

Modern Slavery Act 2015: Warwickshire County Council's Modern Slavery and Human Trafficking Statement 2024/25

Introduction

Warwickshire County Council is committed to preventing slavery and human trafficking in our corporate activities and in our supply chain management. This statement sets out Warwickshire County Council's actions to understand all potential modern slavery risks related to our services and business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own services and business and our supply chain. This statement also applies to Warwickshire Fire and Rescue Service which is part of the Council.

This statement is published in response to the Modern Slavery Act 2015.

This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

We remain dedicated to improving our policies and procedures to tackle modern slavery and human trafficking and will continue to do so in the current financial year.

Organisational Structure

Warwickshire County Council is a local authority which provides a range of statutory and discretionary services delivered both directly by the Council and through external organisations. Our website provides more information about our [Council's organisational structure](#).

Supply Chains

The Council procures goods and services from various suppliers and this is governed by our [Procurement Strategy](#).

Countries of Operation and Supply

Warwickshire County Council only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low due to the nature of the Council's business, the Council remains vigilant to any potential risks and, through our procurement policy, strategy and guidance, sets high expectations from its supply chains.

High Risk Activities

The Council recognises that due to the nature of its business, it has supply chains with several sectors, such as social care and waste management, that are considered to be at a higher risk of slavery or human trafficking. Identifying potential areas of risk such as these in this statement helps the Council to prioritise actions that can be taken to manage such risks.

The [Homes for Ukraine](#), [Asylum Seekers](#), [Hong Kong British National \(Overseas\)](#) and [UK Resettlement](#) schemes that offer housing and support for refugees and asylum seekers provide some level of risk as vulnerable people are being placed with members of the public, hotels or in local housing. Disclosure and Barring Services (DBS) checks and home inspections are carried out for every member of a sponsor family, and a dedicated support officer liaises with families to support them in order to mitigate this risk. For those on the Homes for Ukraine scheme who move into independent accommodation, there is a helpline and email address supported by a bilingual team to provide ongoing support. All staff receive safeguarding training, and staff working alongside refugees and migrants on the Migration Team have also undergone DBS checks as part of the recruitment process.

The [Warwickshire Investment Fund](#) (WIF) is part of the Council's strategy to stimulate Warwickshire's economy, create jobs, support local businesses, and bring investment into the county. Loans and investments can be made under two pillars of the WIF:

1. The Local Communities and Enterprise Pillar; and
2. The Property and Infrastructure Pillar.

As a result of this lending activity, the Council is required to comply with additional rules in relation to the prevention of money laundering and has strengthened its anti-money laundering policy and procedure to ensure it complies with these obligations and safeguards the Council's resources. The strengthened policy and procedure include an organisational risk assessment and thorough customer due diligence for individual investments. This helps to ensure that the investment opportunities provided by the WIF are not used to launder any profits made by those involved in modern slavery and human trafficking.

The Council is responsible for commissioning care and support services for children, young people and adults. The high vacancy rate within the sector and the use of international recruitment, via the government Sponsorship Licence scheme, means that these sectors can be susceptible to modern slavery. The Council is alive to this risk and an action plan has been developed to ensure risks are monitored and mitigated. This is driven by the Quality Assurance team and the Partnership Learning & Development team who have contacted the market to understand the risk for employment of staff on an overseas licence and complete a checklist for International Recruitment when they have direct involvement with a provider. The Council has links with the Association of Directors of Adult Social Services (ADASS)

who share any indicators where a provider has had their overseas licence suspended or revoked. Contracts used include specific clauses which define and prohibit labour abuse and modern slavery. These clauses are actively monitored and managed by contract management officers and action is taken against any breaches of these clauses, including reporting activity to relevant bodies when appropriate. The Quality Assurance team has processes in place to link with safeguarding teams, Quarterly Provider Returns monitor levels of staffing, a Service Escalation Panel exists to ensure that concerns can be raised consistently and strategically, and staff in the team receive modern slavery training.

Responsibility

Responsibility for the Council's anti-slavery initiatives is as follows:

Policies: These are developed by officers in the relevant Service area and are agreed in line with the Council's scheme of delegation. Policies are reviewed to ensure that they remain relevant.

Risk assessments: These are undertaken by the relevant Service area where there is deemed to be a risk of modern slavery or human trafficking, with support from colleagues in Legal Services, Procurement, Contract Management and Community Safety as appropriate.

Investigations and due diligence: Any concerns regarding modern slavery or human trafficking should be notified to the Council's Monitoring Officer who is currently the Director of Strategy, Planning and Governance as soon as is practicable. Further information and guidance on referrals are provided for Council staff on the Council's intranet and is regularly reviewed and updated.

Children in employment: All school-age children who work part-time must be registered with Warwickshire County Council. Our website provides [information about child employment](#), including information on the law around child working hours, information for children, parents and employers, and how to report concerns about children in employment.

Strategies: The Warwickshire Exploitation Strategy 2020-2023, overseen by the then Warwickshire Safeguarding Partnership, aimed to ensure that the Council's relevant staff and partners had an understanding of exploitation and the impact it has on children, young people, adults with care and support needs, and the wider community. In 2024, following a restructure of Safeguarding arrangements, it was decided that the Strategy should be replaced by a Warwickshire Exploitation Strategic Framework in order to better meet the requirements of the partnership boards and their subgroups, show how their work links together and reduce duplication. Although the Strategy ended in 2023, the strategic approach has still been used throughout 2024-25 to ensure continuity while the Framework is being developed. Due to be finalised in May 2025, the Framework will be overseen by the

Safer Warwickshire Partnership Board, the Warwickshire Safeguarding Adults Board, the Warwickshire Safeguarding Children's Partnership and the county's four Community Safety Partnerships and will ensure a multi-agency and collaborative approach to tackling exploitation across the county.

Initiatives

Devolved Decision Making: Warwickshire County Council is participating in a Home Office pilot to devolve decision making for child victims of Modern Slavery. Since February 2023, all National Referral Mechanism (NRM) referrals completed by professionals for Warwickshire children are referred to a local multi-agency NRM Panel which is set up for the purpose of making decisions whether the children are victims of Modern Slavery. This helps to bring more effective and timely decision making by agencies known to the child and connecting them to local safeguarding and support.

National Referral Mechanism Coordination: The NRM process is facilitated by a NRM Coordinator who coordinates the collection and analysis of information required by the Warwickshire Panel to enable decisions to be made on the referrals. This individual is available to support practitioners assessing and supporting victims of modern slavery, providing specialist guidance and advice, and raising service standards regarding modern slavery and use of NRM through the provision of training and awareness. The Coordinator also supports individuals in deciding whether a referral needs to be made to the Independent Child Trafficking Guardianship Service (ICTG).

Transitional Arrangements: Warwickshire County Council has transitional arrangements in place to ensure that children transitioning into adulthood who are awaiting a conclusive grounds decision or who have been deemed a victim of modern slavery continue to receive support. This includes referral to the Independent Modern Slavery Advocate service (IMSA) – a role commissioned by the Office of Police and Crime Commissioner and delivered by the West Midlands Anti Slavery Network – for ongoing support.

Independent Child Trafficking Guardianship Service (ICTG): Warwickshire County Council partners with Barnardo's who provide the ICTG service, which offers advice, guidance, and support for children who have been exploited through trafficking and Modern Slavery, and for professionals working with them.

Child Exploitation Awareness: [The Something's Not Right website](#) and campaign, a partnership initiative between Warwickshire County Council, Warwickshire Police, Barnardo's and the Warwickshire Police and Crime Commissioner, raises awareness of child exploitation in Warwickshire, how it manifests, and what people and organisations can do to keep children safe. In March 2025, as part of Child Exploitation Awareness Week, the Council arranged awareness activities and training events in a bid to help professionals, parents, carers and members of the

public in recognising child exploitation and knowing how to take action when they spot it, amplifying the messages of the Something's Not Right campaign. The Targeted Youth Support service engaged children and young people with a range of activities, including quizzes, discussions, poster designs and pledging to the #HelpingHands campaign. Helping children understand what exploitation may look like to them is an essential part of stopping it. Social media posts highlighting the different types of child exploitation were shared on the Warwickshire County Council social media pages over the week.

Decision Recommendation Tool: The Quality Assurance team has developed a Decision Recommendation Tool which allows inputters to record staffing numbers, percentages of internationally recruited staff and the volume of the market supported by the provider. The tool provides a recommended course of action that could be followed and aids with understanding the level of risk. Once the tool is completed the recommended course of action could be increased monitoring or consider decommissioning. A working group is set up for each provider considered at risk with a planned set of actions that should be followed.

Partnership coordination: The Warwickshire Modern Slavery Steering Group, coordinated by Warwickshire County Council on behalf of the Safer Warwickshire Partnership Board, aims to bring together key local agencies to work collaboratively to ensure people who are identified or present as potential victims of modern slavery in Warwickshire are given the best advice and practical support available to protect them from harm. The group coordinates the delivery of a range of initiatives to meet their objectives, which include raising awareness of modern slavery and human trafficking in Warwickshire; combatting modern slavery by working in partnership and providing collaborative support between local and regional agencies; and ensuring consistent processes, pathways and procedures are in place to help identify and support potential victims of modern slavery.

Champions and first responders: Each of the partnership agencies that sits on the Modern Slavery Steering Group has a nominated champion and first responder. Under section 52 of the Modern Slavery Act, specified first responders have a statutory duty to notify the Home Office when they come across potential victims of modern slavery. When indicators of modern slavery are identified by first responders, all suspected child victims should be referred into the NRM, as well as adults who give their consent to enter the NRM. The role of the champion is to raise awareness of modern slavery, support the first responder and oversee the activity around modern slavery within their own organisation.

Annual partnership conference: In November 2024, the Modern Slavery Steering Group hosted its third annual partnership conference, with key inputs covering NRM coordination, the role of the Independent Modern Slavery Advocate (IMSA) and the lived experience story of a survivor of modern slavery. The event brought together partner organisations for a day of Continuing Professional Development and shared reflection, with the aim of disseminating best practice across the partnership.

Modern Slavery Business Pledge: The Council encourages and supports smaller businesses and NGOs to voluntarily sign the Business Pledge and produce a statement to demonstrate their commitment to tackling modern slavery and human trafficking. [The Warwickshire Business Watch website](#) provides information on the Business Pledge and on modern slavery, and it has templates for businesses to download and fill in with their information.

Relevant Policies

Warwickshire County Council reviews its policies and procedures on an ongoing basis to ensure that they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

Safeguarding policies: In order to safeguard and promote the welfare of children and adults living in Warwickshire, the Council's safeguarding strategy is underpinned by a range of policies and guidance.

Whistleblowing policy: The Council encourages all its employees, consultants, contractors, volunteers and workers to report any concerns related to its direct activities or the supply chains of the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

Employer and Employee Responsibilities Code: The Council's Code makes clear to our employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.

Recruitment: The Council's recruitment processes are transparent and regularly reviewed to ensure compliance with modern slavery prevention measures. The Council's robust procedures for vetting new employees include verifying their age, identity and qualifications. Employees are paid directly into personal bank accounts to prevent exploitation. In accordance with the Asylum, Immigration and Nationality Act 2006, all prospective employees must provide evidence of their eligibility to work in the UK. References are requested and thoroughly followed up. The Council's Terms of Employment allow employees to join unions and terminate employment freely, and outline procedures for overtime working.

Agency workers: The Council engages employment agencies to source additional workforce capacity through our managed service provider. Contracts with external agencies strictly prohibit any attempts to restrict the freedoms of temporary workers

or impose worker-paid recruitment fees. We ensure that all agency workers are treated fairly and ethically, in line with our commitment to preventing modern slavery.

Expectations of suppliers: The Council is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with respect and dignity and act ethically and within the law in workforce matters. The Council has a [dedicated procurement website](#), and our supplier guidance contains a 'Supplier Checklist'.

Due Diligence

The Council requires its contractors and suppliers to demonstrate their commitment to supporting human rights within their supply chain relating to, for example, child labour, forced labour, health and safety and working hours. The Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. This is the responsibility of the particular Council contracting managers with the support of the Council's Commercial and Contracts Team. The Council's due diligence measures in place include:

- The implementation of measures in the evaluation of suppliers to enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act.
- Clarity that if a supplier misrepresents any information, the supplier may be excluded from the procurement process and from bidding for other contracts in the future. If information comes to light after a contract has been entered into, that supplier may be sued for damages and the contract rescinded.
- A review of contract terms and conditions and appropriate clauses for inclusion to ensure compliance with the Modern Slavery Act. Such terms and conditions are also applicable to sub-contractors in the supply chain.
- Embedding a county-wide approach to contract management to consider any potential risk of slavery as it relates to each contract, and through active contract management to more effectively ensure that slavery and human trafficking is not taking place in the supply chain.

Training

The Council has an e-learning module available to all staff entitled 'Modern Slavery and Human Trafficking'. It includes information and guidance on what modern slavery and human trafficking are, forms they might take, legal protections and obligations, how to identify and raise concerns about modern slavery or human trafficking, risks to children and adults, and further resources.

Awareness is also raised with all social care employees about modern slavery and the UK framework for tackling it, explaining specific responsibilities to different services. This includes the NRM, how to identify and support victims of modern slavery and human trafficking, the West Midlands local procedures for children affected by exploitation and trafficking, and the modern slavery helpline for the public.

As part of the NRM Coordinator role, the Council delivers bespoke training and awareness raising to multi-agency partners and to specific services. The coordinator also works with the Police Modern Slavery Trainer and the IMSA who deliver modern slavery training in collaboration to reach wider audience.

In addition, the IMSA delivers training as part of the Safer Warwickshire Partnership arrangement for organisations whose staff may encounter victims of modern slavery. This includes delivering training for local authorities, police, third sector organisations, educational institutions and the NHS. These training sessions focus on recognising potential victims and outlining steps to secure support for them.

General awareness raising is undertaken across the Council periodically in respect of Modern Slavery and Whistleblowing so that all staff are aware of key policies and procedures that should be followed if concerns are raised.

Partnerships

The Council works in partnership with a wide range of partners and agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. This includes District and Borough Councils, Warwickshire Police, the Police and Crime Commissioner for Warwickshire, West Midlands Anti-Slavery Network, Coventry and Warwickshire Integrated Care Board, local NHS Trusts, Border Force, Barnardo's, and local Safeguarding Boards.

[Safe in Warwickshire](#) is a collection of partner agencies who are members of the Safer Warwickshire Partnership Board, which works collaboratively to address crime and safety priorities and coordinates the Warwickshire Modern Slavery Steering Group. The Steering Group aims to bring together key local agencies to work collaboratively to ensure people who are identified or present as potential victims of modern slavery in Warwickshire are given the best advice and practical support available to protect them from harm.

[The Warwickshire Safeguarding Adults Board](#) is a multi-agency partnership which aims to help and safeguard adults with care and support needs. [The Warwickshire Safeguarding Children's Partnership](#) is a multi-agency partnership which aims to ensure children and young people are safeguarded and their welfare is promoted. Information about both of these partnerships can be found on the [Warwickshire](#)

[Safeguarding website](#). This website, along with the Council's own website, contains guidance, procedures and a toolkit relating to the trafficking and exploitation of children and on the duty to report.

[The Warwickshire Learning and Development Partnership](#) works jointly with local Integrated Care Services. It is part of an Association of Directors of Adult Social Services funded project to support providers to understand how to recruit and manage services to meet legal recruitment requirements.

Approval for this Statement

This statement has been approved by the Council's Cabinet. It will continue to be reviewed and provided annually.

Signature:

Date: 11-08-25

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