

This statement applies to all employees of Mid Devon District Council



Modern Slavery Statement and Human Trafficking

RESPONSIBLE OFFICER: CORPORATE SAFEGUARDING LEAD

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This statement sets out Mid Devon District Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

As part of Local Government, we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking. Mid Devon District Council is absolutely committed to preventing modern slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from modern slavery and human trafficking.

In addition to Mid Devon District Council's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of modern slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

Tackling modern slavery and human trafficking requires a collective, co-ordinated and sustained effort from a range of collaborating agencies, both statutory and non-statutory. No single agency or individual can eradicate modern slavery alone and this effective partnership working is essential. Mid Devon District Council works closely with Devon & Torbay Antislavery Partnership to implement a Devon & Torbay Modern Slavery Adult Victims Referral/Support Pathway Protocol and a memorandum of Understanding between Statutory Agencies.

The Home Office's Statutory Guidance on Modern Slavery (2021) ('the Statutory Guidance') is intended for staff in England and Wales within public authorities who may encounter potential victims of modern slavery and/or who are involved in supporting victims. The Home Office states that these individuals and organisations must have regard to the Statutory Guidance, with a view to developing a more consistent response to modern slavery victims to ensure they are identified and receive the available and appropriate support.

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery, local authorities have a key role to play in tackling modern slavery, for more information please select [here](#).

Definition of Modern Slavery

The term 'Modern Slavery' captures a whole range of types of exploitation, many of which occur together. These are defined by Unseen UK to include but are not limited to:

- ✦ Sexual exploitation: this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/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).
- ✦ Criminal exploitation: This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis

cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.

- ✚ Human trafficking: this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.
- ✚ Other forms of exploitation: organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Our roles in tackling modern slavery

This statement covers the activities of Mid Devon District Council who are a rural district local authority covering an area of 353 square miles (914km²) in the agricultural heartland of Devon, between Dartmoor, Exmoor and the Blackdown Hills. While it is the 23rd-largest district council in England by area, it is also the 34th-smallest by population.

Mid Devon District Council is a progressive council committed to providing a wide range of high quality and sustainable statutory and discretionary services, delivered both directly and through external contractors.

- ✚ The Council's Constitution can be accessed [here](#).
- ✚ The Council's [Corporate Plan 2020-2024](#) sets out the priorities for the next few years:
 - Homes
 - Environment
 - Community
 - Economy
- ✚ The Council is structured into 7 service groupings, Public Health & Regulatory and Housing Services; People, Governance and Waste; Democratic Services; Property, Leisure and Climate Change; Digital Transformation and Customer Engagement, Financial and Procurement Services; Planning Economy & Growth.

Key Partnership working relating to the organisations' work to tackle anti-slavery include:

- ✚ [Adult Safeguarding](#) policies (as part of Devon Safeguarding Adults Partnership) and [Child Safeguarding](#) policies (as part of Devon Children and Families Partnership). These policies set out organisational responsibilities for protecting adult's, young people or children at risk of abuse and describe how multi-agency safeguarding arrangements work.
- ✚ East and Mid Devon Community Safety Partnership work collaboratively with the [Safer Devon Partnership](#) who have a shared responsibility to tackle crime, disorder and anti-social behaviour. The partnership have developed an online [Preventing Exploitation Toolkit](#) to tackle the threat of exploitation in Devon.
- ✚ The Council is a partner of the Devon Procurement Partnership which is a partnership of 19 permanent member organisations. Many of our contracts are created through this partnership, dependent on the circumstances and

requirements.

- ✚ Mid Devon District Council works closely with Devon & Torbay Antislavery Partnership to implement a Devon & Torbay Modern Slavery Adult Victims Referral/Support Pathway Protocol and a memorandum of Understanding between Statutory Agencies.

Our roles in tackling modern slavery include:

- 1) Developing a strategy with partners to address modern slavery

The Safer Devon Partnership has identified exploitation as a strategic priority for Devon, based on a strategic assessment of high-level crime and disorder threats in the County.

- 2) Raising awareness of slavery, uncovering its existence and identifying perpetrators

We also work across County and Council boundaries as part of Devon and Torbay Anti-Slavery Partnership, which is responsible for coordinating and overseeing preventative work and responses to modern slavery and human trafficking within the county. The Partnership's roles include:

- ✚ Preventative and awareness-raising work with frontline staff across all sectors and the public. This includes training and communication to increase understanding of modern slavery and human trafficking, and knowledge of how to identify and report concerns and safeguard vulnerable people.
- ✚ Providing strategic support for responses to modern slavery incidents and to the safeguarding of victims.
- ✚ Improving local intelligence in order to increase the likelihood of prosecutions and safeguard those vulnerable to, or being exploited through, modern slavery and human trafficking.
- ✚ Encouraging collaborative working and information sharing between agencies.

- 3) Support victims and safeguarding individuals at risk

Our frontline workers have a vital role in spotting signs of modern slavery and human trafficking and safeguarding and supporting victims.

Under Section 52 of the Modern Slavery Act 2015, local authorities are under a duty to notify the Home Office when they identify a potential victim of modern slavery. The National Referral Mechanism is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Those who are recognised as potential victims of modern slavery through the National Referral Mechanism have access to specialist support for a period of at least 45 days while their case is considered. This support may include access to legal advice, accommodation, protection and emotional and practical help.

This support is in addition to our statutory safeguarding role. Where victims of slavery have care and support needs, we would refer to Devon County Council who are the responsible body and they may carry out an assessment under the Care Act 2014 or safeguarding under the Children's Act 1989.

- 4) Ensuring to the best of our ability that our services and supply chains are free from exploitation arising from modern slavery and human trafficking.

Our main actions relating to procurement include:

- ✚ ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Where turn-over is more than £36 million, the Council suppliers are required to comply with this Modern Anti-Slavery and Human Trafficking Statement. Mid Devon District Council is investing in the process of effective risk assessment strategies.

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- ✚ providing training and guidance to services to ensure they understand procurement regulations;
- ✚ use of frameworks where possible to ensure suppliers meet the necessary standards;
- ✚ checking and challenging quotes and tenders received to ensure they are fully understood and comply with labour regulations and rejecting suppliers that do not meet the required standards;
- ✚ assessing existing suppliers through contract management to ensure they continue to adhere to the standards;
- ✚ working with suppliers to resolve issues and improve standards.

- 5) Raising awareness of modern slavery and human trafficking across our workforce through training.

A preventing exploitation toolkit has been produced for anyone who, through their paid or voluntary work, may come across people who are vulnerable to exploitation. It helps people to understand, identify and report signs of exploitation, and access guidance and support.

- 6) Promoting equality and tackling discrimination in all its forms

Under the Equality Act, we must have due regard to the need to:

- ✚ Eliminate unlawful discrimination
- ✚ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✚ Foster good relations between people who share a protected characteristic and those who don't.

Measuring our effectiveness

We have reviewed our key performance indicators (KPIs). As a result, we are:

- ✚ requiring all officers to have completed training on modern slavery and human trafficking;
- ✚ requiring all Elected Members to have completed training on modern slavery and human trafficking;
- ✚ developing a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain; and
- ✚ reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

Mid Devon District Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, which includes modern slavery and human trafficking.

Aims for our continuous improvement

- ✚ To roll out modern slavery and human trafficking awareness training to all employees via e-learning module and share the understanding of the Devon & Torbay Modern Slavery Adult Victims Referral/Support Pathway Protocol and a memorandum of Understanding between Statutory Agencies.
- ✚ To roll out training on the National Referral Mechanism to officers who may come into contact with possible victims as part of carrying out their duties on behalf of Mid Devon District Council.
- ✚ To roll out awareness training to our Elected Members.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in its operations

- ✚ **Safeguarding policy** sets out how organisational responsibilities in protecting the welfare of children, young people and adults at risk who come into contact with its services and activities. Adult Safeguarding policies (as part of Devon Safeguarding Adults Partnership) and Child Safeguarding policies (as part of Devon Children and Families Partnership) describe how multi-agency safeguarding arrangements work.
- ✚ **Whistleblowing policy:** This policy ensures that workers can report any concerns related to the direct activities, or the supply chains of, our organisation. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation and protects their employment rights if they choose to 'blow the whistle' <https://www.middevon.gov.uk/your-council/internal-audit/fraud-and-corruption/>

- ✦ **Officers Code of Conduct:** is the ethical framework that employees work to, which makes it clear the actions and behaviours expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.
 - ✦ **Recruitment/Agency workers guidance documents:** The council use 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. .
 - ✦ **Robust recruitment procedures:** cover recruitment and working at Mid Devon District Council, including procedures for vetting new employees and eligibility to work in the UK. They cover employer and employee responsibilities in relation to employees, consultants, contractors, volunteers and agency workers. DBS checks are carried out for relevant posts in line with safer recruitment principles.
 - ✦ **Equality Policy:** which describes our commitment to eliminating discrimination, providing equality of opportunity and challenging prejudice within our service delivery and employment. We wish to promote good relations between different groups within the community as we value the positive contribution that all residents bring to the district. Equality, Diversity and Inclusion Scheme. (Equality and diversity - MIDDEVON.GOV.UK)
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This Modern Anti-Slavery and Human Trafficking statement has been approved by the Cabinet and adopted by the Council. The statement will be reviewed and updated annually or sooner if required by legislation to reflect the council's evolution of commitment, understanding and practice and will be published within 6 months of the new financial year.



Mr Stephen Walford
Chief Executive

Date: 04/04/22



Cllr Bob Deed
Leader of the Council

Date: 5 April 2022