



Derbyshire County Council
Modern Slavery Transparency
Statement 2025-2026

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1. Introduction and Commitment

1.1 What is Modern Slavery?

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, sex, gender, nationality, ethnicity or background.

Modern slavery is an under-recognised but significant issue within the UK, with cases identified across a range of sectors and communities. Nationally, the Home Office received 23,411 referrals of potential victims of modern slavery in 2025, which represents a 22% increase in referrals compared to the previous year (19,117). This year continued the national trend of setting the highest number of National Referral Mechanism (NRM) referrals since the NRM began in 2009: this has occurred each year apart from 2020 which was heavily impacted by the Covid-19 pandemic.

In 2025 the Home Office received 7,130 “Duty to Notify” reports of individuals who chose not to enter the NRM, the highest number since the “Duty to Notify” began in 2015 and a 27% increase compared to the previous year (5,598).

1.2 Modern Slavery in Derbyshire

Derbyshire is in the East Midlands and has an estimated population (excluding Derby City) of 822,377. The county has experienced a 3.2% population increase since 2021 and is projected to increase to almost 925,000 by 2047. Derbyshire is characterised by significant geographical and social contrasts, with densely populated urban areas and large rural communities, contributing to variation in access, health outcomes, and service demand.

Derbyshire has strong links with neighbouring cities including Derby, Sheffield, Manchester, Leicester and Nottingham. This connectivity is relevant as exploitation and modern slavery often operate across geographical boundaries. Derbyshire's mix of urban and rural areas can present differing risks, with rural locations potentially offering reduced visibility and access to services, which may increase vulnerability to exploitation.

In Derbyshire (including Derby City), there were 117 National Referral Mechanism (NRM) referrals in 2025, of which 44 were adults and 73 were children. This is a 37% decrease on 2024's total of 185. However, the most significant decrease was seen in adult referrals (58%), whilst child referrals only decreased by 9%.

1.3 This Statement and Our Commitment

This statement outlines the actions taken by Derbyshire County Council ("The Council") to identify and understand potential risks of modern slavery and human trafficking associated with its business operations and supply chains. This statement relates to actions during the financial year ending 31 March 2026 and has been prepared in accordance with Section 54 of the Modern Slavery Act 2015.

The Council is committed to continuously strengthening its approach to identifying, preventing and addressing modern slavery and human trafficking. This includes working in partnership with external agencies and ensuring effective collaboration across internal services. The Council, as a public sector organisation, an employer, community leader and a procurer of services, recognises its responsibility to take a proactive and preventative approach to the risks of modern slavery and human

trafficking across all areas of its corporate activity. This statement applies to all individuals working for or on behalf of the Council, including directly employed staff, agency workers, relief staff, and those delivering services through commissioned providers and supply chains. Given the scale of the Council's procurement activity and its role as a significant purchaser within Derbyshire, the Council acknowledges the importance of transparency and accountability in setting out the actions it is taking to comply with and respond to the requirements of the Modern Slavery Act 2015. This statement will be published on the [Derbyshire County Council](#) website and the Government's [Modern slavery statement registry](#).

The Council 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 also notes its responsibility under the National Referral Mechanism (NRM) as a "First Responder" and is committed to training internal and external partners to be best placed to identify potential signs of Modern Slavery and be confident in the reporting of concerns and taking action to safeguard potential victims.

Derbyshire County Council is a lead member of the Derby and Derbyshire Modern Slavery Partnership (DDMSP), a multi-agency partnership whose focus is to bring partners together to tackle modern slavery and to support victims in Derbyshire.

2. Organisational Structure

The Council is a principal local authority for the purposes of the Local Government Act (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. For 2025-2026, the Council worked towards three strategic objectives, these were:

- Empowered communities where people live safe, happy, healthy and independent lives
- Prosperous, green and sustainable places with opportunities for all
- A resident focused, efficient and effective organisation delivering value for money

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

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. Derbyshire County Council is one of the largest employers in Derbyshire, with a budget of £769.755m during 2025/26. Many jobs range across a number of services, such as:

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

The Council procures goods, services and works from various suppliers and this is governed by its Financial Regulations and Standing Orders and the Public Contract Regulations 2015. Moving forward, the Procurement Act 2023 (PA23), Procurement Regulations 2024 (PR24) and the Provider Selection Regime (PSR) will be applicable.

2.1 Countries of operation and supply

Derbyshire County Council only operates within the United Kingdom and 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 Council's expectations. We would request that our suppliers ensure the same of their own supply chains. The Council has limited contact with overseas sourcing but does require its suppliers to be aware of their own supply chains, as they can be several layers deep.

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 operations

Typical high-risk sectors for modern slavery include agriculture, leisure, hospitality, catering, cleaning, clothing, construction, manufacturing and health and social care. The Council's current contracts register highlights that the council commissions a number of labour-reliant companies in the construction sector and in health and social care. The Council also contracts 62 private, voluntary, and independent (PVI) nursing homes, 82 PVI residential homes and 93 PVI home care agencies.

The Council has adapted its business to work closer across departments and with its external partners to respond to issues arising with its contracted care providers. For more information about the Council's work with Health and Care settings, See section [5.4 Health and Care Settings](#). For more info on the Council's procurement, see section [4. Procurement and Supply Chains](#)

2.3 Responsibility and Key contacts

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 Council, Cabinet or committee, as appropriate..
- **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 Community Safety Unit who will involve the Director of Legal and Democratic Services as required. 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 or elected member who may witness or suspect criminality to report their concerns. Employees should report to their manager and / or the police. Elected members should report to democratic.services@derbyshire.gov.uk and / or the police.

The Council's Whistleblowing policy also extends to any other individual who wants to raise an allegation of wrongdoing, malpractice or illegality by the Council.. This could include consultants, contractors, or sub-contractors who are engaged in work for the Council and includes, Councillors, volunteers or anyone who uses the Council's services, or a member of the public.

- **Receiving intelligence and initiating partner response**: The Council's Community Safety Unit has the responsibility for managing incoming intelligence of suspected modern slavery cases relating to victims and offenders. The Community Safety Unit will work with partners in the Derby and Derbyshire Modern Slavery Partnership (DDMSP) to investigate potential cases, pursue offenders and support victims, sharing intelligence where appropriate. The Community Safety Unit will also take a lead role in raising awareness of Modern Slavery.

3. Relevant Plans and Policies

The Council adheres to the [Modern Slavery Act 2015](#) and 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 2025-2029

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 to improve lives across Derbyshire.

The Council Plan is supported by an overarching Strategic Objectives Implementation Plan and the Council's Financial Plan, and each department has a Service Plan which sets out how the department will deliver the actions in the Council Plan. The Outcome Framework is a wider set of measures that is used to assess whether we are meeting our Outcomes over the life of the Council Plan.

Protecting individuals and responding effectively to Modern Slavery contributes to the following Strategic Objectives detailed in the 2025-2029 Council Plan:

- Empowered communities where people live safe, happy, healthy and independent lives
- Prosperous, green and sustainable places with opportunities for all
- A resident focused, efficient and effective organisation delivering value for money

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 comprehensive safeguarding policies 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 committed to equality, fairness and opportunity. 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 and whistleblowing procedures. The Council has other policies that support fair treatment of employees including attendance management and ill health capability, performance capability, staff appraisals and recruitment and selection.

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 regularly reviewed, and we endeavour to refresh these at least every three years to ensure they are fit for purpose.

The Council's [recruitment policy and processes](#) are transparent and include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications (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. The Council uses 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.

3.4 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. For temporary resource requirements which are not related to business

services, the Council has an arrangement with Comensura for the supply of agency staff which simplifies the way agency workers are hired and enables the council to manage its use of agency workers more effectively.

The Council has chosen to adopt the national framework procured by the Yorkshire Purchasing Organisation (YPO) for the contract between itself and Comensura. Details of the expectations placed upon Comensura relating to modern slavery transparency are set out in **Appendix 2**. In addition to this, the Council expects the agencies that Comensura uses to follow the Government [Code of Practice](#) when recruiting international candidates to a role in the UK Health and Social Care sector.

3.5 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 principles and ethos set out in the Code should be adhered to by contractors, agency workers, volunteers, consultants and those on student / work experience placements. In addition, all registered social workers must operate in accordance with the codes of conduct in relation to their professional registration.

3.6 Procurement

The Council operates from its [Procurement strategy](#), detailing the steps taken to ensure that our county procurement function is best able to support the Council Plan and all applicable legislative requirements. It is informed by the Council's [Procurement values and principles](#). The Council follows the [National Procurement Strategy](#), which sets out local government's ambitions and priorities, focusing on the three core themes; leadership; behaving commercially and; achieving community benefits.

The government has also produced a guidance document to help the public sector to [tackle modern slavery in Government Supply Chains](#), which the Council will use to inform best practice relating to its supply chains.

3.7 Whistleblowing Policy

The Council's [whistleblowing policy](#) seeks to cover all disclosures and allegations made by employees of Derbyshire County Council, including temporary and agency staff. This could include consultants, contractors, sub-contractors who are engaged in work for the Council, volunteers, Councillors, anyone who uses the Council's services or a member of the public. This Policy also extends to any other individual who wants to raise an allegation of wrongdoing, malpractice or illegality.

It is intended to enable individuals or organisations to disclose information about wrongdoing, malpractice or illegality internally and to provide them with protection from subsequent victimisation, discrimination or disadvantage. This will assist in detecting and deterring malpractice and, by demonstrating the Council's accountability, maintain public confidence and the Council's good reputation.

4. Procurement and Supply Chains

The Council is one of the biggest purchasers of goods and services in Derbyshire, with an annual budget of £769.755m during 2025/26. The Council faces increasing pressure to source goods and services that represent value for money, whilst meeting its own Procurement priorities and aligning with the Chartered Institute for Procurement and Supply (CIPS) best practice and the Cabinet Office Commercial Regulations.

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. Since April 2016, all tender processes require bidders that have an annual turnover of more than £36m to provide confirmation that they are compliant with the Modern Slavery Act 2015.

The Council is committed to ensuring that its contractors adhere to all relevant legislation and the highest standards of ethics, and requires its suppliers to adhere to the [Suppliers and services terms and conditions](#). These may be adapted and tweaked by each department, for example, Adult Social Care contracting has its own amended Terms and Conditions that reflect the specific nature of its contracted services.

The Public Procurement Act 2023 came into effect in February 2025. This piece of legislation transforms public procurement, and for the first time will bring contract management and compliance under procurement legislation.

4.2 Risk-Assessing and Mapping of Supply Chains

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.

In 2023, the Council embedded the use of the Cabinet Office's "contract tiering tool" as a form of risk-assessing. The tiering tool helps to classify contracts into 3 groups: "Gold", "Silver" and "Bronze" based on assessing the value, complexity and level of risk attached. Each tier requires a different level of contract management, with Gold being those contracts with highest risk and therefore greater scrutiny and compliance measures put in place, such as being subject to mandatory annual checks on known risk areas. Identified risks are logged on a risk register for the contract. Approximately 20% of the Council's current contracts fall into the 'Gold' category.

The Council, as part of its supplier questionnaire, currently requires contractors to confirm that they comply with the Modern Slavery Act 2015 in relation to its supply chains, putting the emphasis on the contractor to ensure compliance. As a contract condition, contractors should notify the Council whenever there are any changes to their supply chains. Therefore, the onboarding checks that the Council makes at the start of the contract lifespan should provide a basic level of reassurance until the Council is notified otherwise. With the changes made for the Procurement Act 2023, the Council now has greater oversight of Tier 1 suppliers and also their associated supply chains, with more resources to perform in-depth checks.

4.3 Working with Suppliers and due diligence

Due diligence is not just about checking human rights, it is also about assessing suitability, capability, legal and financial standing, to ensure the supplier is compliant with relevant legislation. This includes labour laws, alongside health and safety and environment etc. This is now called a procurement specific questionnaire under the procurement act.

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, including taking measures such as:

- A risk-assessment to understand the contractors and sub-contractors that are utilised. All contractors must answer the mandatory part 1 and 2 of the supplier questionnaire.
- Specific questions relating to modern slavery on the supplier questionnaire during the tender process, for companies with an annual turnover of more than £36m.
- Following the introduction of the Public Procurement Act 2023, using the “contract tiering tool”, to assign a risk level to each contract.

Adult Social Care has three contract management teams focusing on separate areas of business:

- 1) Older Adult Care Homes
- 2) Domiciliary Care
- 3) Working Age Adult Care Homes, Supported living and Non “Care Quality Commission” registered suppliers

The contracts which are managed by Adult Social Care contract management teams are subject to an ongoing risk-assessment process, which considers factors such as safeguarding, value, complexity of service, governance, account records, monitoring data, oversight of international recruitment and concerns raised by partners. This informs ongoing conversations with the contracted organisation about performance and risk management.

Human rights due diligence is also a key concept in the UN Guiding Principles on Business and Human Rights (UNGPs). 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.

4.4 Suppliers Selection Questionnaire

An extract from this document, which relates to modern slavery, can be found in **Appendix 1.**

4.5 Supplier Contract Management and Social Audits

The Council's modern slavery diligence does not end at the offering of a contract. A continuous cycle of risk assessment, supplier engagement and contract management is crucial to keep on top of emerging risk and work with suppliers to mitigate this. Contract reviews are undertaken by departmental contract owners.

As mentioned in previous sections, 'Gold' contracts with the highest identified risk will be eligible for greater contract management resource and scrutiny. For Modern Slavery purposes, the Community Safety Unit will work with the contract management and compliance teams to share current industry-based concerns and best practice, to collaborate on creating proportionate requirements on the supplier to tackle Modern Slavery risk within the contract.

The Council may look to utilise the new **excluded suppliers list** and **public sector debarment list** to identify any companies, directors, sub-contractors and associates that have been excluded from tendering for contracts.

5. Partnerships

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 the Council's direct link to Derbyshire Constabulary's Criminal Exploitation Unit. The Head of Community Safety is also a member of the Derbyshire Serious Organised Crime and Exploitation Board (SOCEX).

The Head of Procurement attends the East Midlands Head of Procurement Forum, to keep informed of best practice regionally. They also received updates from the Local Government Association. The Council's Principal Procurement and Contract Compliance Officer attends the East Midlands Super User Group, to track the implementation of the Public Procurement Act 2023 and also attends the Contract Management Pioneering Programme. This programme ensures that contracting authorities can effectively manage the key stages of commercial delivery.

5.1 Derby and Derbyshire Modern Slavery Partnership

The purpose of the Derby and Derbyshire Modern Slavery Partnership ("The Partnership") is to bring partners together to tackle modern slavery and to support victims in Derbyshire. It focuses on strengthening safeguards against modern slavery by protecting people from exploitation and increasing awareness of and resilience against this crime.

The aim is to provide a forum for which multi-agency partners can plan, share and develop actions and activities relating to modern slavery and exploitation across Derbyshire and Derby City.

Statutory and voluntary sector partners work in partnership to meet the following objectives:

- To work collaboratively with public, private and voluntary sectors, ensuring that the efforts and resources of all member agencies are utilised to the best possible effect.

- To understand the nature and types of slavery across the city and the county
- To ensure that victims are at the heart of our work and that a focus is placed on activity to identify and provide services to support victims of modern slavery.
- To develop and deliver training, events and communications to raise awareness of Modern Slavery
- To be aware of trends, new initiatives and best practice in relation to modern slavery.
- To identify emerging issues and developing preventative strategies to tackle modern slavery in our community.
- To sustain and strengthen the engagement of current partners.
- Establish and appoint sub-groups and/or task and finish groups to advise, guide and oversee particular aspects of the work of the Partnership, as required.

The Partnership meets twice a year, with extraordinary meetings convened where required to consider responses to strategic issues, policy and legislation changes. The meeting is made up of a range of First Responders and those agencies with responsibilities to protect adults and children e.g. Local Authorities, Police, and representatives from the voluntary and community sector.

5.2 Serious Organised Crime and Exploitation (SOCEX)

A multi-agency Serious Organised Crime and Exploitation (SOCEX) thematic structure has been implemented by Derbyshire Police, allowing operational, tactical and strategic oversight of exploitation and serious organised crime. SOCEX is underpinned by information and intelligence sharing and aides the identification, disruption and enforcement against serious organised crime and modern slavery networks in Derbyshire.

Over the past 12 months, the SOCEX structure has co-ordinated partners to work closely on disrupting instances of child and adult exploitation, running operations to test businesses' response to potential exploitation scenarios, and co-ordinating high-intensity visits to properties known or suspected to be "cuckooed".

5.3 Emergency Planning

The Council has a duty to be part of the multi-agency response to investigations into modern slavery and trafficking. The Council has a significant role to play in the setting up of emergency reception centres where multiple potential victims are rescued at the same time. The British Red Cross [publication](#) “First Steps to Safety: The role of reception centres in supporting people out of exploitation” is a useful piece of research and advice for professionals in ensuring the safety of victims rescued from exploitation.

The Council’s Emergency Planning Team and Community Safety Unit have worked with partners from Derby City Council, Derbyshire Police, Justice and Care, Rebuild East Midland, British Red Cross, East Midlands Special Operations Unit and The Salvation Army to develop our planned response when a reception centre is required.

As part of this, we have identified and established a network of suitable reception centre locations across the County and City of varying sizes. An agreed procedure details each partner’s role in the running of small, medium and large centres and supporting victims at that location.

5.4 Health and Care Settings

Care workers and senior care workers are no longer on the main shortage list for new overseas applicants. New visa applications for these roles from abroad were closed as of July 22, 2025. While listed on the previous Immigration Salary List, these roles are phased out for new international recruitment to reduce net migration.

Despite this, potential visa and sponsorship abuse remains of high concern in Derbyshire due to the number of overseas workers already working in the sector.

The Modern Slavery charity “Unseen” have documented some of the known [risks of abuse for workers in the care sector](#):

- Low pay that is less than you were anticipating, combined with higher-than-expected living costs
- Exorbitant “fees” paid to the recruiter for a range of services, from training to accommodation and transport
- Difficulty finding somewhere to live, which can leave workers at the mercy of an agent or employer
- Little understanding of employment rights and language barriers that compound the problem.

The Council contracts 62 private, voluntary and independent (PVI) nursing homes, 82 PVI residential homes and 93 PVI home care agencies.

In the past 12 months, the Derby and Derbyshire Modern Slavery Partnership have received a number of complaints and intelligence relating to potential exploitation of overseas workers contracted to work in the Derby and Derbyshire care sector. As a council we are collectively determined to investigate these allegations and intelligence, to protect workers and ensure that we are not indirectly facilitating Modern Slavery through our contracted services.

As a result, the Council's Community Safety Team co-ordinate Multi-Disciplinary Team (MDT) discussions where key partners can share intelligence and plan a strategic response to allegations and concerns. The MDT consists of Community Safety, Adult Safeguarding and Adult Social Care and Children's Social Care Contract and Commissioning officers from Derbyshire County Council and Derby City Council, as well as Derbyshire Police's criminal exploitation team, the Care Quality Commission (CQC), the Fair Work Agency, HMRC, Home Office Immigration and Enforcement and the Home Office Sponsor Assurance and investigation team.

The MDT has identified a range of concerns across the local care sector, reflecting a spectrum of potential exploitation and poor employment practices concerns. Whilst not all cases meet the threshold for modern slavery, several issues raise significant concerns and require a coordinated response:

1. Employment Practices and Contract Compliance Risks

- Several concerns relate to recruitment and employment practices that may indicate exploitation and poor compliance
- Charging significant upfront fees for Certificates of Sponsorship, subsequently recovered through wage deductions
- Failure to remunerate workers for travel time between care visits
- Restrictions on, or denial of, statutory annual leave entitlement
- Excessive working hours, with potential implications for workforce wellbeing and quality of care provision
- Provision of substandard accommodation, including overcrowding or accommodation not reflective of fees charged
- Use of company vehicles without appropriate business insurance; in some cases, workers may not hold the required UK driving licence

2. Recruitment and Workforce Stability

- Evidence suggests some workers are recruited by agencies or providers who are unable to guarantee contracted or minimum hours
- This creates financial instability and may increase vulnerability to exploitation

3. Worker Vulnerability and Awareness

- Workers may be reluctant to raise concerns due to fear of losing sponsorship or employment
- There is limited awareness among some workers of their rights, including:
 - The ability to seek alternative sponsorship within the permitted timeframe
 - Access to support and employment opportunities elsewhere

4. System Impact and Risk Management

- Interventions to address these concerns must be carefully managed to avoid unintended consequences
- In particular, there is a risk of disruption to essential care provision for vulnerable residents
- Mitigation measures have included:
 - Close coordination with commissioning and contract teams
 - Reviewing workforce rotas to identify potential gaps
- Interventions to address these concerns must be carefully managed to avoid unintended consequences
- In particular, there is a risk of disruption to essential care provision for vulnerable residents
- Mitigation measures have included:
 - Close coordination with commissioning and contract teams
 - Reviewing workforce rotas to identify potential gaps
 - Utilisation of Council-employed staff or alternative providers to maintain continuity of care

Key pieces of work from the MDT include:

- Investigations into a number of contracted care providers.
- We have created a comprehensive Health and Care settings guidance document to help Social Care staff to recognise the signs, report concerns and respond to allegations, including practical advice on MDT discussions.
- We have referred a number of cases into national investigative bodies, such as the Home Office and the Fair Work Agency.

6. Training and Awareness Raising

The Council maintains a comprehensive training programme for all employees. Safeguarding Awareness Training (delivered on a role specific basis), equips staff in community-facing roles with the knowledge and confidence to recognise and

report safeguarding concerns (abuse and neglect), including those related to modern slavery and human trafficking. In addition, the Council's Community Safety Unit delivers a programme of free e-learning and [webinar-based training](#) on Modern Slavery. This training is accessible to all Council employees, as well as Derbyshire partner agencies, charities and the voluntary and community sector.

The training is designed to enhance awareness, improve identification of risk factors and develop skills required to support individuals who may be victims of modern slavery within Derbyshire. Delegates gain an understanding of:

- The definition and forms of modern slavery
- The scale and scope of modern slavery and human trafficking
- The settings and sectors in which modern slavery may occur
- Key indicators and warning signs
- The impact of modern slavery on individuals
- How to raise concerns and access appropriate support for potential victims of modern slavery
- the National Referral Mechanism and local reporting procedures

A dedicated section on modern slavery is available on the [Safer Derbyshire Website](#).

During the reporting period from 1st April 2025 to 31st March 2026, the Council delivered awareness-raising training on Modern Slavery and Exploitation to a total of 522 delegates. This comprised of

- 143 delegates completed Modern Slavery e-learning training.
- 254 delegates completed criminal exploitation and county lines e-learning training.
- 12 delegates completed First Responder and National Referral Mechanism e-learning and pre-recorded webinar.
- 113 delegates from a range of partner agencies have attended a Modern Slavery webinar.

This training programme has contributed to strengthening awareness, improving identification of potential indicators of exploitation, and supporting staff and partners to respond appropriately in line with statutory duties. The Council recognises that specific roles within the organisation require an appropriate level of awareness and training on Modern Slavery. To date, this has primarily focussed on customer facing roles. The Council is currently undertaking a review of its training provision, and during 2026/27 will consider whether completion of modern slavery training should be mandated for additional staff groups based on role. Where staff are designated as First Responders, they will be required to complete the relevant Home Office training and associated guidance, including the pre-recorded webinar on making referrals to the National Referral Mechanism (NRM) to ensure compliance with statutory responsibilities.

7. Performance indicators

The Council measures the effectiveness of its approach to preventing modern slavery and human trafficking within its operations and supply chains through the following mechanisms:

- **Multi-agency coordination and internal governance:**
Ongoing communication and information sharing across relevant Council services to identify emerging risks, ensure a coordinated response, and continuously improve practice.
- **Investigation and response to concerns:**
Effective support to investigate allegations, complaints, and whistleblowing reports relating to modern slavery and human trafficking, including those raised by employees, members of the public, partner organisations, and law enforcement agencies.
- **Workforce development and training uptake:**
Monitoring and promoting completion of modern slavery training among key staff groups, including those in procurement, HR, supply chain management, and designated First Responders.

The Council assesses the impact and effectiveness of its awareness-raising activity through:

- **Training participation and reach:**
Monitoring the number of internal staff, partners, and voluntary sector representatives completing Community Safety-led training, including modern slavery awareness and First Responder training.
- **Referral and identification activity:**
Tracking the number of National Referral Mechanism (NRM) referrals and Duty to Notify (MS1) submissions made by Council-designated First Responders, as an indicator of improved identification and reporting of potential victims.
- **Multi-agency operational effectiveness:**
Evaluating the timeliness and effectiveness of coordinated multi-agency investigations and responses to identified risks and cases of exploitation.

8. What the council has done

Key achievements over the previous 12 months include:

- **Commissioning of Specialist Support:**
Derbyshire County Council, in partnership with Derby City Council, has continued to commission Rebuild East Midlands to deliver an initial support programme for individuals identified as potential victims of modern slavery.
- **Multi-Agency Coordination:**
The Council has played a leading role in coordinating Multi-Disciplinary Team (MDT) discussions to assess and respond to allegations and concerns of exploitation within health and care settings.
- **Workforce Guidance and Practice Improvement:**
Updated guidance has been developed and disseminated to key staff, strengthening awareness of how to identify indicators of exploitation and respond appropriately to safeguarding concerns within health and care environments.

- **Organisational Self-Assessment and Continuous Improvement:**

The Community Safety Unit has completed the [Local Government Association's modern slavery maturity matrix](#) to assess organisational progress, identify areas for development, and inform future priorities. A summary of findings and planned next steps is provided in the Appendices

9. Approval

Signed:



Statement Approved by:

Ellie Houlston, Director – Public Health

Date: 22nd September 2026

This statement is made pursuant of Section 54 of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31 March 2025.

This statement will be registered on the [UK Government modern slavery statement portal](#) and will be updated on an annual basis.

10. List of Appendices

Appendix 1	Modern Slavery extract from Suppliers selection questionnaire
Appendix 2	Extract from Yorkshire Purchasing Organisation (YPO) Template Agreement – Utilised for Modern Slavery purposes between DCC and Comensura for the supply of temporary workers
Appendix 3	Summary of the Council's progress and next steps arising from the LGA Modern Slavery Maturity Matrix

Suppliers Selection Questionnaire

All forms of Supplier Selection Questionnaire used within County Procurement follow the Government Guidance Procurement and Policy Note (PPN) 03/23. The PPN 03/23 replaces PPN08/16 and applies to all contracting authorities in England and contracting authorities in Wales and Northern Ireland that exercise wholly or mainly reserved functions. The revised Supplier Selection Questionnaire include the assessment of supplier awareness and implementation of the Modern Slavery Act 2015, see below.

Section 7 - Modern Slavery Act 2015: Requirement under Modern Slavery Act 2015		
Question No	Question	Response
7.1	You are a relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015 if you carry on your business, or part of your business in the UK, supplying goods or services and you have an annual turnover of at least £36 million. If you are a relevant commercial organisation, please - - confirm that you have published a statement as required by Section 54 of the Modern Slavery Act. - confirm that the statement complies with the requirements of Section 54 and any guidance issued under Section 54.	☐ Yes ☐ No ☐ Yes ☐ No
7.2	Your latest published statement must be available electronically please provide: the web address, with precise reference to the documents	

7.3	If you have answered yes to questions in 7.1 or if you have answered No to question 7.2, please explain what measures have been taken to demonstrate your reliability despite the existence of a relevant ground for exclusion.	
Note: All answers are scored on a PASS / FAIL basis		

Where the supplier is a commercial organisation subject to Section 54 of the Modern Slavery Act 2015, contracting authorities should set appropriate selection criteria and methodology by which to assess compliance.

As compliance with the Modern Slavery Act is only relevant to UK bidders, criteria can be broadened to relate to non-UK bidders by asking them to provide a link to published modern slavery statements in their own jurisdiction or where these are not required, to a relevant company document containing the same type/level of information. A pass/fail selection criterion may be set that either:

- The bidder must have complied with the requirements contained within Section 54 of the Modern Slavery Act 2015 and associated guidance including information relating to:
 - a. the organisation's structure, its business, and its supply chains.
 - b. its policies in relation to slavery and human trafficking.
 - c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains.
 - d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.
 - e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
 - f. the training and capacity building about slavery and human trafficking available to its staff; or

- Where the bidder is a non-UK supplier, the bidder must have provided a link to an equivalent statement or document which demonstrates information relating to a-f above.

Alternatively, if neither of the above are met, but the bidder provides a satisfactory explanation and assurances that either requirement will be met before contract award, this will be sufficient to pass the selection criterion but will be verified prior to contract award.

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”*.

Modern Slavery in the Yorkshire Purchasing Organisation (YPO) Framework Agreement – Comensura

The following is an extract of the YPO Framework Agreement which sets out Comensura's expectations of agencies who supply relief staff to Derbyshire County Council:

- 15.1. The Supplier shall:
 - 15.1.1. In performing its obligations under this Agreement, ensure that each of its suppliers and subcontractors shall comply with:
 - 15.1.1.1. all applicable laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015; and
 - 15.1.1.2. the Supplier Code of Conduct contained at **Schedule 3**.
 - 15.1.2. represent and warrant that at the date of this Agreement:
 - 15.1.2.1. neither the Supplier nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking; and
 - 15.1.2.2. having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
 - 15.1.3. implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.
 - 15.1.4. notify Comensura as soon as it becomes aware of:
 - 15.1.4.1. any breach, or potential breach, of the Supplier Code of Conduct; or
 - 15.1.4.2. any actual or suspected slavery or human trafficking in a supply chain which has a connection with this Agreement.
 - 15.1.5. upon request from the Supplier shall prepare and deliver to Comensura, a slavery and human trafficking report setting out the steps it has

taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.

- 15.1.6. the Supplier shall maintain a complete set of records to trace the supply chain of all Services provided to Comensura in connection with this Agreement and implement steps to monitor its compliance with the Supplier Code of Conduct and provide evidence of the same to Comensura upon request.
- 15.2. The Supplier shall, immediately it becomes aware, advise Comensura of any breach by the Supplier of **Clause 15.1** and provide details of the same.
- 15.3. Breach of this **Clause 15** shall be deemed a material breach of this Agreement

Summary of the Council's progress and next steps arising from the LGA Modern Slavery Maturity Matrix.

LGA Modern Slavery Maturity Matrix

The Local Government Association created this maturity matrix to provide a [framework](#) for councils to assess their current progress and plan future activity on modern slavery.

The first two sections focus on how the council manages its modern slavery work by considering the themes of leadership, resources and capacity needed to effectively manage modern slavery work across a council. The subsequent sections focus on identifying, referring, and supporting victims, disruption and prevention and mitigating the risk of modern slavery in council supply chains.

For each element within the different themes, councils can assess their current progress. Progress levels are identified as either basic first steps, early progress, substantial progress or mature.

Some of the areas that The Council scored strongly in are:

- Training delivered in a multi-agency context to establish links and ways of working.
- In depth training for First Responders and staff in key procurement roles.
- Established Multi-Disciplinary Team process to investigate and support potential victims of modern slavery in the local health and care sector.
- Modern slavery governance as part wider Community Safety governance.
- Supply chain mapping undertaken at a strategic level.
- Recognising the distinct needs of victims who are pre or post NRM.
- Collaborative and proactive work with partner organisations at strategic and operational level.
- Strong multi-agency approach to supporting child victims of modern slavery.
- Jointly commissioning an initial support service for victim support.
- Engagement with national partners such as the Fair Work Agency.

Actions that have been completed from last year's Modern Slavery Statement include;

- Streamlined the process for Multi-Disciplinary Team discussions relating to potential exploitation in the local health and care sector.
- Training delivery reviewed and now includes specific training for First Responders.
- Planned a review of adult victim referral pathways.

Over the next year, some of the next steps for the council to consider as highlighted by the matrix are:

- How to effectively work with other councils on a cross-boundary basis.
- Use of case studies from victim services to assess service impact.
- Exploration of a public health approach to tackling modern slavery.
- Increase awareness and visibility of Council's lead officer for modern slavery.
- Complete review of adult victim referral pathways.
- Co-ordinate an improved data and intelligence model across the partnership.

