

Suffolk County Council
Annual Slavery and Human Trafficking Statement 2023 / 24

Introduction

Suffolk County Council recognises its responsibility to take a robust approach to slavery and human trafficking.

This annual statement sets out Suffolk County Council's ambitions to understand all potential Modern Slavery risks related to its activities, and to put in place steps to ensuring that there is no slavery or human trafficking in the council's activities and supply chains.

The overall aim of the Modern Slavery Act 2015 is to pursue organised criminals and opportunistic individuals involved in the modern-day slave trade and human trafficking, and to prevent people from engaging in, or becoming victims of, Modern Slavery and Human Trafficking crime.

The Council is committed to preventing Slavery and Human Trafficking in its corporate activities, and to ensure that supply chains are free from Slavery and Human Trafficking.

Publication of this annual statement is part of that commitment, and highlights activity undertaken over the past 12 months.



Cllr Matthew Hicks
Leader of the Council



Nicola Beach
Chief Executive

Review of the Slavery and Human Trafficking Statement

Suffolk County Council will review and update this statement annually. The review will be undertaken by officers in Public Health and Communities liaising with a cross-directorate group of Modern Slavery leads.

Modern Slavery Act 2015

Public bodies (including local authorities) in England and Wales are required under the Modern Slavery Act 2015 to publish a slavery and human trafficking statement.

[Modern Slavery: Statutory Guidance for England and Wales. Section 2. \(Updated May 2024\)](#)

What is Modern Slavery?

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Human trafficking consists of three basic components: action, means and purpose of exploitation. All three components must be present in an adult trafficking case; for child trafficking the 'means' component is not required.

In human trafficking cases, exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs.

Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.

Human trafficking is not the same as human smuggling. There are common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help.

Guidance issued by the Home Office in support of the Act, gives the following more precise definitions:

1. Slavery: The 1926 Slavery Convention defines slavery as 'the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised'.

This concept of ownership is what makes slavery distinct – for example a situation where an individual was being controlled by another would not meet this threshold, unless there was clear evidence the person was being used as a commodity. It is a form of servitude with the additional concept of ownership.

2. Servitude: means an obligation to provide a service that is imposed using coercion. Servitude is an 'aggravated' form of forced or compulsory labour. The fundamental distinguishing feature between servitude and forced or compulsory

labour is in the victim feeling that their condition is permanent and that the situation is unlikely to change

3. Forced or Compulsory Labour: The UN Convention No. 29 concerning forced, or compulsory labour defines 'forced or compulsory labour' as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily'.

'Penalty' may go as far as physical violence or restraint, but it can also take subtler forms of a psychological nature, such as threats to denounce victims to the police or immigration authorities when their employment status is illegal. Consent is a factor in forced and compulsory labour, but a victim may have given consent in a situation where they felt they had no viable alternative, in which case they could still be subject to forced or compulsory labour. Slavery, servitude and forced or compulsory labour must include this threat of penalty.

4. Human Trafficking: The essence of human trafficking is that the victim is coerced or deceived into a situation where they are exploited. Article 4(a) of the Council of Europe Convention on Action against Trafficking in Human Beings (the Convention) defines 'human trafficking' as:

“the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”

Organisation and Supply Chains

Suffolk County Council provides a wide range of statutory and discretionary services for its residents, businesses, visitors and the wider public. Consequently, it purchases a wide range of goods and services.

This Statement covers all activities of the Council, including but not limited to all direct employees, agency workers, and services delivered on behalf of the Council by third-party organisations and in the Council's supply chains.

This statement is about understanding potential Modern Slavery risks related to the council's activities and to put in place steps that are aimed at ensuring that there is no Slavery or Human Trafficking in its own activities and in its supply chains, as well as supporting efforts to eliminate Modern Slavery and human trafficking in the wider community.

Partnerships

Partnership working is key to preventing Modern Slavery and supporting those that are most vulnerable in our communities. In Suffolk, the Safer Stronger Communities Board (SSCB) has Criminal Exploitation as a key priority. Modern Slavery is also discussed at each of the three Community Safety Partners across Suffolk.

A number of activities have been undertaken in 2023/24 including the development of the Modern Slavery Network, which brings together a range of partners across the Suffolk system to review and refresh the countywide Modern Slavery Action Plan. The National Referral Mechanism, a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Has been refreshed in Suffolk and published with an NRM Referral Flowchart for professionals. For further details of activity carried out 2023/24 and planned 2024/25 see **Appendix 1**

Suffolk's multi-agency safeguarding policies set out the responsibilities of the Council and its partners to identify signs of potential abuse amongst children and vulnerable adults, which may include signs of Human Trafficking or Modern Slavery. Guidance is available on the Suffolk Safeguarding Partnership website: [Suffolk Safeguarding Partnership Modern Slavery](#)

Suffolk County Council Policies

Set out below are the key relevant policies currently operated by the Council:

Pay

The Chief Executive and Director roles are evaluated through the nationally recognised Hay job evaluation framework. The Chief Fire Officer's post is evaluated in accordance with the National Joint Council for Brigade Managers of Local Authority Fire and Rescue Services. Assistant Director and Senior Manager roles are evaluated through the Hay job evaluation framework, except for those senior staff within the Fire and Rescue Service and Public Health.

The Fire and Rescue Service roles are evaluated in accordance with the National Joint Council for Brigade Managers of Fire and Rescue Services and the NHS roles were evaluated under the Agenda for Change job evaluation process.

All other roles up to and including Grade 8 are evaluated using the NJC Job Evaluation Scheme, which is recognised by employers and trades unions nationally.

All the job evaluation schemes used allows for robust measurement against set criteria resulting in fair and objective evaluations and satisfies equal pay requirements.

Further details are available in our [Pay Policy Statement](#).

Procurement

Contracts are awarded in accordance with the Council's specific requirements for the management of Health and Safety, Risk, Business Continuity, Diversity and Equality.

The Council's procurement webpages include a Modern Slavery webpage, outlining how to report concerns of Modern Slavery, information and resources and our supplier's obligations under the Modern Slavery Act.

The Council's tender documentation outlines Whistleblowing procedures and how to report concerns of Modern Slavery. Our contract terms include clauses to mitigate the risk of Modern Slavery in our supply chains.

For further information on activity carried out and planned see **Appendix 1**.

Recruitment / Agency Workers

The Council uses a specified and reputable employment agency for the recruitment of agency workers. All new employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with appropriate legislation.

The Council will continue to regularly review and update its list of preferred suppliers for the recruitment of agency workers. It will maintain process checks to ensure that each supplier complies with regulations under the Modern Slavery Act 2015

The Council introduced a recruitment policy which set out a transparent and robust process checking a person's 'right to work' in respect of all roles and for ensuring pay rate parity for roles of similar nature. This will continue to be reviewed and updated where required.

Whistleblowing

The Council strongly encourages all its employees, customers and other partners to report any concerns related to the direct activities of the Council, its supply chains, or the behaviour/actions of colleagues or customers. This includes any circumstances that may give rise to an enhanced risk of Slavery or Human Trafficking. The Council's whistleblowing procedures are designed to make it easy for workers to make disclosures, without fear of reprisal.

The Whistleblowing Policy now includes a specific reference to Human Trafficking and will be reviewed as required to reflect the duties incumbent on Suffolk County Council.

Further details are available in [Fraud and corruption](#)

Suffolk County Council Code of Conduct

The Council's [Code of Conduct](#), which has been recently reviewed and updated, makes it clear to employees the actions and behaviour expected of them when representing the Council. As an employer, the Council strives to maintain the highest standards of employee conduct and ethical behaviour. Paragraph 5 of the Council's Code of Conduct requires all staff to meet their personal responsibility to ensure the health and safety of colleagues and customers in their vicinity or sphere of influence. This includes reporting relevant concerns in a prompt and direct manner. Section 6 also details workers preparedness to highlight any concerns with regard Modern Slavery including Human Trafficking where it is felt they or other workers have acted unlawfully or their actions amount to maladministration; or where there could be serious impact on the safety or well-being of colleagues or customers

The Council's Code of Conduct includes links to the Whistleblowing Policy and details that workers must give a high standard of service to the public and must report any breach of procedures or conduct.

All of the Council's wholly owned companies have a Slavery and Human Trafficking Statement, and have published them on their websites:

- a) [Vertas Modern-Slavery-Act-V10-01092024.pdf \(vertas.co.uk\)](#)

Sources of further information

- a) [2021 UK annual report on Modern Slavery](#)
- b) [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) \(last updated May 2024\)](#)
- c) [LGA: Tackling Modern Slavery - A Council Guide \(pdf\) \(November 2022\)](#)
- d) [LGA: Councillor guide to tackling modern slavery \(September 2019\)](#)
- e) [LGA: Modern Slavery Transparency Statements Portal](#)
- f) [UK Government Modern Slavery Statement](#) (Check as being updated Oct 2024) Checked 25/10 not yet updated. Checked 30/10 not yet updated. Checked 11/11 not yet updated. Checked 18/11 not yet updated
- g) [UK Government: Collection of Modern Slavery Documents and Material](#) (updated May 2024)
- h) [Suffolk Safer Stronger Communities Board webpage](#)
- i) Suffolk Modern Slavery, Human Trafficking & NRM Flowchart for First Responder Organisations – [attached document 1](#)
- j) Suffolk Modern Slavery, Human Trafficking & NRM Flowchart for Non-First Responder Organisations – [attached document 2](#)

Appendix 1

Activity in 2023 / 2024

Modern Slavery Network	<p>Suffolk Local Authority Modern Slavery Network members have undertaken a Maturity Matrix Self Assessments informed by the Local Government Association (LGA): Council guide to tackling Modern Slavery revised guidance. This guide and Maturity Matrix self-assessment informed revision and focus for the county-wide Modern Slavery Action Plan.</p> <p>Reviewed and updated Suffolk Modern Slavery and Human Trafficking National Referral Mechanism (NRM) Flowcharts for First Responder and Non-First Responder organisations which are hosted on the Suffolk Safeguarding Partnership Modern Slavery webpage alongside updated guidance for members of the public. NRM Flowcharts have been cited as good practice by Eastern Region Special Operations Unit (ERSOU).</p> <p>Membership of the Modern Slavery Network increased during 2024 and now includes Suffolk Care Association, Suffolk County Council (SCC) Adult Community Services (ACS) Contract and Service Development. The aim of the network is to share best practice across the Suffolk System, share data and information, develop training and awareness raising campaigns and communicate to wider partners on policy developments from central government.</p> <p>MSN Action Plan reviewed and updated to be agile to respond to exploitation tactics in Suffolk.</p> <p>MSN co-ordinated the Suffolk Modern Slavery Awareness Week 24th – 28th June 2024 #SuffolkLooksCloser</p> <p>MSN partnership working developed with Norfolk Modern Slavery and Human Trafficking Co-ordinator and reps from MSN attend the Norfolk Anti-Slavery Network Quarterly Partnership meeting to share best practice.</p> <p>Modern Slavery Task and Finish Group developed toolbox training for District and Borough operational teams as identified by the MSN local authority reps.</p>
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<p>Community Safety Partnerships (CSPs)</p>	<p>The Suffolk Annual Modern Slavery Awareness week was promoted across the system using the hashtag #SuffolkLooksCloser</p> <p>The focus on labour exploitation with a spotlight on the Care Sector, including domiciliary care</p> <p>Community engagement events were held in pop-up shops in Ipswich and engaged with 60 members of the public. The aim was to raise awareness of Modern Slavery including how to spot the signs and indicators, how to report concerns and where to seek support. Posters, You Tube clips, an online quiz and a slavery footprint survey were promoted throughout the week alongside a social media posts using the hashtag #SuffolkLooksCloser, with a reach of 13,441.</p>
<p>Criminal Exploitation</p>	<p>Multi Agency Criminal Exploitation (MACE) panels were introduced in June 2021 in West, South and East Suffolk. These case conferences were introduced to maximise opportunities to disrupt children and young adults from becoming harmed. Improvements in case management systems now allow places and spaces of concern to be flagged. MACE panels contribute to the wider Suffolk County Council aim to Safeguard Adolescents and are explicitly linked to the ‘See Me, Hear Me’ Framework as published by the Office of the Children’s Commissioner.</p> <p>Online Safety Group merged with Extra Familial Harm Group to oversee Contextual Safeguarding work.</p> <p>The Suffolk Modern Slavery and Human Trafficking /National Referral Mechanism (NRM) flowcharts are embedded in MACE to raise awareness and understanding of system responsibilities and legislative changes.</p> <p>Modern Slavery, Human Trafficking and National Referral Mechanism (NRM) awareness is embedded into the multi-agency Criminal Exploitation training delivered as part of the Countywide Criminal Exploitation Work Programme 2021-24. This includes multi-agency training on the Home Office Child Exploitation Disruption Toolkit. Child exploitation disruption toolkit (publishing.service.gov.uk)</p>
<p>Training</p>	<p>Modern Slavery, Human Trafficking and NRM embedded in the Criminal Exploitation training and awareness raising.</p>

	<p>The content and statistics in the E-learning modules have been updated for SCC staff and partner organisations. The aim of the modules is to assist frontline staff and practitioners in identifying Modern Slavery and Trafficking at the earliest opportunity and being clear on what action should be taken. Completion of the modules can now be captured centrally by SCC.</p>
Volunteer Policy	<p>The Council's Volunteer Policy has been reviewed and revised to enable any signs of Modern Slavery and Human Trafficking to be identified and reported. This has been updated in the 'what we expect of you' section and the 'Employer Supported Volunteering' section of the Volunteer Policy. SCC Volunteer Policy v3 14.10.2022.pdf</p>
Procurement	<p>The Council's Annual Social Value Ask was updated, to include an ask of our suppliers to mitigate the risk of Modern Slavery in their supply chains including using Modern Slavery clauses in their contracts, risk assessing their suppliers regarding the risk of Modern Slavery, raising awareness with their staff and ensuring their staff and those they work with are aware how to report concerns regarding Modern Slavery.</p> <p>Briefing held in December 2021 by the Public Health and Communities Team for procurement staff to raise awareness and help develop understanding regarding the risks of Modern Slavery.</p> <p>Light touch risk check piloted to support commissioners to identify Modern Slavery risks in their commissioning decisions and to put in place appropriate mitigations to reduce the risk of Modern Slavery occurring.</p>

Activity Planned in 2024 / 45

Modern Slavery Network

- Modern Slavery training to be continue to be revised and developed with Modern Slavery Network (MSN) partners task and finish group
- Suffolk to receive Modern Slavery and Human Trafficking data collated by Norfolk and Suffolk Constabulary. Data to inform Modern Slavery and Criminal Exploitation Workstreams

- Collaboration with Suffolk Safeguarding Partnership (SSP) to review and streamline content for public and professionals on the SSP website.
- Revised and standardised Modern Slavery and Human Trafficking information agreed for MSN partner webpages
- Collaboration between Norfolk and Suffolk Modern Slavery workstreams to share best practice.
- Delivery of toolbox training by Borough and District councils.

Community Safety Partnerships

- Further develop approach to raising awareness of Modern Slavery and Human Trafficking trends in Suffolk via Social Media to be developed by Modern Slavery Network to enhance established campaigns.
- Annual Suffolk Modern Slavery Awareness Week #SuffolkLooksCloser and National Anti-Slavery Day to be business as usual across Network partners.

Criminal Exploitation

- Continue to embed understanding of the National Referral Mechanism (NRM) duties and protocols across the system reflecting of responsibilities and legislative changes.
- Continue to embed Modern Slavery, Human Trafficking and National Referral Mechanism (NRM) awareness via the multi-agency Criminal Exploitation training delivered as part of the Countywide Criminal Exploitation Work Programme 2024-27.
- Launch 'Introduction to Criminal Exploitation' E-Learning for system partners.
- The ambition for Suffolk is to embed submission of good quality multi-agency NRM referrals to the Single Competent Authority (SCA) and understanding of the requirement to update those referrals as appropriate prior to Conclusive Grounds Decision. This is reflected in the Modern Slavery Action Plan.
- Criminal Exploitation Work Programme 2024-27, bespoke training to continue to develop practical understanding and application of Contextual Safeguarding 'Faces, Places, Spaces' approaches, including digital platforms as contextual 'spaces'.

Training

- Modern Slavery, Human Trafficking and National Referral Mechanism (NRM) continues to be embedded in the Criminal Exploitation training and awareness raising.
- The E-learning module remains flexible so the content can be updated annually as new statistics, guidance and best practice is developed.
- Training offer continue to be developed by Modern Slavery Network partners in response to identified needs.

Procurement

- Review current guidance, resources and tools used to facilitate procurement and contract management to include guidance regarding Modern Slavery and Human Trafficking.
- A light-touch and user-friendly risk assessment has been developed to identify any corporate activities that may be high-risk in relation to any form of slavery or human trafficking.
- The risk check and guidance regarding Modern Slavery to be added to the online internal guidance on MySCC for commissioners, procurement, and contract managers.
- Review the impact of the pilot after 6 months to identify any changes to be made to improve the effectiveness of the risk check.
- Review annually and update if required the Modern Slavery Procurement Webpage.