

Modern Slavery Statement

HAMPSHIRE COUNTY COUNCIL

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2020-21

ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

1. Introduction

Modern slavery, which includes human trafficking, is the illegal exploitation of people for personal or commercial gain. It can take various forms, including:

- Domestic exploitation;
- Labour exploitation;
- Organ harvesting;
- EU Status exploitation;
- Financial exploitation;
- Sexual exploitation¹; and
- Criminal exploitation.

Hampshire County Council (the Council) is fully committed to preventing slavery and human trafficking in its business activities and across its supply chains – and to being open and transparent about any specific instances of slavery identified.

In line with best practice, and in compliance with Section 54 of The Modern Slavery Act 2015 (The Act), this statement sets out the actions taken by the County Council to understand, prevent and address all modern slavery risks within its services (directly provided and commissioned) and supply chains.

The County Council also recognises its legal duties under Section 43 of the Act, which states that specified public authorities (including local authorities) have a duty to cooperate with the Independent Anti-Slavery Commissioner. Specifically, this means that:

¹ Further information about the modern slavery, its types and prevalence can be found on the Hampshire and Isle of Wight Modern Slavery Partnership's website: <https://www.modernslaverypartnership.org.uk/index.php>.

- the Commissioner may request the County Council to cooperate in any way that the Commissioner considers necessary for the purposes of the Commissioner's functions;
- the County Council must, in so far as reasonably practicable, comply with a request made to it under Section 43.

The Commissioner's Strategic Plan identifies several priorities, including *best practice within partnership working*. The County Council demonstrates this through its membership of the Hampshire and Isle of Wight Modern Slavery Partnership, which takes a cohesive approach to addressing the risks of modern slavery, and ensuring Hampshire is a supportive place for victims and a hostile place for perpetrators of slavery.

2. Organisation and supply chains

Hampshire County Council is a large upper tier authority in the South East of England. It spends around £1.9 billion a year on serving Hampshire's 1.3 million residents across eleven districts/boroughs: Basingstoke and Deane, Eastleigh, East Hampshire, Fareham, Gosport, Hart, Havant, New Forest, Rushmoor, Test Valley and Winchester.

This statement directly supports the County Council's *Serving Hampshire Strategic Plan* (2017-2021). This contains four strategic aims, including a commitment to ensuring people in Hampshire enjoy being part of strong, inclusive communities and can live safe, healthy and independent lives.

In achieving its objectives, the County Council provides a diverse range of public services delivered both in-house, through external contractors and in partnership. Consequently, the County Council has an equally diverse supply chain. For full information on the County Council's organisational structure, please refer to its website: <https://www.hants.gov.uk/aboutthecouncil/governmentinhampshire>. Information on the County Council's business activities and supply chains is set out in Appendix A.

This statement covers all activities of the County Council and encompasses direct employees, agency workers and services delivered on behalf of the County Council by third party organisations and in its supply chains.

3. Country of Operation and Supply

The County Council operates in the United Kingdom², where data suggests incidents of modern slavery are growing in prevalence. For example, according to the Government's UK Annual Report on Modern Slavery, there was a 36% rise between 2017 (5,138) and 2018 (6,985) in the potential victims referred to the National Referral Mechanism. The number of modern slavery crimes recorded by the police grew by 49%

² The County Council also has an officer presence in Brussels

between March 2018 and March 2019, when there were 5,059 recorded offences in England and Wales³. In this context, the County Council remains vigilant and will take all steps available to manage risks presented.

Any organisation that works with the County Council, i.e. partnerships and suppliers, which are covered by Section 54 of the Act, are expected to understand and comply with the Act's requirements.

The County Council's procurement and contract management activities (set out below) help to ensure that the Authority 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 County Council's Corporate Management Team is responsible for ensuring appropriate recruitment, employment and purchasing policies are in place and reviewed on an annual basis.

Directors are responsible for ensuring that robust risk assessments are undertaken across relevant service areas where there is deemed to be a risk of modern slavery, including human trafficking. Modern Slavery risks are identified and mitigated within departmental risk registers, with areas of medium – high risk added to the Corporate Risk Register, held centrally, as deemed necessary by departmental Directors.

Service managers are responsible for ensuring that corporate policies - such as those relating to the recruitment of personnel or procurement of goods and services – are adhered to by staff, and that all relevant training relating to modern slavery is undertaken and kept up to date (see section eight below).

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

5. Policies

The County Council has a wide range of policies and processes in place which support its commitment to preventing and tackling modern slavery throughout its business operations. All policies are subject to robust assurance processes, are agreed by the relevant Board or Committee, and are reviewed on a regular basis to ensure they remain compliant and fit for purpose. These include:

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840059/Modern_Slavery_Report_2019.pdf

Employee code of conduct – The County Council expects the highest standards of behaviour and ethical conduct from its employees. This code sets out the standards expected of staff when representing the Authority. The code also applies to contractors, agency staff and volunteers. Any breaches are investigated, and action taken as necessary.

Expectations of suppliers – The County Council requires its suppliers to provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and legally in their use of labour. Violations of these expectations will lead to review and investigation and ultimately may lead to the termination of the business relationship, if the supplier is found not to have taken appropriate corrective actions.

Pay – The County Council operates a job evaluation system which is objective and non-discriminatory and supports the principles of equal pay. All County Council employees are in receipt of at least the UK minimum wage.

Agency workforce – The County Council uses a Managed Service provider – Connect2Hampshire – to source temporary agency staff, apart from a small number of very specific exceptions. Connect2Hampshire is a joint venture partnership between the County Council and Commercial Services Kent Ltd. Connect2Hampshire directly sources agency workers, as well as through reputable employment agencies (who are part of their procurement framework), to provide agency workers. The County Council’s contract to source temporary staff, delivered through Connect2Hampshire, similarly mandates the use of the UK minimum wage and robust immigration and other compliance checks as required for specific roles, prior to placing a candidate within the County Council. Connect2Hampshire also conduct compliance audits with their supply chain.

Emergency planning – The County Council has a duty to partake in the multi-agency response to investigations into modern slavery by assisting victims. Its Children’s Services and Adults’ Health and Care teams work daily to uphold the Authority’s duties to safeguard adults and children, as set out in legislation⁴.

Safeguarding Hampshire’s residents – The County Council has a duty to safeguard Hampshire residents and has a range of policies and procedures in place to protect vulnerable groups from harm and abuse. For example, modern slavery is referenced throughout the Adults’ Health and Care Department’s care governance including, for example, being embedded within the social work practice manual. Similarly, Children’s Social Care Safeguarding policies and procedures set out the County Council’s duty to identify the risks associated with Child Exploitation and to stop children becoming the victims of Child Exploitation, including Trafficking and Modern Slavery.

Inclusion and diversity – The County Council is committed to ensuring all Hampshire residents enjoy being part of strong, inclusive communities – and that it continues to be an inclusive employer with a diverse workforce. The Authority’s Equality Objectives set out how it will

⁴ The Care Act 2014; the Children Act 1989; Working Together to Safeguard Children 2018

support the aims of the Equality Act 2010. These are upheld by a range of policies and procedures designed to advance equality of opportunity and provide fair access and treatment in employment, the delivery of services and partnership working.

Whistleblowing policy – the County Council is committed to the highest standards of openness, probity and accountability. As such, employees, customers and other business partners are encouraged to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to a heightened risk of modern slavery. The County Council will endeavour to resolve such concerns without the need to raise a whistleblowing complaint – however, it is also recognised that this is sometimes necessary. The whistleblowing procedure is designed to make it easy for people to voice serious concerns without fear of harassment or victimisation.

6. Due diligence and risk management

The County Council undertakes due diligence in both its recruitment processes, and when reviewing or taking on new suppliers.

Recruitment processes – The County Council has robust recruitment policies and processes in place which ensure that all prospective employees undergo immigration and pre-employment checks in line with the latest UK [guidance](#) on Right to Work Checks (e.g. can confirm personal identifies and qualifications, are paid directly into an appropriate, personal bank account and can supply evidence of eligibility to work in the UK). All staff with responsibilities for recruitment and selection receive appropriate training, including their legal obligations under existing employment legislation. Agency appointments are subject to the same rigour.

Managing Supply Chains: The County Council takes a practical, risk-based approach to managing its supply chain by identifying key risk areas and working with suppliers to monitor and mitigate these where practicable. Contract management is devolved across the County Council and it is the responsibility of individual contract managers to undertake appropriate due diligence checks when taking on new suppliers.

As a Contracting Authority, the County Council undertakes procurement in compliance with the UK Public Contract Regulations 2015. The Standard Selection Questionnaire (asked in all competitive tenders) includes a requirement to declare and evidence (where applicable) compliance with the Modern Slavery Act 2015.

The County Council's due diligence and reviews include:

- requiring suppliers covered by the Act to self-certify that they comply 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; and

- introducing action plans / sanctions where areas of poor compliance and/or performance are identified.

7. Reporting suspicions of modern slavery

If the County Council, or any of its staff, suspects slavery or human trafficking activity either within the organisation or through its supply chain, it will be reported to Hampshire Constabulary via the Modern Slavery Helpline (08000 121 700)⁵. Concerns with regard to children are also reported through the Hampshire Multi-Agency Safeguarding Hub (MASH). The County Council will also fulfil its statutory obligations to refer via the National Referral Mechanism where required.

8. Staff training and capacity building

All staff undertaking recruitment are required to complete Hiring Manager eLearning. This includes tailored information on how to recruit safely and mitigate the risk of modern slavery occurring in the supply of labour. The eLearning also signposts to a separate online learning tool intended to raise awareness of the signs of modern slavery and human trafficking. This is available to all staff via the County Council's Learning Zone.

The County Council also works through the Hampshire Modern Slavery Partnership to improve professionals' understanding of their responsibilities, and to increase the level of reporting by both professionals and the public. For example:

- establishing a partnership engagement plan which incorporates a quarterly media campaign focusing on how to spot the signs of modern slavery and promotes the Modern Slavery Helpline;
- providing awareness raising materials, training and events, including the 'enslaved' theatre production to mark Anti-Slavery Day 2019; and
- utilising the partnerships website and Community Partnership forum to share to information.

Regular communication activity and involvement in national events and campaigns support awareness raising. Examples include:

- supporting Anti-Slavery Day (18th October 2019), which included alerting staff to its message, via HantsHeadlines;
- marking the International Day of Abolition of Slavery (2nd December 2018), which included dedicated staff communications, via HantsHeadlines;
- contributing to, and signposting, external resources, including a regional awareness raising video produced by South East England Councils, of which the County Council is a member.

⁵ <https://www.modernslaverypartnership.org.uk/contact-us/>

Signed:

A handwritten signature in black ink that reads "John Coughlan". The signature is written in a cursive style with a large initial 'J' and 'C'.

John Coughlan

Chief Executive

17 July 2020

Appendix A – Business Activities and Supply Chains

A wide range of business activities are undertaken by the Council and across its five departments, as summarised below:

Corporate Services - activities include Human Resources, IT, Finance, Legal, Audit and Procurement, Marketing and Communications

Adult's Health and Care (AHC) - activities include Safeguarding, Care Homes, Support for Adults with Disabilities

Children's Services - activities include Education (including schools) Fostering and Adoption, Care Homes, Youth Offending and Safeguarding

Culture, Communities and Business Services (CCBS) - activities include Property Services, Facilities Management, Country Parks, Fleet Management, Printing, Catering (including in Schools, Country Parks and Staff Canteen), Asbestos Management, Libraries, Registration Service, Trading Standards and County Supplies.

Economy, Transport and Environment (ETE) – activities include Highways, Traffic, Transport, Waste, Economic Development