



South Cambridgeshire District Council Modern Slavery Statement 2021-22

Introduction

This Modern Slavery Statement for 2021-22 sets out the steps South Cambridgeshire District Council has taken, and the actions that are planned to ensure that there is no modern slavery or human trafficking in any part of our business, including our supply chains.

In accordance with the Modern Slavery Act 2015, South Cambridgeshire District Council (SCDC) produces a slavery and human trafficking statement each financial year.

What is Modern Slavery?

“Modern slavery is a serious crime that violates human rights. Victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self.” – Home Office, 2021

The term ‘modern slavery’ encompasses human trafficking, slavery, servitude and forced or compulsory labour. Definitions of each of these terms are detailed below:

- **Human Trafficking** relates to the coercion or deception of an individual into a situation where they are exploited. It involves three basic components: 1 - the action of recruiting, transporting, transferring or receiving and individual; 2 - the threat or use of coercion or deception; 3 - exploitation or intent to exploit. This exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs. Some people who have not been subject to all three components may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour ¹.
- **Slavery** – ‘the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised ²’

¹ Modern slavery: statutory guidance for England and Wales (under S49 of the Modern Slavery Act 2015)

² The 1926 Slavery Convention



- **Servitude** – ‘an obligation to provide a service that is imposed by the use coercion’³
- **Forced or Compulsory Labour** relates to ‘all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily’⁴

While the level of sophistication varies, modern slavery is intrinsically linked to organised crime groups⁵.

National and Regional Trends

Under the Modern Slavery Act 2015, specified local authorities (including South Cambridgeshire District Council) have a duty to notify the Home Office of suspected cases of Modern Slavery under the Modern Slavery Act, 2015. The 2020 UK Annual Report of Modern Slavery states that in 2019, there were 10,627 potential victims referred through the National Referral Mechanism (NRM). This is a 52% increase from the 6,986 referrals in 2018. In June 2020, however the Office for National Statistics published a report highlighting the challenges producing accurate figures due the hidden nature of the crime.

In the year to March 2020, 7,779 Modern Slavery crimes were recorded, a 59% increase on the previous year⁶, whilst Cambridgeshire Constabulary had 124 NRM referrals in 2020⁷.

Examples of cases that have occurred within Cambridgeshire are as follows:

- In July 2020 two people were arrested and charged in Cambridge and Cambourne on five counts of holding a person in slavery or servitude, five counts of arranging or facilitating travel of another person with a view to exploitation, one count of money laundering and one count of fraud by false representation⁸.

³ Modern slavery: statutory guidance for England and Wales (under S49 of the Modern Slavery Act 2015)

⁴ Modern slavery: statutory guidance for England and Wales (under S49 of the Modern Slavery Act 2015)

⁵ <https://www.college.police.uk/article/challenges-policing-modern-slavery>

⁶ 2020 UK Annual report on Modern slavery

⁷ Modern Slavery: National Referral Mechanism and Duty to Notify Statistics, end of year summary 2020: data tables

⁸ [Two charged with slavery, fraud and money laundering offences after arrests in Cambridge and Cambourne \(cambridgeindependent.co.uk\)](https://www.cambridgeindependent.co.uk/news/cambridge/cambridge-and-cambourne-two-charged-with-slavery-fraud-and-money-laundering-offences-after-arrests-in-cambridge-and-cambourne)



- In March 2021 four people were rescued from the back of a lorry in Trumpington, and this followed two similar cases in February where twenty-one people were rescued from lorries in Cambridgeshire⁹.

Within the district itself, SCDC has worked with partner agencies, such as Cambridgeshire Constabulary, to respond to multiple incidents of modern slavery, including one case in 2019 where five vulnerable workers were found to be living in unacceptable conditions on an agricultural nursery site in the district¹⁰.

The Role of Local Authorities

Within their 'Tackling Modern Slavery: A Council Guide' (2017) document, the Local Government Association (LGA) highlight that modern slavery can intersect with many different areas that councils are involved with and as such that they can play a key role in tackling modern slavery. The LGA also outline the following roles of local authorities in tackling modern slavery:

1. Identification and referral of victims (under which the council has a duty to notify the Home Office of suspected cases of Modern Slavery under the Modern Slavery Act, 2015)
2. Supporting victims – this can be through safeguarding children and adults with care and support needs and through housing/homelessness services
3. Community safety services and disruption activities
4. Ensuring that the supply chains councils procure from are free from modern slavery.

Each of these points have been included as an area of focus within the action plan detailed later in this statement.

Given that different services may come into contact with modern slavery, it is important that councils adopt a joined-up approach to modern slavery across the organisation.

Existing Policies and Procedures

South Cambridgeshire District Council (SCDC) has a range of policies, processes, procedures and practices in place that help to ensure that we are acting ethically and with integrity to prevent slavery and human trafficking, including the following:

⁹ [M11 Trumpington: Police called from inside lorry and four rescued - BBC News](#)

¹⁰ [Modern slavery operation finds five men at Cambridgeshire nursery - BBC News](#)



Safeguarding Policy: SCDC is committed to safeguarding and promoting the welfare of children and adults at risk of harm and their families. The Council has signed an agreement with Cambridgeshire County Council to work within their Adult Safeguarding policy guidelines and procedures. We take our responsibilities seriously and expect all staff, partners and contractors to share this commitment. We ensure our procurement and contracting policies and procedures adequately reflect our safeguarding responsibilities, and that all incidents of poor practice, allegations and suspicions are taken seriously, reported, and are always responded to. Additionally, all staff are expected to attend regular safeguarding training.

Whistleblowing Policy: The Council encourages staff, contractors and elected Members who have serious concerns about any aspect of the council's activities, to come forward and voice those concerns. Our Whistleblowing Policy has been prepared in consultation with staff and with the help of the independent charity, Public Concern at Work. It commits the Council to ensuring that whistle-blowers will suffer no recrimination or victimisation as a result of raising a genuine concern about malpractice.

Pay Policy: The Council is committed to ensuring that its pay strategy is fair and equitable, affordable, transparent and easily understood, enabling the organisation to attract, retain and develop a skilled and flexible workforce. Our staff salaries are evaluated using the National Joint Council (NJC) Job Evaluation Scheme which is based on the principle of joint ownership, openness, transparency and equality. From 2020/21 SCDC has committed to pay all directly employed staff, as well as agency workers, at least £10 an hour. This pledge means the Council will pay all its workers, except apprentices (subject to their own training agreement and wage structure), more than the Government's minimum wage. The figure is also higher than the Living Wage Foundation's Real Living Wage of £9.50 per hour.

Equality Scheme: SCDC published a revised Equality Scheme in December 2020 setting out how it will seek to meet the aims of the Public Sector Equality Duty by promoting equality of opportunity through its approach to service delivery, employment, community leadership and other activities.

Recruitment Process: South Cambridgeshire District Council's Recruitment and Selection policy and procedures are designed to recruit staff in a fair and consistent way that supports equality of opportunity. Our recruitment processes are open and robust with procedures for checking that interview attendees are eligible to work in the UK and for requesting and following up applicant references. We also aim to ensure that interview panel members have received interview training, covering equality and diversity, to ensure a consistent and fair process.

Agency Workers: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.



Code of Conduct: All employees of South Cambridgeshire District Council are expected to work to our code of conduct, including fair and equitable treatment of all staff, customers, and residents.

Partnership Working: South Cambridgeshire District Council works closely with several partner organisations. These organisations are also expected to adhere to policies which protect against modern day slavery and discrimination.

Due Diligence Processes

Safeguarding Training: This includes how to spot the signs of modern slavery and how to make a referral. Safeguarding training is mandatory for all members of staff at South Cambridgeshire District Council.

Procurement Training: This training includes awareness of modern slavery and actions that are taken to prevent the modern slavery from occurring within our supply chain. In the past 2 years, 113 members of staff have completed this training.

Safeguarding Lead and Officers: The council has a designated Safeguarding Lead (Peter Campbell, peter.campbell@scambs.gov.uk), who ensures that the council is undertaking its duties under the Modern Slavery Act, 2015 (including the duty to notify). Safeguarding officers have also been identified across the council's services to assist with the escalation of potential cases. A list of these can be found on the council's intranet).

Procurement

In all our procurement activity, we aim to be consistent with the highest standards of integrity and to ensure fairness in allocating contracts.

Equality and diversity, social responsibility and safety are important criteria in the provision of goods and services procured. These criteria are achieved through the following requirements:

- Key contractors must have safeguarding policies, procedures and training in place.
- Larger contractors must undertake regular audits of their safeguarding policies, procedures and training, reporting the outcome to the council.
- The World Trade Organisation (WTO) tender processes requires potential suppliers to confirm that they meet the requirements under the Modern Slavery Act 2015.



- Any supplier engaged by South Cambridgeshire District Council is contracted to do so in line with the authority's Modern Slavery Statement, Safeguarding Policy; Equality and Diversity Scheme; Code of Conduct and Whistleblowing Policy.
- Should the council look to procure or import products or services from outside the UK, then we would undertake further consideration of supply chains in order to account for potential risks.
- The council expects all suppliers of goods and services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the council's expectations. We request that our suppliers ensure the same of their own supply chains.

Suppliers to South Cambridgeshire District Council must abide by all employment legislation and regulations. The council examines, as appropriate, suppliers' past records in respect of their treatment of staff and their conduct in relation to modern day slavery and human trafficking.

The council's zero-tolerance approach to modern slavery includes communication to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter. Where there are questions over the conduct of a supplier then these shall be investigated, and the appropriate action taken.

Partnerships

South Cambridgeshire District Council is an active member of the South Cambridgeshire Community Safety Partnership. This partnership includes joint work with Police, Fire, District Council, County Council, Cambridgeshire and Peterborough Clinical Commissioning Group (CCG) and voluntary group partners to protect vulnerable people living in the district that may be exposed/coerced into modern slavery and trafficking.



Action Plan and Ownership

The table below sets out South Cambridgeshire District Council's modern slavery prevention objectives for 2021-22. These are categorised using the four roles of local authorities in tackling modern slavery, as set out by the LGA:

Local Authority Role	Action	Team/Service
Identification and referral of victims	Run communications to raise awareness around modern slavery.	Policy and Performance
	Ensure staff complete safeguarding training that includes the referral process for SCDC.	HR
	Provide a Human Trafficking and Modern Day Slavery online training to all staff.	HR
	Review coverage of Safeguarding officers to ensure representation and engagement from wide range of teams.	Safeguarding
	Hold quarterly Safeguarding meetings to discuss any issues and how these can be proactively managed	Safeguarding
	Review how we monitor and collect data on potential modern slavery cases raised through our services, including 'concern cards'.	Safeguarding
	Review use and promotion of generic safeguarding email address.	Safeguarding
	Set up central Safeguarding and Modern Slavery resource page on Intranet to provide a central location for key resources.	Safeguarding
	Active participation with Community Safety Partnership Problem Solving Group. This is a multi-agency safeguarding hub bringing together Police, Fire, District Council, County Council and Housing Association, Cambridgeshire and Peterborough Clinical Commissioning Group (CCG) and voluntary group partners to review serious cases.	Sustainable Communities
Work with partners to carry out the South Cambridgeshire Community Safety Partnership communications plan which	Sustainable Communities	



	<p>features Modern Day Slavery. This includes awareness campaigns e.g. National Anti-slavery day (18 October).</p> <p>Ensuring the ‘Community Eyes and Ears’ leaflet and project principles are circulated across South Cambridgeshire. This project addresses Modern Day Slavery as well as a range of other issues.</p> <p>Raise awareness of modern slavery and how to report it amongst South Cambridgeshire licenced taxi drivers, through the Taxi Proficiency and Safeguarding course.</p>	<p>Sustainable Communities</p> <p>Licensing</p>
<p>Supporting victims – this can be through safeguarding children and adults with care and support needs and through housing/homelessness services</p>	<p>Review internal communications and resources to support those experiencing or have experienced Modern Day Slavery, Safeguarding issues and/or Domestic Abuse.</p> <p>Provide Housing Advice, Homelessness support and Welfare support to any victims of Modern Slavery as required.</p> <p>Working towards Domestic Abuse Housing Alliance accreditation to support victims of Domestic Abuse (which has potential for overlap with Modern Slavery)</p> <p>Develop a method of supporting victims who are not legally in the country or do not have recourse to public funds.</p>	<p>Housing</p> <p>Housing and Benefits</p> <p>Housing</p> <p>Safeguarding</p>
<p>Community safety services and disruption activities</p>	<p>Continue to play an active role within the South Cambridgeshire Community Safety Partnership. This includes joint work with Police, Fire, District Council, County Council, Cambridgeshire and Peterborough Clinical Commissioning Group (CCG) and voluntary group partners to protect vulnerable people living in the district that may be exposed/coerced into modern slavery and trafficking.</p> <p>Work with partners to carry out the South Cambridgeshire Community Safety Partnership action plan which features Modern Day Slavery.</p> <p>Highlight modern slavery as one of several issues for focus at the annual Community Resilience Event.</p>	<p>Sustainable Communities</p> <p>Sustainable Communities</p> <p>Sustainable Communities</p> <p>All relevant teams (depending on</p>



	Continue to work in partnership with other agencies such as Cambridgeshire Constabulary in response to reported incidents of modern slavery.	nature of case and response requirements)
Ensuring that supply chains are free from modern slavery	Undertake a review of the council's existing contract's list to determine whether any additional action is required. Adopt a risk-based approach to auditing external suppliers and contractor's compliance, particularly in at risk areas. Modern slavery is included within the procurement training that is delivered to all SCDC staff purchasing goods and services on behalf of the council.	Procurement Procurement Procurement

Reporting and Guidance

All modern slavery concerns raised by council staff, councillors and volunteers are reported via the National Referral Mechanism.

Any South Cambridgeshire District Council employees affected by slavery, or who suspect someone is at risk are advised to:

- Report concerns to a Safeguarding Officer. A list of designated Safeguarding Officers can be found on the council's staff directory, located on the council's Intranet. The Safeguarding Lead for the council is Peter Campbell peter.campbell@scambs.gov.uk
- Following the 'reporting a concern' process for child or adult safeguarding process available on Insite.

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 website](#).
- or via the free Unseen app available on Android or iOS