



**Derbyshire County Council
Modern Slavery Transparency
Statement 2021/22**

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1. Introduction

Modern Slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Anyone can become a victim of modern slavery and in all types of exploitation, victims can be of any age, gender or ethnicity.

Even though most people think that slavery only exists overseas, modern slavery in the UK is thriving. It is estimated that tens of thousands of people are in modern slavery in the UK today, with an average cost per modern slavery crime at £328,720 (Home Office 2018/17).

This statement sets out Derbyshire County Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities for the financial year ending 31 March 2022 meeting the requirements of Section 54 of the Modern Slavery Act 2015.

Derbyshire County Council (the Council') is a key member of the Derby and Derbyshire Modern Slavery Partnership (DDMSP), a multi-agency partnership whose focus is to protect the public by identifying and safeguarding victims and potential victims of modern slavery / human trafficking and by relentlessly targeting those who enable or facilitate this criminality.

The Council is committed to improving its practices to identify and combat this crime. The Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor with other bodies; and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as required by section 52 of the Modern Slavery Act 2015.

The Council is absolutely committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community, and ensuring these are free from slavery and human trafficking. The Council also notes its responsibility under the National Referral Mechanism (NRM) as a "First Responder".

This statement covers the activities of the Council. The statement covers direct employees of the Council, agency workers, relief staff and services delivered on behalf of the Council by third party organisations and in the Council's supply chains.

2. Organisational Structure and Supply Chains

The Council is a principal local authority for the purposes of the Local Government Association (LGA) 1972. The Council provides a wide range of services to support residents and businesses in Derbyshire to thrive, these services are delivered directly by the Council and through external organisations. The Council has

identified four strategic priorities to direct improvement activity over the coming years, these are:

- resilient, healthy and safe communities,
- high performing, value for money and resident-focussed services,
- effective early help for individuals and communities
- a prosperous and green Derbyshire

The Council is currently split into four directorates: Adult Care, Children's Services, Corporate Services and Transformation, Place.

Derbyshire is a largely rural county with many sparsely populated areas alongside larger built-up urban conurbations and has a county population of 802,694 people. The Council has responsibility for providing a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. The Council manages a wide range of services which are delivered directly and through external contractors.

Over 13,000 people work for the Council (excluding schools), with a budget of over £500 million per annum, making it one of the largest employers in Derbyshire. Many jobs range across a number of services, such as:

- | | |
|----------------------------------|------------------------|
| • social care | • libraries |
| • education | • waste management |
| • children centres and nurseries | • trading standards |
| • highways | • economic development |
| • street lighting | • tourism |
| • community safety | • countryside parks |

The Council procures goods, services and works from various suppliers and this is governed by its Financial Regulations and Standing Orders and also Public Contract Regulations 2015.

2.1 Countries of operation and supply

Derbyshire County Council only operates within the United Kingdom.

Derbyshire County Council would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the County Council's expectations. We would request that our suppliers ensure the same of their own supply chains.

Due to the nature of the Council's business, the risk of slavery and human trafficking is considered low, however the Council remains vigilant to any potential risks.

2.2 High-risk activities

The Council considers that, due to the nature of its business and the policies/processes (see below) that are in operation, there are no areas of its business that are at high risk of slavery or human trafficking.

2.3 Responsibility

Responsibility for the Council's anti-slavery initiatives is as follows:

- Policies: These are developed by officers employed by the Council and are then agreed by the relevant board or committee.
- Risk assessments: These will be undertaken by officers within the relevant service area with support from Human Resources and Procurement / Commissioning Support as required.
- Investigations / due diligence: Any concerns regarding modern slavery or human trafficking should be raised with the Director of Legal and Democratic Services in the first instance. The Council actively works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain roles such as cleaning and care work, and large numbers of adults in multiple occupancy domestic properties. The Council expects any employee / elected member who may witness or suspect criminality to report their concerns to their manager and/or the police. Whistle blowing requirements included in contract for at risk services.

3. Relevant Plans and policies

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered key in the Council meeting the requirements of the Modern Slavery Act 2015 and preventing slavery and human trafficking in its operations.

3.1 Council Plan 2021-25

The [Council Plan](#) is a key document that describes the Council's priorities, resources and how progress is monitored. The Plan shows how we will work together with our partners and communities to be an enterprising council, delivering value for money and enabling local people and places to thrive.

Our strategic approach governs how we work, as a council, with and for communities, and in collaboration with partners. Three key areas of activity are taking the approach forward: 'Enterprising Council', 'Thriving Communities' and 'Vision Derbyshire'. Together these key areas place the Council in a stronger position to understand, to adapt and respond to future challenges and to bring about the changes needed to ensure future success.

Modern slavery is a multifaceted issue requiring a co-ordinated partnership response and encompassing many aspects. The Council's plan highlights the importance of working together to address issues such as fraud, financial abuse and ensuring that individuals and communities are supported and protected.

3.2 Safeguarding

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. The Council has a comprehensive Safeguarding Policy and Procedures which all staff and Elected Members are expected to read and work within. The Council works within

multi-agency partnerships namely the Derbyshire Safeguarding Adults Board and the Derby and Derbyshire Safeguarding Children Partnership to protect and safeguard people, this includes complying with the Safeguarding policies and procedures for [Adults](#) and [Children](#).

More information about Modern Slavery is also made available in the Derby and Derbyshire Safeguarding Adults Board Practice [Guidance](#).

3.3 HR / Employment Policies and Practices

The Council remains highly committed to advancing equality, eradicating unfair treatment, and promoting good relations across and between all our communities. We have clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation.

The Council has procedures and policies in place on all major employment issues – e.g. disciplinary, grievance, harassment and bullying, Code of Conduct, Confidential Reporting Procedures, as well as other policies that support fair treatment of employees including attendance management and ill health capability, performance capability, staff appraisals and recruitment and selection. These policies are available on the Council's 'Our Derbyshire' staff website.

Our management guidance supplements the above to make sure the policies are applied consistently and fairly to employees and the service in different circumstances. Policies are constantly reviewed and we endeavour to reissue at least every three years to ensure they are fit for purpose.

3.4 Recruitment

The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualification (where necessary) and they are paid directly into an appropriate, personal bank account. To comply with legislation all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

3.5 Agency Workers

The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

3.6 Pay

The Council use a job evaluation scheme, thereby ensuring that all employees are paid fairly and equitably. All new and changed jobs are evaluated by a panel of trained evaluators including trade union representatives.

3.7 Employee Code of Conduct

The Council's Code of Conduct for Employees makes clear the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and

breaches are investigated. The code also applies to contractors, agency staff, volunteers and those on student / work experience placements and anyone working on behalf of the Council. In addition, all registered social workers must operate in accordance with the codes of conduct in relation to their professional registration.

3.8 Confidential Reporting (Whistleblowing)

The Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing [policy](#) is intended to enable individuals or organisations to disclose information about malpractice internally and to provide them with protection from subsequent victimisation, discrimination or disadvantage. This will assist in detecting and deterring malpractice and, by demonstrating our accountability, maintain public confidence and a good reputation.

3.9 Equality and Diversity

The Council's Equality and Diversity Policy is a declaration of its commitment to making equality an integral part of the Council's business. As a major employer and provider of services we are committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services. To support our commitment to equality, we embed equality and diversity into our everyday business. We expect all our Councillors, managers, employees and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers.

4. Procurement

4.1 Procurement Contractors and Service Providers

The Council Procurement [Strategy](#) sets out a clear vision and the key organisational outcomes that implementation of the Strategy is looking to deliver. The Council expects its providers and suppliers to have safeguarding policies, procedures and training in place. From April 2016, all tender processes require bidders to provide confirmation that they are compliant with the Modern Slavery Act 2015.

The Council is committed to ensuring that its contractors adhere to the highest standards of ethics.

4.2 Working with Suppliers and Due Diligence

The nature of global supply chains for goods and services is increasingly complex. Modern slavery can be found anywhere in the supply chain, but it tends to be much worse further down the value chain, where there is little visibility and where the poorest and most vulnerable work. In order to help eradicate modern slavery, the government has provided statutory guidance on [transparency in supply chains](#) for those organisations with an annual turnover of £36m or more.

Human rights due diligence is also a key concept in the UN Guiding Principles' on Business and Human Rights (UNGPs). The government has set out a clear expectation in the National [Action Plan](#) on Implementing the UN Guiding Principles on Business and Human Rights. UK organisations should respect internationally

recognised human rights wherever they operate and treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue.

As part of the Council's initiatives to identify and mitigate risk, the Council undertakes due diligence when considering taking on new suppliers or contractors.

The Council operates to its Procurement [Strategy](#) 2021-2026 and has an annual strategy delivery plan (2021-22). The strategy is part of the Council procurement function ensuring that it is able to support the Council Plan, the Enterprising Council Programme all legislative requirements such as the Public Services (Social Value) Act 2012.

All forms of Supplier Selection Questionnaire used within County Procurement (Government Guidance Procurement and Policy Note 8/16) include the assessment of supplier awareness and implementation of the Modern Slavery Act 2015.

Section 7 - Modern Slavery Act 2015: Requirement under Modern Slavery Act 2015		
Question No	Question	Response
7.1	Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?	Yes ____ N/A ____
7.2	If you have answered yes to Question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?	Yes ____ Please provide the relevant URL to view the statement No ____ Please provide an explanation
Note: All answers are scored on a PASS / FAIL basis		

The Supplier Selection Questions also includes instruction to bidders regarding the applicability of response to consortium members or subcontractors as follows: *"If you are bidding on behalf of a group (consortium) or you intend to use sub-contractors, you should complete all of the selection questions on behalf of the consortium and/or any sub-contractors"*.

Contract reviews are undertaken by departmental Contract owners. County Procurement is developing a Contract Management Compliance team who will provide support and validation of appropriate contract management across the Council, ensuring that key policies and standards are met by suppliers. The team will be in place from April 2022.

The Council works to ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Any investigation and/or victim support in relation to modern slavery is conducted through the Derby and Derbyshire Modern Slavery Partnerships Multi Agency Tactical Response Agreement.

The Council complies with Section 52 of the Modern Slavery Act 2015 - Duty to Notify. Incidents of modern slavery are referred to the police and the Designated Modern Slavery Lead within Community Safety, who is also the Council's direct link to Derbyshire Constabulary's Adults Exploitation Unit (AEIU@derbyshire.police.uk) and the Local Serious and Organised Crime Boards.

5. Partnerships

Through its Community Safety function, the Council along with Derby City Council, leads the Derby & Derbyshire Modern Slavery Partnership. Bringing together public, private and voluntary organisations to disrupt perpetrators and support victims of human trafficking & modern-day slavery in Derby and Derbyshire and further afield. We strive for a community wherein awareness of all forms of human trafficking and modern-day slavery is commonplace and that across all sectors people work collectively to eradicate its existence in our community.

The Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes the Derbyshire Safeguarding Children and Adults Boards.

5.1 Derby and Derbyshire Modern Slavery Partnership

The work of the Derby and Derbyshire Modern Slavery Partnership is driven by a vision to protect the public by identifying and safeguarding victims and potential victims of modern slavery / human trafficking and by relentlessly targeting those who enable or facilitate this criminality. This vision is driven by a three-year Strategy (2019-2022), which focuses on the four strategic themes – Pursue, Prevent, Protect and Prepare and are in line with Government's Modern Slavery Strategy 2015, whereby reducing the threat and vulnerability to victims in Derbyshire as follows:

Reducing Threat

- prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue / Prevent).

Reducing Vulnerability

- protecting vulnerable people from exploitation and reducing the harm caused by modern slavery through enhanced support (Protect / Prepare).

The Partnership manages several subgroups to fulfil these strategic themes:

- **Pursue/Prevent** – a tactical and enforcement subgroup which identifies and responds to modern slavery related offences across Derby and Derbyshire. Attendees are made up of First Responders (including the Council) and other organisations with law enforcement powers.
- **Protect (Adults) and Protect (Children)** – Areas of business include working with / for individuals who have entered / exited the NRM and with those individuals where entering the NRM is not an option. The subgroup is made up of a range of First Responders and those agencies with responsibilities to

protect Adults and Children e.g. Local Authorities, Police, British Red Cross, Hope for Justice, Barnardo's, Rebuild.

- **Awareness Raising/Training** - this subgroup seeks to improve the understanding of the roles and responsibilities within organisations when dealing with instances of slavery and trafficking; improving public understanding of slavery and trafficking (including the signs to look for); and promoting training within organisations particularly around recognising and responding to slavery and trafficking.

The Council is represented by several officers on the subgroups including officers from: Community Safety, Trading Standards, Emergency Planning, Adults Safeguarding and Childrens Safeguarding. The Council has been involved in awareness raising around Modern Slavery through its social media forums such as Twitter, Facebook etc.

5.2 Emergency Planning

The Council has a duty to be part of the multi-agency response to the investigations into modern slavery and trafficking by providing assistance to victims (including facilitating and resourcing a place of safety) when they are taken to such a place during these investigations.

6. Training and Awareness

The Council has a programme of training for all employees. Safeguarding Awareness Training (this is role specific), enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking. The Councils Community Safety Unit provides a range of free e-learning and webinar [training](#) on Modern Slavery, the training is available to all employees, partner agencies, charities and the third sector.

A substantial amount of training has been delivered to voluntary, statutory and private sector stakeholders. The training helps delegates gain an increased understanding of what modern slavery is, signs to look out for and develop skills in supporting people who may be victims of modern slavery in Derbyshire. Delegates will gain an understanding of:

- what modern slavery is
- the scale and scope of modern slavery and human trafficking
- where modern slavery happens
- signs to look out for
- how modern slavery affects individuals
- how to raise concerns and gain help for people affected by modern slavery
- the National Referral Mechanism and local procedures

A dedicated section on [Modern Slavery](#) is available on the Safer Derbyshire website.

The Home Office e-learning for [Modern Slavery First Responders](#) is also available for all the Councils social care staff (Adults and Children), the training provides an understanding of what to do when looking to refer a victim into the NRM.

Since April 2021 to date (January 2022), the Council has delivered the following awareness raising training to 838 delegates:

- 126 delegates completed e-learning training, includes 29 delegates completed the newly introduced First Responders (Adults and Child) e-learning training.
- 494 delegates completed e-learning training for criminal exploitation and county lines.
- 189 delegates from a range of partner agencies have attended a Modern slavery webinar.

The Council recognises that certain employees within the organisation should be required to complete training on modern slavery. To date, this has focussed on customer facing roles. The Council is however currently reviewing training and as part of this review; consideration will be given to prioritising training on modern slavery for those staff responsible for supply chain management and those working in HR and Procurement within the Council.

Further awareness raising by the Council has included a multi-agency webinar to celebrate Anti-Slavery Day 2021, featured training as part of Derbyshire Safeguarding Adults Week 2021, co-published the Derby and Derbyshire Modern Slavery Partnership [Annual Report](#) and supported national initiatives such as the Clewer Car Wash and Farm Work App.

7. Supporting Material / Resources

In addition to the web links highlighted throughout this Statement, the [Home Office](#) has a range of documents and promotional material including infographics, briefings and posters. Safer Derbyshire website provides support and advice on a range of community safety topics, including a dedicated section about partnership working to address [modern slavery](#) in Derbyshire.

8. Performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and / or human trafficking is not taking place within our business or supply chains through:

- Investigating all allegations, complaints, whistleblowing reports received from employees, the public, or law enforcement agencies regarding modern slavery and human trafficking.
- Undertaking community awareness programmes for adults and children.
- Requiring staff including those working in supply chain management, First Responders, Procurement and HR to have completed training on modern slavery.
- Reviewing and evaluating high risk supply chains, occupations and contracted services as part of on-going contract management activity.
- Working with our statutory partners to further develop a Modern Slavery Problem Profile for Derby and Derbyshire.

9. Review and Approval

This statement has been approved by Derbyshire County Councils Portfolio Holder for Health and Communities. The Statement will be reviewed on a regular basis. Responsibilities for the Statement and Modern Slavery are designated as:

Modern Slavery Transparency Statement: Portfolio Holder for Health and Communities.

- The Portfolio Holder is responsible for the Council's Modern Slavery Statement.

Developing and Updating the Statement: Designated Modern Slavery Lead

- The Designated Modern Slavery Lead within Community Safety, in conjunction with HR, Procurement, Safeguarding and Legal, monitors and updates the Statement in line with national guidelines and organisation development priorities.
- Refreshed versions of the Council's Modern Slavery Statement approved by the Director of Community Services.

Risk Assessments and Prevention: Designated Modern Slavery Lead

- The Designated Modern Slavery Lead within Community Safety is responsible for:
 - working with Team Leaders to identify high risk activities and appropriate actions relating to modern slavery and human trafficking.
 - ensuring appropriate information and training for staff and Councillors.
 - ensuring that this Statement and resulting actions are embedded within the Council's Safeguarding Policies and Procedures and Strategic Plans.

Early Identification and Notification: Team Leaders

- Team Leaders will notify any suspected modern slavery concerns encountered during their work, to the Designated Modern Slavery Lead within Community Safety. They will ensure that they and their staff complete all relevant training.

Identifying and Reporting Concerns: All Staff and Councillors

- As with all safeguarding concerns, all staff and Councillors are required to share these in order that they can be investigated, and action taken as required.

For further information regarding this statement and Derbyshire County Councils work on Modern Slavery, contact: Michelle Collins – Community Safety Manager, Email: michelle.collins@derbyshire.gov.uk Telephone: 01629 538951.

Approved by:

Councillor Carol Hart
Portfolio Holder for Health and Communities

Dated 18 July 2022