



WSCC Modern Slavery & Human Trafficking Transparency Statement

Spring 2021

Transparency Statement Requirements

The Council has made a clear commitment regarding its determination to tackle modern slavery by signing up to this Modern Slavery Transparency Statement. This statement is for the financial year commencing the 1 April 2020 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

Our Commitment

West Sussex County Council as a Local Authority, is committed to understanding all potential modern slavery risks related to our activities and agrees to put in place steps to eliminate and eradicate acts of modern slavery and human trafficking within our business, supply chains, sub-contractors and partners by adopting a zero tolerance policy in respect of modern slavery and human trafficking.

Our commitment is demonstrated in the [West Sussex Plan](#) under the key priority to strive for a Strong, Safe & Sustainable place. This includes an outcome of strong communities where reports of crime in West Sussex is a measure for success.

Definition of Modern Slavery

Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children in order to produce child abuse images or videos
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties
- **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars)
- **Bonded labour:** this includes descendant slavery when people give themselves into slavery as security against a loan or when they inherit a debt from a relative
- **Criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker
- Other forms of exploitation include organ removal, forced begging fraud, forced marriage and illegal adoption

Our Responsibility

We take our responsibility to highlight potential risks to our Supply Chain very seriously, and therefore have taken guidance from [Central Government](#) in order to establish several procedures that contribute to ensure modern slavery is not evident in our business:

- For all Large Value contracts, considered to be £500k and above, we conduct Compliance Checks asking new suppliers who wish to Tender and work with the Council to commit to their own recruitment policies and procedures in order to demonstrate how Modern Slavery is avoided in their own Businesses.
- Annual gathering and reviewing of Modern Slavery Statements from our Strategic and Business Critical Suppliers in our Supply Chain, as well as all Suppliers with an Annual Turnover of £36m and over per annum.
- Encouraging the reporting of suspicions of slavery through our allocated Team Associate who will act as the Modern Slavery SPOC. This will enable the Procurement & Contract Management Team to have an allocated single point of contact for cases of slavery and human trafficking within the department, where information is time-sensitive, and accuracy is important.
- We are responsible for ensuring Staff have access to and are completing mandatory training which supports the Modern Slavery Act.
- We reserve the right to challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor

practising modern slavery. The Council can use Regulation 69 of the Public Contracts Regulations 2015 to require tenderers to explain the costs within the tender.

Within Our Supply Chain

We utilise a category management approach to minimise any market risks concerning slavery and human trafficking within our large and complex supply chain.

Category plans and strategies identify industries and sectors where risks of modern slavery are high.

To comply with the [Modern Slavery Act 2015](#), we have updated our Standard Questionnaire (SQ) within the procurement sourcing process. The SQ is a mandatory requirement for all suppliers to complete when submitting a tender return for all Procurements for West Sussex County Council when valued £100k and above. For all Frameworks and Dynamic Purchasing Systems this will be a mandatory requirement at the point of application to join either purchasing mechanism. The questions require a bidder to evidence their compliance with the Modern Slavery Act. Any bidder who fails to evidence their compliance with the required legislation shall be excluded from participating further in the tender process.

Incorporated within our standard contract terms are clauses that specify the supplier's contractual obligation concerning Modern Slavery.

Any supplier engaged by us to undertake the supply of goods, services and or works is

contracted to do so in line with our following policies:

- Legislation, regulation and safeguarding [Policy](#)
- Equality and Inclusion [Policy](#)

These policies are key to ensuring that staff employed by our supply chain have appropriate channels to report any incidents of slavery and human trafficking.

Policies and Due-Diligence

Within the Procurement and Contract Management team, our Strategic Supplier Relationship Managers gather and review MS Statements from our Key Strategic and Business Critical Suppliers annually. We aim to monitor the commitments which our direct and indirect suppliers have pledged, in order to confidently understand their own supply chain compliancy and transparency.

This would include the identification and management of risks in relation to modern slavery and human trafficking. This is done by:

- Increasing openness, transparency and efficiency in the management of supply chains
- Improving ability to identify strengths, weaknesses, opportunities and threats in supply chains
- Improving communications with suppliers
- Enhancing relationships with suppliers

Training

Staff in our Procurement & Contract Management Team will be required to complete training for Modern Slavery Awareness and wider safeguarding and Equality issues.

Further information on modern slavery can be found on [GOV.UK](#) This statement will be reviewed on an annual basis, which will take place on 1 April 2021 and annually thereafter.

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](#)

This statement has been approved by Emily King as Director of Communities and Katharine Eberhart as Director of Finance and will work in conjunction with the WSCC Modern Slavery Pledge as approved by Paul Marshall, Leader of the Council and Becky Shaw, Chief Executive Officer of West Sussex County.

For further information regarding this statement and our work on Modern Slavery, contact - procurement@westsussex.gov.uk