responses to Invitation to Tenders for contracts over the contract procedure rules threshold of £213k (inc. VAT) must confirm whether they have an active modern slavery policy and approach. This must be available for reviewing and what actions they actively take to negate the risk of modern slavery in their operation. This assessment is part of the Selection Questionnaire and will determine if their Invitation to Tender response will be taken forward in the procurement process.

Contract Managers will continue to monitor their contracts with relation to modern slavery commitments by suppliers and their sub-contractors. Where a risk assessment shows there is potential for modern slavery to occur, contract managers will seek reassurance that the supplier has policies, procedures and training in place to detect and deter such abuse. Training is in place to help officers understand the risk of modern slavery and what actions they should take, including undertaking surprise audits of a supplier's place of work.

Planned Actions for 2023 – 2024

Governance

- ✓ Explore the merit in establishing a Key Performance Indicator for modern slavery and exploitation to ensure effective tracking of referrals for adult and child victims - both National Referral Mechanism (NRM) and Duty To Notify (DTN).
- ✓ Review the referral pathway and support offered for adult victims of modern slavery and exploitation to ensure partners know how to refer and staff know how to respond to victims.

Training and Development

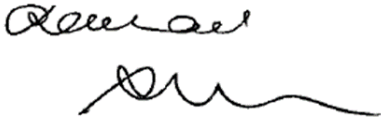
- ✓ Promote modern slavery awareness training corporately with staff and specifically with key staffing groups in agreed service areas. Monitor uptake of modern slavery awareness e-learning by new and existing staff.
- ✓ Develop materials to improve service area understanding of how to report modern slavery and exploitation.
- ✓ Explore funding opportunities and seek new provider to establish a modern slavery training offer to voluntary and community sector organisations in Buckinghamshire.

Managing Risk and Due Diligence

- ✓ Continue to develop and deliver the Modern Slavery and Exploitation Awareness training for all commissioners and contract managers.
- ✓ Develop a revised Modern Slavery and Exploitation risk assessment tool specifically for the Integrated Commissioning Service to ensure content is easily understood and consistently applied by contract leads.
- ✓ Ensure mandatory contract management performance indicators on supplier organisations adoption/compliance with anti-modern slavery and exploitation, are embedded for all qualifying contracts and supplier organisations.

Approval

This statement has been approved by the Council's Cabinet Committee and is supported by the Safer Buckinghamshire Board, Buckinghamshire Safeguarding Children Partnership, Buckinghamshire Safeguarding Adults Board and Buckinghamshire Health & Wellbeing Board. It will be reviewed and updated annually. The statement, progress and new actions will be reported to the Cabinet Committee and, where appropriate other committees, annually for performance monitoring and assurance purposes.



Rachael Shimmin, Chief Executive
Corporate Lead

Date: 9th January 2024



Councillor Arif Hussain, Cabinet Member for Communities
Council Lead

Date: 9th January 2024