



Statement on Preventing Modern Slavery and Human Trafficking

2024/2025

Council statement on preventing modern day slavery and human trafficking

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain. The Modern Slavery Act 2015 was introduced to tackle these crimes.

Under the Act 'slavery' is where ownership is exercised over a person through:

- 'servitude' which involves coercion to provide services
- 'forced or compulsory labour' involving work or service extracted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily
- 'human trafficking' involving arranging or facilitating the travel of another to exploit them

Large businesses have been required to produce an annual modern slavery statement since 2015 and this requirement will be rolled out to local authorities. This document is our modern slavery statement covering our own business and relationships, and our supply chains.

Organisational structure, business and supply chains

We have adopted a 'One Council' approach, which ensures all services are working together towards shared goals. We want to offer our residents the services they need and the lifestyle they deserve, whilst showing strong leadership and speaking up proudly for Lincolnshire.

Our corporate plan details our key priorities for the Council and for Lincolnshire so that people and communities have:

- high aspirations
- the opportunity to enjoy life to the full
- thriving environments
- good-value council services

Councils are under unprecedented pressure particularly in large rural counties such as Lincolnshire, which is the fourth largest county in England, covers 5,921 square miles and has a population of 768,400.

More than 50,000 people in Lincolnshire live in an area recognised as being in the 10% most deprived in the country. Four of the seven districts in the county are classed as either mainly or largely rural. This sparsity makes services more difficult and costly to deliver and may provide opportunities for modern slavery.

We provide a wide range of services for our residents including social care, education, waste management, highways and much more, through an annual budget of around £600 million (for 2023/4, including schools).

We work with a range of external partners to reduce the risk of modern slavery. These partners include (but are not limited to):

- Lincolnshire Safeguarding Adults Board
- Lincolnshire Safeguarding Children Partnership
- Lincolnshire Police
- Safer Lincolnshire Partnership

Due to the nature of our business and the existing policies in place, there is generally a low risk of slavery or human trafficking. In areas where nationally evidence suggests the risk might be higher, such as residential care, we have robust safeguarding policies and procedures in place which help us recognise and prevent modern slavery. The key policies can be seen below. They ensure that we:

- remain vigilant
- work with our staff and external partners to detect and report any abuse that is found
- support any known survivors

Additionally, our commissioning cycle is sufficiently robust to hold our contracted providers to account to ensure they meet their requirements and to reduce the risk of modern slavery.

We are aware of upcoming reforms, affecting modern slavery legislation regarding our organisational structure and supply chains. We will ensure all our policies and procedures comply with these new changes and are adapted where necessary and appropriate.

Relevant policies

We review our policies and procedures on a regular basis to ensure they remain compliant and fit for purpose. The following policies and procedures are relevant and essential to meeting the requirements of the Modern Slavery Act, however this is not an exhaustive list:

Safeguarding policies – this refers to both the [Lincolnshire Safeguarding Adults Board policy and procedure](#) and the [Lincolnshire Safeguarding Children's partnership manual](#). We adhere to comprehensive safeguarding policies which all staff are expected to read and work within. We work within multi-agency partnerships to protect and safeguard people.

[Whistleblowing policy](#) – should other routes fail, or where there is a public interest, we encourage anyone to raise genuine concerns regarding our work, or that undertaken through our supply chains, via our whistleblowing process. Our policy applies equally to staff (including agency workers and contractors), partners and suppliers providing goods or services to us or on our behalf, elected members, as well as the public, and can be used confidentially. It covers all forms of crime, including modern slavery and human trafficking. Where any safeguarding concerns are identified they are referred to our safeguarding teams and any criminal matters, such as modern slavery, will be referred to the Police.

[Pay policy statement](#) – in terms of our own staff we enforce a pay evaluation scheme. This ensures we pay employees fairly and equitably. We comply with equal pay regulations. Our diversity and inclusion policy states that we oppose all forms of unlawful discrimination. We apply pay decisions consistently across the Council. Where discretions are available, we apply these fairly.

[Recruitment policy](#) – ensures those involved in recruitment and selection are appropriately trained, with additional training for those recruiting to safer recruitment posts. Successful candidates commence employment when all the relevant/agreed pre-employment checks and references have been obtained (such as right to work in the UK, DBS, identity and qualifications). We are an appointed sponsor for migrant workers and comply with all the associated requirements. Our code of conduct is based on the Nolan principles and is clear on employees' position of trust, approach to equalities, and Safeguarding.

[Agency, relief and off-payroll workers policy](#) - this policy sets out standards and procedures to ensure that we appropriately engage, train and deploy these staff. We are committed to equality of opportunity in recruitment, employment, transfer and promotion. We treat agency, relief and off-payroll workers fairly and consistently.

Training

We have an induction programme for all new staff members and ongoing training that employees must complete. This includes safeguarding e-learning and tackling exploitation and modern slavery e-learning. This training:

- enables staff to identify and know how to spot and report incidents of abuse and neglect, including modern slavery and human trafficking
- explains what to do if a member of staff comes into contact with a potential victim
- explores the risks to individuals who have been trafficked and enslaved
- explains how support is available through a multi-agency approach

Our tackling exploitation and modern slavery e-learning is also freely available to our providers and suppliers.

For those front-line staff more likely to detect modern slavery we offer additional training courses. For example:

Our Children's Services staff additional training includes:

- child exploitation
- missing children in Lincolnshire
- modern slavery and trafficking

Our front line Adult Care and Community Wellbeing staff additional training includes:

- grooming and exploitation – covering how to recognise modern slavery, how this may manifest in Lincolnshire and what action can be taken to alert concerns
- safeguarding core knowledge – including learning from the experience of large-scale modern slavery in Lincolnshire

We have implemented additional training on tackling modern slavery in supply chains for our commercial teams. This covers the practical steps commercial officers can take throughout the commissioning lifecycle to identify and mitigate modern slavery risks.

We also signpost relevant providers and suppliers to nationally recognised modern slavery awareness raising and training materials in order to improve the level of knowledge and understanding throughout our supply chain and across our services, whether delivered internally or externally.

Reporting

Through our website we advise residents and communities if they are affected by slavery, or suspect someone is at risk, to:

- call 999 if there is any immediate danger
- use the Lincolnshire Police [online crime reporting service](#) or call 101, in all other instances
- seek help or advice from the [Modern Slavery Helpline](#) on 08000 121 700.

Our training details clearly to all our staff the processes to follow should they have any concerns relating to modern slavery or human trafficking.

We are aware of the [National Reporting Mechanism \(NRM\)](#) and we also have close links with the Lincolnshire Police Safeguarding Hub. This allows our staff to have a clear local referral pathway and process for modern slavery concerns identified and ensures all potential cases are reported appropriately at both a local and national level.

Due diligence and risk assessment

We communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them. We reinforce it as appropriate through contract reviews.

We have updated our processes to ensure that during the supplier selection stage of procurements relevant suppliers have to demonstrate they are compliant with the Modern Slavery Act and annual reporting requirements. If they are not compliant, we may remove these suppliers from the process.

Our contract conditions include obligations on our suppliers to comply with all applicable law and relevant Council policies and practices – including those regarding safeguarding, equality and inclusion as well as any suspected criminal activity. In addition express anti-slavery obligations in standard terms are felt to be required over and above a general requirement to comply with the law given the importance placed upon this nationally within recent guidance and, also within the Procurement Act 2023. As such we are introducing within our standard terms and conditions for relevant future contracts, specific requirements for our suppliers to comply with the Modern Slavery Act 2015 and to have in place governance and oversight of the practices of any subcontractors they use and their supply chain.

We will continue to develop our procurement and contracting process, contracts, policies and practices in line with both the modern slavery legislation and procurement reforms. Any changes and additional obligations will be communicated to our current and future providers and our website will be updated to set out our stance on modern slavery as part of a wider discussion about the requirements needed to be a supplier for Lincolnshire County Council.

Statement approval

Approved (July 2024) by:



Debbie Barnes

Chief Executive Officer,

Lincolnshire County Council