

Surrey County Council

Modern Slavery Statement for the financial year ending 2023/2024

Introduction

This statement outlines key steps Surrey County Council have taken during the 2023 to 2024 financial year to mitigate modern slavery risks within our operations and supply chains. This is pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires certain organisations to publish an annual modern slavery statement.

As a public sector body, Surrey County Council recognises that we have a duty to ensure that public money is spent responsibly and our activities and those working on behalf of the authority are conducted in an ethical, responsible and sustainable manner.

[The Surrey Way](#) is our overarching strategic framework that explains the way we do things at the Council. It breaks down our ambitions and objectives, and provides us with a clearer, more joined up picture of what our ways of working should be. At Surrey, we have established cultural commitments and values to shape how we work and what we care about. We strive to be the kind of organisation that embraces inclusivity, collaboration, openness and ambition. Our values show we care about:

Our residents

- Being excellent
- Being open
- Working together
- Respecting others

These values encourage us to take action to prevent people from being subject to unfair treatment both within our organisation and our supply chains. In Surrey, as part of our Community Vision for Surrey in 2030 (the 2030 vision) the Council have an ultimate ambition-that no one is left behind. This means helping those who need us most and improving quality of life for everyone. Our [organisational strategy](#) sets out our contribution towards achieving the outcomes in the 2030 Vision.

This includes:

- growing a sustainable economy

- tackling health inequality
- enabling a greener future; and
- empowering communities.

At a time when local government is facing significant challenges and uncertainties, we remain dedicated to progressing our understanding of modern slavery and implementing appropriate measures to tackle it. Due to the widespread and multifaceted nature of this issue, it is crucial that people working for and on behalf of the Council be involved in efforts to combat exploitative practices. The Council fully acknowledges the complexity and challenges involved in tackling modern slavery. This issue requires appropriate resources to understand, implement and monitor the effectiveness of various approaches. Despite the daunting nature of this problem – a heinous crime affecting 50 million people worldwide and over 100,000 in the UK, one thing is certain: We have a duty to take action. Our approach to combatting this problem is focused on securing sustained long-term efforts and we are committed to taking action to safeguard the most vulnerable members of our society.

In our previous modern slavery statements, we expressed a commitment to doing more to address risks within our operations and supply chains and outlined how we are working to progress understanding of the problem, looking more closely at our own spending to understand potential risks, and putting measures in place to strengthen our response. In the last financial year, we have continued to work on building and strengthening the foundation of our anti-slavery efforts.

This statement includes information on:

- our organisation structure and supply chains
- policies in relation to modern slavery
- risk assessment
- due diligence measures
- how we measure our performance, and
- training available to our staff

Additionally, as the Modern Slavery Act 2015 encourages public scrutiny of modern slavery statements, we have included information for reporting cases of suspected or actual cases of modern slavery.

Due to the complex and ubiquitous nature of modern slavery, there are different people, teams and local partnerships working to address it and related concerns such

as issues around vulnerability and safeguarding. Consequently, it is challenging to document all activities including training, support and correspondence. Therefore, this statement may not fully reflect all actions taken by the authority, but it provides insight into key activities.

This statement relates to the steps taken by the Council during the financial year 1 April 2023 to 31 March 2024.

Our organisation structure and supply chains

Surrey County Council provides a range of services to over 1.2 million residents in Surrey including providing social care to children and the elderly, maintaining roads and providing libraries and waste management services. The Council employs approximately 11,000 staff corporately.

Our Corporate Leadership Team provides strategic direction to the whole Council which is organised into the following directorates:

- Adults, Wellbeing and Health Partnerships
- Children, Families and Lifelong Learning
- Communications & Engagement
- Customer, Digital & Change
- Environment, Infrastructure & Growth
- Highways, Infrastructure & Planning
- Environment, Property & Growth
- Finance & Corporate Services
- Surrey Fire and Rescue Service

Surrey County Council have partnered with Brighton & Hove City Council and East Sussex County Council to establish Orbis Procurement – our shared service partnership working together to deliver lean procurement support, shared learning to achieve excellent outcomes, and shared resource for the delivery of achieving value for money for our residents. Collectively, we comprise of one of the largest public procurement spends in local government, with an expenditure circa £2 billion a year with external suppliers across the three local authorities. As we deliver a significant amount of our projects annually via our Orbis Procurement service, its contribution to

our anti-slavery in supply chain activities is vital. Accordingly, this work is driven by our Orbis Procurement service for the benefit of the three authorities.

For each of the authorities where services are not procured directly by Council departments, we procure them via our Orbis Procurement service. This statement reports on activities related to these services. Further work will be required to map services procured outside our partnership and directly by Council departments. These services are often significantly lower in value and spend and are governed by the Council's Procurement and Contract Standing Orders. As noted in our previous statements, it is anticipated that such work would require longer-term assessments in collaboration with other teams working across the Council. Focusing on services procured via our Orbis Procurement partnership allows us to ensure adequate prioritisation of modern slavery risks and allocation of shared resources to respond to these risks.

Beyond work undertaken in our Orbis Procurement service to mitigate modern slavery risks in our supply chains, the Councils also have people and teams across the authorities working on addressing related concerns such as issues connected to abuse, vulnerability, safeguarding, and community and partnership.

During the 2023 to 2024 financial year the Council spent approximately **£1,080 million** with **6,192** suppliers.

Education, health & social care	£601 million
Assets and infrastructure	£345 million
Corporate & Business	£134 million

Policies in relation to slavery and human trafficking

Surrey County Council recognises the importance of policies to communicate our commitments and expectations of our staff, suppliers, and those who we do business with, to effectively address modern slavery. We also recognise that modern slavery sits on the extreme end of the labour exploitation continuum. Therefore, we have several policies, procedures, and codes of conduct with respect to abuse, fair labour and employment conditions that work to prevent and respond to a range of issues, including modern slavery, in our operations and supply chains. This includes whistleblowing, recruitment, health and safety, and grievance policies. Details of these policies and their relevance to modern slavery can be found in the Annex.

During the 2022/2023 financial year, our Orbis Procurement service conducted a review of our Supplier Code of Conduct to assess whether it is fit for purpose in addressing modern slavery and other ethical and sustainable issues within our supply chains. The Code of Conduct outlines the Council's expectations of suppliers with regards to ethical conduct when bidding for and delivering contracts. Following a review of the current Code and consultation with procurement officers across the three authorities in 2022/2023, we identified the need to refresh the Code to ensure that it adequately communicates our expectations of suppliers and that procurement and contract management officers are aware of the Code and how to utilise it in their respective roles. During the 2023/2024 financial year, we redrafted the Code which underscores our responsibility to ensuring that our activities do not cause, contribute, or are linked to adverse human rights impacts such as modern slavery and our commitment to engaging collaboratively and proportionally with our suppliers to deliver greater ethical and sustainable value from our relationship. We also carried out a consultation with procurement officers to understand support needed with implementing it. Our Orbis Procurement team is in the process of preparing for publication of the Code and producing guidance for staff on its implementation.

Risk assessment

As a public sector body, we recognise the risk of modern slavery facing our vulnerable people and service-users in our community, as well as workers in the supply chains supporting our activities. We also acknowledge that modern slavery is an issue that is prevalent in the UK. While we have an ambition to work with local supply chains, the risk of slavery still exists as the unfortunate reality is that no supply chain is entirely free of modern slavery or unethical labour practices. Modern slavery can take place at any stage of a supply chain, from the extraction of raw materials to the delivery and use of a final product while people delivering and receiving services can be subjected to exploitative practices by preparators internal and/or external to an organisation.

To aid our understanding of risks and inform our due diligence approach, we regularly consult and communicate up-to-date information on high-risk goods and services within the UK and beyond. Regarding modern slavery concerns in services we provide and the communities we serve, we recognise vulnerable service-users including children, young people, and vulnerable adults. Within our supply chains, we recognise risks in our third party spend in high-risk areas such as adults social care, construction, and facilities management but acknowledge that the Council's potential exposure to modern slavery issues is likely much greater due to the extent and nature of our activities. Identifying potential areas in our supply chain at higher risk such as these, helps us to prioritise our anti-slavery efforts.

As a local authority, we expect the type of risks we are likely to encounter to remain consistent and unlikely to vary significantly.

Due diligence

This section of our statement reports on activities aimed at understanding and managing risks within our operations and supply chains. The Council recognises the breadth, impact and reach of our activities as a local authority. We exist to serve the public interest and are accountable to the residents of our communities. Consequently, tackling modern slavery in our operations also means taking action to support efforts to eradicate modern slavery within our locality.

Our operations and communities

The Council have numerous legal responsibilities to protect and safeguard vulnerable adults, children and young people. Under the Care Act 2014 we have a duty to safeguard adults with care and support needs. We also have a duty under child protection legislation, notably the Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017 to safeguard children and young people in need in our local area. Surrey County Council is also first responder organisation. This means we have a responsibility to refer potential victims into the National Referral Mechanism (NRM). This is the government's framework for identifying and supporting potential victims of modern slavery. Under section 52 of the Modern Slavery Act 2015, we have a statutory duty to notify the Home Office of potential victims of modern slavery that we come across. Adults who give their consent and child victims can be referred into the NRM. Where a potential adult victim has not consented to a referral, the Council still have a duty to notify (DtN) the Home Office to support intelligence gathering.

In 2023, 17,004 potential victims of modern slavery were referred to the Home Office.¹

Of these, Surrey County Council referred 26 child victims (aged 17 and under) into the NRM. Two DtN referrals were also made.

According to the NRM statistics, 2023 saw the highest number of potential victims claiming exploitation as children nationwide since it was introduced in 2009. The rise in the number of victims is said to be attributed to the increase in county lines – a term used to describe organised criminal gangs and networks transporting and selling illegal drugs from one area to another within the UK using mobile phones to facilitate

¹ [Modern Slavery: NRM and DtN statistics, end of year summary 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtN-statistics-end-of-year-summary-2023)

their dealings. Often children and vulnerable adults are exploited and taken advantage of to support these activities such as being forced to store and conceal illegal drugs.

With regards to adult safeguarding, Section 42 of the Care Act requires local authorities to make enquires, or ask others to do so, if they believe an adult with care and support needs is at risk of abuse or neglect in their area and to find out what, if any, action may be needed to protect them. The Care Act 2014 includes modern slavery as a type of abuse, as well as being a serious crime, therefore, managing cases of modern slavery is closely linked to safeguarding adults procedures. A section 42 duty is triggered when three requirements of the Care Act have been met. This is when an adult: has care and support needs, is experiencing or is at risk of abuse or neglect and as a result of those care and support needs is unable to protect themselves from the risk or experience of abuse or neglect.

During the 2023/2024 financial year, 13 safeguarding cases reported as a modern slavery concern progressed to a section 42 safeguarding enquiry.² Various types of abuse were reported including emotional/psychological abuse, financial and material abuse, and sexual exploitation. The alleged harm occurred in a range of settings, mostly commonly in a person's own home or in their community.

The process of a statutory enquiry under section 42 of the Care Act typically involves understanding what happened, considering the wishes of the adult involved, assessing their needs for protection and support, taking immediate actions to protect them, interviewing relevant people, taking action against the abuser, developing a protection plan, liaising with authorities such as the police, and identifying others who may be at risk.

Further information on the safeguarding enquiry process is available at:

<https://www.surreysab.org.uk/>

Our supply chains

Regarding due diligence undertaken to tackle modern slavery in our third party spend, the Council have taken several actions through our Orbis Procurement partnership. We view compliance with the law, particular Section 54 of the Modern Slavery Act

² This figure only reflects the cases that have been enquired upon and is not indicative of all safeguarding concerns received by the Local Authority.

2015³, as the minimum expectation and are working towards more stringent due diligence measures.

Key work undertaken within the partnership in the 2023/2024 financial year include:

- Keeping abreast of new research, data, and guidance published by different organisations to inform and strengthen our approaches.⁴
- As part of standard tendering process, requiring organisations within the threshold of Section 54 of the Modern Slavery Act 2015 to confirm their compliance with the annual reporting requirements.
- Advising teams to require suppliers bidding for contracts involving high-risk works or services to produce a modern slavery statement or similar document (where not legally required to) and include information on the six suggested reporting areas⁵ included in the legislation to level the playing field.⁶
- Encouraging teams to consider procurements where tendering activity and wording could be strengthened, such as emphasising risks within specifications and introducing quality questions to understand suppliers' commitments and capabilities to managing modern slavery risks.
- Reviewing current high-risk contracts to understand if and how modern slavery considerations were embedded within tendering and contract activity and identify ways to improve in similar future projects, including re-procurements and extensions and consider opportunities to further engagement with current suppliers and their supply chain partners to mitigate risks.

³ Section 54 of the Modern Slavery Act 2015 requires certain organisations to publish a modern slavery statement each year outlining the steps taken to address modern slavery in their operations and supply chains.

⁴ Notably statutory guidance including PPN02/23, the Global Slavery Index, the Modern Slavery Policy & Evidence Centre, the Local Government Association and anti-slavery charities such as Unseen who manages the national modern slavery helpline.

⁵ The organisation's structure, business and its supply chains; Its policies in relation to slavery and human trafficking; Its due diligence processes in relation to slavery and human trafficking in its business and supply chains; 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; Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators; The training about slavery and human trafficking available to its staff.

⁶ Existing research on modern slavery statements have reported inconsistency in the quality and content of statements produced by organisations with some only complying with the minimum requirements of the legislation.

- Consulted with key operational staff such as procurement, commissioners and contract managers within services across the partnership to understand how these roles need to work in tandem to ensure that modern slavery risks are taken seriously, and considerations adequately embedded throughout a contract's lifecycle.
- Considered ways to strengthen engagement with suppliers, including monitoring supplier's anti-slavery efforts. This included delivering workshop and risk briefings to increase providers' understanding of issues facing their sector, and trialling use of supplier assessments, such as central government's Modern Slavery Assessment Tool (MSAT).
- Delivered practical training sessions to key supply chain management teams on embedding modern slavery considerations in service delivery.
- Finalised draft of the Orbis Supplier Code of Conduct which communicates the Councils' expectations of providers with regards to behaving ethically and responsibly.
- Strengthening modern slavery wording in contract documentation, such as including an offence under the Modern Slavery Act 2015 as a prohibited act in all Orbis Public Law service contract templates.

The work undertaken above was driven by the Council's Senior Policy Lead on Modern Slavery, based in the Orbis Procurement team. While lessons were drawn from each authority in our partnership, we are working towards consistency across the partnership to strengthen collective efforts in tackling modern slavery and we hope to build on this year on year.

Key performance indicators to measure effectiveness of steps being taken

Our general approach to tackling modern slavery, particularly within our supply chains, is heavily informed by existing research, best practices, and statutory guidance. Research on modern slavery statements often report that one of the areas organisations tend not to report on are indicators to measure effectiveness of anti-slavery efforts. The Council therefore recognises this as an area for improvement and is working to strengthen how we measure our overall approach. As aforementioned, a challenge the Council faces with tracking actions to tackle modern slavery and consequently their effectiveness, is the number of activities and correspondence undertaken in this area by different people, teams, and services across the authority, particularly those that handle concerns such as safeguarding, whose work captures modern slavery issues alongside others.

The indicators below have been drawn from and inspired by external guidance and demonstrate what our organisation believes is feasible for us to monitor at this stage in our journey to managing modern slavery risks. These indicators support our anti-slavery efforts by i) helping us to understand potential risks ii) ensure that we are taking action iii) understand the effectiveness of our approach and iv) identify areas that require improvement. We will monitor and report on our indicators on an annual basis in our modern slavery statements.

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
Potential cases of modern slavery	Reports of potential cases of modern slavery can be made through various channels within the local authority and the process for addressing different types of concerns may differ. As a result, the number of cases that have been reported in this statement may	Identifying cases not only ensures that potential victims have access to necessary support, but also gives us insight into the risks we may encounter	Number of reports made through the following channels: <ul style="list-style-type: none"> • Our whistleblowing helpline • Adult safeguarding enquires • NRM (end of year summary statistics) 	Whistleblowing: 0 Adult Safeguarding (s42 enquiry): 13 NRM 2023: 26 referrals & 2 DtN

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
	not reflect all potential cases or concerns received by the local authority.	as an authority, vulnerabilities within our community, operations, and supply chains, and our overall response to these challenges.		
Training of key supply chain management staff	Despite the availability of Council-wide training on our e-learning platform, the authority recognises the importance of providing regular and targeted training for our staff. However, it can be challenging to require this type of training due to the large number of staff members who have various roles and responsibilities. Additionally, staff may have access to training (both internal and external) provided by their teams or services. As a result, the training reported may not accurately reflect all staff	Targeted training ensures that staff responsible for key aspects of service delivery are equipped with the necessary knowledge and skills to address modern slavery within their specific roles.	Number of training delivered to staff and attendance	<u>Commissioners & contract managers</u> Number of sessions: 1 Number of attendees: 24 <u>Procurement</u> Number of sessions: 2 Number of attendees: Session 1 (46), Session 2 (45)

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
	members who have accessed modern slavery training.			
Monitoring implementation of supplier code of conduct	A limitation with monitoring the implementation of supplier code of conduct is the lack of capacity to assess how it is used in all relevant procurements and contracts.	To ensure Code is being used in tendering activity.	Project sampling across the partnership	Too early to report on
Review active high-risk projects to understand how modern slavery considerations were embedded	Due to capacity limitations, it is not feasible to review all current projects that are potentially high-risk for modern slavery practices.	To leverage insights from current contracts to inform our handling of future high-risk projects and our overall approach to managing risks in procurement and contract management activity.	Project sampling across the partnership	During the 2023/2024 financial year, 29 projects across the Orbis Partnership with a total contract value of approximately £5 billion were reviewed by Orbis Senior Policy Lead on Modern Slavery.
Identification of projects across the partnership that may be at high-risk	This assessment is not a confirmation of risk or the appropriate approach needed to respond. In most cases, projects may require further	To understand Orbis partner authorities' exposure to potential modern	Number of projects across the partnership that have been flagged as potentially high-risk by procurement officers.	At the time of drafting this statement, there are 231 projects in total that have been flagged. ⁷

⁷ As projects are at various stages of the tendering process, this figure represents the total number of projects presently in our project management system rather than by financial year.

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
for modern slavery practices.	assessment, taking into account various factors such as the complexity of the procurement, the route to market, nature and characteristics of potential risks, and opportunities and challenges to managing these. Additionally, some projects may experience delays or changes before the procurement process begins and anti-slavery measures may need to be considered at a later stage. Further there is also a risk that some projects may go unflagged. Procurement officers regular receive reminders to flag projects.	slavery risks and opportunities to manage these.		

The indicators above reflect what the Council believe is currently feasible for our organisation to monitor our approaches to combat modern slavery practices. Despite the Council’s own challenges of capturing and monitoring all anti-slavery activities undertaken across the authority, the Council remains dedicated to strengthening our anti-slavery efforts, raising awareness of the problem of

modern slavery throughout our organisation and supply chains, reporting on the areas we have adequate visibility of, and developing firm measures that continuously advance and improve over time.

Training on modern slavery available to staff

The Council understands the importance of ensuring that people within our organisation have the relevant knowledge to support wider anti-slavery efforts. As mentioned previously, the complexity of modern slavery and the nature of our activities as a local authority means that we are likely to face a variety of risks. We also acknowledged the challenge of documenting all work undertaken Council-wide to manage these risks. To overcome this, we rely on our greatest asset: our people. It is important that our staff understand the problem of slavery and can address it in their respective roles. Therefore, the Council provides several courses for staff on modern slavery.

- Human Trafficking and Modern Slavery
 - This is a 45-minute e-learning course which offers an understanding of modern slavery and the scope of the problem in the UK. It includes information on what modern slavery is, key pieces of legislation dealing with modern slavery, spotting the signs that someone may be a victim, how to respond, and how to get potential victims help and refer them into the NRM.

- Introduction to Modern Slavery in Supply Chains
 - This is a 60-minute e-learning course designed by the Council's Senior Policy Lead on Modern Slavery in the procurement service to help staff in supply chain management roles understand the unique issue of modern slavery in supply chains. It includes information on key findings of the Global Slavery Index 2022 in relation to forced labour in supply chains, the current legislative landscape, the International Labour Organization's Indicators of Forced Labour, high-risk sectors for forced labour, examples of cases within the UK and public sector responsibility for addressing modern slavery risks within our supply chains. This training was developed to ensure consistency in training received for staff working across Orbis Procurement partnership as well as others in operational roles.

Like other anti-slavery efforts, due to the lack of a centralised reporting or material database, it is challenging to document all training, work, and correspondence undertaken relating to modern slavery. Beyond training that is available Council-wide,

different staff and teams within the Council deliver and circulate local training and guidance (including from external sources) on modern slavery while broader discussions and meetings involving different staff can address this issue. For instance, in the procurement team, new joiners are required to complete the Introduction to Modern Slavery in Supply Chains E-learning course as part of the induction process while existing staff are encouraged to take it as a refresher prior to more practical sessions being delivered.

In addition to the Council-wide training available above, during the 2023/2024 financial year, a 90-minute session on modern slavery was delivered to commissioners and contract managers and two 1-hour sessions to procurement staff. These sessions were delivered by the Council's Senior Policy Lead on Modern Slavery in the procurement team and offered guidance on embedding modern slavery considerations throughout service delivery, including discussion on determining risk, drafting tender and contract wording, and engaging with suppliers, including guidance for officers conducting site visits. The training highlighted the importance of staff in doing their part within their respective roles to support the Council's wider anti-slavery commitments.

Reporting concerns of modern slavery

For further information on modern slavery and how to spot the signs that someone may be a victim, please see: [Unseen](#) and [GLAA](#).

Reports of suspected or actual cases of modern slavery can be made via the following channels.

Non-emergency concerns: call the Modern Slavery Helpline – 08000 121 700 or local police on 101 (ask for their Modern Slavery Team)

Emergency, immediate danger, or threat to life situation: call 999

Surrey County Council Whistleblowing: [Our counter fraud initiatives and strategies - Surrey County Council \(surreycc.gov.uk\)](#)

Concerns for an adult with care needs – Adult Safeguarding: 0300 470 9100

Concerns for a child with care needs – Children's Single Point of Access: 0300 470 9100

Approval of statement

This statement has been approved by the Corporate Leadership Team on 6 August 2024. It will be reviewed and updated on an annual basis.

Signed by:



Tim Oliver OBE, Leader of the Council
Date: 19/08/2024



Terence Herbert, Chief Executive
Date: 10/09/2024

Annex – Organisation policies

Policy	Relevance to tackling modern slavery
Council Constitution	Surrey County Council's Constitution sets out how the council conducts its business, how decisions are made and the procedures to be followed to make sure that these are efficient, transparent and accountable to local people. The "Procurement and Contract Standing Order" in the Constitution sets out how the Council authorises and manages spending and contracts with other organisations. The procurement approach is relevant to tackling modern slavery as it covers issues such as: social sustainability measures to ensure that supply chain partners operate fair and ethical working practices; the requirement of procurement teams to work closely with human resources to manage direct and indirect employment arrangements (such as temporary workers, agencies, and consultants); and ensuring that relevant policies and codes of conduct are communicated to suppliers.
Whistleblowing Policy	Our whistleblowing policy enables individuals to feel confident in raising a serious concern and reassures that they will be protected from possible reprisal or victimisation. The policy covers: all council employees; members of the council; those carrying out work for the Council on our premises, such as agency workers, contractors, and consultants; providers of works services and supplies, including external contractors; and those providing services under a contract with the council in their own premises, for example, care homes. The policy provides information on how individuals may raise concerns confidentially and how they will be dealt with. This policy is important for individuals wanting to raise concerns about modern slavery and/or related issues.
Social Value Policy	The aim of this policy, and the accompanying guidance, is to set out how Surrey County Council will deliver maximum social, economic and environmental value, not only through its commissioning, procurement, and contract management activities but also through enabling wider collaboration and resource sharing between people and organisations across the county. The policy and accompanying guidance are relevant to tackling modern slavery as they encourage commissioners to identify social issues that might be connected to a project or service. This is relevant for projects or services where the risk of poor working practices and modern slavery are high.
Officers' Code of Conduct	The purpose of this Code is to help employees support the Council's aim to provide high quality services fairly and efficiently in line with its values of listening, responsibility, trust, and respect. The Code of Conduct, which applies to all council employees, agency workers and contractors, outlines the expectations of the organisation in terms of the behaviour of individuals whilst working for, or on behalf of, the Council. This is relevant to the anti-slavery agenda as the Code expects employees to behave ethically and maintain high standards of personal conduct and be aware of and act in accordance with the Council's values and behaviours.
Health and Safety	The Council has various policies which aim to promote high standards and good practices in relation to health, safety, and welfare. This includes a Health and Safety Manual on aspects of work such as safe workplaces, safe equipment, and training and supervision. These procedures are important to tackle modern slavery as victims of forced labour and modern slavery may be at increased risk of work-related injuries due

Policy	Relevance to tackling modern slavery
	to inadequate protective equipment and health and safety measures, including appropriate training.
Working Time Regulations Policy	The Council recognises that excessive overtime beyond permitted national legal limits can contribute to forced labour practices when coupled with forms of threat. The Working Time Regulations Policy sets out the Council’s position regarding working time in line with the Working Time Regulations 1998. This policy applies to all Surrey County Council’s employees who are defined in the regulations as “workers” and includes all permanent, part-time, temporary, and casual employees and relief workers employed by the Council. Managers using agency workers are expected to ensure that the limits to working time and rest break requirements are applied to these workers when they are working for the Council.
Recruitment	<p>The Council has several recruitment policies to ensure that we have the right people with the right skills in the right place at the right time. Key policies include:</p> <p>Resourcing policy: This covers various aspects of the resourcing process such as human resource planning, internal progression, recruitment, selection, and induction. It ensures that relevant eligibility and safeguarding checks are in place in the hiring process. This includes ensuring eligibility of successful candidates to work in the UK and confirming qualifications and experience.</p> <p>Safe employment and disclosure and barring service policy: This enables the Council to fulfil its statutory obligations to perform appropriate background checks on employees and volunteers who carry out certain roles that involve working with children or vulnerable adults. This policy applies to individuals who are, or wish to be, directly engaged by the Council to carry out work duties and voluntary activities on its behalf. The policy does not cover contractors or agency workers.</p> <p>Short term resourcing needs policy: The policy covers the management of temporary or short-term resourcing needs, including the use of agency workers or consultants. Managers are responsible for ensuring there is a clear business case based on the urgency of service needs, potential scarcity of skills and the impact insufficient staffing would place on the service prior to engaging a temporary worker. The Council have a managed service provider who supplies all agency workers. The Council have set out the responsibilities for the agency as a hiring manager throughout their assignment. The policy recognises the rights of agency workers including the rights under the Agency Workers Regulations 2010 which gives agency workers the entitlement to the same or no less favourable treatment as comparable employees with respect to basic employment and working conditions, if and when they complete a qualifying period of 12 weeks in a particular job.</p> <p>Equal opportunities in employment policy: This policy ensures that the Council provides equal opportunity in employment and service provision. This includes ensuring that terms of employment, benefits, facilities, and services are afforded equally to all employees in the same or similar circumstances. We also have an Equality, Diversity,</p>

Policy	Relevance to tackling modern slavery
Equality policy	<p>and Inclusion (EDI) action plan for 2021 to 2022 which aims to make EDI central to the council's culture.</p> <p>The above policies are relevant to the anti-slavery agenda as they cover aspects of work where vulnerable people could be taken advantage of and exploited. The Council recognises that victims of modern slavery can be exploited in legitimate jobs with legal terms of employment but exploited by others unrelated to the Council. Therefore, the above policies are important to ensure that potential victims and vulnerabilities are identified during the resourcing and recruitment process. The Council also recognises that certain vulnerable, marginalised, and underrepresented groups are at a higher risk of poor labour and employment practices and therefore our equality and diversity policies ensure that every member, manager, and employee have a duty to be aware of equality issues in their daily activities. Additionally, the policies are relevant to the anti-slavery agenda as they cover aspects of work where vulnerable people accessing our services could be taken advantage of and exploited.</p>
Grievance Resolution Policy and Procedure	<p>The Council is committed to creating a positive working environment in which managers and employees can discuss any problems or concerns openly and deal with them promptly and fairly. This policy's objective is to encourage staff to resolve any issues as quickly, locally, and informally as possible and the procedure and associated guidance have been devised to support managers and employees when complaints have been raised formally. There is also a Procedure and Guidance document to assist those involved of the approach required to handle the grievance resolution process effectively and fairly. Grievance mechanisms are important to tackle modern slavery as it involves an additional route by which employees can raise complaints or concerns.</p>
Domestic Abuse	<p>This policy gives guidance to managers on how to recognise and support employees who are victims of domestic abuse and how to deal with employees who are perpetrating domestic abuse. The principles and standards apply to all employees and temporary workers whilst working for, or on behalf of, the Council. This does not require that all those involved in an incident of Domestic Abuse are Surrey County Council employees. The policy educates managers on signs that may indicate an underlying domestic violence issue such as a drop in performance, increased absenteeism, deliberate isolation at work and showing obvious signs of stress and nervousness. While this policy focuses specifically on domestic abuse, it is important for tackling modern slavery as cases may share similar indicators of abuse.</p>
Trade Unions	<p>At Surrey County Council unions meet very regularly with the Council's management to discuss a wide variety of issues and to feedback staff concerns and issues. The Council provides information to staff on the benefits of trade union membership and information on how to join a union. The Council has published guidance on the Facilities and time off for Trade Union duties and activities. The guidance aims to avoid or minimise misunderstandings, ensure fair and consistent treatment and facilitate better planning for trades unions duties and activities. The Council recognises that trade union representation in the workplace can help reduce the risk of modern slavery by representing the interest of workers, ensuring fair working practices, supporting workers in negotiating their terms and conditions, and the resolving of grievances.</p>

Policy	Relevance to tackling modern slavery
Surrey Safeguarding Adults Policy and Procedures	<p>Our safeguarding adults work is an important part of our work in Adult Social Care. The aim of this policy is to set the direction for our safeguarding adults work. It outlines the Council's commitment to adult safeguarding including: preventing harm and reduce the risk of abuse or neglect to adults with care and support needs; stop abuse or neglect wherever possible; safeguard adults in a way that supports them in making choices and having control about how they want to live; promote an approach that concentrates on improving life for the adults concerned; raise public awareness so that communities, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect; provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult address what has caused the abuse or neglect.</p>
Surrey Safeguarding Children Partnership Procedures Manual	<p>This manual contains the Surrey Safeguarding Children Procedures which cover the areas served by the Surrey Safeguarding Children Partnership. The manual reflects current legislation, government statutory guidance and expectations, and accepted best practice. It advocates a child-centred approach to ensure that the welfare of children is safeguarded and promoted. This includes protecting: Protecting children from maltreatment; preventing impairment of children's health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.</p>