



# Modern Slavery Statement

## 2021 - 2022

---



**547k**  
Population



**724**  
County size in  
sq miles



**67.8**  
all crimes per  
1,000 population



**0.2%**  
Deprivation



**£459m**  
Total Budget



**1495**  
Number of  
suppliers



**4146**  
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, awareness raising, information sharing 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 2021 - March 2022**

## Organisational Structure and Supply Chains

Buckinghamshire Council is a new unitary authority covering the county of Buckinghamshire and a population of 547,000 people. The Council's vision is to make Buckinghamshire the best place to live, raise a family, work and do business.

The Council has an annual budget of £459 million and employs 4146 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 1495 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

GOVERNANCE	
Planned Actions for 2021-2022	Actions taken in 2021-2022
<ul style="list-style-type: none"> <li>✓ Develop Key Performance Indicators for modern slavery and exploitation training.</li> <li>✓ Establish a partnership group to work together to tackle child and adult exploitation, to support the priorities of the Safer Buckinghamshire Board and Safeguarding Boards in helping vulnerable people.</li> </ul>	<ul style="list-style-type: none"> <li>✓ We have agreed the need for performance indicators for modern slavery and exploitation training for contract management. Subject to approval the intended indicator is that 'Identified commissioners and contract managers have attended modern slavery and exploitation training in 2022-2023.'</li> <li>✓ We have worked with partners to develop a Joint Modern Slavery &amp; Exploitation Sub-Group focusing on adults and children. The inaugural meeting was held on 24th March 2022. The multi-agency group is responsible for developing and implementing an action plan to support delivery of Priority 2 in the Safer Bucks Plan. The Group reports to the Safer Buckinghamshire Board and links with the Safeguarding Boards and Serious Violence Taskforce.</li> </ul>

## 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.

### **Business Planning**

The Council's business plans include a section on safeguarding that specifically makes reference to human trafficking and the steps those services will take to manage that risk.

### **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 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 a clear 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 primarily provides consultative support to lead professionals working with children and young people who are victims of exploitation and can work with and signpost those in need of support 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 Plan](#) and associated delivery plans under the Safer Buckinghamshire Partnership and our shared working through the Joint Protocol.

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.

### Joint Protocol

The Joint Protocol recognises 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. The Joint Protocol has been formally signed off across the Health and Wellbeing Board (HWB), Safer Buckinghamshire Board (SBB), Buckinghamshire Safeguarding Children Partnership (BSCP), Buckinghamshire Safeguarding Adults Board (BSAB). It aims to ensure:

- there is clarity and agreement regarding the roles and responsibilities of different partnerships and boards in relation to safeguarding
- that governance arrangements are clear and work is well co-ordinated, preventing duplication of effort
- that we achieve more by working together
- that working together has a positive impact on people and communities
- that there is effective challenge and scrutiny of safeguarding arrangements across Buckinghamshire

## Training and Development

TRAINING AND DEVELOPMENT	
Planned Actions for 2021-2022	Actions taken in 2021-2022
<ul style="list-style-type: none"> <li>✓ Continue to deliver virtual training sessions to staff and partners across Buckinghamshire to raise awareness of modern slavery and exploitation.</li> <li>✓ Identify key staffing groups to undertake e-learning and roll out to agreed service areas.</li> <li>✓ Develop toolkit for Members to raise awareness of councillor responsibilities for modern slavery and exploitation.</li> <li>✓ Improve staff understanding of modern slavery and exploitation through increased service representation at Bucks A-SEN and promotion of Anti-Slavery Day.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Worked with Willow, Thames Valley Partnership to provide virtual training to a further 84 staff and partners across Buckinghamshire to raise awareness of modern slavery and exploitation.</li> <li>✓ The e-learning is available to all staff via the e-learning Hub and key staffing groups have been identified. However, the roll out to services across the Council has been delayed. This action will be incorporated into our training programme for 2022-2023.</li> <li>✓ A Modern Slavery and Exploitation training resource specifically for Councillors is now available on the Council intranet pages. It contains eight useful topics including how to spot signs of exploitation, reporting concerns, the impact of Covid 19 on modern slavery and further e-learning and training available.</li> <li>✓ We increased service and partnership representation at our regular Bucks A-SEN and now have over 25 organisations represented. Speakers this year have included nationally recognised organisations such as the Human Trafficking Foundation, Clewer Initiative and Gangmasters &amp; Labour Abuse Authority.</li> </ul>

The council has a programme of mandatory training that all employees and members must complete, including eLearning Safeguarding Awareness which references modern slavery.

As part of the council’s Safer Buckinghamshire Plan there is introductory training on modern slavery and exploitation for front line professionals and Single Point of Contact (SPOC) training as part of our first responder role and our local authority duty with the National Referral Mechanism (NRM). Bespoke eLearning to raise awareness of modern slavery and exploitation is now also available for council staff.

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

MANAGING RISK AND DUE DILIGENCE	
Planned Actions for 2021-2022	Actions taken in 2021-2022
<ul style="list-style-type: none"> <li>✓ Undertake a risk assessment of our suppliers utilising the Modern Slavery Assessment Tool and national guidance to determine high risk areas.</li> <li>✓ Introduction of mandatory contract management performance indicators on modern slavery and exploitation.</li> <li>✓ Promotion of accreditation schemes that apply to supplier sectors and consider these as qualifying criteria for suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>✓ We have designed a tool for use within our contract management application (CMA) for contract managers. This will be rolled out during 2022 – 23 to be used with all contracts and supplier organisations on CMA.</li> <li>✓ We have introduced fields within CMA to capture information about supplier organisations adoption / compliance with anti-modern slavery and exploitation. During the coming 2022-23 period this will become mandatory for all qualifying contracts and supplier organisations.</li> <li>✓ We have provided training and support for contract managers of the Council to ensure that contract review meetings include an update on anti-modern slavery and exploitation. During the coming 2022-23 period we will also expect the supplier organisations to meet fully their industry / sector / profession requirements on modern slavery and exploitation.</li> </ul>

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.

Where there is a risk assessment for the 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 2022 – 2023

### Governance

- ✓ Embed the work of the Joint Modern Slavery and Exploitation Sub-Group, creating and delivering a partnership action plan.
- ✓ Review the referral pathway for adult victims of modern slavery and exploitation.

### Training and Development

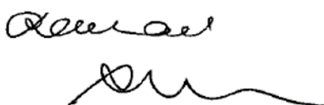
- ✓ Review and refresh the Exploitation Training Strategy.
- ✓ Map training offerings and opportunities across the Partnership to understand good practice, identify gaps and ensure a breadth of exploitation topics are covered.
- ✓ Roll out e-learning to key staffing groups in agreed service areas.
- ✓ Review understanding and awareness of modern slavery for all staff, as part of safeguarding responsibilities.

### Managing Risk and due diligence

- ✓ Roll out risk assessment tool to be used with all contracts and supplier organisations on CMA.
- ✓ Mandatory contract management performance indicators embedded for all qualifying contracts and supplier organisations.
- ✓ Continued promotion of accreditation schemes so that supplier organisations are expected to meet fully their industry / sector / profession requirements on modern slavery and exploitation.
- ✓ Prepare and disseminate resources and tools for providers to support due diligence around the use of agency staff.
- ✓ Deliver workshop sessions for Integrated Commissioning staff to ensure they are confident checking personnel files during monitoring visits.

## 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: 19th July 2022



Councillor Steve Bowles, Cabinet Member for Communities  
Council Lead

Date: 19th July 2022