

1. Introduction

- 1.1. East Suffolk Council recognises its responsibility to take a robust approach to slavery and human trafficking. This annual statement sets out the Council's ambition to understand all potential modern slavery risks related to its activities, and to put in place actions that are aimed at ensuring that there is no slavery or human trafficking in its own activities and supply chains.
- 1.2. The overall aims of the Modern Slavery Act 2015 are to pursue organised criminals and opportunistic individuals behind the modern-day slave trade and to prevent people from engaging in modern slavery crime. The Act places a legal duty on Councils and we recognise our responsibility to take a robust approach to slavery and human trafficking.
- 1.3. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that supply chains are free from slavery and human trafficking.

Definition of modern slavery

- 1.4. Modern Slavery is a term the government has used in the Modern Slavery Act to encapsulate the offences of slavery, servitude and forced/compulsory labour, and human trafficking.

Guidance issued by the Home Office in support of the Act, gives the following more precise definitions:

- a) Slavery: Where someone exercises over another person powers associated with the right of ownership.
- b) Servitude: Where someone is obliged to provide services through the use of coercion, including the obligation to live on another person's property.
- c) Forced or Compulsory Labour: Where work or service is exacted from someone under threat or coercion and for which that person has not volunteered.
- d) Human Trafficking: Where the movement of an individual is arranged or facilitated, with a view to that person being exploited, even if they have given their consent to travel.

However, modern slavery includes numerous types of exploitation, many of which may occur together, and may not be limited to the definitions above.

Under Section 1 of the Modern Slavery Act a person will commit an offence if they:

- a) Hold another person in slavery or servitude and the circumstances are such that they know or ought to know that the person they hold is in slavery or servitude, or;
- b) Require another person to perform forced or compulsory labour and the circumstances are such that they know or ought to know that the person is being required to perform such labour.

Under Section 2 of the Act, a human trafficking offence will have been committed if an individual has arranged or facilitated the travel of another person with a view to that person being exploited:. This includes:

- a) If that individual intends to exploit the other person during or after travel, or;
- b) If that individual knows or ought to know that the other person is likely to be exploited by someone else. Guidance on the Modern Slavery Act is available at: [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/modern-slavery-how-to-identify-and-support-victims)

2. Organisational structure and supply chains

- 2.1. East Suffolk Council provides a wide range of statutory and discretionary services for its residents, businesses, visitors and the wider public. Consequently, it purchases a wide range of goods and services. This Statement covers all activities of the Council, including but not limited to all direct employees, agency workers, and services delivered on behalf of the Council by third party organisations and in the Council's supply chains.
- 2.2. We have conducted risk assessments of our activities to assess whether or not particular activities are high risk in relation to slavery or human trafficking. We consider we currently have no high risk activities.

Responsibility

- 2.3. Responsibility for the organisation's anti-slavery initiatives is as follows
 - **Policies:** The Human Resources Manager and the Legal Services Manager are jointly responsible for reviewing this policy and the Procurement Manager is responsible for keeping under review contract procedures where a risk is identified in the supply chain. This policy will be reviewed annually or when legislation changes.
 - **Risk assessments/Investigations/due diligence:** It is the responsibility of the Procurement Manager to ensure that procurement processes are robust in identifying potential risks in relation to slavery and human trafficking, and mitigating these risks as far as possible.
 - **Referral:** Any concerns should be raised initially with the Head of Communities, the officer responsible for Safeguarding.

3. Relevant policies

- 3.1. The council operates the following policies that describe their approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.
 - **Whistleblowing policy** - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk

of slavery or human trafficking. The council's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct** - The code makes clear to employees the actions and behaviour expected of them when representing the council. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- **Supplier Selection** – We are committed to ensuring that suppliers adhere to the highest standards of ethics. Since 1 October 2015, commercial organisations that carry on a business or part of business in the UK, supply goods or services and have an annual turnover of £36 million or more have been required under Section 54 of the Act to prepare a slavery and human trafficking statement as defined by section 54 of the Act. We allow potential suppliers to self-declare that they meet the relevant criteria in the supplier selection stage. If a supplier seriously misrepresents any factual information in filling in the procurement documentation, and so induce an authority to enter into a contract, the council will seek damages in the event that a contract has been awarded to a bidder as a result of receiving false information. The supplier may be excluded from the procurement process, and from tendering for other contracts for three years. If fraud, or fraudulent intent, can be proved, the supplier or supplier's responsible officers may be prosecuted and convicted of the offence of fraud by false representation, and the supplier must be excluded from further procurements for five years; all potential suppliers are required to provide up to date information.
 - **Recruitment/Agency workers policy** - We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency. New employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines as appropriate.
 - **Safeguarding children and vulnerable adults policy**. Our safeguarding policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery and is supported by training for staff, Councillors and delivery partners.

4. Performance

4.1. We consider ourselves to be low risk on the basis although, the council do:

- Require all HR Professionals to be suitably qualified in relation to recruitment procedures. Further all recruiting managers are supported by HR staff and training is offered in recruitment and interviewing techniques.
- Have in place robust procurement procedures which reflect the requirements of the Act; and

- Keep under review supply chain and contract procedures.

5. Partnership Working

5.1 Partnership working is key to preventing Modern Slavery and supporting those that are most vulnerable in our communities. In Suffolk, the Safer & Stronger Communities Board (SSCB) has Modern Slavery as one of its key priorities, which means it also appears as a priority on the East Suffolk Community Safety Action Plan.

Modern Slavery Network - A new Modern Slavery Network was formed in June 2021, of which several East Suffolk staff are members. This aims to share best practice across the Suffolk System, share data and information, develop training and awareness raising campaigns and communicate to wider partners about developments from central government. It also produces a regularly updated Modern Slavery Strategy and Action Plan, focused on four key themes: a) Identifying Victims, b) Supporting Victims, c) Preventing Exploitation and d) Protection & Justice.

Community Safety Partnership - The East Suffolk Community Safety Partnerships (CSP) is made up of representatives from the 'responsible authorities' (the police, local authorities, fire and rescue authorities, the probation service, and health), who work together to protect their local communities from crime, and help people feel safer. The CSP produces an annually-updated action plan which includes objectives and actions on Modern Slavery, and which drives a range of pro-active activity to help educate local communities, business and organisations on Modern Slavery, how to spot the signs and how to report it.

Criminal Exploitation - Multi Agency Criminal Exploitation (MACE) panels were introduced in June 2021. East Suffolk has two MACE panels, one in the south of the District and one in the north. They have the objective of meeting to discuss individual cases of young people who may be at risk of criminal exploitation and taking a multi-agency approach to protecting them from harm due to exploitation.

Criminal Exploitation Hubs were launched in May 2021 with one Hub already operating in Felixstowe and others planned. Criminal Exploitation Hubs allow highly-trained staff to work, at a local level, with key partners, voluntary groups, communities, children, and families to support, disrupt and empower children and communities and reduce the risk of exploitation.

6. Training

6.1. The council is in the process of incorporating an on-line/e-learning package for staff including those regularly awarding contracts, those in roles involving significant contact with the public, and HR professionals working within the council, providing training on modern slavery. This will be in addition to the Safeguarding Training which is very well received and is delivered to all relevant staff. This includes information on signs of trafficking and slavery and how to refer concerns.

6.2. Our modern slavery training will cover:

- our business's procurement practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant person within the councils;
- what external help is available, for example through the Modern Slavery Helpline, Gang masters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

7. Awareness-raising programme

7.1. As well as training key staff, the council will raise awareness of modern slavery issues by regularly circulating information through intranet links and messages.

7.2. The information available to staff will explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking and their role in this;
- potential risks in our communities in relation to slavery and trafficking
- how employees can flag up potential slavery or human trafficking issues to the relevant person within the council; and
- what external information and help is available, for example through the Modern Slavery Helpline.

6.3 The briefing note in the following link will also be publicised:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638368/MS - a briefing NCA v2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638368/MS_-_a_briefing_NCA_v2.pdf)