

Modern Slavery and Human Trafficking Statement

1.0 Purpose

1.1 The purpose of this Modern Slavery and Human Trafficking Statement is to demonstrate how the Council meets its duties under the Modern Slavery Act 2015.

2.0 Introduction

2.1 The Modern Slavery Act 2015 was implemented to combat slavery and human trafficking.

2.2 'Modern slavery' is an umbrella term that encompasses offences relating to slavery and human trafficking. The most common forms of exploitation that victims are subjected to are:

- **Sexual exploitation:** victims may be forced into prostitution, pornography or lap dancing for little or no pay. They may be deprived of their freedom of movement and subjected to threats and violence.
- **Labour exploitation:** a victim is made to work with little or no pay, and may face violence or threats. If they are foreign nationals, their passports may be confiscated by their exploiters and they may be made to live in terrible conditions and under constant threat. Two key business types identified as being higher risk by Surrey Police are nail bars and car washes.
- **Forced criminality:** victims can be forced to participate in a range of illegal activities including pick pocketing, shop lifting, cannabis cultivation, county lines exploitation and other activities. The Modern Slavery Act provides for a defence for victims who have been forced into criminality.
- **Organ harvesting:** victims are trafficked in order for their internal organs (typically kidneys or the liver) to be harvested for transplant.
- **Domestic servitude:** victims work in a household where they may be ill-treated, humiliated, subjected to exhausting hours, forced to work and live under unbearable conditions or forced to work for little or no pay. In some cases forced marriage can lead to domestic servitude.

2.3 In 2019, 10,627 potential victims of modern slavery were referred to the National Referral Mechanism (NRM); a 52% increase from 2018. Of the potential victims referred in 2019, two-thirds claimed that the exploitation occurred in the UK only, whilst 26% claimed that the exploitation took place overseas only.

2.4 Just over half (5,866) of the referrals were for individuals who were potentially exploited as adults, whilst 43% (4,550) were for potential victims who were exploited as minors. These proportions remain similar to 2018.

2.5 Of the potential victims referred in 2019, one-third (3,391) were female; two-thirds (7,224) were male; one individual was transgender; and the gender of 11 potential victims was not known. Compared to 2018, males have slightly increased as a proportion of all NRM referrals.

- 2.6 Overall, female potential victims were most commonly referred for sexual exploitation, whilst males were most often referred for labour and criminal exploitation.
- 2.7 As was the case in the previous year, the most common nationality of all referrals to the NRM in 2019 was UK nationals, accounting for 27% (2,836) of all potential victims. The second most commonly referred nationality was Albanian (1,705 referrals) followed by Vietnamese nationals (887 referrals).
- 2.8 Modern slavery frequently involves multiple victims, offenders and places; it is often hidden and may take place alongside a wide range of abuses and other criminal offences.
- 2.9 Human traffickers can use a variety of means to recruit, transport, receive and hide their victims such as threats or force, abduction, deception or false promises. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent.
- 2.10 Children (those aged under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, transported, received or harboured for the purpose of exploitation.

3.0 The role of councils

- 3.1 Councils have a key role to play in tackling this exploitation, which can be separated into four distinct areas:
 - **Identification and referral of victims** - For children this means referring them into the National Referral Mechanism (NRM) through children's services. For adults, a NRM referral can also be made if they consent to the referral. If an adult doesn't consent to enter the NRM, councils are still under a duty to notify and should refer them to the Home Office by submitting the MS1 form.
 - **Supporting victims** - This can be through safeguarding children and adults with care and support needs and through housing/homelessness services. During the five days where the competent authority (a unit in the Home Office) aims to make a reasonable grounds decision, if the victim is destitute, support can be provided through the Government's contract with The Salvation Army. To activate any support during these five days, alongside sending in the NRM referral form, the first responder (the Council if it is the referrer) would need to contact The Salvation Army separately to arrange this (via the 24 hour referral number).
 - **Community safety services and disruption activities** - Under Section 17 of the Crime and Disorder Act councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which includes modern slavery and trafficking. Information sharing through key partnerships, such as community safety partnerships, is key to ensuring that disruption activities and enforcement work is targeted effectively.
 - **The production of a slavery and human trafficking statement** – produce a statement covering the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and any part of its own business.

5.0 Steps Runnymede Borough Council has taken to prevent modern slavery and human trafficking

5.1 The table below identifies the steps taken by the Council to fulfil its role in the four distinct areas identified in 3.1.

Area	Steps taken
Identification and referral of victims	Training is provided to key front line service staff to understand modern slavery and the need to refer concerns to the Council's Safeguarding Lead Officer.
Supporting victims	N/A in this financial year
Community safety services and disruption activities	The Council forms part of the Runnymede Community Safety Partnership with other key partners. This group provides an opportunity for partners to share information and to support common activity across partners on modern slavery to deliver a local coordinated approach to disruption and other activities based on local intelligence.
The production of a slavery and human trafficking statement covering the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and any part of its own business.	Corporate Procurement Office's Tackling Modern Slavery in the Supply Chain Policy has been developed (see Appendix A) and approval is sought as part of this statement. CIPs Ethical Procurement and Supply training course covering the identification of high risk suppliers in our supply chain has also been provided to Corporate Procurement Office staff.

6.0 Related policies and plans

Runnymede Borough Council has a range of policies and plans that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

Safeguarding Policy – this policy sets out the steps the Council is taking to safeguard and protect the welfare of children, young people and adults at risk who come into contact with its services and activities. The policy includes the Council's responsibilities in respect of modern slavery and human trafficking and its legal obligation to notify the Home Office of suspected victims of these offences.

Runnymede Council is committed to safeguarding children, young people, and adults with care and support. This is demonstrated by:

- Appointment of a Lead Member for Safeguarding
- Appointment of a Lead Officer for safeguarding across the Council
- A representative of Surrey's district and borough councils sits on the Surrey Safeguarding Adults Board and the Surrey Safeguarding Children Board
- Appropriate returns are made to both Boards
- Engagement and co-operation with the Multi Agency Safeguarding Hub (MASH) for adults and Multi agency Partnership (MAP) for children

Runnymede Community Safety Partnership and Community Safety Action Plan – The Community Safety Partnership (CSP) is a statutory multi agency partnership which meets quarterly with the remit to work together to reduce crime and disorder in the community and creates an annual action plan to deliver priorities for the year. Runnymede’s Community Safety aims are the following:

Aim 1: To reduce crime and anti-social behaviour by tackling offenders, reduce reoffending and to support vulnerable victims and areas.

Aim 2: To protect the most vulnerable individuals from high harm and abuse.

Aim 3: To maintain public confidence by making residents feel safe and secure.

Corporate Procurement Strategy – this sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from third-party and in-house providers.

Equality Policy and Equality Objectives – these policies set out the Council’s procedures to ensure that it fulfils its obligations under the Equality Act 2010.

7.0 Useful links for more information

7.1 The following hyperlinks provide additional useful information:

- [Surrey Police - advice on modern slavery](#)
- [Home Office You Tube video](#)
- [LGA Modern Slavery Guidance for Councils](#)
- [LGA Modern Slavery training](#)

Appendix A:

Procurement Policy – Tackling Modern Slavery in the Supply Chain

The Council is committed to ethical purchasing and ensuring our supply chain operates in an ethical and sustainable way. As part of that commitment, Runnymede Borough Council:

1. Ensures its corporate procurement team have appropriate training to understand modern slavery.
2. Requires its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
3. Notes that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
4. Publicises its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
5. Requires its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
6. Ensures that quality assurance safeguards are in place to protect its contractual spending and identify any potential issues with modern slavery.
7. Highlights for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
8. Refers for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
9. Reports publicly on the implementation of this policy annually.

Procurement Policy for addressing modern slavery in the supply chain

Part of the Quality evaluation criteria for any future procurement must incorporate an assessment of the company's policy and procedures for assessing and dealing with modern slavery in their operations including any sub-contractors.

Suitability Assessment of Tenderers

If a company has declared that they meet the criteria of Section 54 of the Modern Slavery Act 2015 by means of self-certification in the suitability assessment form, Buying Managers must check the company for full compliance via the TISC REPORT <https://tiscreport.org/>. If this report determines that the company is required to comply and does not fully comply, the tender should be excluded from further evaluation.

Quality Evaluation of Tenders

With immediate effect, when a new contract is tendered, the tenderer must provide as part of their Quality response, information to demonstrate their commitment to assessing and dealing with modern slavery in their operations including any sub-contractors

The question below should be used in the Quality Questionnaire or Method Statement questions with a weighting of no less than 5% of the total marks for Quality:

The Authority is committed to combating modern slavery in its supply chain. Please describe your policy and procedures for ensuring that no cases of Modern Slavery, as defined in the Modern Slavery Act 2015 in either your organisation or your work force are used to fulfil the contract. Specific examples should be provided of your company's steps taken to assess and combat modern slavery from your supply chain.

Contract clauses to combat modern slavery

All bespoke contracts and standard T&Cs to include the need for open book accounting

Contract termination clauses to allow for termination due to non-compliance with the Modern Slavery Act 2015

Contract Management

Once a contract is in place, it is the responsibility of the Contract Manager to ensure that at regular and frequent intervals an assessment of the supplier and any sub-contractors is undertaken. This could include:

Unannounced visits to construction sites – Officers to spot the signs of potential modern slavery <https://www.gla.gov.uk/who-we-are/modern-slavery/who-we-are-modern-slavery-spot-the-signs/>

Ask to see workers with their written employment contracts and passports

Ask to meet with some workers to assess for signs of potential modern slavery

Ask to see company accounts to check salaries/wages are being paid to individuals – follow the money

Assessing our supply chain

Corporate Procurement will assess the existing supply chain in relation to their compliance with section 54 of the Modern Slavery Act 2015 by means of the NGO, TISC REPORT (Transparency in Supply Chains – <https://tiscreport.org/>)

Further, Corporate Procurement will communicate with our supply chain on the signs of modern slavery and facilitate an audit of the supply chain on a regular basis to seek overall reassurance that the suppliers that we contract with are combating modern slavery.