

# Essex County Council

## Modern slavery and human trafficking statement 2024

Modern slavery is a heinous and often hidden crime, and the impact can be devastating for the victims. Modern slavery can be broadly grouped into five categories but is not limited to:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images, videos or live streaming.
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties.
- **Labour Exploitation:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and retail businesses that rely on cash payments (for example nail bars and car washes)
- **Debt Bonded Labour:** this is a form of forced labour when a person is forced to work to pay off a debt. They are tricked into working for little or no pay, with no control over their debt. This is thought to be the most widespread form of slavery today.
- **Criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- **Other** forms of exploitation include organ removal, forced begging fraud, marriage, and illegal adoption.

Essex County Council (ECC) recognises its responsibility to take a robust approach to modern slavery and human trafficking.

This annual statement sets out ECC's actions to understand all potential modern slavery risks related to our activities and to put in place steps to eliminate acts of modern slavery and human trafficking within our business and in our supply chains, sub-contractors and partners. ECC is committed to preventing modern slavery and human trafficking in all its activities, and to ensure our supply chains are also free of this.

The publication of this Annual Statement is part of that commitment and highlights our activities to address this.

### **Organisation's structure**

ECC governs the non-metropolitan county of Essex in England. At the time of the 2021 census, it served a population of 1,503,300, (excluding Southend and Thurrock) which makes it one of the largest local authorities in England.

As a non-metropolitan county council, responsibilities are shared between districts (including boroughs) and in many areas also between civil parish (including town) councils. We provide county-wide services including:

- schools
- roads
- children's social care
- adult social care
- Trading Standards
- Youth Offending Service

Decisions about the way we run our services are taken by the 75 Councillors that are elected every 4 years. The 75 Councillors come from different political parties, and some have different roles in the decision-making process.

## **Our Business**

### **People**

We have a number of policies and procedures in place that aim to ensure modern slavery does not occur in our business:

- **Robust Recruitment Policy** and process which are compliant with UK employment legislation, the process includes several pre-employment checks, for example 'right to work' document checks, referencing and understanding any employment gaps. DBS checks are undertaken for relevant posts.
- **Mandatory Corporate Governance Training**, (which includes the employee code of conduct, how we behave, and Equality and Diversity), defines the responsibilities and standards required for all who work for and on behalf of us including interims, agency workers and employees seconded to other organisations.
- **Whistle Blowing** - reporting knowledge or suspicion of modern slavery through our whistleblowing procedures and hotline which ensures that staff or members can raise their concerns confidentially without fear of reprisal. For those staff unable to raise their concern with anyone within ECC they can contact Ethics point, Ethics point is an independent external whistleblowing provider that delivers ECC's Speak up! Service.

### **Safeguarding vulnerable adults and children**

We have responsibility to develop, implement and monitor policies and processes to safeguard the welfare of vulnerable adults and children and work within multi-agency partnerships to protect and safeguard people.

To ensure staff awareness there is E-Learning training which supports the Modern Slavery Act, such as, Essex Social Care Academy (ESCA) – An Introduction to Modern Slavery and Human Trafficking, Child Trafficking and Slavery Human Trafficking, Modern Slavery Spotting the Signs and What you should Do Human Trafficking, which is available to all ECC staff.

In addition, the Essex Safeguarding Children Board provide E-Learning exploitation training which covers both children and vulnerable adults.

## **Procurement**

Procurement consists of three front facing teams, People, Place and Corporate. Across these teams the total value of all managed contracts is in excess of £5 billion with over 500 suppliers managed.

### **Procurement Supply Chains**

Our procurement activity complies with the Council's Procurement Rules and the wider Public Contract Regulations 2015. To support our Category Management approach to minimise market risks concerning modern slavery within our large and complex supply chain, we have implemented a Modern Slavery Risk Assessment Tool. Where the category is assessed as higher risk, we will consider whether a wider verification of modern slavery risks is required across the supplier base and whether further supply chain mapping is appropriate. This information is captured for tenders over £100k and is discussed by the Procurement Management Team to improve understanding and lessons learned.

To comply with the Modern Slavery Act 2015, we have:

- updated our professional and technical ability tender questions within the procurement sourcing process. The questions require a bidder to evidence their compliance with the Modern Slavery Act if they are a relevant commercial organisation as defined by Section 54 of the Modern Slavery Act 2015. Any bidder who fails to evidence their compliance with the required legislation shall be excluded from participating further in the tender process.
- Incorporated within our standard contract terms clauses that specify the Supplier's contractual obligation concerning Modern Slavery.
- Any supplier engaged by us to undertake the supply of goods and or services is contracted to do so in line with our following policies:
  - Safeguarding
  - Equality and diversity code of conduct
  - Whistleblowing

These policies are key to ensuring that staff employed by our supply chain have appropriate channels to report any incidents of slavery and human trafficking.

We have reviewed and updated our contract management processes and guidance with a relaunch in April 23 to overtly include more guidance for employees.

The objective of the review was to identify approaches that would improve our processes to enable the identification and management of risks in relation to modern slavery and human trafficking. Possible ways of doing this could include:

- increasing openness, transparency, and efficiency in the management of supply chains
- improving ability to identify strengths, weaknesses, opportunities, and threats in supply chains.
- improving communications with suppliers
- enhancing relationships with suppliers

One such approach is to (if appropriate and proportionate) introduce annual audits on suppliers to ensure compliance with the contract agreement. A Contract Compliance Audit Template has been developed within our Contract Management Tool. As part of the Contract Compliance Audit Process suppliers with an annual turnover of over £36m are requested to confirm that they have updated their Modern Slavery Statement within the last 12 months. Where feasible, and where justification for further investigation is identified, further audits can be completed.

The outcome of this will inform how we can continue to review how modern slavery is incorporated into the contract management process.

We have added to all relevant workflows a requirement for one contract management meeting per year to have an agenda item covering Modern slavery. This can be used as an opportunity to remind suppliers of the actions they can take to seek to reduce the risk of Modern Slavery.

The Modern Slavery agenda item should cover:

- Whether the supplier has audited, and risk assessed their own supply chain
- If they have carried out these processes, what the main findings were
- Whether there are any areas of risk that we need to be aware of that the provider is looking into
- If the provider has not carried out any of these steps, plans for when they intend to do so
- Whether there are updates from the supplier's Modern Slavery Statement that may impact on the contract.

We are also exploring how we can capture information that will enable us to have effective oversight of modern slavery risks. This could take the form of KPIs that might include the following:

- All suppliers confirming their adherence to the Modern Slavery Act 2015
- All relevant Suppliers will need to evidence the publication of their Modern Slavery Statement
- Annual monitoring of modern slavery risks with suppliers and internal functions which informs gap analysis and reflective action log and programme
- Percentage of suppliers reporting that all their staff have completed modern slavery training.

In November 2023 we launched our Sustainability Charter which sets out to prospective and current suppliers what we expect of them in relation to Modern Day Slavery.

## **Training**

The Procurement Induction Pack given to all new members of the Procurement Team sign-posts staff to available training on The Modern Slavery and Human Trafficking Act 2015. This has included the internal ESCA E-Learning and external training. Going forward it is intended that training on Modern Slavery will be mandatory for all new team members, training options for non-procurement staff is being reviewed. Established members of the team are required to complete the CIPS Ethical Procurement Module on

an annual basis. A Procurement Training Playlist has been created which includes Modern Slavery and PREVENT Learning modules.

### **Further Information**

#### **Finding Help**

If you or someone you know is being or has been exploited or you are unsure if someone is in need of help, assistance and advice is available:

for life-threatening emergencies, call 999, or for non-emergencies, call 101 for the police

[Modern Slavery Helpline](#) can be called on 08000 121 700 or contacted via an [online form](#)

[Victim Support](#) can be called on 0808 16 89 111 or contacted via an [online form](#)

[Crimestoppers](#) can be called on 0800 555 111 or contacted via an [online form](#)

[Migrant Help](#) can be called on 01304 203977

[The Salvation Army](#) have a 24/7 confidential referral helpline, which can be called on 0800 808 3733

Child Victim - Essex Social Care - 0345 603 7627

This statement will be reviewed on an annual basis, which will take place on or before 1 April 2025.

This statement will be published on the ECC website and on the Government 'Modern Slavery Statement Register' which went live on the 6th May 2021.

This statement has been signed by Kevin Bentley Leader of the Council and Gavin Jones, Chief Executive Officer of Essex County Council.

Further information on modern slavery can be found on [GOV.UK](#).



**Cllr Kevin Bentley  
Leader of the Council**



**Gavin Jones  
Chief Executive**