

## ***Report to the Cabinet***

***Report reference: C-020-2017/18***

***Date of meeting: 12 October 2017***



**Epping Forest  
District Council**

**Portfolio: Safer, Greener and Transport**

**Subject: Modern Slavery Transparency Statement and Policy**

**Responsible Officer: Julie Chandler (01992 564214)**

**Democratic Services: Gary Woodhall (01992 564470)**

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### **Recommendations:**

**(1) That, in order to meet legal and moral safeguarding obligations, the Modern Slavery Transparency Statement for the Council be adopted, along with the associated Modern Slavery and Human Trafficking Policy.**

### **Executive Summary:**

Modern slavery is prevalent across the UK and is a growing safeguarding concern for all local authorities due to its serious and often brutal criminality, in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK is unknown, but human trafficking particularly is an international problem and victims may have entered the UK legally, on forged documentation, although they can also be British citizens living in the UK.

There have already been a range of Modern Slavery cases identified within the District, including a recent and very serious case of slavery and child sexual exploitation, where the Council worked with Essex Police and this resulted in arrest and conviction of several perpetrators. This report therefore seeks Cabinet agreement to adopt the Modern Slavery Transparency Statement for the Council and associated Modern Slavery and Human Trafficking Policy in order for the Council to meet its legal obligations.

### **Reasons for Proposed Decision:**

It is a legislative requirement for all organisations with a turnover of £36 million, to have a Modern Slavery Transparency Statement.

As part of Section 11 Children's Safeguarding Audits and inspection of safeguarding relating to the Care Act 2014, all local authorities are required to have a range of policies in place which relate directly to district level safeguarding. This includes Modern Slavery, as it affects children, young people and adults of all ages and abilities.

### **Other Options for Action:**

There are no other options in relation to this.

## **Report:**

### Background

1. Modern slavery is prevalent across the UK and is a growing safeguarding concern for all communities due to its serious and often brutal criminality, in which people are treated as commodities and exploited for a range of criminal gains. The true extent of modern slavery in the UK is unknown, but human trafficking particularly is an international problem and victims may have entered the UK legally, on forged documentation, although they can also be British citizens living in the UK.

2. The term 'Modern Slavery', includes a range of activities including human trafficking, slavery, servitude and forced and compulsory labour, and exploitation takes a number of forms, including sexual exploitation, forced manual labour and domestic servitude, with victims coming from all walks of life. Victims may be unwilling to come forward to law enforcement or public protection agencies, indeed, not seeing themselves as victims, or fearing further reprisals from their abusers. Victims may also not always be recognised as such, by others who come into contact with them.

3. Unfortunately, there have already been Modern Slavery cases identified within the District, including a recent and very serious case of slavery and child sexual exploitation, at a local car wash. Following intelligence provided by the Council's Community Safety Team, a police raid on local premises in Epping found a number of adult illegal immigrants and male and female children aged 12 – 14. This resulted in the arrest of three males, one of whom was charged with child trafficking and rape. It was suspected that this case was part of a much bigger organised crime operation in the South East.

4. A further case of trafficking and slavery was identified in Buckhurst Hill, where it was identified that a large number of males were living in appalling conditions and being used for slave labour. Three persons of Eastern European descent were arrested at the scene in relation to people trafficking offences.

5. Unfortunately, these two examples that have been identified in the Epping Forest District are likely to be just a very small part of a much wider landscape of Modern Slavery, as this type of criminality is usually very well hidden. The Council's Community Safety Team therefore works closely with local communities and individuals, to try and identify any unusual circumstances and encourages local people to report any concerns. In respect of the two cases mentioned, initial intelligence came from members of the public who raised concerns with the Council's Anti-Social Behaviour Officers, who then investigated further with Essex Police.

6. The Council's Licensing Team is also mindful of the potential links between modern slavery, the night time economy and local taxi services, and is now providing safeguarding training for all licensed drivers, which includes Modern Slavery and Child Sexual Exploitation, in order to raise their awareness and vigilance. In addition, information leaflets about this are provided to all taxi drivers when they are granted their licence.

### EFDC Modern Slavery Governance Statement

7. The Council's Modern Slavery Governance Statement sets out its commitment to identify, address and prevent slavery and exploitation within its work; that of contractors that it commissions and services that it procures. It highlights the Council's responsibilities as an employer and acknowledges and accepts its duty as a Council under Section 52 of the Modern Slavery Act 2015, to notify the Secretary of State of suspected victims of slavery or human trafficking.

8. The Statement refers to Forced Labour, Debt Bondage, Human Trafficking, Descent –based Slavery, Child Slavery and Forced and Early Marriage and provides details of how the Council aims to prevent these.

9. This prevention work is addressed through the Council's policies and procedures relating to Procurement, Recruitment, Staff and Elected Member Code of Conduct, Whistle-blowing Policy, overarching Modern Slavery and Human Trafficking Policy, staff and Member safeguarding training, and through proactive work with partners such as Essex Police and Trading Standards.

10. The Council's Modern Slavery Transparency Statement is attached to this report, as Appendix 1.

#### Modern Slavery and Human Trafficking Policy

11. The aim of this Policy is to provide guidance on how the Council will safeguard potential victims of modern slavery and how it will work in partnership with other local statutory organisations, to help address and prevent slavery and exploitation.

12. The policy applies to all services within the remit of Epping Forest District Council and to all EFDC employees including permanent, temporary, casual workers, voluntary workers, Elected Members, work experience students, agency staff, consultants, outside hirers and other contracted persons within the duration of that contract, whatever their position, role, or responsibilities. It also applies to work carried out in **all** settings, including Council premises or external, privately hired and other venues.

13. A copy of the Council's Modern Slavery and Human Trafficking Policy is attached to this report, as Appendix 2.

#### **Resource Implications:**

None.

#### **Legal and Governance Implications:**

It is a legislative requirement for all organisations with a turnover of £36 million, to have a Modern Slavery Transparency Statement.

#### **Safer, Cleaner and Greener Implications:**

The Transparency Statement and Policy forms part of the Council's overarching Safeguarding framework.

#### **Consultation Undertaken:**

Internal consultation with procurement and Management Board.

#### **Background Papers:**

None.

#### **Risk Management:**

The Council is at risk of non-compliance with a legal requirement if it does not adopt a

Modern Slavery Transparency Statement.

**Equality Analysis:**

The Equality Act 2010 requires that the Public Sector Equality Duty is actively applied in decision-making. This means that the equality information provided to accompany this report is essential reading for all members involved in the consideration of this report. The equality information is provided at Appendix 3 to the report.

Appendix 1.

## **EFDC Modern Slavery Act - Transparency Statement 2017-18**

**The Council is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.**

### **Background**

Epping Forest District Council fully supports the implementation of the Modern Slavery Act 2015 and this statement sets out the Council's actions to identify and address potential modern slavery risks, including human trafficking, related to its business and its supply chains.

The Council recognises that it has a responsibility to have a robust approach to slavery and human trafficking, including as an employer. It acknowledges and accepts its duty as a Council under Section 52 of the Modern Slavery Act 2015, to notify the Secretary of State of suspected victims of slavery or human trafficking.

### **Actions and activities included within this statement**

The Council is committed to preventing and addressing any acts of Modern Slavery as constituted in the Modern Slavery Act 2015, by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. This includes;

**Forced labour** – any work or services which people are forced to do against their will under the threat of some form of punishment.

**Debt bondage or bonded labour** – where people borrow money that they cannot repay and are required to work to pay off the debt, thus losing control over the conditions of both their employment and the debt.

**Human trafficking**– the transportation, recruitment or harbouring of people for the purpose of exploitation, using violence, threats or coercion.

**Descent-based slavery** – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.

**Child slavery** – when a child's labour is exploited for someone else's gain, including child trafficking, child soldiers, child marriage and domestic slavery.

**Forced and early marriage** – when someone is married against their will and cannot leave the marriage.

### **Council Policies and Procedures related to prevention of Modern Slavery**

**Procurement:** In September 2016, the Council introduced the standard Pre-qualification Questionnaire (PQQ) which is used in all contract tenders over the EU threshold. This requires suppliers to declare any involvement in modern slavery and such companies will not be accepted as a supplier.

**Recruitment Policy and Toolkit:** The Council's recruitment processes are reviewed regularly and training is provided to all staff responsible for recruitment. Robust procedures are in place for the vetting of new employees and DBS checks are undertaken for relevant roles.

**Staff Code of Conduct:** The Council's Code of Conduct sets out the actions and behaviours expected of employees when representing the Council.

**Whistleblowing Policy:** The Council encourages all employees, customers and other business partners to report any concerns related to the direct activities, or, the supply chains of the Council.

**Elected Members (Councillors) Code of Conduct:** The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All councillors are required to abide by a formal Code of Conduct.

**Safeguarding:** The Council takes its responsibility for safeguarding very seriously throughout the organisation. It has a dedicated Safeguarding Team and implements and monitors safeguarding policies and procedures, in order to safeguard the welfare of children and vulnerable adults, and to protect them from harm.

**Safeguarding Training:** Safeguarding training is mandatory for all Council employees and Elected Members, with regular refresher training provided. The training is structured, with a range of levels suitable for each working role across the Council and it is aligned to key policies, including Modern Slavery and Human Trafficking. It is endorsed by the Essex Safeguarding Children and Adults Boards and provides specific examples on how safeguarding concerns can be identified and a clear and defined procedure for reporting these.

**Contractors and Service Providers:** The Council requires its contractors to have appropriate safeguarding policies, procedures and training in place and where practicable, these are assessed at the time of appointment. As new legislation is introduced, Contractors are required to address this as required.

**Partnership working:** The council actively works in partnership with a number of organisations to prevent neglect and abuse, to detect and report occurrences, and to support victims of crime. These include (amongst others) Essex County Council, Essex Safeguarding Children and Adults Boards, Epping Forest Community Safety Partnership and Essex Police.

### **Action for 2017-18**

The Council is committed to undertake a programme of work, with managers, to monitor and review their work areas, with the aim of identifying any potential risks of slavery and human trafficking; to take appropriate steps to manage those risks and to work in partnership to protect and support vulnerable people in the Epping Forest District.

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