

Buckinghamshire Council: Modern Slavery Statement 2020

As a new authority Buckinghamshire Council published its first modern slavery statement in April 2020 in *advance* of the financial year and could not include previous activities.

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, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and 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 the horrendous crimes of modern slavery and human trafficking, including through effective partnership working (prevention, identification, awareness raising, information sharing & 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).

Relevant policies

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.

- **Employee's 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. We try to maintain the highest standards of employee conduct and ethical behaviour and alleged breaches are investigated by line managers. The council has a process in place for employees to make declaration of outside interests where appropriate including other paid employment.

- **Recruitment**

The council's recruitment processes are transparent and reviewed regularly. 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**
Where the need arises to source resources from alternative agencies, the council will verify the practices of any new agency it is using before accepting workers from that agency.
- **Pay**
The council through its human resources policies ensures that all employees are paid fairly and equitably.
- **Business planning**
The council's business plans will each include a section on safeguarding that specifically makes reference to human trafficking and the steps those services will take to manage that risk.
- **Training and development**
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 Community Safety Strategy there is introductory training on modern slavery and exploitation for front line professionals and also Single Point of Contact (SPOC) training as part of our first responder role and our local authority duty with the National Referral Mechanism (NRM). We have also completed the development of an e-learning package that will be rolled out in 2020.

Our Procurement team has developed 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.

Our due diligence processes for slavery and human trafficking

- **Whistleblowing**
The council publishes its "whistle blowing" confidential reporting policy as part of its constitution. This encourages all its employees and others the council deals with who have serious concerns about any aspect of the council's work to come forward and voice their concerns, and lays out a process for doing so, which complies with the Public Interest Disclosure Act 1998 so that if necessary employees may make disclosures, without fear of reprisal or victimisation.
- **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.

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 Childrens 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.

- **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.

- **Suppliers and those who provide services on our behalf**

The council's contract standing orders provide clarity as to the requirements for commercial decisions in order 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 and these include an appropriate clause placing obligations on suppliers to comply with the Modern Slavery Act 2015. 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.

- **Partnership working**

The Missing and Exploitation Hub is a multi-agency team made up of partners from Childrens Social Care, Thames Valley Police, Barnardo's, Health and Education as well as a Parent worker, currently provided by Buckinghamshire Safeguarding Children Partnership. The team support victims of all forms of exploitation and can work with and sign post those in need of support up to the age of 25.

The Council is a member of the Safer Buckinghamshire Board. This is 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". It reviews partnership progress in addressing issues of modern slavery in its widest sense and is signed up to a countywide 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.

Approval

This statement has been approved by the council's Cabinet Committee and is supported by the Buckinghamshire Safeguarding Children Partnership and the Buckinghamshire Safeguarding Adults 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.