



# WSCC Modern Slavery & Human Trafficking Transparency Statement

1<sup>st</sup> April 2022 – 31<sup>st</sup> March 2023

## Transparency Statement Requirements

West Sussex County 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 2022 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

### 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 Commitment

Modern slavery is a serious crime that is often hidden in plain sight in our communities of West Sussex.

Perpetrators exploit people from all backgrounds and will target an individual's particular vulnerability. That vulnerability could be an individual's desire to seek a better life for themselves and their families or they could be homeless living on the streets. There is no one stereotype to neatly define a victim of modern slavery. Modern slavery cases are complex and often entwined with other serious offences such as drugs and county lines, knife crime and sexual exploitation. All these crimes trade in human misery and exploit people for profit. These forms of exploitation have recently become an even greater concern during the Covid pandemic, as criminal organisations now seek to exploit the shortages in the labour market and the obvious difficulties that professionals have faced in identifying and supporting potential victims during lockdowns. To compound this threat, with so many people now fleeing Ukraine due to the conflict with Russia, vulnerabilities are heightened, and the risk of trafficking is increasing. 12,727 potential victims of modern slavery were referred to the Home Office in 2021, representing a 20% increase compared to the preceding year (10,601).

West Sussex County 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, this statement sets out the actions to be undertaken by WSCC to understand, prevent and address all modern slavery risks within its services (directly provided and commissioned) and supply chains.

WSCC 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:

- the Commissioner may request WSCC to cooperate in any way that the Commissioner considers necessary for the purposes of the Commissioner's functions.
- WSCC 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 recommending developing strategic partnerships. WSCC demonstrates this through its membership of the Sussex Anti-Slavery Network, which takes a cohesive approach to addressing the risks of modern slavery, and ensuring Sussex is a supportive place for victims and a hostile place for perpetrators of slavery. WSCC also maintains a Modern Slavery Operational Group

to develop policy and procedures and oversee our response to modern slavery and human trafficking.

This statement covers all activities of WSCC, including our Fire and Rescue Service and our licensing functions and processes and encompasses direct employees, agency workers and services delivered on behalf of WSCC by third party organisations and in its supply chains.

Any organisation that works with WSCC 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.

WSCC procurement and contract management activities 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.

WSCC are developing a Supplier Code of Conduct (SCoC) which sets out the ethical standards we at WSCC adopt and wish to see embraced by our suppliers in their methods, processes, and behaviours in their business and supply chains. It is therefore a document WSCC expects suppliers to WSCC to align to and attest that they will behave ethically on all matters of

- The Law and applicable Regulations
- Business Practices
- Sustainability and Climate Change
- Employee rights

West Sussex stands in support of the United Nations Global Sustainable Goal 8.7. This means we will take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour by 2030.

[WSSC Modern Slavery Pledge and Policy](#)

## Due Diligence and Risk management

Within the Procurement and Contract Management team, our Strategic Supplier Relationship Managers gather and review Modern Slavery Statements from all our suppliers with an annual turnover of £36m and above, this is an annual activity. We aim to monitor the commitments which our direct and indirect suppliers have pledged, 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:

Utilising data and intelligence gathered pre-commissioning and pre-procurement, including early market engagement, this will help to assess whether modern slavery risk is relevant to the subject matter of the contract and will help shape specification requirements. Knowing the risk of modern slavery will also help on the approach to contract management and working with the supplier to identify and mitigate the risk.

Positive, proactive, and collaborative engagement with our suppliers increases

openness, transparency, and efficiency in the management of supply chains.

Improving our ability to identify strengths, weaknesses, opportunities, and threats in supply chains.

Improving communications with suppliers and enhancing relationships with suppliers.

Close contract management of high-risk agreements combined with use of key performance indicators (KPIs) should reduce the likelihood of modern slavery. Working as a Joint Venture partner through the Home Office Modern Slavery Prevention Fund, has enabled WSSC to commission Stop The Traffik a leading NGO to conduct a Risk Mapping Report of our Tier 1 Suppliers. This will enable us to identify our greatest areas of risk in relation to modern slavery with these suppliers.

## 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:

- 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.
- WSCC reserve the right to challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery. WSCC can use Regulation 69 of the Public Contracts Regulations 2015 to require tenderers to explain the costs within the tender.

## Within Our Supply Chain

WSCC 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 WSCC 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 questionnaire requires a bidder to confirm whether they are a relevant commercial organisation as defined by section 54 of the Act 2015, if they answer yes then they are required to be compliant with the annual reporting requirements contained within section 54 of Act 2015. 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.

## Training

All staff in our Procurement & Contract Management Team are trained and new starters are required to complete the WSCC Modern Slavery Awareness course. Our team also have access to the E-learning course developed by the government to help public sector commercial staff identify and mitigate modern slavery risks in their procurements. As part of the government's efforts to tackle modern slavery in global supply chains, the Home Office's Modern Slavery Unit and Joint Security and Resilience Centre have produced an [e-learning course](#) for public sector commercial staff at all grades. The course covers practical steps staff can take throughout

the commercial lifecycle to identify and mitigate modern slavery risks.

WSCC is fully aware of its designation as a First Responder Organisation under the National Referral Mechanism and its statutory obligation to identify potential victims and refer cases to the Single Competent Authority. We therefore need to ensure we train our staff to the highest possible level to ensure they are able to identify potential victims and refer accordingly.

This is achieved through training being available to all WSCC staff via our Learning & Development Gateway. This includes Modern Slavery Webinars intended to raise staff awareness of the signs of modern slavery and human trafficking and our e-learning packages on our First Responder Duties and Tackling Child Modern Slavery.

Further information on modern slavery can be found on [GOV.UK](https://www.gov.uk) This statement will be reviewed on an annual basis, and annually thereafter.

## **Reporting suspicions of modern slavery**

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](#)

If WSCC, 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 Sussex Police and/or via the Modern Slavery Helpline. Suppliers shall report the discovery or suspicion of any slavery or trafficking found in its business or supply chain, including its subcontractors to WSCC. We will also fulfil our statutory obligations to refer via the National Referral Mechanism where required.

This statement has been approved by Emily King Assistant Director of Communities and Taryn Eves 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 Council.

This Statement is also publicly available on our customer facing WSCC website and is also published on the Home Office Modern Slavery Statement Registry.

<https://modern-slavery-statement-registry.service.gov.uk/>

For further information regarding this statement and our work on Modern Slavery, contact - [procurement@westsussex.gov.uk](mailto:procurement@westsussex.gov.uk)