



Slavery and human trafficking statement (2022-2023)

Introduction

This statement explains how Durham County Council aims to understand and address all potential modern slavery and human trafficking risks related to its business. It outlines the steps in place to ensure modern slavery or human trafficking does not occur in the Council's own business, and the preventative measures to ensure this extends to any of its supply chains. This statement is subject to continual annual review and will be published on the Council's website.

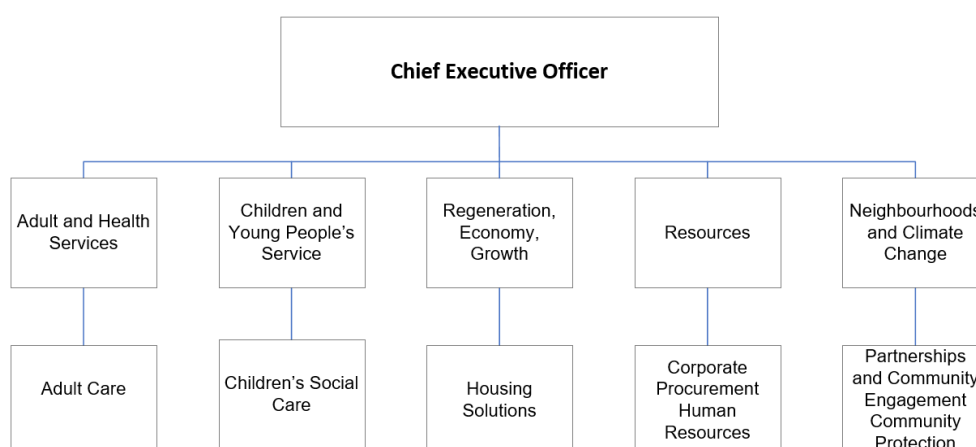
Commitment

Durham County Council as a public sector organisation, employer, community leader and a procurer is committed to undertaking a preventative approach to modern slavery and human trafficking within its corporate responsibilities and activities. This also includes co-operating with partners and internal services, such as, adult care, human resources and corporate procurement to work towards the disruption of such activities.

Organisational Structure and Supply Chains

County Durham is the largest local authority in the Northeast of England with over half a million residents. The population size has risen consecutively over the last 15 years. Durham County Council provides a range of services, including Children's Services, Adult and Health Services, Public Health, and Environmental Services. The Council directly delivers some services but also works in partnership with other organisations and commissions and procures services externally. In 2022-2023 the total third party spend was over £700 million. Specific services covered by this statement illustrated in the structure below.

Durham County Council agreed with stakeholders that the mechanism to seek assurance of a commitment to improving practice and preventing slavery and human trafficking currently sits with the Durham Safeguarding Adults Partnership governance arrangements. Slavery and human trafficking also spans wider partnerships, such as, the Durham Safeguarding Children Partnership and Safe Durham Partnership. In 2022, the local Police, Crime Commissioners Office formed an anti-slavery network with a key role in coordinating the local response to modern slavery and human trafficking and support for victims, the Council is supportive of their work.



Supply Chains

There is a clear expectation that external services or goods procured by the Council be undertaken in conjunction with organisations operating their own policy and practice in relation to modern slavery.

All suppliers bidding in Durham County Council's procurement processes must state whether 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 are, they are required to confirm their compliance with the annual reporting requirements contained within Section 54 of the Act. Failure to meet these requirements are treated as a ground for Mandatory Exclusion. The above approach adopted by Durham County Council is in line with that developed by Crown Commercial Services, the executive agency and trading fund of the Cabinet Office of the UK Government, and is utilised nationally across the public sector.

In addition to addressing its obligations during the procurement process, the Council previously undertook an assurance activity (with 250 of its key suppliers) to ensure that relevant organisations/suppliers produced and published an annual slavery and human trafficking statement. In 2022 the Council reported it would commit to undertake a future exercise and contact key suppliers to seek the assurances around production and publication. The statement summarises the steps organisations have taken to ensure that slavery is absent from their supply chains in line with the Modern Slavery Act. That exercise will take place during 2023-2024 with reporting to local anti-slavery network and Durham Safeguarding Adults Partnership.

Durham County Council has an expectation that any organisation with which we work, commission a service or procure a service from, operates appropriate policy and practice in relation to modern slavery.

Our Responsibilities

In line with requirements placed upon Durham County Council, there is commitment to ensuring there is no modern slavery and/or human trafficking in our supply chains. Durham County Council has a corporate crosscutting role as an employer, community leader and procurer with responsibility to safeguard people within our communities. This extends responsibilities to Adult Social Care, Children's Social Care, Housing, Corporate Procurement, Human Resources as well as Community Safety. Durham County Council works closely with Durham Constabulary and other enforcement agencies as appropriate to share intelligence and work collaboratively to address issues relating to modern slavery or human trafficking. Working with partners, guidance and clear pathways to support and signpost victims for appropriate support is in place.

Our Policies

As a Council, there are a wide range of policies and processes in place that reflect our commitment to prevent modern slavery and human trafficking in everything that we do. All policies are subject to a robust assurance process, and agreed by the relevant board or committee. This can include councillors, senior officers and/or partner organisations.

- Code of Our Values, Behaviours and Conduct (2023) - Durham County Council expects high standards of conduct from its employees. This code sets out the minimum standards expected of all employees, including treating others with

dignity and respect and in fair and impartial manner in line with the Council Equality policy. Employees will adhere to all standards set out in the code inclusive of procurement activity. The Council makes further commitment to ensuring its employees understand its expectations through an accessible Code of Values, Behaviours and Conduct e-learning or workbook (2022) a mandated requirement for all employees.

- *Confidential Reporting Code (2023)* – Durham County Council confidential reporting (whistleblowing) code reiterates a commitment to the highest possible standards of openness, honesty and accountability. ‘Whistleblowing’ is the term used when an employee passes on information concerning wrongdoing. Often referred to as ‘making a disclosure’ or ‘blowing the whistle’. The code applies to employees, former employees, job applicants, and agency staff working for the council, contractors and suppliers. All individuals to whom the code applies can utilise it to report any concerns that may infer a heightened risk of modern slavery or human trafficking in relation to Council activities and/or its supply chains. The Confidential Reporting Form is made readily accessible to all employees.
- *Equality Policy (2020-2024)* – The Council as a major employer and provider of services is committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering or procuring services or working in partnership. The Council following consultation identified its equality objectives to improve employment opportunities for disabled people, build inclusive communities as well as a welcoming employee culture. The Council’s Equality Policy and objectives of its Council Plan (2020-2035) for employees and citizens make clear its responsibility under the public sector equality duty under the Equality Act 2010 and Equality Impact Assessments. Effective procurement can drive progress in equality and embed real improvement. Equality is therefore considered and embedded in the Corporate Procurement Strategy, and ensures commissioned services are appropriate and responsive to different groups. The Council is committed to equality, diversity and inclusion and has a range of equality network groups formed.
- *Corporate Procurement Strategy (2020-2025)* – The current strategy sets out the Council’s vision and priorities up to 2025, it incorporates the latest government procurement legislation, and local and national drivers in line with Council initiatives and its Vision 2035. The Council aims to ensure that all commissioning and procurement activities carried out in collaboration do so in an economically, environmentally and socially responsible manner. This includes ensuring high-risk works and services are subject to effective evaluation and contributing to community cohesion by addressing equalities issues in the supply chain. Corporate Procurement staff previously completed the Chartered Institute of Procurement and Supply (CIPS) training for Ethical Procurement & Supply and in turn, secured the Corporate Ethics kitemark. Corporate Procurement are committed to maintaining its CIPS ethical charter status and the renewal programme is underway.
- *Recruitment and Selection Policy (2022)* – The Council undertakes its own recruitment activity through in-house functions. Robust processes are in place to ensure that the policy is adhered to and all employees with a responsibility for recruitment and selection must be aware of their legal obligations under existing employment legislation. Agency worker appointments are subject to the same

rigour as Council appointed employees, for example, Disclosure and Barring Service (DBS) checks (where applicable); proof of eligibility to work in the UK; any gaps in employment history. The Council through its corporate procurement seeks assurance that its Agency worker supplier is complying with its duties under the Act. The accompanying Right to Work in the UK policy supports lead officers with ensuring recruitment activity is in line with relevant legislation and guidance.

- *Domestic Abuse and Sexual Violence* - The Safe Durham Partnership (SDP) has 'support and protect vulnerable people from harm' as a key priority of its overarching plan for 2021-2025. Its vision is to ensure every adult and child will feel and be safe. This includes working with partners to prevent domestic abuse and sexual violence and reducing the associated harm through dedicated access to help and support through services available to address needs. It includes improving the criminal justice response to tackling domestic abuse, sexual violence and sexual exploitation. It is committed to working with partners and the wider safeguarding partnerships in raising awareness with staff of organised crime and county lines. Adult Care and Children Services are active members of the local Domestic Abuse and Sexual Violence Executive Group.
- *Safeguarding People in our Communities* - The Council has a duty to safeguard people in our communities and for ensuring policies are in place to protect vulnerable groups from harm and abuse. The Care Act 2014 sets out duties in relation to safeguarding adults and for children the duty comes from the Children Act 1989 and 2004. Working Together to Safeguard Children 2018 sets out the expectations of all agencies involved in the safeguarding function. All Children and Adult Care teams of the Council hold responsibilities to meet these duties on a daily basis. The Council has established a dedicated team to support unaccompanied asylum-seeking children, who may have experienced human trafficking and exploitation during their travel to Durham and are committed to supporting them to recover and thrive in communities.
- *Trade Unions* - regular engagement and consultation is in place with Trade Unions relating to working conditions, ways of working, council policies, health and safety and staff surveys.
- *Staff Networks* – there are a number of staff network groups administered by the Equality and Diversity and HR Teams. Staff are encouraged to attend/join these networks to share experiences, shape working environments and access support.

A wide range of information is accessible to staff across both service groupings and wider service areas. This extends to modern slavery and human trafficking.

Multi-agency arrangements

The Durham Safeguarding Adults Partnership in line with statutory requirements set out within the Care Act 2014 have an agreed multi-agency safeguarding policy and procedure in place. Regular review across a broad range of policy and practice takes place.

In addition, the Durham Safeguarding Adults Partnership has worked with partners to develop modern slavery and sexual exploitation referral pathways. The partnership continues to work in collaboration with the wider safeguarding system where there are links for example, the Safe Durham Partnership multi-agency domestic abuse referral pathway, and local safeguarding children arrangements.

The Durham Safeguarding Children Partnership have up to date on-line procedures in relation to domestic abuse, child sexual exploitation and modern slavery.

In 2022-2023 the local Safeguarding Partnerships continued to promote preventative messages related to Modern Slavery through a range e-bulletins and briefings including ways to report concerns.

The Council is committed to sharing updates across its workforce.

For more information, visit the [Durham Safeguarding Children Partnership](#) and the [Durham Safeguarding Adults Partnership](#) website pages.

Management Responsibilities

The Council has responsibilities to its workforce, this includes employee health, safety and welfare.

As part of the Council commitment to the welfare of its workforce, any employee can raise concerns and have assurance from the Council that their concerns will be taken seriously.

Managers regularly undertake supervision or 1-1 sessions with staff during which health and safety or health and wellbeing concerns that an employee may have can be discussed.

The Council also offers work related and personal advice and support to its employees covering a broad range of issues from better health at work, to victims of crime. Employees have access to an Employee Assistance Programme which includes 24-hour confidential support, 365 days per year and contacts for external support.

Training & Awareness Raising

To meet its statutory safeguarding responsibilities, the Council offers a wide and extensive training programme to staff across all services.

The Council's learning and development system hosts a range of training accessible to its staff. Training opportunity examples include Child Trafficking and Modern Slavery (developed by the Home Office and Every Child Protected Against Trafficking (ECPAT) UK and the Virtual College), Preventing Human Trafficking Risks for Ukrainian Refugees (guidance) and Modern Slavery e-learning. These learning opportunities are open to all staff.

The Durham Safeguarding Adults Partnership and Durham Safeguarding Children Partnership continue to provide a range of training including regular briefings for Modern Slavery and Human Trafficking and face to face and online training opportunities through a variety of events.

The Council is committed to sharing safeguarding partnership resources and ebriefings and in continuing to provide up to date information on a range of related topics, including reporting mechanisms such as mobile applications, [Stop App](#), [Unseen App](#), [Safe Car Wash app](#), social media campaigns, consultations and any National and/or annual Modern Slavery reports and related guidance.

Recognising, reporting and responding to modern slavery and human trafficking is embedded within the Durham Safeguarding Adults Partnership training programmes and in collaboration and consultation with Durham Constabulary. Key training competencies include recognising signs and indicators of modern slavery and human trafficking, and indicators of forced labour, how and where to share intelligence, local referral pathways for potential victims of modern slavery, how to make reports to the National Referral Mechanism, and raised awareness of the potential support needs for victims, and accessible support for example, [the National Modern Slavery Care Contract \(MSVCC\)](#).

Each year the adult and child safeguarding partnerships work in collaboration with the Safe Durham Partnership to host a Safeguarding Week. In June 2022 the partnership included key articles in its newsletter with a focus upon modern slavery training and those fleeing the Ukraine. The aim to raise awareness of keeping people safe and stopping exploitation. A dedicated 'modern slavery' workshop was also open to agencies during Safeguarding Week in November 2022. The partnership has supported a local university with a dedicated topical session on modern slavery and human trafficking in 2022.

In 2023 the Council will continue to promote the opportunities provided by the local safeguarding partnerships to its workforce to ensure staff can remain informed of the local and national context of modern slavery and human trafficking issues. Relevant communications, briefing sessions and up to date training continues to be accessible to all Council employees across all service groupings and the wider workforce.

If any staff witness or suspect modern slavery or human trafficking is taking place, they can seek advice or report their concerns to the police on 101. In line with statutory responsibilities and related guidance for local authorities, the police and others, may need to make a notification where a potential victim of modern slavery is identified to the National Referral Mechanism.

Further information is available from the [Durham Safeguarding Adults Partnership](#) and [Durham Safeguarding Children Partnership](#) related training pages.

As a partner of the Durham Safeguarding Adults Partnership and Durham Safeguarding Children Partnership the Council is committed to raising the profile of modern slavery and human trafficking. The Durham Safeguarding Adults Partnership on behalf of its partners and in line with its awareness raising priority has shared key messages through its quarterly newsletter.

Council intranet pages are a vital platform to share information with employees; Council Directors of Service Groupings are committed to connecting with employees and cascading relevant updates on legislation and guidance.

The Council is committed to participating and working alongside our wider partnerships such as the newly formed Durham Anti-Slavery Network. In October 2022, the Council supported the local anti-slavery network event 'Anti-Trafficking and Modern Slavery'

with key messages for its multi-agency audience, sharing an update on the role of the local authority with a lens upon adult care. The Council will support further work of the anti-slavery network in 2023-2024 through its training needs analysis exercise. We are committed to sharing updates on policy and legislation, promoting key messages, and updating on the activity of partners and the network. We are committed to working with wider networks and agencies to reduce exploitation of children and adults and its existence in Durham and to learning from the local and national picture.

Due Diligence

Durham County Council is committed to and understands the vital role procurement plays in its functions. This includes the consideration and recognition when sourcing any provision that effective employment practice takes place, and all modern slavery and human trafficking practices are discouraged.

Due diligence actions must be carried out at all times in collaboration, between Contract Managers and Procurement Officers, to ensure before awarding any contracts to prospective bidders the Council meets its legal obligations under the Modern Slavery Act 2015. Internal commissioners of social care provision have linked with the Gangmasters Labour and Abuse Authority and UK Visa and Immigration for advice. Subsequently, social care commissioners have introduced additional due diligence for any new home care provision in County Durham. It includes site visits to local offices, checking records for Disclosure and Barring Service (DBS) and Right to Work in the UK documentation, staff training records, and that the relevant internal infrastructures are in place to reduce risk.

Where suppliers fail to meet their appropriate obligations under the Modern Slavery Act 2015, the issue should be raised by the assigned Contract Manager, in order to protect the Council's reputation and remain compliant under the regulations going forward.

Regular monitoring and assurance activities take place to ensure compliance of suppliers' obligations under the Modern Slavery Act by all Local Authorities.

Corporate Procurement continually explore research and wider initiatives, for example, the work of the University of Nottingham Rights Lab related to risk assessment and due diligence for adult social care contract and commissioning. The Corporate Procurement function anticipates publication of guidance to further inform its work and assurance activity within this space.

Performance

Durham County Council holds a key role for safeguarding children, and safeguarding adults. The Council regularly reviews and monitors a wide range of data to support identifying emerging issues and/or trends. This includes 'modern slavery' as an abuse category which is included within the statutory return for Councils through the NHS Digital Safeguarding Adults Collection.

The Council is committed to working with local safeguarding partners and in developing and monitoring modern slavery data and issues to better understand the size and nature of the issue at a local level.

Declaration

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Durham County Council's slavery and human trafficking statement for the term of the financial period of 1st April 2022 to 31st March 2023.