

# Modern Slavery Policy

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**CEREDIGION**  
County Council

Author and service: Alun Williams, Policy Support

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## **Ceredigion County Council Modern Slavery Policy**

### **Introduction**

This policy sets out Ceredigion County Council's aims and commitments to tackle Modern Slavery.

The development of this policy was influenced by

- The Modern Slavery Act 2015.
- Ceredigion County Council's Policy and Guidelines for Safeguarding Children and Adults at Risk 2016.
- Safeguarding policies and processes
- The Welsh Government's Code of Practice on Ethical Employment in Supply Chains.
- The Welsh's Government's Community Cohesion National Delivery Plan.

### **Overview**

- Ceredigion County Council's Modern Slavery Policy adopts an integrated approach bringing together key areas of safeguarding, policy support, human resources, procurement and civil contingencies. Ceredigion County Council's Anti-Slavery Policy covers the 12 commitments of the Code and also refers to safeguarding processes and the responsibilities of the Local Authority under the Modern Slavery Act 2015.

### **Policy Aims**

- Ceredigion County Council will ensure that modern slavery and human trafficking reporting and support for victims is mainstreamed in safeguarding systems and processes.
- Ceredigion County Council will produce an annual statement that slavery and human trafficking is not taking place in the supply chain which is approved and signed off by the Leadership Group. The annual statement will be published on the County Council's website.
- Ceredigion County Council will appoint an Elected Member as the Anti-Slavery and Ethical Employment Champion.

### **Modern Slavery or Human Trafficking involves**

- Recruiting vulnerable children and adults
- Moving them to another place, often another country
- Using threats, force or deception to make them do something against their will
- Exploiting them to make money or provide services for their traffickers.

### **Types of Exploitation**

- Labour Exploitation
- Sexual Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

## Statistics

It is estimated that there are 10,000 to 13,000 victims of Modern Slavery in the UK. In 2016, 3,805 potential victims of modern slavery were submitted to the National Referral Mechanism, (NRM), a 17% increase on 2015.

In Wales 123 potential victims were referred in to the NRM, an 8.3% decrease from the referral total of 2015. The 123 referrals were 62 females and 61 males. 102 or 83% of referrals were adults and 17% of referrals were children.

The most common types of exploitation in 2016 in Wales were

- 42 adult male potential victims of labour exploitation.
- 25 adult female potential victims of sexual exploitation.
- 18 adult female potential victims of domestic servitude.

In Wales, 10 children were potential victims of labour exploitation or domestic servitude. 9 female children were potential victims of sexual exploitation, including 5 UK nationals.

The top 5 nationalities of potential victims in Wales were

- Vietnam 16
- Eritrea 12
- Nigeria 12
- Sudan 9
- United Kingdom 9

## Structures in Wales

Dyfed Powys Regional Anti-Slavery Group meet and plan the regional strategic delivery of anti-slavery work. The group sits under the Wales Anti-Slavery Leadership Group and the Wales Anti-Slavery Operational Group. The Welsh Government has appointed an Anti-Slavery Co-ordinator.

**The Modern Slavery Act 2015** was introduced to criminalise slavery, forced servitude and human trafficking in the UK.

## **Under the Act a Local Authority has a number of statutory duties and responsibilities:**

- **Annual Statement**, this is a requirement under s.54 of the Act for commercial organisations that meet criteria prescribed by regulations made by the Secretary of State. In the case of the Local Authority, The Welsh Government's Code of Practice for Ethical Employment in Supply Chains also provides for an annual statement to be made, . Ceredigion County Council will produce an annual statement that slavery and human trafficking is not taking place in the organisation or in our supply chain which is approved and signed off by the Leadership Group. The annual statement will be published on the County Council's website.

The **responsibility** for the production and publication of the Annual Statement will lay with appointed Anti- slavery and Ethical Employment Champion,

supported by the Head of Policy Support. The statement will be subject to scrutiny and to approval by Council Cabinet.

- **Duty to notify the Home Office of Potential Victims of Modern Slavery.**  
The duty to notify is set out in s.52 of the Act and requires Local Authorities to notify the Secretary of State of suspected victims of slavery or human trafficking. Guidance and notification forms have been produced by the Home Office. The County Council will notify the Home Office of potential victims.  
The **responsibility** for notifying the Home office will lie with the Strategic Director for Care, Protection and Lifestyle.
  
- **A Local Authority has a responsibility to refer potential victims as a first responder** to a competent authority, (the Modern Slavery Human Trafficking Unit – MSHTU), via the National Referral Mechanism, (NRM). NRM forms are available and the Dyfed Powys Regional Anti-Slavery Group has produced a Victim Care Pathway with adult and child processes. The County Council, as a first responder, will refer potential victims of modern slavery into the NRM. The **responsibility** for referring potential victims via the NRM will lie with Strategic Director for Care, Protection and Lifestyle.
  
- **Independent Child Trafficking Advocates, (ICTAs).** The role of ICTAs is outlined in s.48 of the Act, *‘Interim Guidance for 3 ICTA early adopter sites.’* All of Wales has been selected as an early adopter site. A Local Authority in Wales is therefore required to make a referral for any potential child victims of trafficking to the ICTA service managed by Barnardo’s. The County Council will refer potential child victims of trafficking to ICTAs.  
The **responsibility** for referring child victims to the Independent Child Trafficking Advocate, will lie with the Head of Families and Children’s services

### **Safeguarding**

Ceredigion Local Authority is a member of the Mid and West Wales Safeguarding Board which has as its core aims:

- To protect children and adults in their area who may be experiencing, or at risk of abuse, neglect and other kinds of harm and;
- To prevent children and adults in their area from becoming at risk of abuse, neglect and other kinds of harm.

Locally there is a Children’s Safeguarding Local Operation Group (CYSUR) and an Adults Safeguarding Local Operation Group (CWMPAS). The Local Operation Groups (LOG’s) work collaboratively, within a multi-agency context, to keep children and adults, who may be at risk, safe within their local area.

Key aims include:

1. Ensuring safeguarding practice, strategic planning and commissioning of services across all partner agencies continuously improves and promotes good outcomes for children and adults who may be at risk in their local area.
2. Create a forum in which shared learning, information sharing and guidance takes place within a multi-agency environment

3. Whilst working collaboratively will also professionally challenge and hold each other to account when safeguarding practice falls below expected standards.

Ceredigion have representatives on the membership of the Dyfed Powys Regional Anti-Slavery Group who feed relevant information and actions to the LOG as part of the cross cutting Adults and Children's agenda.

Ceredigion County Council has in place Policy and Guidelines for Safeguarding Children & Adults at Risk (September 2016) which outlines key roles, responsibilities and processes in relation to safeguarding.

Other relevant documents include-

- Victim Care Pathway
- [Duty to Notify the Home Office of Potential Victims of Modern Slavery - Form and Guidance](#)
- All Wales Practice Guidance for Safeguarding Children Who May Have Been Trafficked
- Operational Handbook / Child Trafficking / Wales
- [National Referral Mechanism Guidance for Child First Responders](#)
- [National Referral Mechanism Guidance for Potential Adult Victims of Modern Slavery / England and Wales](#)
- All Wales Child Trafficking Protocol
- All Wales Safeguarding and Promoting the Welfare of Children at Risk of or Abuse Through Sexual Exploitation.
- CYSUR Child Sexual Prevention Strategy
- Independent Child Trafficking Advocates Guidance / Wales

The **responsibility** for safeguarding victims of Modern Slavery within Ceredigion will remain with the Care, Protection and Lifestyle Directorate of Ceredigion County Council. This policy has already been endorsed by the Ceredigion Local Operating Group and will also proceed to the Mid and West Wales Safeguarding Board following approval by the County Council.

### **Survivor Reception Centres**

Survivor Reception Centres are set up and managed by the Police to gather information from survivors of incidents and could potentially be used when multiple potential victims of Modern Slavery occur in too great a number to be accommodated in existing safe houses.

The Police take lead **responsibility** in the planning and opening of Survivor Reception Centres. If a need arises, survivor reception centres would be scoped and identified on a case by case basis, utilising civil contingency and multi-agency partnerships at a Tactical Control Group level. Local Authorities do not have permanent reception centre facilities suitable for victims of Modern Slavery. The Ceredigion County Council Civil Contingencies Unit will provide a range of support to the Police where required throughout the process.

## **Code of Practice: Ethical Employment in Supply Chains**

The Welsh Government has launched a Code of Practice for Ethical Employment in Supply Chains. There is an expectation from the Welsh Government that Local Authorities will sign up to the Code.

**Ceredigion County Council will comply with the code of Practice and all Services within the Council will observe the Code. The responsibility for monitoring progress against the code will lie with the Policy Support Service.**

**The Council will produce an Annual Statement on ethical employment**

**The Council will appoint an Anti-Slavery and Ethical Employment Champion.**

**Ceredigion County Council's Modern Slavery Policy covers the 12 commitments of the code:**

- 1. The production of a written policy on ethical employment within our organisation and our supply chains, which includes the appointment of an Anti-slavery and Ethical Employment Champion.**

This Modern Slavery policy encompasses ethical employment. This policy will be communicated throughout Ceredigion County Council. We will monitor its effectiveness and review the policy. In Addition the Council will appoint an Anti-Slavery and Ethical Employment Champion.

- 2. The production of a whistle-blowing policy.**

Ceredigion County Council's whistle-blowing policy received Cabinet Approval on 17<sup>th</sup> May 2016. The policy outlines the Local Authority's commitment to conduct its business with honesty and integrity, and to encouraging a culture of openness and accountability, whilst ensuring protection to whistle-blowers. An e-learning package on Whistleblowing will be developed and will be rolled out for all staff.

- 3. The delivery of a training programme on modern slavery and ethical employment.**

Ceredigion County Council will identify the training needs of staff, and provide appropriate, ongoing training in order to ensure understanding of modern slavery and human rights abuses, including human trafficking. The 'CERI' database will record information relating to all employees that have attended modern slavery and ethical employment training. Information regarding attendance at training events is provided to each and every Head of Service on a monthly basis.

- 4. Ensure employment practices are mainstreamed in the procurement process.**

Ceredigion County Council will require that a copy of CCC's Anti-Slavery Policy is included in all tenders and relevant documents. A short question set on ethical employment will also be included in tenders. The Welsh Government's Code on Ethical Employment in Supply Chains will be uploaded to new tenders. Existing tenders in high risk categories will be

identified and sent the Code. A question set will be produced and relevant elements of the code will be included in contracts.

**5. Work with suppliers to ensure that working arrangements do not compromise ethical employment practices.**

The Council will work with suppliers to ensure that they do not compromise ethical employment practices. Ceredigion County Council will ensure that suppliers are paid in good time.

**6. Expect suppliers to sign up to the Code.**

The council will encourage suppliers to sign up to the code of Practice.

**7. Assess expenditure to identify and address issues of modern slavery, human rights abuses and unethical practice.**

Ceredigion County Council Procurement will review expenditure. Ceredigion County Council service areas will directly engage with contract workers and work with suppliers to rectify issues of illegal or unethical employment practice. Service areas will monitor employment practices of high risk suppliers.

**8. Ensure that false self-employment is not undertaken and that umbrella schemes and zero hour contracts are not used unfairly.**

Ceredigion County Council will mitigate any risk of unethical employment by assessing the eligibility of all self-employed claims against HMRC guidelines and ensuring that umbrella schemes and agencies are registered with appropriate regulation bodies. In addition to this, Human Resources will review relief contracts on a regular basis, to ensure that workers are afforded the rights to be recognised with employee status, where appropriate.

**9. Ensure that workers are free to join a trade union without discrimination.**

Ceredigion Councils HR Policies and Procedures ensure that staff are able to join trade unions without discrimination.

**10. Consider paying the Living Wage Foundation's Living Wage as a minimum and encourage suppliers to do the same.**

Ceredigion County Council has adopted the National Living Wage at its full Council meeting with effect from 1<sup>st</sup> April 2015. A living wage supplement is paid in addition to the hourly rate for Scale point 7 and 8 ensuring that the minimum hourly rate of Scale Point 9 is achieved by all staff.

**11. Produce an annual written statement to ensure that slavery and human trafficking are not taking place in the organisation and supply chain, (ref: s.54 of the Modern Slavery Act 2015).**

The Local Authority will prepare an annual slavery and human trafficking statement. The annual statement will be submitted to Overview and Scrutiny Committee and then to Cabinet for Approval,. It will be signed off by the Anti-Slavery and Ethical Employment Champion and published on the County Council's website

**12. Ensure that all those undertaking work on an outsourced contract are treated fairly and equally.** In accordance with the “Transfer of Undertakings (Protection of Employment) Regulations 2006” employees’ rights are protected when the organisation or service they work for transfers to a new employer. Outsourced contracts are also subject to the Welsh Government Code of Practice on Workforce Matters (Two Tier Code). The County Council will continue to observe these regulations.