

**Modern Slavery Statement**  
**HAMPSHIRE COUNTY COUNCIL**  
**MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2023-2024**  
**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 exploitation<sup>1</sup>; 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:

---

<sup>1</sup> 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 £2 billion a year on serving Hampshire's 1.4 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](#) (2021-2025). This contains four strategic aims, including a commitment to ensuring people in Hampshire enjoy being part of strong, inclusive, resilient 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 Kingdom<sup>2</sup>, where data suggests incidents of modern slavery are growing in prevalence. For example, according to the Government's UK Annual Report on Modern Slavery 2021, there were 8,730 modern slavery offences recorded by the police, a 5% increase from 8,354 in the year to March 2020. The number of potential victims referred to the NRM has risen from 2,340 in

---

<sup>2</sup> The County Council also has an officer presence in Brussels

2014 to more than 10,000 in 2020. The profile of victims and the worst threats have also changed, with labour and criminal exploitation now the most prevalent forms of modern slavery identified.<sup>3</sup>. 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. Directorates identify areas of potential risk within their Inclusion and Accessibility assessments, together with any actions to address concerns and drive improvements. 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 (see section 7 below).

#### **5. Policies**

---

<sup>3</sup> [2021 UK Annual Report on Modern Slavery \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

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:

**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 legislation<sup>4</sup>.

**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 Directorate's care governance including, for example, being embedded within the social work practice manual. Similarly,

---

<sup>4</sup> The Care Act 2014; the Children Act 1989; Working Together to Safeguard Children 2018

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 and resilient communities – and that it continues to be an inclusive employer with a diverse workforce. The Authority's Equality Objectives set out how it will 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 identities 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)<sup>5</sup>. 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,
- utilising the partnerships website and Community Partnership forum to share to information.
- communication about activity and involvement in national events and campaigns support awareness raising.
- establishing a centralised resources and information bank.

---

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

**Signed:**

A handwritten signature in black ink, appearing to read "Williamson". The signature is written in a cursive style with a large initial 'W'.

**Carolyn Williamson**

**Chief Executive**

**1 April 2023**

## Appendix A – Business Activities and Supply Chains

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

Place focused directorate	HAMPSHIRE 2050					
	<ul style="list-style-type: none"> <li>Economic Development</li> <li>Strategic Transport</li> <li>Strategic Spatial Planning</li> <li>Climate Change and Environmental Strategy</li> <li>Minerals and Waste Policy</li> </ul>		<ul style="list-style-type: none"> <li>Skills and Participation (excluding lead for HCC Apprenticeships)</li> <li>Strategic Capital Planning - Property and Land (all directorates)</li> <li>Strategic Asset Management</li> <li>Rural Estates and Strategic Land (including County Farms)</li> <li>Superfast Broadband</li> </ul>		<ul style="list-style-type: none"> <li>Culture and Communities (includes lead for Cultural trust, Rural Communities Strategy and Local Nature Recovery Strategy)</li> <li>Partnerships</li> <li>Devolution</li> <li>Policy</li> </ul>	
Public facing directorates	ADULTS' HEALTH & CARE		CHILDREN'S SERVICES		UNIVERSAL SERVICES	
	<p><b>Younger Adults</b></p> <ul style="list-style-type: none"> <li>Contact Assessment and Resolution Team</li> <li>Multi-Agency Safeguarding Hub (MASH)</li> <li>Mental Health Teams</li> <li>Physical Disabilities</li> <li>Learning Disabilities</li> <li>Commissioning</li> <li>Supported Accommodation Team</li> <li>Safeguarding Unit</li> <li>Prevent</li> <li>Prisons</li> <li>Client Affairs</li> <li>Practice Excellence</li> </ul> <p><b>Older Adults</b></p> <ul style="list-style-type: none"> <li>Community Teams</li> <li>Hospital Teams</li> <li>Hampshire Equipment Services</li> <li>Reablement</li> <li>Continuing Healthcare</li> </ul> <p><b>HCC Care In-house Provision</b></p> <ul style="list-style-type: none"> <li>Respite</li> <li>Day Services</li> <li>Res/Nurse Long Term and Short Term</li> <li>Shared Lives</li> </ul>	<p><b>Governance and Assurance Team</b></p> <ul style="list-style-type: none"> <li>Policy and Guidance</li> <li>Freedom of Information requests and Complaints</li> <li>Quality Team</li> <li>Hampshire Adults Safeguarding Board</li> <li>Risk Management</li> <li>Information Governance</li> </ul> <p><b>Headquarters</b></p> <ul style="list-style-type: none"> <li>Argenti Telecare</li> <li>Brokerage and Billing</li> <li>Digital</li> <li>Performance Improvement</li> <li>Commissioning</li> <li>Recruitment and Careers</li> <li>Information and Advice</li> <li>Director's Office</li> <li>Demand Management and Prevention</li> <li>Procurement</li> <li>Learning and Development</li> <li>Transformation</li> <li>Portfolio Management Office</li> </ul> <p><b>Public Health</b></p>	<p><b>Children and Families</b></p> <ul style="list-style-type: none"> <li>Children's Social Care &amp; Safeguarding (incl. Multi-Agency Safeguarding Hub &amp; Children's Reception Team)</li> <li>Adoption &amp; Fostering</li> <li>Residential &amp; Secure Services</li> <li>Youth Offending Team</li> <li>Sector Lead Improvement &amp; Service Development</li> <li>Regional Adoption Agency</li> <li>Local Safeguarding Children's Partnership</li> <li>Quality &amp; Performance</li> </ul> <p><b>Education and Inclusion</b></p> <ul style="list-style-type: none"> <li>Virtual School</li> <li>School Improvement Service (Hampshire Inspection and Advisory Service and Governor Services)</li> <li>Services for Young Children</li> <li>Hampshire Music Service</li> <li>Primary Behaviour Service</li> <li>Special Educational Needs</li> </ul>	<ul style="list-style-type: none"> <li>Inclusion Support Service</li> <li>Ethnic Minority and Traveller Achievement Service</li> <li>Specialist Teacher Advisory Service</li> <li>Education Psychology Service</li> <li>County Supplies</li> </ul> <p><b>Business Development and Transformation</b></p> <ul style="list-style-type: none"> <li>Information Governance &amp; Business Support</li> <li>Learning &amp; Development</li> <li>Home to School Transport</li> <li>School Admissions</li> <li>School Place Planning</li> <li>Childcare Funding &amp; Sufficiency</li> <li>Data and Information</li> <li>Strategic Partnerships</li> <li>Procurement, Commissioning &amp; Placements</li> <li>Transformation</li> <li>HC3S</li> <li>Library Service</li> </ul>	<ul style="list-style-type: none"> <li>Countryside Service</li> <li>Country Parks</li> <li>Rights of Way</li> <li>Sir Harold Hillier Gardens</li> <li>Hampshire Outdoor Centres</li> <li>Basingstoke Canal</li> <li>Trading Standards</li> <li>Registration Service</li> <li>Coroners Service</li> <li>Archives and Local Studies</li> <li>Corporate Records Management</li> <li>Customer Contact Function</li> <li>Property Services operational delivery</li> <li>Facilities Management</li> <li>Repair &amp; Maintenance</li> <li>The Great Hall</li> <li>County Farms (operational delivery)</li> <li>Rural delivery</li> </ul>	<ul style="list-style-type: none"> <li>Hampshire Transport Management</li> <li>Asbestos Management</li> <li>River Hamble Harbour Authority</li> <li>Hampshire Scientific Services</li> <li>Business, Strategy &amp; Improvement</li> <li>Customer Engagement &amp; Business Development</li> <li>Business Support</li> <li>Transport schemes</li> <li>Highways Delivery</li> <li>Highways Commissioning</li> <li>Highways Traffic</li> <li>Engineering Consultancy</li> <li>Waste and Environmental Services</li> <li>Business Support</li> <li>Transformation</li> <li>Planning Control and Development Management (including Minerals and Waste and Reg 3 Planning Applications and Enforcement)</li> </ul>
Organisational facing directorates	CORPORATE OPERATIONS (Finance, IT, Procurement, IBC, Internal Audit, Pensions)					
	<ul style="list-style-type: none"> <li><b>Finance</b> <ul style="list-style-type: none"> <li>Financial Planning</li> <li>Business Partners</li> <li>Operational Finance</li> </ul> </li> <li>Corporate Accounting</li> <li>Education Financial Services (EFS)</li> </ul>		<ul style="list-style-type: none"> <li><b>Pensions, Investments &amp; Borrowing</b></li> <li><b>Strategic Procurement</b></li> <li><b>Internal Audit</b></li> <li><b>IT</b> <ul style="list-style-type: none"> <li>IT Portfolio Delivery</li> <li>Service Delivery</li> </ul> </li> <li>Service Management</li> <li>Shared Services IT</li> </ul>		<ul style="list-style-type: none"> <li><b>IBC</b> <ul style="list-style-type: none"> <li>Transactional HR &amp; Pay</li> <li>Payroll &amp; Pensions</li> <li>Recruitment Operations</li> </ul> </li> <li>Customer Operations</li> <li>Transactional Finance</li> <li>Engagement Planning</li> <li>Shared Services</li> <li>Transformation</li> </ul>	
	PEOPLE AND ORGANISATION					
	<ul style="list-style-type: none"> <li><b>HR and Organisational Development</b> <ul style="list-style-type: none"> <li>HR Business Partners</li> <li>Casework</li> <li>Policy and Reward</li> </ul> </li> <li>Organisational Change</li> <li>Occupational Health</li> <li>Leadership &amp; Management Development</li> </ul>		<ul style="list-style-type: none"> <li>Quality Assurance and Project Management</li> <li>Education Personnel Services (EPS)</li> <li>Inclusion and Diversity</li> </ul>		<ul style="list-style-type: none"> <li><b>Lead for HCC Apprenticeships</b></li> <li><b>Legal Services (and Monitoring Officer)</b></li> <li><b>Information Governance (and Data Protection Officer)</b></li> <li><b>Democratic Services</b></li> <li><b>Organisational Strategy and Programmes</b></li> <li><b>Corporate Communications &amp; Engagement</b></li> <li><b>Corporate Health &amp; Safety</b></li> <li><b>Corporate Risk</b></li> <li><b>Chief Executive and Leaders Office</b></li> <li><b>Corporate Emergency Planning and Resilience</b></li> <li><b>Armed Forces</b></li> </ul>	