

Cambridgeshire County Council Modern Slavery Act Statement

1 Introduction

This statement sets out Cambridgeshire County Council's actions to understand and mitigate potential modern slavery risks related to its business. This statement meets the requirements of Section 54 of the Modern Slavery Act 2015.

Modern slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced/compulsory labour. It is the illegal exploitation of other people for personal or commercial gain. Modern slavery is often hidden from view and many victims do not self-identify meaning that quantifying the extent of modern slavery is challenging.

The Council is committed to improving its practices to tackle modern slavery, it recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner, contractor and public service responsible for safeguarding.

This statement covers the activities of the Council, it covers direct employees of the Council, agency workers and services delivered by and on behalf of the Council by third party organisations and their supply chains.

2 Organisation Structure and Supply Chains

The Council is a large upper tier local authority in the East of England. It provides a wide range of services supporting residents and businesses in the County, services are delivered directly by the Council and by third party organisations. The Council's priorities are:

- Environment and sustainability: tackling climate change and sustainability
- Health and care: people in Cambridgeshire enjoy healthy, safe and independent lives
- Places and communities: ensuring our communities are inclusive, creative and equitable
- Children and young people: opportunity to thrive
- Transport: safer and sustainable travel around the County.

The Council is currently split into 7 Directorates:

- People and communities
- Place and economy
- Customer and digital
- Resources
- Public health
- Business improvement and development
- Law and governance

The Council employs approximately 4,500 staff and there are 61 Councillors. The Council's budget is approximately £937m per year. The procurement of goods, services and works are governed by the Council's Contract Procedure Rules and Financial Procurement Rules.

In achieving its objectives, the Council provides a wide range of public services delivered both in-house, through external suppliers and in partnership. Consequently, the Council has a diverse supply chain.

3 Country of Operation and Supply

The Council operates in the United Kingdom. Any organisation that works with the Council and which is covered by Section 54 of the Modern Slavery Act (2015) is expected to understand and comply with the Act's requirements. The Council's procurement and contract management activities help to ensure that it works with compliant organisations. In addition, suppliers are expected to carry out checks on their sub-contractors to ensure there is no slavery or human trafficking in their own supply chains.

4 Responsibilities

The Council's Corporate Leadership Team is responsible for ensuring appropriate recruitment, employment and procurement policies are in place and reviewed on a regular basis.

Directors are responsible for ensuring that robust risk assessments are undertaken across their service areas and where there is deemed to be a risk of modern slavery, including human trafficking, this risk will be included in those assessments with actions identified to mitigate those risks where possible.

Heads of service are responsible for ensuring that corporate policies, such as those relating to recruitment or procurement, are adhered to by their staff and that all relevant training is undertaken and kept up to date.

It is the responsibility of staff, including those directly employed by the County Council, agency staff and those within commissioned services, to report any concerns regarding modern slavery.

It is the responsibility of adult and children's safeguarding services to ensure appropriate identification of and support for vulnerable residents at risk of modern-day slavery to enable them to live safe and healthy lives.

5 Policies

The Council has a wide range of policies and processes in place which support its commitment to preventing and tackling modern slavery through its business operations. All policies are subject to robust assurance processes and are agreed by the relevant Director or Committee.

Relevant policies include:

- Pay policy
- Employee code of conduct
- Whistleblowing policy
- Safeguarding policies
- Equality, diversity and inclusion policy

6 Due Diligence and Risk Management

The Council undertakes due diligence in its recruitment processes and when procuring goods, services and works.

Recruitment processes: The Council has robust recruitment policies and processes in place to ensure that all prospective employees undergo immigration and pre-employment checks in line with the latest guidance on Right to Work checks. All staff with responsibilities for recruitment and selection receive appropriate training, including on their legal obligations under employment legislation. Agency appointments are subject to the same rigour.

Managing supply chains: The Council takes a practical, risk-based approach to supply chain management by identifying key risk areas and working with suppliers to monitor and mitigate risks wherever practical. Contract management is devolved across the Council and it is the responsibility of individual contract managers to undertake appropriate due diligence checks when procuring new contracts and managing existing contracts. The Council undertakes procurement in compliance with the Public Contract Regulations (2015) and uses the Standard Selection Questionnaire which includes a requirement to declare and evidence (where applicable) compliance with the Modern Slavery Act (2015). The Council's due diligence includes:

- Requiring suppliers covered by the Act to self-certify compliance with the Modern Slavery Act as part of the tender process;
- Including provisions in all new contracts requiring compliance with the Modern Slavery Act and enabling contract suspension/termination in the event of a breach where deemed necessary;
- Introducing action plans/sanctions where areas of poor compliance and/or performance are identified.

Service Delivery: Where a risk to vulnerable residents is identified, safeguarding assessments are undertaken to identify the nature of the modern slavery risk. Plans of support are put in

place for individuals and where criteria are met the statutory modern slavery National Referral Mechanism processes will be followed.

7 Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or our supply chains by:

- Investigating all allegations, complaints, whistleblowing reports received from employees, the public or law enforcement agencies regarding modern slavery and human trafficking.
- Requiring all staff to undertake core training which, where relevant, will include modern slavery and human trafficking.
- Reviewing and evaluating high risk supply chains, occupations and contracted services as part of ongoing contract management activity.
- Monitor vulnerable residents known to be at risk from modern slavery through the National referral mechanism processes

8 Training and Capacity Building

Staff undertaking recruitment are required to complete relevant e learning, this includes information on how to recruit safely.

Safeguarding training (this is role specific) enables officers in relevant roles to identify and understand how to report incidents of abuse and neglect, including the National Referral Mechanism processes.

9 Reporting and Guidance

All modern slavery concerns raised by council staff, councillors and volunteers are reported via the National Referral Mechanism.

Any Council employee affected by slavery, or who suspects someone is at risk is advised to:

- Report concerns to a Safeguarding Officer, a list can be found on the Council's Intranet.
- Follow the 'reporting a concern' process for a vulnerable child or adult, the relevant safeguarding process should be followed.

The advice to residents and communities if they are affected by slavery, or suspect someone is at risk, is to:

- Call 999 if it is an emergency
- Call 101 for non-emergencies
- Call Crimestoppers anonymously on 0800 555 111
- Call the Modern Slavery Helpline on 08000 121 700
- Report online via the Modern Slavery Helpline website or via the free Unseen app available on Android or iOS
- If a case is open to Child or Adult Safeguarding services speak with your Social Worker.