



Modern Slavery & Human Trafficking Statement (Financial Year 2023-2024)

Introduction

As a Council we are committed to ensuring people are safe within our communities, and to work in ways to prevent risk, this includes modern slavery. Durham County Council is committed to understanding and addressing modern slavery and human trafficking risks related to its business.

Our Council Plan includes how we will protect vulnerable people from harm including monitoring data related to the risk of abuse and exploitation. Our Council Plan also recognises challenges within the local care sector, and we continue our commitment to commission in ways that will sustain a high-quality care market. This is echoed within our Corporate Procurement Strategy 2020-2025 and our Social Value in Procurement 2023-2025 policy statement which shares our vision and commitment to healthier, safer and more resilient communities.

As a Council we procure goods, services and work across commercial, health and social care, buildings and construction areas, at the centre of that activity is a focus upon understanding our market, products, suppliers and supply chains as well as our communities.

This statement aims to outline our understanding of modern slavery and human trafficking and the steps in place to ensure we prevent its occurrence in the Council's own business and in our communities. It includes preventative measures that extend to our supply chains and our commitment to work with wider partnerships and networks and remaining informed of related legislation and guidance for this real and current issue.

What we know about Modern Slavery and Human Trafficking

We know that Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking and that traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude, and inhumane treatment¹.

Modern slavery and human trafficking can be committed by anyone, it can occur through organised crime or by individuals. We have a key role as a Council to educate the workforce in recognising the signs and reporting concerns and we work with agencies and networks to support us with that aim.

We know that anyone can be affected by modern slavery and human trafficking, and that exploitation is more likely to occur for our most vulnerable within our communities. There are many factors that can contribute to increasing the vulnerability of people in our communities. Factors like poverty, lack of education, unstable social and political conditions, climate change and other issues.²

¹ [Modern slavery strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/modern-slavery-strategy.pdf)

² [Unseen \(unseen.org\)](https://www.unseen.org/)

We know that some of the types of modern slavery that exist are (not limited to):

- Criminal Exploitation – being coerced, deceived or made/groomed by others into committing crime
- Domestic Servitude – being made to work within a home for little or no money
- Forced Labour and Debt Bondage – being forced or made to work for little or no money or to pay debt
- Organ Harvesting/Egg harvesting – bodily organs being removed for financial gain
- Sexual Exploitation – being coerced or forced into selling sex

In addition, some people may be trafficked and made to enter into a [forced/sham marriage](#). The Home Office has a specialist unit for [forced marriage](#).

We will continue to promote to our workforce the message that ‘it’s everybody’s and an everyday role to prevent abuse’. Sharing and signposting to related advice and information for example, the [Independent Anti-Slavery Commissioner - Local Government and Modern Slavery](#) awareness raising resource(s) and the [Modern Slavery and Exploitation Helpline](#)

Facts and figures

In 2023, the Home Office statistics tell us that around 17,004³ referrals were made for modern slavery and human trafficking. The reality is thought to be far higher.

We know that labour exploitation in the UK is the most reported form of adult exploitation. We know this from the National Referral Mechanism (NRM).

The NRM was introduced as the route for reporting modern slavery concerns under Section 52 of ‘the Act’ and a ‘duty to notify’ for key agencies known as ‘first responders.’

Section 54 of ‘the Act’

As a Council we are committed to ensuring modern slavery does not exist within our supply chains in line with Section 54 of ‘the Act’. This can be shown by our continued commitment to publish our Modern Slavery Statement spanning several years.

Our Role

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 support working towards the disruption of such activities.

The Council is an active member of the local Anti-Slavery Network (ASN). The local anti-slavery network was commissioned by the County Durham and Darlington Police and Crime Commissioner (PCC) in 2022. This network is a welcome addition to our partnership ways of working. The network has brought opportunity to strengthen links

³ Source: [Modern Slavery: NRM and DtN statistics, end of year summary 2023 - GOV.UK \(www.gov.uk\)](#)

with our safeguarding partnerships and engage a range of agencies in working together to understand the size and prevalence of the issue at a local level and supporting the local response.

Representation at the local Anti-Slavery Network forum includes:

- Durham County Council
- and
- Police and Crime Commissioner
 - Durham Constabulary

With representation from a range of wider agencies (not exhaustive):

- Crown Prosecution Service
 - Ashiana
 - Changing Lives
 - We are Causeway
 - Salvation Army
 - Barnardos
 - The Children's Society
 - Humankind
- and
- Faith and Education Sector representation

Our local safeguarding partnerships continue to share key messages with Council staff and wider partners about modern slavery and human trafficking and in a variety of ways:

If you SEE IT, REPORT IT. If you are concerned that you, a child, or an adult may be a victim of modern slavery or human trafficking, TELL SOMEONE:

Always call 999 in an emergency.

Call 101 for Police

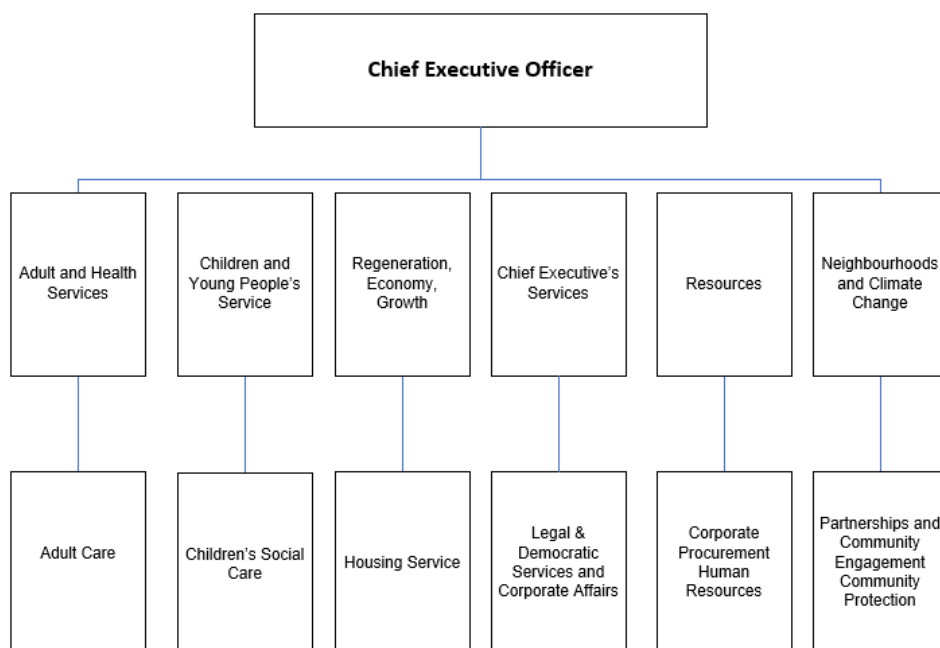
Call Social Care Direct on 03000 267979

For advice and information or confidential support call the helpline free on [08000 121 700](tel:08000121700)

Our Organisational Structure

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 2023-2024 the total third party spend was over £800 million. Specific services covered by this statement illustrated in the structure below.

Our Council Structure



Durham County Council agreed with stakeholders that the mechanism to seek assurance of preventing and responding to modern slavery and human trafficking also sits with the Durham Safeguarding Adults Partnership. A focus on modern slavery and human trafficking also spans wider partnerships, such as, the Durham Safeguarding Children Partnership and Safe Durham Partnership.

The Council as a lead statutory partner of safeguarding partnerships signposts to their respective websites where a range of advice and information is available:

[Durham Safeguarding Adults Partnership](#)
[Durham Safeguarding Children Partnership](#)

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 (CCS), the executive agency and trading fund of the Cabinet Office of the UK Government and is utilised nationally across the public sector as outlined in the Procurement Policy Note 02/2023: Tackling Modern Slavery in Government Supply Chains⁴.

⁴ [PPN 02/23: Tackling Modern Slavery in Government Supply Chains - GOV.UK \(www.gov.uk\)](#)

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.

Supporting Prevention and Our Responsibilities

Durham County Council has a corporate crosscutting role for prevention 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. In line with requirements placed upon Durham County Council we are committed to ensuring there is no place for modern slavery and/or human trafficking of our staff.

Durham County Council works closely with the local Anti-Slavery Network, 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 are in place and will be reviewed in 2024-2025.

As a Council we work with other agencies to prevent any form of mistreatment or abuse occurring and should it occur, we want to ensure that our staff are equipped with the relevant knowledge they need to respond appropriately and are informed of what they should do.

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 Councils 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 with the status achieved for a fourth consecutive year.
- *Recruitment and Selection Policy (2023)* – 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. These networks serve to give a voice to staff and act as a platform for staff to share any concerns in a safe and confidential environment. Staff are encouraged to attend/join these networks to share experiences, shape working environments and access support. One example is the Race, Equality and Diversity staff network. 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.
- Anchor Networks – in addition to staffing networks, the Council is a contributive member in a wide range of anchor networks such as the Association of Directors for Adult Social Services (ADASS), and Northeast ADASS, Inclusion and Economic forums, as well as leading on a number of networks including the Community Wealth Building Network and County Durham Pound.

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.

These partnerships continue 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.

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

Training & Awareness Raising

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

The Council's learning and development system hosts a range of training accessible for its workforce. Training opportunity examples include (not exhaustive):

- 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.
- Safety for Business – Modern Slavery – E-learning – to support staff in identifying the signs and indicators and how to report concerns.

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.

In 2023-2024 the Durham Safeguarding Adults Partnership has continued to offer access to 'Modern Slavery – Must Know' training as part of its core offer to the wider multi-agency workforce. In addition, safeguarding partnerships hosted sessions in a joint Safeguarding Week in November 2023 to raise awareness, which included:

- Making Recruitment Safer
- Modern Slavery
- Trauma Informed Approaches
- Unaccompanied asylum seeking children
- Working with families who have English as an additional language

In 2023-2024 the local Safeguarding Partnerships have also continued to promote key messages such as 'Anti-Slavery Day' and '[spotting the signs](#)' for preventative messages related to Modern Slavery. Sharing messages through a range e-bulletins and briefings including ways to report concerns and the [lived experience of adults](#). The Council remains committed to sharing those updates to its staff.

As a Council we also work towards strengthening links through multi-agency working, communicating with internal/external colleagues for local initiatives such as access via the Educational Development Trust (EDT) to the Gangmasters Labour and Abuse Authority (GLAA) 'workers rights' training.

We actively encourage staff to access the [Durham Safeguarding Children Partnership](#) and the [Durham Safeguarding Adults Partnership](#) website pages.

The Council is committed to sharing safeguarding partnership resources and ebriefings and continuing to provide up to date information on a range of related topics, including reporting mechanisms such as mobile applications, [Unseen App](#), [Stop 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 8

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

In 2024-2025 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.

If any staff witness or suspect modern slavery or human trafficking is taking place, they can seek advice and support from internal/external colleagues, from our policies and from a range of websites. For example, promotion of confidential/whistleblowing reporting for concerns relating to suppliers. In line with statutory responsibilities and related guidance for local authorities as a [first responder](#), the Council, police and others, may need to make a notification where a potential victim of modern slavery is identified to the National Referral Mechanism (NRM).

As a member of the local anti-slavery network (ASN) the Council is supportive of the networks' approach to develop a tiered approach to local modern slavery and human trafficking training. As a Council we are actively contributing to that development. The work follows a multi-agency training needs analysis led by the ASN (2023).

The Council is also supportive of the ASN ambition to develop a pool of staff across a range of agencies who will champion the preventative approach to modern slavery and human trafficking. Key staff have been identified for that programme and they will play a pivotal role in ensuring our workforce remains up to date. As a workplace champion, they will act as a single point of contact, and will have the relevant skills and knowledge to advise and support staff. This includes spotting the signs for potential victims, reporting concerns in line the S52 'duty to notify' requirements, and support for victims in line with statutory guidance. These workplace champions will help us to ensure our response to potential victims supports achieving good outcomes.

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. 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 continue to undertake a range of activity such as 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.

As a Council we are aware of some emerging concerns in England that relate to 'international recruitment'. The Council is committed to ensuring high-quality care provision within the local care sector, and through its commissioning and contracting practice (as outlined in the Council Plan).

In October 2023, the Local Government Association (LGA) in conjunction with the Association of Directors for Adult Social Services (ADASS) and Unseen shared an opportunity for all Councils to access a key modern slavery update. It was an opportunity for local authorities to hear about the findings from research of 'labour exploitation in the care sector', the size and nature of the issue and of ['establishing modern slavery risk assessment and due diligence in adult social care'](#). The Council previously keeping a watching brief for the publication which serves as a support tool for adult social care commissioning activity (as reported in our 2022-2023 statement).

In January 2024, the Council also provided update to the local Safeguarding Adults Partnership of the national context and developments related to 'international recruitment' and the local position. With Durham County Council acting in a lead role across the North East region, to support the field of 'international recruitment' help with challenges, uphold ethical recruitment and employment practice, the allocation of funding across the adult social care sector through North East ADASS. In addition, the Council is supporting adult social care providers/suppliers with advice, information and signposting to a range of resources and toolkits, via its [website](#).

Durham County Council has contributed to the development of an organisational abuse toolkit, working alongside North East ADASS colleagues. All North East local authorities have actively engaged and contributed to that work. Its main aim is to share good practice and promote consistency across our region when issues may arise for commissioned services under the adult social care supplier market. The toolkit includes specific reference to 'international recruitment' as a potential area of risk and signposts to relevant resources.

The anticipated Procurement Act 2023⁵ will also bring change and strengthen procurement activity across local authorities. In preparation, the Council has already directed a mandatory training programme in the year ahead; Corporate Procurement: Contract Management, with an expectation that all relevant staff complete this important programme by February 2025.

⁵ [Procurement Act 2023 \(legislation.gov.uk\)](https://legislation.gov.uk)

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.

Performance

Durham County Council holds a key role for monitoring key performance indicators (KPIs), with a list of related KPI's included within our Council Plan. Safeguarding children, and safeguarding adults are also key areas that the Council should remain informed. The Council regularly reviews and monitors a range of in house and external data to support identification of any 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, as well as monitoring any emerging concerns relating to the quality of care that the Council commissions or its business activity.

The Council is committed to working with local safeguarding partners in developing and monitoring modern slavery data and related issues to better understand the size and nature of the issue at a local level. In 2023-2024, the Council and Durham Constabulary shared their modern slavery data with the local safeguarding adult's partnership and the anti-slavery network. This is supportive of that multi-agency commitment to understand the prevalence of modern slavery in our County.

The Council is also ensuring it meets the Best Value Standard as outlined in the Best Value Duty relating to the statutory requirement for local authorities under Section 26 of the Local Government Act 1999 and continues its work in this area to meet the appropriate obligations.

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 2023 to 31st March 2024. The statement is subject to continual annual review and will be published on the Council's website.