

# West Berkshire Council's Modern Slavery and Human Trafficking Statement

## Introduction

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Modern slavery is the illegal exploitation of other people for personal or commercial gain. Modern slavery can take many forms, including:

- Human trafficking;
- Forced labour;
- Debt bondage/bonded labour;
- Descent-based slavery;
- Slavery of children; and
- Forced and early marriage.

West Berkshire Council (the Council) is committed to preventing modern slavery and human trafficking within all our corporate activities and supply chains. We uphold our statutory duty as described within the Modern Slavery Act 2015 to make a notification should we suspect an individual to be a possible victim of slavery or human trafficking.

This statement sets out the Council's actions and activities undertaken during the financial year 1 April 2024 – 31 March 2025 to understand all potential modern slavery risks relating to our services (directly provided and commissioned) and to ensure no slavery or human trafficking takes place in our services or supply chains.

As part of Local Government, the Council recognises that we have a responsibility to take a robust approach to slavery and human trafficking and furthermore, acknowledge our requirement under Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

## 1. Organisation structure and supply chains

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This statement covers the activities of the Council. That includes direct employees of the Council, agency workers engaged through the Council's managed service and services delivered on behalf of the Council by third party organisations and in the Council's supply chains.

The Council operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low, the Council remains vigilant and will take all steps available to manage the risks presented.



Where the Council requires external organisations to provide services on our behalf, contractors are required to sign Terms and Conditions (T&Cs) which require their compliance, and that of any sub-contractor, with all applicable statutory provisions. As part of this work, the Council's General T&Cs include a Modern Slavery clause.

The Council undertakes public procurement in accordance with the Public Contract Regulations 2015 and Procurement Act 2023. In applicable tenders the Selection Questionnaire (SQ) includes a requirement to declare and evidence compliance with the Modern Slavery Act 2015.

## 2. Policies

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The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose.

The following internal policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

### *Employees code of conduct:*

The Council's employees are expected to behave in accordance with the high standards of behaviour set out in the Officers' Code of Conduct. All employees are expected to apply the Council's Values to all aspects of their behaviour and conduct at work. All employees are expected to comply with the law relating to their work and general conduct. Any breaches of the Code of Conduct or other rules will be investigated and action taken as necessary.

### *Recruitment:*

The Council has a stringent Recruitment and Selection Policy and Procedure which sets out how recruitment is managed within the Council. Our processes are transparent and reviewed regularly.

All appointments will be subject to pre-employment checks. As a minimum these will include identity, the right to work in the UK, references from previous employers and medical fitness. Some jobs require additional checks; these may include Disclosure and Barring Service (DBS), qualifications and professional registration. This process is supported by the Council's internal Pre-employment Checks Policy and Procedure.

### *Whistleblowing:*

The Council is committed to the highest standards of openness, probity and accountability. All employees, Elected Members, agency staff, volunteers and contractors working for the Council who are concerned about modern slavery in the Council can access the Council's Whistleblowing Procedure.

People who raise concerns, based on a reasonable belief, under the Whistleblowing Procedure will be protected from dismissal, victimisation or detriment because they have made a disclosure.

Council employees also have access to one of our recognised trade unions to report any concerns.

The following external policy and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

### **Pan Berkshire Safeguarding Adults Multi Agency Policies, Procedures and Guidance:**

The Council's Adult Social Care services use this as their core safeguarding policy and includes any safeguarding responses to Modern Slavery identified within West Berkshire as per responsibilities set out under the Care Act.

## **3. Due diligence processes**

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The Council undertakes due diligence in all aspects of its work.

The Council's due diligence and reviews include:

- Reinforcing adherence to the Modern Slavery Act duties by working towards incorporating these into the relevant Council policies;
- Taking appropriate measures in the selection of suppliers and contractors using an SQ as part of the procurement process and ensuring T&Cs around compliance are being met;
- Robustly undertaking a thorough recruitment and selection process for all employees;
- Respond to concerns of modern slavery involving children through our child exploitation processes and monthly Exploitation, Missing Risk Assessment Conference (EMRAC) meetings. Support is provided to identify child victims of modern slavery and human trafficking, completion of NRM referrals and taking account of findings alongside our colleagues in TVP to ensure that we respond to and address the needs of children assessed at risk.
- Ensuring Council officers working in the front door service, Contact, Advice and Assessment Centre (CAAS), have access to CareKnowledge learning briefs and are aware of modern slavery and human trafficking to respond accordingly when such issues are identified or suspected;
- Continuing to be part of the National Transfer Scheme providing caring responsibilities for many young people and young adults who have experienced trafficking in their journey to the UK;
- Ensuring Care Quality Teams remain vigilant through contract monitoring and Care Quality processes;
- Adding additional compliance requirements that agencies must complete which confirms the workers sponsor visa status when submitting their CV;
- Providing training and awareness raising for staff and partner organisations to develop understanding of modern slavery and human trafficking;
- Accessing the International Recruitment Data Hub to review suspensions or revocations regarding Certificate of Sponsorship (COS) in West Berkshire.
- Officers working within the Councils Public Protection Partnership are mindful of and respond accordingly to any modern slavery or human trafficking concerns when undertaking work in relation to houses of multiple occupancy, non-licensed caravan sites, Op CeCe, Op Machinize, work with Border Force focusing on small businesses such as nail bars and car washes and when conducting investigations in to criminality by Organised Crime Groups.

## 4. Risk assessment and management

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The Council has not had any modern slavery concerns during the period of this statement

## 5. Key performance indicators to measure effectiveness of steps being taken

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Thames Valley Police's (TVP) restructure to Local Command Units (LCU) from Local Policing Areas now places West Berkshire within the 'Berks West' LCU alongside Reading and Wokingham. As a result, data received from TVP in respect of modern slavery is for the Berks West LCU and not specific to West Berkshire. This makes the understanding of our local profile and risks challenging..

The Council annually reviews the work that has been undertaken to address any modern slavery and human trafficking concerns. Any modern slavery concerns are addressed on a case-by-case basis ensuring there is a collaborative response to raise and address concerns whilst safeguarding individuals.

## 6. Training on modern slavery and human trafficking

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All Council employees working within Children and Family Services and Adult Social Care undergo mandatory safeguarding training which includes awareness of Modern Slavery. The Council has an online e-learning module on Modern Slavery and Human Trafficking available to all staff to provide a level of awareness in regard to Modern Slavery.

## Further steps

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The Council is committed to working to ensure there is no slavery or human trafficking in our services or supply chains and will review this statement on an annual basis.

As part of the work of the Community Safety Partnership, a review of processes for identifying and managing exploitation and Modern Slavery in the local area will be taking place.

A coordinated multi-agency approach is essential to effectively tackle Modern Slavery and Human Trafficking. The Council continues to work closely with key partner organisations, including Thames Valley Police, to ensure that any incidents, intelligence, or concerns relating to modern slavery within West Berkshire are identified and addressed promptly and effectively. This collaborative approach extends across local authority boundaries to manage cross-border risks and investigations. In addition, Berkshire LCU Intelligence and Disruption Teams deliver targeted 'Need to Know' sessions for partner agencies, enhancing awareness of the current threat landscape, emerging trends, and key indicators of modern slavery and exploitation, thereby strengthening the collective ability to identify and respond to potential cases.

## Approval for this statement

This statement was approved by the West Berkshire Council Chief Executive.

Name: Joseph Holmes

Signature:  \_\_\_\_\_

Date: 17th September 2026