

#### OFFICER REPORT TO COUNCIL

# SURREY COUNTY COUNCIL'S DRAFT 2021/2022 MODERN SLAVERY STATEMENT

#### **KEY ISSUE/DECISION:**

The purpose of this report is to inform Council about Surrey County Council's draft 2021/2022 Modern Slavery Statement and seek approval for the statement in advance of its publication.

The publication of the statement is pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires certain organisations to publish an annual statement outlining actions that have been taken in the previous financial year to address modern slavery within their operations and supply chains.

#### **Executive Summary**

In Surrey, as part of our Community Vision for Surrey in 2030, the Council has an ultimate ambition-that no one is left behind. This means helping those who need us most and improving quality of life for everyone. For an organisation responsible for services as diverse as social care, community protection, education and much more, 'no one left behind' is an important touchstone to ensure we are serving all our residents to the best of our ability.

Modern slavery is a heinous practice affecting millions of people worldwide. These practices threaten an equitable and sustainable economy and often impacts the most marginalised and vulnerable members of our society. Following our guiding principle of "no one left behind" Surrey County Council is committed to addressing this problem in our community, operations, and supply chains. We have a responsibility to ensure that public spend and our activities do not cause, contribute or are linked to the exploitation of people.

This report outlines the steps we have taken during the 2021/2022 financial year to address modern slavery within our operations and supply chains. This is pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires certain commercial organisations to publish an annual Modern Slavery Statement. Impending changes to the legislation mean that public sector bodies meeting the threshold (such as Surrey County Council) will be legally required to publish a statement when the law is amended.

Due to the significance of the problem of modern slavery and the Council's commitment to tackle it, the statement is being brought to full Council for approval. This ensures that it is given attention by the highest level of governance of the organisation. Our first statement incorporates existing statutory guidance and best practice and includes information on our organisational structure and supply chain,

the various responsibilities for anti-slavery activities, and our policies in relation to modern slavery. It also includes information on our due diligence measures to respond to this problem including commitments the Council have made, partnership and collaborative work, engagement with our suppliers, measures to support and protect victims and training on modern slavery in supply chains that was delivered to our staff. The statement also touches on some of the planned activities we aim to undertake over the next financial year to address modern slavery in our operations and supply chains.

#### **BACKGROUND:**

Modern slavery is an umbrella term used to describe situations of exploitation where people are exploited for financial gain. It refers to situations that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power and vulnerability. It encompasses practices such as slavery, forced labour or compulsory labour, debt bondage, human trafficking, domestic servitude, and sexual exploitation. The eradication of modern slavery is part of the United Nations' sustainable development agenda, and it is interlinked with other developmental priorities such as those focusing on inclusive and sustainable economic growth, decent work, poverty and inequality.

The Council is committed to addressing modern slavery and have taken a number of important measures. For instance, hawse have made public declarations and agreements regarding modern slavery and have engaged in collaborative forms of work at community level. We have also taken a number of steps to tackle modern slavery such as raising awareness of modern slavery to our communities, establish measures to protect vulnerable groups against exploitation, and working together to support the identification and safeguarding of victims. We have also committed to addressing modern slavery in our supply chain by committing to vet our own supply chain to ensure no instances of modern slavery are taking place.

Impending changes to modern slavery legislation (Modern Slavery Act 2015) will place an additional responsibility on the Council to report on the steps taken to address modern slavery within our supply chains. The Council recognises the need to ensure that public spend is used for public good and does not contribute to modern slavery practices. We are therefore committed to being transparent in the activities we undertake to respond to this issue. We are also keen to seek approval of our first "Modern Slavery Statement" from full Council to demonstrate that this issue has been given attention by the highest level of governance of the organisation.

#### Section 54 of the Modern Slavery Act and extension to the public sector

The key legislation in the UK on this issue is the Modern Slavery Act which was introduced in 2015. Section 54 of the legislation requires commercial organisations with an annual turnover of £36 million or more to report publicly on their efforts to address modern slavery in their operations and supply chains. To comply with the legislation organisations meeting the threshold are legally required to publish a slavery and human trafficking statement for each financial year outlining the steps taken (or not taken) by the organisation to address modern slavery during this year. Statements must be approved at the highest level of an organisation, signed by the most senior member of the organisation, and published on their website with a link in a prominent place on their homepage.

The statement should focus specifically on supply chains and business operations and must "describe the steps your organisation has taken during the financial year to deal with modern slavery risks in your supply chains and your own business." Currently, Home Office statutory guidance recommends that statements include information on the following areas:

- Organisation structure and supply chains;
- Policies in relation to slavery and human trafficking;
- Due diligence processes;
- Risk assessment and management;
- Key performance indicators to measure effectiveness of steps being taken;
- Training on modern slavery and trafficking.

Following an independent review and public consultation of the legislation, the government announced plans to make changes to the legislation. In addition to mandating the aforementioned reporting areas listed, the government announced that it will extend Section 54 obligations to public bodies with a budget of £36 million or more, including local authorities in England and Wales. While extending Section 54 will require legislative changes, in March 2022 the Home Office acknowledged in a letter to public sector bodies that this change will be introduced as soon as parliamentary time allows and encouraged organisations to in any case produce a statement for the 21/22 financial year by 30 September 2022.

#### Surrey County Council's draft 2021/2022 Modern Slavery Statement

The draft 2021/2022 statement is the Council's first statement and demonstrates how we have responded to modern slavery risks in our operations and supply chains and some of our planned actions. Further work is being planned to support the Council in its approach to addressing this problem. This includes engaging with services and teams across the Council and designing and delivering tailored training to staff and ensuring that measures are recorded for reporting purposes in the Council's statements.

While the Council's first statement has touched on some of its planned actions, statements are primarily retrospective, focusing on the actions that have already been taken in the last financial year to tackle modern slavery in its organisation and supply chains. It is not a policy or a strategy document, but rather an annual reporting mechanism.

The aim is to have the statement published by 30 September 2022. However, prior to publication, it is important that the statement is approved and signed as required by Section 54 of the Modern Slavery Act 2015. It is anticipated that the statement will be approved by Council and co-signed by the Chief Executive and Leader of the Council.

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It is recommended that Council approves SCC's draft 2021/2022 Modern Slavery Statement (see Annex)

#### **Lead/Contact Officers:**

Dr Akilah Jardine, Senior Policy Lead on Modern Slavery

## Sources/background papers:

None.

#### **Annexes:**

Annex 1 - Surrey County Council's Draft 2021/2022 Modern Slavery Statement

Annex 1: Surrey County Council's Draft 2021/2022 Modern Slavery Statement

Modern Slavery Statement for the financial year ending 2021/2022

June 2022 [Draft]



#### **Executive summary**

Modern slavery is a heinous practice affecting millions of people worldwide. These practices threaten an equitable and sustainable economy and often impacts the most marginalised and vulnerable members of our society. Following our guiding principle of "no one left behind" Surrey County Council is committed to addressing this problem in our community, operations, and supply chains. We have a responsibility to ensure that public spend and our activities do not cause, contribute or are linked to the exploitation of people.

The Council is committed to addressing this problem and have taken a number of important measures. This statement outlines the steps we have taken during the 2021/2022 financial year to address modern slavery within our operations and supply chains. This is pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires certain organisations to publish an annual Modern Slavery Statement. Our first statement includes information on our organisational structure and supply chain, the various responsibilities for anti-slavery activities, and our policies in relation to modern slavery. It also includes information on our due diligence measures to respond to this problem including commitments the Council have made, partnership and collaborative work, engagement with our suppliers, measures to support and protect victims and training on modern slavery in supply chains that was delivered to our staff. The statement also touches on some of the planned activities we aim to undertake over the next financial year to address modern slavery in our operations and supply chains.

#### Introduction

Modern slavery is an umbrella term encompassing exploitative practices such as slavery, servitude, forced or compulsory labour and human trafficking. This statement is pursuant to Section 54 (transparency in supply chains) of the UK's Modern Slavery Act 2015 and sets out actions taken by Surrey County Council to address the risk of modern slavery in our operations and supply chains. This includes ensuring that the goods and services we procure do not contribute to modern slavery in the UK and globally and protecting and safeguarding vulnerable people and workers from exploitative practices. We are committed to understanding where the risks to people being exploited lie within our own organisation and supply chains and putting in place measures to prevent and respond to cases.

In Surrey, as part of our Community Vision for Surrey in 2030 (the 2030 vision) the Council has an ultimate ambition-that no one is left behind. This means helping those who need us most and improving quality of life for everyone. For an organisation responsible for services as diverse as social care, community protection, education and much more, 'no one left behind' is an important touchstone to ensure we are serving all our residents to the best of our ability. Our organisational strategy sets out our contribution towards achieving the outcomes in the 2030 Vision.

The Council has made public declarations and <u>agreements regarding modern</u> <u>slavery</u> and has engaged in collaborative forms of work at community level. We have also taken a number of steps to tackle modern slavery such as raising awareness of modern slavery to our communities, establish measures to protect vulnerable groups against exploitation, and working together to support the identification and safeguarding of victims. However, we have recognised the need to undertake further work in our operations and supply chains to ensure that our own activities do not contribute, cause or are linked to modern slavery practices. Surrey County Council is therefore committed to tackling this problem and being transparent in our anti-slavery activities and outcomes.

As this is our first statement, it demonstrates how we have started responding to modern slavery risks in our operations and supply chains and some of our planned actions. We believe that tackling modern slavery requires continuous improvement and therefore we are committed to keeping track of measures that are put in place to ensure effectiveness of actions taken.

This statement relates to the steps taken by the Council during the financial year 1 April 2021 to 31 March 2022.

#### Our organisational structure and supply chains

Our Corporate Leadership Team provides strategic direction to the whole council which is organised into the following directorates:

Corporate Resources

- Children, Families, Lifelong Learning and Culture
- Health, Wellbeing and Adult Social Care
- Environment, Transport, and Infrastructure
- Public Service Reform
- Customer and Communities
- Community Protection Group
- Communication, Public Affairs and Engagement
- Partnerships, Prosperity and Growth

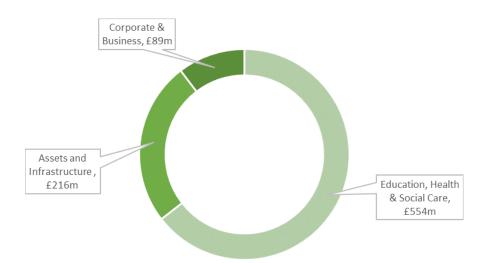
Surrey County Council has partnered with East Sussex County Council and Brighton & Hove City Council to develop Orbis Procurement – a shared service partnership working together to deliver lean procurement support, shared learning to achieve excellent outcomes, and shared resource for the delivery of achieving value for money for our residents. Collectively, we comprise of one of the largest public procurement spend in local government. Orbis Procurement service delivers a significant amount of our projects annually, and therefore its contribution to our antislavery activities is vital.

The three authorities have committed to developing an approach to respond to modern slavery in our operations and supply chains. This responsibility will rest with Orbis Procurement on behalf of Surrey County Council, East Sussex County Council and Brighton & Hove City Council. The Director of Orbis Procurement sits within Surrey County Council and reports to the Director of Corporate Resources. The three authorities have also jointly funded the establishment of a new Senior Policy Lead on Modern Slavery role for Orbis Procurement to help design, deliver and coordinate our anti-slavery in supply chain activities.

For each of the authorities where services are not procured directly by the Councils, they are procured via Orbis Procurement on behalf of the Council. This statement reports on activities related to these services. Further work will be required to map services procured directly by the Council. These services are often significantly lower in value and spend and are governed by the Council's procurement and contract standing orders. Therefore, it is anticipated that such work would require longer-term assessments in collaboration with other teams working across the Council. Focusing on services procured via Orbis Procurement in the short-term allows us to ensure adequate prioritisation of modern slavery risks and allocation of shared resources to respond to these risks.

During the 2021/2022 financial year the Council spent approximately £859 million with 6,060 suppliers, procured via Orbis Procurement's services on behalf of the Council.

The diagram below demonstrates the distribution of this spend:



# Responsibility for anti-slavery activities in our operations and supply chains

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Activity	Responsibility
Approving the modern slavery statement	- Council
Signing the modern slavery statement	<ul><li>Leader of the Council</li><li>Chief Executive</li></ul>
Drafting and reviewing the modern slavery statement	Orbis Procurement Senior Policy     Lead on Modern Slavery     Orbis Procurement Senior     Leadership team     Representatives from:     Procurement; Legal; Human     Resources; Audit, Safeguarding;     and Community safety teams  Orbis Procurement Senior Policy
Assessment and prioritisation of modern slavery risks for services procured via Orbis Procurement on behalf of the Council	- Orbis Procurement Senior Policy Lead on Modern Slavery
Modern slavery due diligence in the supply chain for services procured via Orbis Procurement on behalf of the Council	<ul> <li>Orbis Procurement Senior Policy Lead on Modern Slavery</li> <li>Heads of services</li> <li>Commissioning managers</li> <li>Procurement teams</li> <li>Contract managers</li> </ul>
Education and training of procurement personnel	Orbis Procurement Senior Policy     Lead on Modern Slavery
Education and training of wider council and staff, including councillors	<ul> <li>Orbis Procurement Senior Policy         <ul> <li>Lead on Modern Slavery</li> <li>Safeguarding and Community</li> <li>Safety teams</li> </ul> </li> </ul>

	and responding to	
suspected	cases of modern slavery	•

 All staff is responsible for identifying and responding to suspected cases of modern slavery.

#### Our policies in relation to modern slavery

Surrey County Council recognises the importance of policies to communicate commitments and our expectations of our staff, suppliers, and those who we do business with, to effectively address modern slavery. We recognise that modern slavery sits on the extreme end of the labour exploitation continuum. Therefore, we have several policies with respect to fair labour and employment conditions that work to prevent and respond to a range of issues, including modern slavery, in our operations and supply chains.

The following are our key policies, procedures, and codes of conduct in relation to modern slavery.

- Council Constitution
- Whistleblowing Policy
- Social Value Policy
- Officers Code of Conduct
- Health and Safety Policies
- Working Time Regulations Policies
- Recruitment Policies
- Equality, Diversity, and Inclusion Policies
- Grievance Resolution Policy and Procedure
- Domestic Abuse Policy
- Trade Unions Policy

Details of these policies and their relevance to modern slavery can be found in the **Annex.** 

#### Modern slavery due diligence

In addition to our existing policies which are relevant to the anti-slavery agenda, Surrey County Council has undertaken the following due diligence measures to respond to modern slavery risks within our operations and supply chain:

#### **Anti-Slavery Commitments**

In 2018, we joined the Co-operative Party Charter Against Modern Slavery. The Charter commits Councils across England and Scotland to proactively vet their own supply chain to ensure no instances of modern slavery are taking place. This includes committing to take actions such as reviewing contractual spending to

identify potential modern slavery risks, train procurement teams, and engaging with suppliers. We recognise that while commitments are important, they alone cannot address modern slavery and that further practical action is needed.

#### Partnership and Collaboration

In addition to our shared-service partnership through Orbis Procurement which helps to coordinate our anti-slavery approach, we are engaged in multi-agency anti-slavery partnerships. The Surrey Anti-Slavery Partnership aims to eradicate human trafficking and slavery. The partnership strives for a community where awareness of all forms of human trafficking and modern slavery is commonplace, and that across all sectors people work collectively and steadfastly to eradicate its existence in our community and support victims. The partnership comprises of members from the voluntary community and faith sector, the police, Surrey County Council, borough councils, Office of the Policy & Crime Commissioner, Surrey Chambers of Commerce, Trading Standards, and Surrey Clinical Commissioning Group. The group's purpose is to support and enable the discovery of and response to incidents of human trafficking, slavery, and exploitation with a victim-centred, multi-disciplinary and collaborative community effort. In January 2022, the partnership established and circulated a draft modern slavery pledge to local parishes for feedback. The pledge aims to encourage churches and small businesses to commit to actions such as providing regular training to staff, use recruitment methods to prevent modern slavery from occurring, and ensure that suppliers and contractors have employment procedures that eliminate the risk of modern slavery. Plans to review and circulate the pledge more widely are currently underway.

We also have representatives who are part of the Sussex Anti-Slavery Network. Members of this multi-agency partnership include West Sussex County Council, Brighton & Hove City Council, East Sussex County Council, Office of the Sussex Police & Crime Commissioner, East and West Sussex Fire and Rescue Services, Sussex Clinical Commissioning Groups, and the Gangmasters and Labour Abuse Authority. The aim of the partnership includes asserting and supporting organisations' responsibility towards tackling modern slavery, sharing intelligence and best practice, and developing preventative strategies. We also have representatives who are part of the Brighton & Hove Anti-Slavery Network. This group also focuses on monitoring progress in addressing modern slavery and includes representatives from within the local authority (such as children's and adult social care, housing) and organisations such as Sussex Police, Sussex Clinical Commissioning Groups and East Sussex Fire and Rescue. While these partnerships contribute to action against modern slavery, we recognise the need to bring a business and supply chain element to their focus. This includes co-ordinating with the network to engage with local businesses and suppliers.

#### **Supplier Engagement**

We recognise the need to ensure that modern slavery requirements are consistently implemented throughout our procurement to effectively tackle this problem. We are developing and strengthening existing measures to engage with our suppliers on the problem of modern slavery. Such measures include reviewing modern slavery clauses in contracts and procurement materials such as tender and specification

documents to ensure that the Council and our suppliers adequately respond to modern slavery risks.

#### **Victim Support and Protection**

Surrey County Council recognises that having adequate safeguarding measures can help identify potential victims, support them in their rehabilitation and protect them from further victimisation. Surrey County Council's Community Safety Team have introduced an open access support page to ensure all individuals have enough information to make appropriate choices in referral and information sharing regarding Modern Slavery. There has been an increase in the number of referrals made into the National Referral Mechanism and we continue to receive valuable intelligence related to the demographics and characteristics of victims and the type of exploitation experienced. This information has been particularly useful in being able to identify potential victims and vulnerabilities such as those facing vulnerable migrant workers, adults with multiple complex needs and children forced into criminal exploitation. We have also benefited from the support of the Independent Child Trafficking Guardians whose focus is supporting children. Consequently, a key area of focus has been to prevent further victimisation and increased risks to exploitative practices such as labour exploitation where there are limited opportunities for victims and vulnerable people to support themselves, this has been supported by the national charity Justice & Care who support adult victims of Modern Slavery across Surrey.

#### Training on modern slavery

We recognise the importance of raising awareness of modern slavery amongst our staff. We are committed to designing and delivering training to our staff, including providing targeted training to key personnel.

We have delivered one virtual training session on modern slavery risks in supply chains to staff. The training was delivered on three different slots to enable staff to attend. It lasted approximately 2 hours and focused on improving our staff's understanding of the problem of modern slavery in supply chains. The training, which will be distributed in phases to different teams, was first delivered to our staff working across Orbis Procurement for the three authorities. Sixty-eight percent (68%) of procurement staff undertook the training. This included people working in various roles such as Heads of Procurement, Procurement Specialists, Contract & Supply Specialists, and Strategic Procurement Managers. The contents of the training included:

- Definition of modern slavery
- Types of modern slavery
- Vulnerabilities to exploitation
- General signs of exploitation
- Nature and scale of slavery globally and in the UK
- Introduction to the UK's Modern Slavery Act and Section 54 on Transparency in Supply Chains

- Enablers of modern slavery in supply chains and high-risk sectors
- Relevance of modern slavery to the public sector
- Different responsibilities within our organisation for tackling modern slavery
- Commitments of Surrey County Council, East Sussex County Council and Brighton & Hove City Council in addressing modern slavery, including planned actions (see following section).

To assess our staff's knowledge and awareness of modern slavery, we assessed a short questionnaire completed by staff before and after the training was delivered. Of those responding to the questionnaire, there was a marked difference in their understanding of modern slavery. Prior to the training, most respondents (56%) reported that they had a poor (knew hardly anything about modern slavery) or fair (knew a little about it, but was unsure of how it was relevant to their role) understanding of modern slavery. Forty-two (42%) reported that they felt they had a good understanding of modern slavery and its relevance to their role but were unsure how to embed this into their work to address it. Only 2% of respondents reported an excellent understanding i.e., good understanding of the problem, its relevance to their role and how to embed anti-slavery action into their work. Following the training, most respondents rated their understanding as either good or excellent. See table below.

Level of understanding		After training
Poor (I hardly know anything about it)	9%	0%
Fair (I know a little about it, but I am not sure how it is relevant to my role)	47%	6%
Good (I have a good understanding of modern slavery and its relevance to my role, but I am unsure how to embed this in my work)		74%
Excellent (I have a good understanding of modern slavery, its relevance to my role and how to embed this in my work)		21%

We also collected feedback from staff to inform future training and materials to ensure usefulness and effectiveness of training delivered. This is particularly important for ensuring that our staff have the knowledge, confidence, and skills to embed anti-slavery action into their work. It is anticipated that the training will be reviewed and repeated on an annual basis.

#### Looking ahead: Our plans for 2022/2023

Surrey County Council is committed to ensuring that our anti-slavery approach is effective in tackling modern slavery in our operations and supply chains. Therefore, over the next financial year some of the activities we aim to undertake include:

• Review policies to consider how we can strengthen them.

 Working with other stakeholders across the Council to understand services procured directly by the Council to support modern slavery due diligence of these activities.

 Assess and prioritise areas within our organisation and supply chains at highrisk of modern slavery.

Review our procurement processes and identify areas to embed anti-slavery

activities in the procurement lifecycle.

Strengthen engagement with our suppliers to address modern slavery in

supply chain risks.

• Design and deliver targeted training to key roles and responsibilities within our

organisation.

Develop performance indicators to measure the effectiveness of actions

Publish a modern slavery statement for the 2022/2023 financial year.

Approval of statement

This statement has been approved by Council on [insert date here]. It will be

reviewed and updated on an annual basis.

Signed:

Joanna Killian, Chief Executive

Tim Oliver, Leader of the Council

[Insert signature here]

[Insert signature here]

Date: [Insert date here]

**Annex: Organisational Policies** 

Policy	Relevance to tackling modern slavery
Council Constitution	Surrey County Council's Constitution sets out how the council conducts its business, how decisions are made and the procedures
	to be followed to make sure that these are efficient, transparent and accountable to local people. The "Procurement and Contract Standing Order" in the Constitution sets out how the Council authorises and manages spending and contracts with other
	organisations. The procurement approach is relevant to tackling modern slavery as it covers issues such as: social sustainability measures to ensure that supply chain partners operate fair and
	ethical working practices; the requirement of procurement teams to work closely with human resources to manage direct and indirect employment arrangements (such as temporary workers, agencies,
	and consultants); and ensuring that relevant policies and codes of conduct are communicated to suppliers.
Whistleblowing Policy	Our whistleblowing policy enables individuals to feel confident in raising a serious concern and reassures that they will be protected from possible reprisal or victimisation. The policy covers: all council employees; members of the council; those carrying out work for the
	Council on our premises, such as agency workers, contractors, and consultants; providers of works services and supplies, including external contractors; and those providing services under a contract with the council in their own premises, for example, care homes. The
	policy provides information on how individuals may raise concerns confidentially and how they will be dealt with. This policy is important for individuals wanting to raise concerns about modern slavery and/or related issues.
Social Value Policy	The aim of this policy, and the accompanying guidance, is to set out how Surrey County Council will deliver maximum social, economic and environmental value, not only through its commissioning,
	procurement, and contract management activities but also through enabling wider collaboration and resource sharing between people
	and organisations across the county. The policy and accompanying guidance are relevant to tackling modern slavery as they encourage commissioners to identify social issues that might be connected to a
	project or service. This is relevant for projects or services where the risk of poor working practices and modern slavery are high.
Officers' Code of Conduct	The purpose of this Code is to help employees support the Council's aim to provide high quality services fairly and efficiently in line with
	its values of listening, responsibility, trust, and respect. The Code of Conduct, which applies to all council employees, agency workers and contractors, outlines the expectations of the organisation in
	terms of the behaviour of individuals whilst working for, or on behalf of, the Council. This is relevant to the anti-slavery agenda as the
	Code expects employees to behave ethically and maintain high standards of personal conduct and be aware of and act in accordance with the Council's values and behaviours.

# Health and Safety

The Council has various policies which aim to promote high standards and good practices in relation to health, safety, and welfare. This includes a Health and Safety Manual on aspects of work such as safe workplaces, safe equipment, and training and supervision. These procedures are important to tackle modern slavery as victims of forced labour and modern slavery may be at increased risk of work-related injuries due to inadequate protective equipment and health and safety measures, including appropriate training.

### Working Time Regulations Policy

The Council recognises that excessive overtime beyond permitted national legal limits can contribute to forced labour practices when coupled with forms of threat. The Working Time Regulations Policy sets out the Council's position regarding working time in line with the Working Time Regulations 1998. This policy applies to all Surrey County Council's employees who are defined in the regulations as "workers" and includes all permanent, part-time, temporary, and casual employees and relief workers employed by the Council. Managers using agency workers are expected to ensure that the limits to working time and rest break requirements are applied to these workers when they are working for the Council.

#### Recruitment

The Council has several recruitment policies to ensure that we have the right people with the right skills in the right place at the right time. Key policies include:

Resourcing policy: This covers various aspects of the resourcing process such as human resource planning, internal progression, recruitment, selection, and induction. It ensures that relevant eligibility and safeguarding checks are in place in the hiring process. This includes ensuring eligibility of successful candidates to work in the UK and confirming qualifications and experience.

Safe employment and disclosure and barring service policy: This enables the Council to fulfil its statutory obligations to perform appropriate background checks on employees and volunteers who carry out certain roles that involve working with children or vulnerable adults. This policy applies to individuals who are, or wish to be, directly engaged by the Council to carry out work duties and voluntary activities on its behalf. The policy does not cover contractors or agency workers.

Short term resourcing needs policy: The policy covers the management of temporary or short-term resourcing needs, including the use of agency workers or consultants. Managers are responsible for ensuring there is a clear business case based on the urgency of service needs, potential scarcity of skills and the impact insufficient staffing would place on the service prior to engaging a temporary worker. The Council have a managed service provider who supplies all agency workers. The Council have set out the responsibilities for the agency as a hiring manager throughout their assignment. The policy recognises the rights of agency workers including the rights

under the Agency Workers Regulations 2010 which gives agency workers the entitlement to the same or no less favourable treatment as comparable employees with respect to basic employment and working conditions, if and when they complete a qualifying period of 12 weeks in a particular job.

#### Equality policy

Equal opportunities in employment policy: This policy ensures that the Council provides equal opportunity in employment and service provision. This includes ensuring that terms of employment, benefits, facilities, and services are afforded equally to all employees in the same or similar circumstances. We also have an Equality, Diversity, and Inclusion (EDI) action plan for 2021 to 2022 which aims to make EDI central to the council's culture.

The above policies are relevant to the anti-slavery agenda as they cover aspects of work where vulnerable people could be taken advantage of and exploited. The Council recognises that victims of modern slavery can be exploited in legitimate jobs with legal terms of employment but exploited by others unrelated to the Council. Therefore, the above policies are important to ensure that potential victims and vulnerabilities are identified during the resourcing and recruitment process. The Council also recognises that certain vulnerable, marginalised, and underrepresented groups are at a higher risk of poor labour and employment practices and therefore our equality and diversity policies ensure that every member, manager, and employee have a duty to be aware of equality issues in their daily activities. Additionally, the policies are relevant to the anti-slavery agenda as they cover aspects of work where vulnerable people accessing our services could be taken advantage of and exploited.

#### Grievance Resolution Policy and Procedure

The Council is committed to creating a positive working environment in which managers and employees can discuss any problems or concerns openly and deal with them promptly and fairly. This policy's objective is to encourage staff to resolve any issues as quickly, locally, and informally as possible and the procedure and associated guidance have been devised to support managers and employees when complaints have been raised formally. There is also a Procedure and Guidance document to assist those involved of the approach required to handle the grievance resolution process effectively and fairly. Grievance mechanisms are important to tackle modern slavery as it involves an additional route by which employees can raise complaints or concerns.

#### Domestic Abuse

This policy gives guidance to managers on how to recognise and support employees who are victims of domestic abuse and how to deal with employees who are perpetrating domestic abuse. The principles and standards apply to all employees and temporary workers whilst working for, or on behalf of, the Council. This does not require that all those involved in an incident of Domestic Abuse are Surrey County Council employees. The policy educates managers on signs that may indicate an underlying domestic violence issue such as a drop in performance, increased absenteeism, deliberate isolation at work and showing obvious signs of stress and nervousness. While this policy focuses specifically on domestic abuse, it is important for tackling modern slavery as cases may share similar indicators of abuse.

#### Trade Unions

At Surrey County Council unions meet very regularly with the Council's management to discuss a wide variety of issues and to feedback staff concerns and issues. The Council provides information to staff on the benefits of trade union membership and information on how to join a union. The Council has published guidance on the Facilities and time off for Trade Union duties and aims minimise The guidance to avoid misunderstandings, ensure fair and consistent treatment and facilitate better planning for trades unions duties and activities. The Council recognises that trade union representation in the workplace can help reduce the risk of modern slavery by representing the interest of workers, ensuring fair working practices, supporting workers in negotiating their terms and conditions, and the resolving of grievances.

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