



Monmouthshire County Council

Tackling Exploitation & Supply Chain Transparency **Modern Slavery Statement 2025**

1. Overview

Monmouthshire County Council delivers a wide range of statutory and discretionary public services, provided directly through our own workforce, and through over 3125 private and third sector organisations.

In January 2020, Monmouthshire County Council signed the Welsh Government's [Code of Practice: Ethical Employment in Supply Chains](#). The Code's 12 commitments include tackling Modern Slavery and Human Trafficking. This Statement sets out the actions that the Council has taken, and will take, to ensure that there is no Modern Slavery and Human Trafficking in its own business or supply chains.

Monmouthshire County Council is fully committed to providing visibility to its Modern Slavery Statement and ensuring 'Transparency in Supply Chains'. To this end the Council is working in partnership with Welsh Government, the wider public sector, suppliers, service providers, and others to address Modern Slavery challenges and drive collaborative action with a view to reducing risks and incidence of modern slavery.

2. What is Modern Slavery?

In the UK, the Modern Slavery Act 2015 defines criminal offences of slavery, servitude and forced or compulsory labour and of human trafficking and includes measures for the protection of potential victims.

Slavery is any system in which principles of property law are applied to people, allowing individuals to own, buy and sell other individuals.

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic servitude, forced labour, criminal activity or have their organs removed to be sold.

In 2023, the National Crime Agency recorded 559 potential victims of trafficking in Wales, an increase from 536 in 2022.

There is no typical victim, and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they are unable to speak the language, have their travel and identity documents removed and are told that if they try to escape, they or their families will be harmed.

Locally and across the United Kingdom, criminal exploitation generally and ‘county lines’ drug trafficking in particular has become a prominent way in which people, particularly children, are increasingly exploited. ‘County lines’ is the practice of trafficking drugs into rural areas and smaller towns and cities, away from the major conurbations. Many factors contribute to the way in which vulnerable children and other individuals are exploited by traffickers, and it is an important factor that a child can never consent to their own exploitation.

The National Referral Mechanism (NRM) is the UK framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. The Single Competent Authority (SCA), is one of the UK’s competent authorities responsible for decision-making in the NRM and is part of the Home Office. However, due to delays in cases being considered by the Home Office, a Gwent pilot has been developed and responds to the NRM referrals. The NRM pilot means that decisions about NRM threshold will be made by local Safeguarding partners, including Children’s Services, Police and Health, although the positive ‘Conclusive Grounds’ decision, remains the responsibility of the SCA and determines the support offered to the individual

3. Our Policies

Monmouthshire County Council’s five-year Community and Corporate Plan 2022-2028 [MMCCCommCorpPlan_Final_EN.pdf \(monmouthshire.gov.uk\)](#) puts tackling poverty and inequality at the heart of the Administration’s priorities.

Commented [SJ1]: Jess, as per your email I have cut and pasted your suggested updates to better reflect the Gwent position. Do we have any figures that can be quoted with regards to how many NRM referrals we have had across Gwent - Monmouthshire and how this measures against the previous year? For clarity the statement relates to 2024 or the latest data that you have

Commented [SJ2R1]: Jess, further to the above comments, can the data be added to this paragraph to identify NRM referrals for 2024? It might also help if you could show data for 2023 so that the audience can gain some context as to whether referrals are going up or down

The Council's over-arching [Corporate Safeguarding Policy](#) incorporates this Modern Slavery Statement and sets out the Council's duty and commitment to safeguard and promote the wellbeing of children, young people and adults at risk and to ensure that effective practices are in place throughout the Council and its commissioned services. The policy covers all functions and services of the Council and applies to all Council employees, elected members, foster carers, individuals undertaking work placements and volunteers working within the Council.

Commented [JN3]: Insert hyperlink to document

Commented [SJ4R3]: Jess are you able to embed MCC's latest Corporate Safeguarding Policy into the text?

The other key strategies and policies include:

- The Council's Socially Responsible Procurement Strategy 2023-2028 (within [Doing business with us - Monmouthshire](#) web page) identifies "Improving Fair Work, Equity and Safeguarding practices adopted by suppliers", as one of the key strategic objectives of the strategy and is supported by a dedicated delivery plan.
- Delivery of the [Welsh Government's Code of Practice on Ethical Employment in Supply Chains](#) and the elimination of Modern Slavery, so that Monmouthshire County Council plays a leading role in making Wales hostile to modern slavery. The Council's other key Policies in this area include:
- **The Whistleblowing Policy** which enables Council staff and employees of the Council's contractors / suppliers to report unethical employment practices to the Council, and there is clear guidance available within this policy.
- **Employee Code of Conduct** makes it clear to employees the actions and behaviour expected of them when representing the Council. In performing their duties, they must act with integrity, honesty, impartiality and objectivity. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.
- **Safer Recruitment policy** - the Council aims at all times to recruit the person who is most suited to the particular job. The Council has robust recruitment processes, which includes document checks to ensure that candidates are allowed to work in the UK.
- **Agency workers** – the Council sources all agency workers and temporary staff through a neutral vendor agency provider whose Modern Slavery Statement sets out their zero-tolerance approach to modern slavery.

4. **Our supply chains**

The Council spends approximately; £150 million annually with over 3125 suppliers who provide a broad range of goods and services. 70.27% of our spend is with Welsh based companies. However, the Council recognises that our supply chains spread across the world, and that parts of the supply chain could be engaged in modern slavery. The Council has limited resources to monitor and manage our supply chains and so will focus on our direct suppliers and will require our suppliers to ensure that their supply chain is free from modern slavery.

The high-risk sectors for Modern Slavery include agriculture, leisure, hospitality, catering, cleaning, clothing, construction and manufacturing. A review of Council spend has shown that for the majority of the high-risk areas the Council provides the service in-house, utilises national frameworks and/or local suppliers. The risk of modern slavery and human trafficking by our direct suppliers is considered low.

Through the tendering process, the Council ensures that our direct suppliers are aware of our commitment to tackle modern slavery and human trafficking and that they also understand their obligations as a supplier or contractor of the Council.

The Council undertakes due diligence checks when considering taking on new suppliers and will seek to review its existing suppliers on an annual basis through its contract management arrangements. The due diligence and reviews include:

- Ensuring compliance with the s54 (Modern Slavery Act 2015) requirement regarding a Modern Slavery Statement and, as part of tender evaluation (for tenders above Public Contract Regulations 2015 thresholds) and ongoing contract management, consideration of the potential and likelihood of modern slavery; seeking mitigations from the supplier through a clear understanding of the suppliers' structure, business and supply chains and policies in relation to slavery and human trafficking.
- Conducting supplier assessments to create a risk profile focusing on financial stability and also covering insurance and compliance with various employment policies including the Welsh Government's Code of Practice: Ethical Employment in Supply Chains.
- Taking steps to improve sub-standard supplier practices, including the provision of advice to suppliers and requiring them to implement Action Plans; for example, to demonstrate compliance with safer recruitment guidelines.
- Participating in collaborative initiatives focused on human rights and socially responsible procurement policies in general and modern slavery and human trafficking in particular.
- Invoking sanctions in respect of suppliers who fail to meet our expectations or to improve their performance in line with an Action Plan, which includes a provision to terminate the business relationship.
- With all invitations to tender for business with Monmouthshire County Council over £1 million, there is an expectation that the supplier should be a signatory of the Welsh Government's Code of Practice: Ethical Employment in Supply Chains, and the question is posed directly in Pre-Qualification Selection Questionnaires . This is also encouraged in all other tenders.

5. Employee training

Monmouthshire County Council is committed to developing and delivering tailored training to our employees, including the Commissioning and Procurement Team, in order to raise awareness of modern slavery, human rights abuses and blacklisting.

A generic Safeguarding Awareness Training (Level 1) already exists which includes reference to Modern Slavery, and all Council employees are expected to complete it. There is more detail of Modern Slavery in the Safeguarding children Level two; and signposting to accessible information.

The enclosed link is accessible to employees across the Council [Modern Slavery and Human Trafficking \(learningpool.com\)](#)

The Modern Slavery Training addresses:

- The Council's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage or the provision of products by an unrealistic deadline.
- How to assess the risk of slavery and human trafficking in relation to various other aspects of the business, including resources and available support.
- How to identify the signs of slavery and human trafficking and action to be taken to report concerns and/or suspicions.
- The initial steps to be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to relevant parties within the Council (Multi-Agency Safeguarding Hub).
- The external help that is available, including the [Modern Slavery Helpline](#), [Gangmasters and Labour Abuse Authority \(GLAA\)](#) and the [Labour market enforcement - GOV.UK \(www.gov.uk\)](#).
- The messages, business incentives or guidance that can be provided to suppliers and other business partners and contractors to implement anti-slavery policies.
- The steps the Council should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios or to implement changes in business practices arising from an Action Plan, including the termination of the business relationship.

6. Duty to Notify

Specified public authorities have a duty to notify the Secretary of State of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. The 'duty to notify' provision is set out in Section 52 of the Modern Slavery Act 2015 and applies to local authorities in England and Wales which includes Monmouthshire County Council.

Guidance on the duty to notify is provided at:

[Modern slavery: duty to notify - GOV.UK](#)

This requirement in respect of potential victims of Modern Slavery is harnessed to responsibilities under the Social Services and Wellbeing (Wales) Act 2014 as set out in the Corporate Safeguarding Policy when, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

For concerns about children contact 01291 635669

For concerns about adults contact 01873 735492

Out of hours and on weekends contact 0800 328 4432

Alternatively, contact the Modern Slavery Helpline 08000 121 700

If an individual is perceived to be at an immediate risk of significant harm call '999'

There are factsheets and a poster that explain what you need to do if you think someone has been a victim of Modern Slavery:

Modern Slavery - Duty to Notify Poster

[6.2286 HO LL Duty of notice poster v2.pdf](#)

Modern Slavery – Duty to Notify Factsheet:

[6.2286 HO LL factsheet duty to notify copy V3.pdf](#)

7. What the Council has done

We have:

Action
Become a signatory of the Welsh Government's Code of Practice: Ethical Employment in Supply Chains
Developed a process for reviewing our supply chains to identify areas of high risk.
Developed and agreed implementation of the Modern Slavery training e learning programme
Continuing to support Welsh Government efforts to promote the Code of Practice and share best practice in relevant circumstances
Completed a review and updated the Council's tender documentation to ensure Modern Slavery and Human Trafficking issues are fully addressed which included clauses to: (i) Check that contractors who have a turnover above £36million have a Modern Slavery Statement. (ii) Include the Code of Practice: Ethical Employment in Supply Chains as a part of our tender documents.

8. What the Council will do

Monmouthshire County Council will take the following action in our efforts to ensure that there is no Modern Slavery or Human Trafficking.

Action
Appoint Elected Member Anti-Slavery and Ethical Employment Champion to oversee the implementation of the Code of Practice
To increase awareness and the number of referrals of potential victims of trafficking into the National Referral Mechanism (NRM)
To develop a Modern Slavery Communication Strategy to raise awareness across the Council and our supply chains.
In line with clause 7 of the Code of Practice, ensure that the Council carries out a regular review of expenditure and undertakes a risk assessment. We will: <ul style="list-style-type: none">• Identify any high-risk suppliers and monitor for human rights abuses and unethical employment practices which will become a standard agenda item in contract meetings and reviews.• Explore ways of working with our Tier 1 suppliers to raise awareness of Modern Slavery to prevent it from occurring through a formalised Risk Assessment process: 'Tackling Modern Slavery in Supply Chains'.• Ensure procurement personnel and devolved contract managers have access to the latest case studies and relevant intelligence on potential exploitative practices to use within procurement processes.

We shall seek to ensure that any new requirements arising from the review of Welsh Government's 'Code of Practice – Ethical Employment in Supply Chains' are fully implemented within procurement and associated working practices once it is released, including Fair Work Guidance arising from the Social Partnership & Public Procurement Bill.
Review and update where necessary the Modern Slavery Statement annually and report progress on this Action Plan.
Introduce a proportionate process for reviewing our supply chains and evaluating existing suppliers through the formal Risk Assessment guidance 'Tackling Modern Slavery in Supply Chains'.
We shall evaluate the benefits of registering with the new British Standard for managing the risk of Modern Slavery when it is published (BS 25700 & BS 20151)
Review and revise a Self-Assessment Questionnaire (SAQ) for use in circumstances where a high risk of exploitation becomes apparent within our supply chains.
We shall participate in campaigns and collaborative Human Rights initiatives aimed specifically at Modern Slavery and Human Trafficking, including pro-actively engaging with 'Anti-slavery Day'.
Review and update the Council's standard Terms and Conditions to ensure employment practices are considered as part of the procurement process.
<p>We will collaborate and deliver a targeted programme of Modern Slavery (virtual) training on a multi-agency basis and across the various Council service areas – , coordinated with wider Corporate Safeguarding training.</p> <ul style="list-style-type: none"> • In collaboration with Welsh Government and other partners, we shall scope the UK-national resources available for training and due diligence provided by the Crown Commercial Service and others. • We shall identify staff requiring training in ethical employment practices and seek to build awareness / capacity particularly amongst front-facing members of staff working in the Community. • We will keep records of who has undertaken training across the various service areas and target those where completion rates require improvement.
We shall seek to strengthen 'communities of practice' where Local Authorities work together to share best practice and achieve efficiencies of scale, e.g., sharing due diligence data across public, private and voluntary sectors to inform audits, etc. (using platforms such as TISCreport).
To develop the Council's Safeguarding Policy for Contractors which provides guidance to Contractors so that they understand their role in supporting the Council to safeguard and promote the wellbeing of children, young people and adults at risk from abuse, neglect or harm.

9. Supporting Material / Resources

In addition to the links highlighted throughout the Statement the Home Office has a range of documents and promotional material available –

[Modern slavery - GOV.UK](#)

10. Statement Sign Off

This Statement has been approved by the Councils Whole Authority Safeguarding Group and will be reviewed and updated annually.

Name:

Position with the Council:

Signature:

Date signed off:

County Councillor Ian Chandler Cabinet Member for Social Care, Safeguarding and Accessible Health Services, Monmouthshire County Council

Signature:

Date signed off:

Chief Executive Officer, Monmouthshire County Council

Name:

Signature:

Date signed off: