



## Modern Slavery and Human Trafficking Statement 2026

### Introduction

Modern slavery is often a hidden crime involving one person denying another person their freedom. It includes slavery, servitude, forced and compulsory labour and human trafficking. To tackle these crimes, the Modern Slavery Act 2015 (the “Modern Slavery Act”) was introduced. The Modern Slavery Act consolidates and clarifies modern slavery offences; toughens penalties and prosecution; and introduces greater support and protection for victims.

This statement sets out Leicestershire County Council’s main actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or in its supply chains.

This statement relates to actions and activities during the year 1st January 2025 to 31st December 2025 and it is intended to fulfil the requirements of Section 54(1) & 54(4) of the Modern Slavery Act 2015.

This statement covers the activities of Leicestershire County Council. The Council manages a wide range of services which are delivered both directly by the Council and through external organisations. The gross annual turnover of the Council is approx. £1.2 billion. The Council’s annual procurement spend is significant, covering sectors such as social care, construction, transport, and facilities management.

The Council also co-owns ESPO (Eastern Shires Purchasing Organisation) along with five other local authorities. A major part of ESPO’s business is the provision of compliant public sector frameworks, through which public bodies spend approximately £2.4 billion annually. Despite its scale, ethical procurement remains the touchstone of ESPO’s procurement operations. ESPO’s position on modern slavery can be read on its website<sup>1</sup>.

### What is Modern Slavery?

Modern slavery is not defined as a single term within the Modern Slavery Act, but the legislation criminalises two main categories of activities: -

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<sup>1</sup> <https://www.espo.org/Modern-Slavery-Statement>

- (1) Slavery<sup>2</sup>, servitude<sup>3</sup> and forced labour<sup>4</sup> and .
- (2) Human Trafficking<sup>5</sup>.

The Modern Slavery Act also covers other forms of exploitative behaviours<sup>6</sup>. A person does not need to regard themselves as a victim of modern slavery in order for the provisions of the Modern Slavery Act to be engaged.

In determining whether a person has been held in slavery or servitude or required to perform forced or compulsory labour, the Court may have regard to all the circumstances of the case, (including, whether the victim is a child; his/her family relationships; and any mental or physical illness).

Whilst the Modern Slavery Act is now the main anti-slavery legislation in the United Kingdom, it sits within a broader framework of UK domestic legislation<sup>7</sup> and International Conventions<sup>8</sup>. The Council expects to comply with all anti-slavery provisions from time to time in force in UK law.

## The Council's Values

The Council regards modern slavery, in all its forms, as morally repugnant and utterly incompatible with its core values. The practices prohibited by the Modern Slavery Act stand in direct opposition to the Council's unwavering commitment to human rights, dignity, fairness, inclusion, and its resolute stance against fraud and corruption.

As a public body, the Council is bound by legal obligations to prevent and address modern slavery. Beyond legal compliance, the Council recognises its unique position within its local community, due to the scale of its operations. This confers a particular responsibility on the Council to provider leadership in challenging such practices wherever they may arise.

Accordingly, the Council adopts a zero tolerance approach to all forms of modern slavery—not only within its own operations, but also throughout its supply chains and commercial relationships.

Where instances of modern slavery are identified, the Council is committed to taking robust and appropriate action, including full cooperation with law enforcement authorities, including the police and the Gangmasters and Labour Abuse Authority

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<sup>2</sup> Slavery involves being in the legal ownership of another (*which is known as chattel slavery*)

<sup>3</sup> Servitude means an obligation to provide one's services which is imposed by use of coercion. The concept of servitude includes the obligation on the part of the "serf" to live in another's property and the impossibility of changing his / her condition. See *Connors v R* [2013] EWCA Crim 324

<sup>4</sup> Forced labour involves direct compulsion to undertake work.

<sup>5</sup> Trafficking involves arranging or facilitating the travel of another person with a view to the victim being exploited.

<sup>6</sup> Sexual exploitation, the unlawful removal of organs, securing services by threats or deception, securing services from children or vulnerable persons.

<sup>7</sup> The Human Rights Act 1998, Gangmasters (Licensing) Act 2004 and The Procurement Act 2023

<sup>8</sup> The 1926 Slavery Convention, and The Universal Declaration of Human Rights 1948 and the European Convention on Human Rights

(GLAA) as well as other relevant bodies including the Independent Anti-slavery Commissioner.

## Countries of operation

Leicestershire County Council primarily operates within the United Kingdom. However, from time to time, the Council may have commercial interests located outside of the United Kingdom including pension investments and beneficial interests in companies trading abroad. This statement is intended to explain the Council's approach to modern slavery irrespective of where assets are held and regardless of where any commercial operations take place.

However, the Leicestershire County Council LGPS Pension Fund has its own funding strategy statement which covers responsible investment which in turn adopts the LGPS Central Responsible Investment and Engagement Framework (which specifically addresses the issue of Modern Slavery)

## Steps taken in the last financial year:

The Council works with local safeguarding boards to share best practice and to enable effective communication between relevant bodies, including law enforcement, local authorities, health care bodies and local groups.

The Council recognises that due to the nature of its business it procures from a number of sectors that are considered to be at high risk of slavery or human trafficking, these include but are not limited to clothing, construction, catering, cleaning, health and social care and hospitality.

- The Council has taken steps to adhere to the Procurement Act 2023 which came into force on 24 February 2025 (including providing detailed training thereon). Schedule 6 of the Procurement Act 2023 makes the commission of modern slavery offences a mandatory exclusion ground. Officers dealing with procurements on behalf of the Council expect to be vigilant for behaviours which would lead to exclusion.
- The Council has reviewed tools such as the Anti-slavery Risk Tiering Tool (ARTT) to assess supply chain risks.
- The Council has reviewed suppliers' own modern slavery statements and prevention policies, especially for those with turnover above £36m.
- The Council has included modern slavery questions in supplier selection and tender documentation.
- The Council has considered appropriateness to monitor supplier practices during contract management, using tools like the Modern Slavery Assessment Tool (MSAT) for high-risk suppliers.
- The Council has ensured that the modern slavery requirements are embedded in the Council's Supplier Code of Conduct appropriately.

- The Council has encouraged suppliers and subcontractors to report concerns via the council's Whistleblowing Policy.
- The Council has shared updates and guidance from government sources (e.g., Cabinet Office PPN09 updates).
- The Council has reported no incidences of slavery or trafficking during the last financial year.

## Policy and Approach

The Council has the following policies in place to support its commitment to identifying and preventing slavery and human trafficking in its operations:

### **• Whistleblowing Policy and Procedure**

The Council encourages all its workers, 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.

The Council's Whistleblowing Policy and Procedure<sup>9</sup> is designed to make it easy for workers to make disclosures, without fear of retaliation.

Similarly the Council has a Supplier's Whistleblowing Procedure<sup>10</sup> to enable suppliers to raise any concerns they may have.

### **• Employee Code of Conduct**

The Council's Code of Conduct<sup>11</sup> makes clear to employees the actions and behaviour expected of them when representing the Council.

The Council strives to maintain the highest standards of employee conduct and ethical behaviour. Any breaches are investigated and action taken as necessary. The Code also covers the policies on Declaration of Personal Interests, and on the receipt of Gifts and Hospitality

### **• Expectations of Suppliers**

The Council, in conjunction with ESPO, has implemented a Supplier Code of Conduct to help ensure that suppliers of both organisations 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 Council is committed to better understand our supply

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<sup>9</sup> <https://www.leicestershire.gov.uk/jobs-and-volunteering/staff-policies/whistleblowing-policy>

<sup>10</sup>

[https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2016/3/2/supplier\\_whistleblowing\\_policyv5\\_dm\\_.pdf](https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2016/3/2/supplier_whistleblowing_policyv5_dm_.pdf)

<sup>11</sup> <https://www.leicestershire.gov.uk/jobs-and-volunteering/staff-policies/employee-code-of-conduct>

chains and working towards greater transparency and responsibility towards people working in them and works with suppliers to ensure they meet the required standards. However, serious violations of these expectations will lead to the termination of the business relationship.

The standard arrangements for doing business with the Council are set out on the Council's website<sup>12</sup>. The Standard Terms and Conditions for the Supply of Goods and/or Services excluding ICT procurements and Works/Construction procurements published thereon contain requirements mandating compliance with anti-slavery guidance<sup>13</sup>.

Suppliers struggling to identify their Modern Slavery risks can use the Government tool MSAT (Modern Slavery Assessment Tool). The tool uses several questions to assess supplier risk and gives tailor made recommendations. The MSAT can all be accessed via the following link: <https://supplierregistration.cabinetoffice.gov.uk/msat>.

- **Recruitment**

The Council's recruitment processes are transparent and reviewed. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

- **Agency Workers**

The Council recruits its employees via its in-house recruitment function, East Midlands Shared Services. Where agency workers are required, these are ordered in accordance with the terms of a framework agreement developed and managed by ESPO. A comprehensive procurement process was applied to select the providers available through the framework during which the practices of these agencies were verified.

- **Pay**

The Council use a job evaluation scheme, thereby ensuring that all employees are paid fairly and equitably. All new and changed jobs are evaluated by a panel of trained evaluators. As a minimum. The Council expects its suppliers to comply with all Minimum Wage Legislation which is applicable.

- **Training**

Modern slavery awareness is embedded within procurement training for staff involved in commissioning and contract management.

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<sup>12</sup> <https://www.leicestershire.gov.uk/about-the-council/council-spending/doing-business-with-the-council>

<sup>13</sup> PPN/009 – Tackling modern Slavery in government supply chains.

## Due Diligence

The Council assesses modern slavery risks in procurement by considering six key factors:

Industry Type: Sectors such as agriculture, clothing, construction, catering, cleaning, health and social care, hospitality, leisure, and manufacturing are higher risk.

Nature of Workforce: Risks increase with reliance on low-paid, low-skilled, or vulnerable workers, including temporary, seasonal, or agency staff, and those in physically demanding or isolated roles.

Supplier Location: Some countries present higher risks. Reviewing the Global Slavery Index for national risk estimates, suppliers from high-risk countries may be present in UK supply chains.

Supplier Context: Risks are higher where there are weak labour laws, cheap labour, vulnerable workers, poor grievance mechanisms, lack of accountability, discrimination, conflict, or high poverty and unemployment.

Type of Commodity: Certain products and countries are more likely to involve child or forced labour. For example, polysilicon from China and rubber gloves from Malaysia. In the UK, garments, electronics, fish, textiles, and timber are considered to present the highest risk slavery risks.

Business/Supply Chain Models: Large or complex supply chains, reliance on agency or subcontracted workers, use of labour recruiters, and purchasing focused solely on profit margins all increased risk.

The Council will assess the procurement and identify the risk rating, using high, medium or low.

Risk level actions are assigned as follows:

**Low Risk**: Suppliers self-declare exclusion grounds do not apply; Council checks debarment list; exclusion grounds reviewed at procurement start and before contract award.

**Medium Risk**: Same as low risk, plus assessment of supplier compliance with Section 54 of the Modern Slavery Act via the Procurement Specific Questionnaire.

**High Risk**: Same as medium risk, plus modern slavery-specific questions included in the contract specification or evaluation, whichever is appropriate and proportionate to the contract.

For procurements below threshold, proportionate questions about modern slavery risks may be included if relevant to the contract.

## Contract Conditions

Suppliers are expected to comply with the Council's Supplier Code of Conduct.

## Contract Management & Reporting

Contract Managers maintain where appropriate an up-to-date risk register for each contract, identifying any risks of slavery or human trafficking. Where risks are found, suppliers may be asked to complete the Modern Slavery Assessment Tool and work together on improvements.

Regular reviews with suppliers will assess quality, performance, and discuss any risks or concerns.

If poor performance is identified, action plans or sanctions may be implemented, including possible termination of the contract.

Supplier KPIs will be reviewed individually, based on identified risks.

## Partnerships

Leicestershire County Council works across Leicester, Leicestershire and Rutland to share experiences and risks and maintain an effective multi-agency response to reduce and respond to modern slavery related offences.

## Training

The Council recognises that certain employees within the organisation should be required to complete awareness training in relation to modern slavery and human trafficking. The Council has published an awareness-raising document which is available to all employees and covers the following:

- The basic principles of the Modern Slavery Act 2015;
- How to identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available (e.g. the Modern Slavery Helpline).

Training is available for all Council staff via the Council's internal Learning Hub. This includes Modern Slavery Awareness hosted by Leicestershire Police and Modern Slavery First Responders which provides guidance on how to spot the signs of Modern Slavery and what to do when you come across a potential victim of Modern Slavery.

The Learning and Development Team (LD Team) of the County Council have been engaged to discuss the inclusion of Modern-Day Slavery in all training delivered around safeguarding.

## Reporting and whistleblowing

The Council's Whistleblowing Policy and Procedure <https://www.leicestershire.gov.uk/jobs-and-volunteering/staff-policies/whistleblowing-policy> is designed to make it easy for workers to make disclosures, without fear of retaliation. Similarly the Council has a Supplier's Whistleblowing Procedure [https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2016/3/2/supplier\\_whistleblowing\\_policyv5\\_dm.pdf](https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2016/3/2/supplier_whistleblowing_policyv5_dm.pdf) to enable suppliers to raise any concerns they may have.

Modern Slavery Helpline on 08000 121 700 or [online](#).

In an emergency where there is immediate danger, call 999.

## Contact information.

Commissioning Support

[Commissioning.support@leics.gov.uk](mailto:Commissioning.support@leics.gov.uk)

## Continuous Improvement

Leicestershire County Council is committed to embedding social value and eradicating modern slavery and human trafficking in all our business activities and supply chains.

Over the next 12 months, we will strengthen our approach by:

- Collaborating with suppliers, staff, customers, and stakeholders to share best practice and drive improvements.
- Using contract management to identify and manage risk areas throughout the lifecycle of each contract.
- Further developing our Social Value Model criteria to ensure ethical standards are upheld.

This statement will be reviewed and updated annually to reflect progress and new developments.

Signed by a senior member – Post and name and date