

# Modern Slavery Statement.

## Introduction

Norfolk County Council is committed to preventing and acting against modern slavery and human trafficking in its corporate activities and in the wider community.

This statement sets out the actions that Norfolk County Council has taken and the policies and procedures it has adopted to understand modern slavery risks related to its activities and to help ensure slavery and human trafficking is not taking place within the organisation or through its partnerships and supply chains.

Further information regarding modern slavery is published on the Government's website.

[Access modern slavery details at www.gov.uk](http://www.gov.uk).

This statement relates to the financial year 1 April 2023 to 31 March 2024.

## Organisational Structure and Supply Chains

Norfolk County Council is the upper tier local authority for Norfolk and provides a range of services itself, in partnership with third party organisations or via its supply chain.

The Council owns Norse Group Limited, the parent company of a range of companies which deliver services including social care, waste disposal, catering, grounds maintenance and property professional services, and Independence Matters, a social care provider. This statement does not cover these companies, who produce their own statements; nor does it cover the other, smaller companies that the council owns partly or as a whole.

The Council is a member of the Eastern Shires Purchasing Organisation (ESPO), which procures commodity goods and services on behalf of the council and of many Norfolk schools. ESPO has its own modern slavery statement.

The Council procures a wide range of goods and services and has identified certain supply chains as being higher risk for modern slavery. These are set out at Annex A.

Through its use of its in-house contractor, Norse Group Limited, for facilities management and care services, the Council has mitigated what would otherwise be a material modern slavery risk in residential and domiciliary care, cleaning, security and similar services.

## **Policies and Procedures**

The Council has adopted policies and procedures that help to prevent modern slavery and human trafficking. These include:

- Whistleblowing Policy and Procedure
- Standard of Conduct and Behaviour Policy
- Equality, Diversity and Inclusion Policy
- Anti-Fraud, Bribery and Corruption Policy
- Norfolk County Council Safeguarding Policy 2016
- Adult Social Services Safeguarding Policies, Procedures and Best Practice
- Norfolk Multi-Agency Safeguarding Adults Policy and Procedure
- Adult Social Services Human Trafficking Procedure
- Children's Services Procedures Manual

## **Procurement**

The County Council undertakes due diligence in its procurement process and acts in accordance with the Public Contracts Regulations 2015.

In accordance with Cabinet Office procurement policy note 08/16, the council excludes bidders where it is aware that they have committed offences under the following legislation:

- section 4 of the Asylum and Immigration (Treatment of Claimants etc.) Act 2004
- section 59A of the Sexual Offences Act 2003
- section 71 of the Coroners and Justice Act 2009
- section 2 or section 4 of the Modern Slavery Act 2015
- an offence in connection with the proceeds of drug trafficking within the meaning of section 49, 50 or 51 of the Drug Trafficking Act 1994.

The County Council's Contract Standing Orders require officers to include requirements in contracts where there is an elevated risk of modern slavery for appropriate risk mitigation.

Contract managers within directorates are required to monitor contracts and manage and mitigate against the risks associated with human trafficking and modern slavery. In respect of lower risk supply chains, our Standard Terms and Conditions contain provision for termination of an agreement with a supplier where there is failure to comply with social or labour law.

## **Employment**

The County Council operates a robust recruitment process which includes checks of all new employees to confirm their identity and the right to work in the United Kingdom. This process also involves securing references. Where the prospective employee will encounter children and vulnerable adults in their roles, managers who are involved in recruiting such employees are required to complete recruitment and selection training and to adopt safer recruiting procedures.

The Council has rationalised its agency worker supply chain and its contract with its neutral vendor, Geometric Results International (GRI), requires GRI to carry out checks on the agencies it uses.

## **Training and Awareness Raising**

Norfolk County Council works within multi agency partnerships to protect and safeguard people and seeks to raise awareness of modern slavery through its key partners and partnerships. This includes the Multi Agency Safeguarding Hub (MASH) which is a partnership between Norfolk County Council social care, police, probation services and health services. MASH works to safeguard children and vulnerable adults in the community and to support professionals in understanding the threats to children or vulnerable adults, including modern slavery and human trafficking, to enable steps to be taken to prevent abuse.

Training on modern slavery has been delivered to procurement staff, commissioners, and contract managers, commissioned from Unseen.

The Council takes an active role in supporting Norfolk Police to respond to victims of modern slavery and human trafficking, utilising our specialist social work team to provide humanitarian support to victims, and ensuring that all NCC staff know how to raise concerns locally about modern slavery and human trafficking victims to CADS, Adult Safeguarding Team or the People from Abroad Team.

The Council participates and hosts the International Recruitment East hub which supports care providers that recruit international employees. The hub includes a link to Modern Slavery risk resources.

An officer working group for 'Modern Slavery – Care Sector' meets regularly to co-ordinate response and share best practice.

## **Reporting**

The County Council acknowledges its duty, as set out in Section 52 of the Modern Slavery Act 2015, to notify the Home Office of any individual encountered in England and Wales who it believes is a suspected victim of slavery and human trafficking.

**Councillor Kay Mason Billig**  
**Leader of the Council**

**Tom McCabe**  
**Chief Executive**



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## **Annex A: Higher-risk supply chains**

### **Social care**

Adult social care is the Council's largest category of expenditure. Employers in this sector typically have high levels of staff turnover, a significant migrant workforce, and low levels of unionisation. The use of agency staff is considerable, and in care homes there are significant numbers of 'back room' staff in roles such as catering, cleaning and laundry.

### **Waste disposal**

The waste disposal industry in the United Kingdom employs significant numbers of low-paid, casual and migrant staff and there are low rates of unionisation. The industry is considered high-risk for health and safety. Certain recyclates are exported for processing and this reduces the visibility of the supply chain.

### **Highways and construction**

Construction is a higher-risk industry because it employs significant numbers of low-paid, casual and migrant staff, there are low rates of unionisation and there are often multiple tiers of contractors.

### **Electronics**

- There are significant risks throughout the electronics supply chain. These include for example.
- the use of 'conflict minerals'.
- coercion, child labour and dangerous working conditions in raw material extraction and processing.
- coercion, child labour and dangerous working conditions in assembly and sub-assembly.

### **Catering**

Food production and food processing are both high-risk industries that employ significant numbers of low-paid, casual and migrant staff. The Council does not procure significant amounts of food directly, but it has large contracts for school catering and other catering services.

### **Textiles**

The Council procures relatively small quantities of textiles (mainly uniforms and personal protective equipment) but this is a high-risk category for child labour, poor working conditions and coercion.

### **Products derived from forestry products (rubber products, paper, furniture)**

Illegal logging raises significant environmental risks and in addition there are risks about use of slave labour by those carrying out illegal trade in forest products