

---

## **Modern Slavery Statement 2018/19**

This statement is made in accordance to s.54 of the Modern Slavery Act 2015. It sets out the steps that Southend-on-Sea Borough Council has taken, and is continuing to take, to ensure that modern slavery and human trafficking is not taking place within our organisation, our partners, our sub-contractors or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Council has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to ensuring effective systems and controls are in place to safeguard against any form of modern slavery taking place within the organisation or supply chain.

### Our business

Southend-on-Sea Borough Council is a unitary local authority, serving a population of 180,600 residents. The Council spends about £150m per year on purchasing services, supplies and works contracts to meet the delivery of services to the public. The Council employs around 1,650 staff to provide a huge range of services to fulfil statutory and discretionary services for residents, businesses, visitors and partners.

In addition to the Council's responsibilities as an employer, it is committed under [s.52 of the Modern Slavery Act 2015](#) to notify the Secretary of State of suspected victims of slavery or human trafficking. Southend-on-Sea is located on the Thames Estuary with a long coastline. As such it is close to Tilbury docks, DP World London Gateway and Harwich docks. Southend has an airport and is close to London meaning there are several transport and access routes for consideration in relation to modern slavery and human trafficking.

### Our areas of focus

We deem particular areas of focus within the Council to include children and adult services, housing (including social and private sector housing), environmental health, education, and licencing. Homeless people or those at risk of homelessness are at higher risk of exploitation and falling prey to modern slavery.

We recognise that other areas of focus in the borough include (\*but are not limited to) restaurants, car valeting services, the sex trade and affiliated establishments, the construction industry (including sub-contractors) and forced or arranged marriages.

We are currently working on the provision of corporate and community awareness raising communication strategies and training programmes for staff to ensure that our workforce, contractors and community are fully aware of the signs of modern slavery and human trafficking, including the methods of reporting incidents.

The Community Safety Team was involved in Operation Clover throughout 2017, which became a Community Policing Team patrol priority with fortnightly updates. The aim of which was to gather intelligence and identify locations of modern slavery and human trafficking, including regular visits to identify premises by the Community Policing Team and partner organisations. This intelligence was shared with Project Aident, a National Crime Agency initiative to target modern slavery and human trafficking through a weekly action agenda in a given month, aimed at specific communities and issues. Intelligence gathered was shared with Council housing and social care departments, resulting in joint operations to address safeguarding concerns raised.

### Our policies

The Council reviews its policies and procedures on a regular basis and operates a number of internal policies to ensure we are conducting business in an ethical and transparent manner and in compliance with the Modern Slavery Act. These include:

1. The [Modern Slavery guidance 2017-18](#) sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. The guidance should be read alongside Southend, Essex and Thurrock ([SET](#)) [Safeguarding Adults Guidelines](#) and the ([SET](#)) [Safeguarding Child Protection Procedures](#).
2. We operate a robust 'Safer Recruitment and Selection Policy', including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. The Procurement Team is responsible for ensuring all procurement activity complies with the Council's 'Contract Procedure Rules' and wider 'Public Contract Regulations 2015'.
4. We operate a 'Whistleblowing Policy' so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
5. Our 'Code of Conduct' explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Our suppliers

Southend-on-Sea Borough Council operates a supplier policy and maintains a database of registered suppliers as well as a corporate contract register. We conduct due diligence on all suppliers before allowing them to become a contractual supplier. This due diligence may include an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They comply with the Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015
- They are a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?
- If they answer yes to the previous question, are they compliant with the annual reporting requirements contained within section 54 of the Act 2015?

Contract terms and conditions, including the supplier questionnaire process, are currently under review to ensure they fully incorporate modern slavery and human trafficking. Further updates will follow once this process has been completed.

## Training

Corporate Procurement regularly provides training across the business that covers the Corporate Contract Procedure Rules (CPRs). Within the CPRs are ethical procurement requirements that link to the procurement process which tests suppliers on their compliance with the Modern Slavery Act. Corporate Procurement also developed a Contract Management Framework, with training rolled out in 2016 and refreshers held bi-annually. Contract Management across the business is key to ensuring that suppliers are monitored in terms of compliance.

The Contracts Team provided training in May 2016 via the Border Agency for care home providers to have an enhanced awareness around forged documents to prevent employing illegal workers. The Council (via the Contracts Team / No Recourse to Public Funds (NRPF) Network) offer care home providers the ability with consent to 'right to work' status formally (the Council offers this service through the Home Office) as sanctions for employing an illegal worker carry steep financial penalties and could lead to imprisonment: <https://www.gov.uk/penalties-for-employing-illegal-workers>.

School nurse representatives attended the NWG network's training event 'Modern Day Slavery and Human Trafficking' at Thurrock College on 26 September 2017.

The Community Policing Team undertook modern slavery and human trafficking training in November 2016 alongside Essex Police Specials and Partners. Refresher training is regularly available to this partnership group.

Council wide training is offered through partnership organisations including Southend Association of Voluntary Services (SAVS) 'The Impact of Domestic Abuse within Ethnic Minority Communities' covering issues of forced servitude. Sessions were held between 31 October to 20 November 2017.

The Principle Social Worker for Adults (on behalf of the Council) and the University of Essex (Health and Social Care) hosted Essex Police, Stop the Traffik and the Salvation Army Human Trafficking Unit during the half day 'Modern Slavery and Trafficking: The Unseen Crime' conference on 6 December 2016 which targeted private, voluntary, independent (PVI) sector, university, police and council staff (including customer services, social care and school nurse representatives) and had over 120 attendees.

The Workforce Strategy Team are leading on provision of Stop the Traffik training to social workers and the provision of training for core social care staff including child sexual exploitation and domestic abuse modules, with 84 staff/partner organisation representatives attending to date.

Council representatives from across all departments will continue to attend refreshers, ad-hoc training, events and conferences hosted by partner organisations.

#### Next steps

We will further embed the importance of the Modern Slavery Act into our business and supply chain procedures, ensuring that all our activities and that of our suppliers are committed to complying with the requirements of the Act.

We will continue to monitor and audit our policies and procedures to make amendments and update staff where necessary. The Council has a programme of mandatory training that all employees must complete and we will incorporate additional elements for officers in community-facing roles to identify and know how to report suspected incidents of abuse and neglect, to include modern slavery and human trafficking.

The Southend Local Safeguarding Children Board (LSCB), working with local partners and key Council representatives, held a planning meeting on 11 April 2018 incorporating MSHT. The LSCB are organising an Exploitation and Safeguarding Learning Event to target front line staff from all partner organisations, voluntary sector and schools, scheduled for October 2018.

A cross-Council officer group is meeting regularly to highlight activity, establish key training needs and departmental leads going forward and assess progress against the Annual Statement.

Key actions for the group include:

- Clarifying the referral process and provision of training/support to encourage this. This includes identifying single persons of contact (SPOCs) for key teams or departments and providing further training to these individuals.
- Enhancing online tools and resources to support awareness raising and reporting procedures. This includes introduction of an intranet site and signposting to key partnership organisations and support services.
- Clearer guidelines to support procurement and transparency in supply chains.
- Enhancing partnership working and knowledge sharing, including clarifying reporting processes and sharing information between core partnership organisations.
- Submitting our Modern Slavery Statement to the [Modern Slavery Registry](#) to enhance our commitment, demonstrate transparency and utilise the registry to learn what others are doing to eradicate modern slavery and human trafficking within their organisations.

This work will be included in future Modern Slavery Statements for the Council.

The Council has supported 57 West, a local church run community café, with their bid to the office of Police and Crime Commissioner for a grant from the community safety development fund. 57 West is implementing a 'Southend Anti-Slavery Community Partnership' that will employ a part-time partnership coordinator to identify and partner with key community stakeholders, community mobilise, raise awareness of modern slavery and human trafficking in the community, be part of effective action and work with other agencies in disruption activities.

The Council is fostering a strong, co-ordinated approach from local stakeholders, channelled through the Southend partnership boards (Community Safety, Local Safeguarding Children's Board, Adult Safeguarding Board and Health and Wellbeing Board) and aligning the MSS and associated actions through the violence and vulnerability cross-cutting priority. This will be formalised to sit within the violence and vulnerability strategic group to ensure a consistent and robust approach to MSHT in Southend.

Approval for this statement

This statement was approved on 5 July 2018 by

A handwritten signature in blue ink, appearing to read "A. Griffin".

Alison Griffin, Chief Executive Southend-on-Sea Borough Council

A handwritten signature in black ink, appearing to read "J. Lamb".

Councillor John Lamb, Leader of the Council