



South Hams and West Devon Modern Slavery and Human Trafficking Statement 2020/21

1. Introduction

This statement sets out South Hams District Council and West Devon Borough Council's (SHWD Councils) actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year April 2020 – March 2021.

As part of Local Government, South Hams and West Devon Councils recognise that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Councils responsibility as an employer, we also acknowledge our duty as a District Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

The Councils are absolutely committed to preventing slavery and human trafficking in our corporate activities, and ensuring that our supply chains are free from slavery and human trafficking.

What is Modern Slavery?

Modern slavery is where someone is held in domestic servitude (for example, a maid/servant in a home) and/or forced to work for little or no pay. It includes human trafficking (moving people from one place to another to be exploited) and sexual exploitation (selling people for sex or pornography).

People are often tricked into forced labour or servitude. A victim of modern slavery will have their movements controlled or restricted by another. It doesn't always mean they are imprisoned or in chains.

A situation can still be modern slavery if a person has given consent (agreed to do the work.) This is because people can feel pressurised into doing the work and staying with their exploiter. They may be vulnerable and unable to challenge (for example - children, those who are mentally ill or those who have a learning disability) or frightened what might happen to them or their family if they leave. A person committing modern slavery might use force, threats or deception (tricks) to keep that person.

Sometimes a victim of modern slavery may feel grateful for being provided with some food and accommodation if they are destitute. That doesn't make it right or legal – they are still being exploited.



Which industries are affected by Modern Slavery?

In the UK it is estimated that around 13,000 people are enslaved. It is more likely to be found in industries where there is high demand and low pay (manual work). Modern Slavery has been found in the following industries (not an exhaustive list):

- farming – including fruit, veg and flower picking
- HGV driving
- care homes
- hotels
- nail bars
- car washes
- charity bag collection
- domestic servants
- fishing
- tarmacking and paving
- restaurants and takeaways

Are certain groups more vulnerable to becoming victims of Modern Slavery?

Yes. Whilst it is possible for anyone to become a victim of Modern Slavery, the following groups are more at risk:

- young people
- women and girls (around 70%)
- homeless people
- people with little or no English, including asylum seekers and refugees
- people with learning disabilities
- people with mental health problems

2. Organisational Structure

Information about South Hams and West Devon Councils leadership team, including areas of responsibility can be found here:

- [South Hams Management](#)
- [West Devon Management](#)

3. Corporate strategy and priorities

South Hams and West Devon Councils corporate strategy and priorities can be found here:

- [Performance and Strategy - South Hams](#)
- [Performance and Strategy - West Devon](#)



4. The Councils' constitution

South Hams and West Devon Councils constitutions sets out how the Council operates, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people. Some of these processes are required by the law, while others are a matter for the Council to choose:

- [Who We Are and What We Do - South Hams](#)
- [Who We are and What We Do - West Devon](#)

5. HR Strategy

The HR strategy is reviewed annually to ensure it remains relevant. The strategy has the following themes:

- Continuous improvement (organisation)
- Continuous personal improvement
- Effective employee relations and engagement
- Learning and development
- Attracting the right people
- Health and Wellbeing

The following processes and procedures support the Council in meeting the requirements of the Modern Slavery Act.

Employment Policies

The Councils have an ongoing programme to update employment related policies regularly, the policies are introduced in conjunction with the recognised Trade Unions.

Recruitment

South Hams and West Devon Councils recruitment policies are reviewed and updated in conjunction with our recognised Trade Unions. This policies includes robust procedures for vetting new employees and ensures original documents are seen to verify identity and qualifications, and they are paid directly into an appropriate, personal bank account.

Confidential reporting policy

The Councils encourage all its staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our organisation's confidential reporting policy is published on our website and designed to make it easy for workers (Council and third parties) to make disclosures, without fear of victimisation, subsequent discrimination or disadvantage.



Staff Code of Conduct

South Hams and West Devon's Staff Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain. The Staff Code of Conduct was last updated in 2019.

Supplier/Procurement Strategy

The organisation 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 dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's procurement strategy will lead to the termination of the business relationship.

Agency workers

South Hams and West Devon Councils 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. We use a managed service, provided by Comensura Ltd, who contract out to agencies.

Councillors Code of Conduct

The Councils expect all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. Breaches are investigated by the Monitoring Officer or a representative of his/her choice.

Declaration of Interests

We expect all Councillors and employees to record and declare personal and prejudicial interests.

Councillors Induction and Training

Councillors complete induction training which include safeguarding training following election. Further training is offered to all staff and councillors on an ongoing basis through the safeguarding specialist and the Community Safety Partnership.

Safeguarding

The Councils reviewed and updated the safeguarding policy in November 2020. An internal audit was also completed in 2020 with a "good" outcome. A number of training sessions have taken place for staff. South Hams and West Devon Councils have a safeguarding specialist and three safeguarding champions. The safeguarding specialist regularly meets with other district council colleagues to share best practice of implementation and monitoring of relevant policies and procedures, to stay up to date with current legislation and to safeguard and promote the welfare of children and vulnerable adults and protect them from harm.



Partnership Working

The Council works in partnership with a wide range of agencies including Devon and Cornwall Police and Devon County Council Social Care teams to prevent neglect and abuse, to detect and report occurrences and to support victims.

Staff Training

Posters will be displayed on staff notice boards across the organisation, detailing where staff can go for help if they become aware of anyone who may be experiencing slavery. There is also further information on the website for staff who regularly work from home.

Awareness and information courses are offered regularly to staff, at no cost, through the South Devon and Dartmoor Community Safety Partnership.

6. Review

This statement has been approved by South Devon and Dartmoor Community Safety Partnership and the Senior Leadership Team (SLT) who will be responsible for ensuring the oversight of the annual review and update.