

Oxfordshire County Council Modern Slavery and Human Trafficking Statement 2023/24

Introduction

Oxfordshire County Council has an ethical duty as an employer and service procurer to manage and reduce the impacts of modern slavery and human trafficking. We are committed to taking action on modern slavery risks across all our services, both direct and commissioned.

The Modern Slavery Act 2015 addresses issues of “slavery, servitude and forced or compulsory labour”. In its wider sense, this includes:

- Sexual exploitation
- Labour exploitation
- Criminal exploitation
- Financial exploitation
- Domestic servitude
- Human trafficking
- Child slavery
- Forced or early marriage
- Offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003

This statement outlines the policies and processes we have in place for managing risk, identifying occurrences, and preventing slavery and human trafficking.

Policies and procedures

Codes of Conduct – All members must comply with the [Members’ Code of Conduct](#), which sets out the ethical framework in which they must act and behave as part of the council’s business. The [Officers’ Code of Conduct](#) sets out the expectations and principles all employees must follow.

Working Time Regulations – We follow regulations arising from the Working Time Directive of the European Union which ensures the health and well-being of our employees by laying out the minimum appropriate conditions pertaining to weekly work hours, annual leave and rest breaks during workdays.

Pay Policy – We have nine pay schemes in operation which are agreed with trade unions, ensuring that all employees are paid fairly.

Recruitment – We ensure all new employees are properly vetted and provide guidance on pre-employment checks to hiring managers so that they verify candidates’ identities, their right to work in the UK, qualifications, and possession of their own personal bank account.

Agency workforce and fixed-term contracts - We ensure that all those we employ are treated fairly, including on matters of pay and working hours. We have a policy on fixed-term contracts of employment which ensures similar terms and conditions of

permanent employees. Agency workers are hired from the council's approved agencies who carry out all necessary pre-employment checks.

Ethical Procurement Policy Statement – Our expectation is that all stages of the supply chain, including for goods and services procured from third parties, are ethically sourced and suppliers are legally compliant and respect the dignity and safety of their workers. We expect suppliers to have suitable and ethical policies in place, and concerns or reports to them must be taken seriously. We reserve the right to terminate the contract of any supplier who does not comply with these standards or take appropriate action following a challenge or disclosure.

Social Value Policy – Our Social Value Policy specifically addresses the risk of modern slavery by including three relevant measures for our bidders to disclose:

- Number of full-time equivalent (FTE) employees hired on the contract that are survivors of modern slavery.
- Initiatives taken throughout the local and global supply chain to strengthen the identification, monitoring and reduction of risks of modern slavery occurring in relation to the contract.
- Number of FTE employees in the supply chain with specific responsibility to identify and manage the risk of modern slavery occurring in relation to the contract.

These measures are prioritised during the bidding process, where eligible, to encourage prospective suppliers to select them as part of their bid offer. Contracted suppliers are required to meet the targets they set during bidding which are monitored through contract delivery.

Whistleblowing Policy – We encourage all our employees, including contractors and agency staff, to report any concerns around council activities or supply chains without fear of discrimination, victimisation, or any other negative consequence. Our whistleblowing policy aims to facilitate disclosures employees may wish to make easily and safely.

Employee training

There is a range of training available for all employees of the council to make them aware of the signs that may indicate abuse and mistreatment, and how to manage risks and suspected cases. All employees are required to complete basic training on safeguarding children and adults.

Risk management

Our Procurement Hub oversees all our procurement and tendering activities above £100,000, ensuring our process fulfils its legal obligations and appropriately manages the risk of modern slavery throughout the procurement lifecycle.

Our Quality Improvement Team works across Adult and Children's services to monitor our providers and share findings with relevant partners.

Partnership working

We are a member of the Safer Oxfordshire Partnership (also known as 'Safer Oxfordshire'), which provides strategic oversight and direction for preventing crime and anti-social behaviour. The partnership supports the four Community Safety Partnerships (CSPs) led by the district councils, which act as a single point of contact for the office of the Police and Crime Commissioner and help co-ordinate community safety priorities.

We are members of the Oxfordshire Health and Wellbeing Board, associated Health Improvement Board and The Children's Trust. We also work closely with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) and are members of the Oxfordshire Safeguarding Adults Board (OSAB) and the Oxfordshire Safeguarding Children's Board (OSCB). These relationships allow us to work in collaboration with other key system partners.

We are part of a co-ordination group to deliver the statutory community safety requirements across the county with district councils, Thames Valley Police, the National Probation Service, the BOB ICB, and the voluntary sector.

We take our responsibilities seriously in escalating and tackling slavery and exploitation in all its forms. Our connections and broader work as a council are outlined within the Safer Oxfordshire Partnership's strategy and action plans.

Safeguarding

We are committed to safeguarding children and vulnerable adults, and we ensure that our policies and protocols protect the welfare of those with additional needs, as well as making sure we can identify and mitigate sources of harm to them.

We have established clear referral pathways around modern slavery. Referrals to Adult Social Care and Children's Social Care are handled by trained officers and details around referrals are passed onto the Oxfordshire Safeguarding Adult Board, or the Multi-Agency Safeguarding Hub (MASH). The Oxfordshire Safeguarding Children's Board is also informed of relevant reports.

Approval

This document constitutes Oxfordshire County Council's modern slavery and human trafficking statement, made with reference to Section 54(1) of the Modern Slavery Act 2015, and relates to all services and activities across the Council.

This policy has been approved by Oxfordshire County Council's Cabinet on the 18th June 2024.

Corporate Lead: LORNA BAXTER

Council Lead: CLLR LIZ LEFFMAN