

Introduction

Modern slavery is a global problem and international crime, affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds can fall victim to human trafficking. Victims can be controlled by force, threats, coercion, abduction, fraud and deception.

Mid Sussex District Council provides a wide range of services alongside partners, to the local community. We are making a clear commitment to tackle modern slavery by signing up to this Modern Slavery and Human Trafficking Transparency Statement.

The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking do not exist within its supply chain or in any part of its own business. The term 'modern slavery' captures a whole range of exploitation which includes:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children, in order to produce child abuse images or videos;
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties;
- **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars);
- **Bonded labour:** this includes descendant slavery when people give themselves into slavery as security against a loan or when they inherit a debt from a relative;
- **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;
- **Human Trafficking:** this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult;
- **Other forms of exploitation:** including organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption.

Our Responsibilities

The abuse of human rights in our supply chains through modern slavery is gaining greater awareness. The Council has a responsibility to prevent slavery and human trafficking within our supply chain and in any part of the organisation. It expects the same high standards from all of our contractors, suppliers and other business partners.

This Statement sets out the Council's actions and commitments to understand all potential modern slavery risks related to our activities and to put in place steps to combat and prevent acts of slavery and human trafficking within our business and supply chains. It applies to everyone working for the Council or on our behalf in any capacity. The Council's Senior Management Team has overall responsibility for ensuring this Statement complies with our legal and ethical obligations, and that all those under the Council's control comply with it.

The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

Our Policies

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

The following policies and procedures are considered to be key in meeting the Council's requirements of the Modern Slavery Act 2015.

Procurement Code: This strategy sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from suppliers. All tender exercises are conducted by the Council's procurement officer and in accordance with the Chartered Institute of Procurement and Supply Code of Ethics. The Council's Invitation to Tender document requires all bidders:

- i. to confirm that they (or any sub-contractor that they intend to use) have not been convicted of any offences including an offence under the Modern Slavery Act 2015;
- ii. to demonstrate how they tackle any modern slavery or human rights abuses in their business;
- iii. with a turnover of £36 million or more must submit a copy of their Modern Slavery Statement with their bid.

Equality & Diversity Policy: The Council is committed to increasing inclusion and providing equality of opportunity in all its activities and to ensuring that discrimination does not occur at any level.

Recruitment and Selection Policy: The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, references are sought for all employees and relevant checks are carried out, for example, Disclosure and Barring Service checks are carried out where relevant to the position. The employees are paid directly into an appropriate, personal bank account.

Pay and Reward Policy: The Council is committed to operating transparent, consistent and equitable pay arrangements for its employees. The policy sets out the key principles for establishing pay levels, the basis for determining salaries, pay progression and pay supplements.

Whistleblowing Policy: The Council encourages all its employees, volunteers, Councillors, contractors, agents, consultants, suppliers and service providers who have concerns about any aspect of the Council's work to come forward and voice those concerns. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easier to disclose any information without fear of discrimination and repercussions.

Safeguarding: The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults who come into contact with its services and activities and to protect them from harm. The Council has a comprehensive policy which all staff and councillors are expected to read and work within

Duty to Notify

The Council, as part of the public sector and as an employer recognises that it has a duty to take a robust approach to modern slavery and human trafficking. The Council acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking under Sections 43, 52 and 54 of the Modern Slavery Act 2015. [Modern Slavery Act 2015](#).

The Council expect the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Council include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Council expect that its suppliers will hold their own suppliers to the same high standards.

Guidance on the duty to notify is provided at [Modern Slavery: how to Identify and support victims](#)

This requirement in respect of potential victims of Modern Slavery is set out in the council's safeguarding operating procedures and guidance where, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

The advice to residents and communities if they are affected by slavery, or suspect someone is at risk, is to:

- Call 999 if it is an emergency
- Call 101 for non-emergencies
- Call Crimestoppers anonymously on 0800 555 111
- Call the Modern Slavery Helpline on 08000 121 700
- Report online via the [Modern Slavery Helpline](#)

There are factsheets and a poster that explain what you need to do if you think someone has been a victim of Modern Slavery:

Modern Slavery - Duty to Notify Poster: [6.2286 HO LL Duty of notice poster 2 v2.pdf \(publishing.service.gov.uk\)](#)

Modern Slavery – Duty to Notify Factsheet: [6.2286 HO LL factsheet duty to notify copy V3.pdf \(publishing.service.gov.uk\)](#)

Due Diligence and Risk Assessment

The Shared Procurement Service, who deal with most contracts worth £50,000 or more, take the lead on tackling modern slavery within our supply chains and works in conjunction with stakeholder departments that may face the greatest risk of procuring goods, services or works associated with this crime. Staff are trained to ensure they are aware of the risks and issues and how to mitigate these in the procurement process.

The Council expects all suppliers regardless of size to actively work towards mitigating the risk of modern slavery within their organisations and its supply chain and may request evidence to demonstrate steps taken. In addition, the Shared Procurement Service has processes and due diligence mechanisms in place to ensure that modern slavery is tackled by its supply chain.

The Council aims to monitor the commitments which our suppliers have pledged, including the identification and management of risks in relation to modern slavery and human trafficking. This is done by:

- 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

Training

Training on this policy, and on the risk faced by the Council from modern slavery in its supply chains, forms part of the safeguarding training for all staff who work for the Council, and regular refresher training will be provided as necessary.

Frontline staff who may witness the signs of modern slavery receive more bespoke training around exploitation to include modern slavery and all staff are encouraged to take part in any additional training offered by partner agencies which include modern slavery.

The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

Regular information and updates on modern slavery will be shared with Councillors, partners and the public alike through a range of media platforms.

Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been at ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of inspections of direct suppliers and sub-contractors in our supply chains in the past year.
- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

Effectiveness in Combating Slavery and Human Trafficking

Across the year 2023, the council has undertaken the following to meet its commitment to tackle modern slavery:

- the MSDC Community safety team joined Sussex police's exploitation team to visit our town centres and approach local businesses and locations that young people spend time in to support and increase awareness of child exploitation and county lines drug dealing. We spoke to staff in these locations and were able to leave business cards, QR codes and leaflets to enable children/young people and adults to find out more about the subject and support available.
- Community Safety Manager attends quarterly West Sussex Modern Slavery Operational Group quarterly to share learning and guidance with other Authorities and agencies.
- Incorporated modern slavery in our safeguarding training to all frontline staff and discussed training needs within quarterly Designated Safeguard Officer meetings.
- Legal has assessed the Council's standard contract terms, which have robust "anti-slavery and human trafficking" provisions within them for the service provider to adhere to.
- Procurement has ensured that any supplier that wishes to tender for the Council contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015

Our Commitment for the Next Year

Following a review of the effectiveness of the steps we have taken across 2023 to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking

1. We will continue to disclose identified instances of modern slavery and continue to work with the Police, Home Office, West Sussex County Council, Gangmasters and Labour Abuse Authority and other relevant authorities as appropriate where there are slavery concerns;
2. We will continue to offer training to staff which supports their duties under the Modern Slavery Act and arrange bespoke modern slavery training to front-line services in how to spot the signs and action to be taken to report concerns or suspicions, to include county lines and exploitation.
3. We will ensure that modern slavery considerations are incorporated in any relevant new or updated council policies;
4. We will continue to monitor our supply chains and report on any issues identified through non-compliance or insufficient information provided;
5. We will continue to ensure that any supplier that wishes to tender for the Council contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015, and will check in accordance with the Central Digital Platform (under the Procurement Act 2023, when in force).
6. As part of our contract management processes, we will continue to undertake annual gathering and reviewing of Modern Slavery Statements for all suppliers with an annual turnover of £36m and over.
7. For all the above Threshold contracts (currently £213,477, inclusive of VAT) or contracts where we believe there are likely to be greater supply chain risks, we will continue to assess suppliers' recruitment policies and procedures to ensure that they are minimising the risk of modern slavery in their organisation.
8. The Shared Procurement Service will undertake an annual risk assessment of its supply chain to identify high-risk areas and will continue to deliver training and guidance to contract managers to highlight the potential modern slavery risks.

Declaration

This voluntary slavery and human trafficking statement is made for the financial year ending 2025.

Signed: 

Lucy Corrie Assistant Director - Communities, Mid Sussex District Council

Date: 7th August 2024