

**Modern slavery risk  
assessment and due  
diligence guidelines  
for adult social care**

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LGA

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Modern slavery, human trafficking, labour abuse can affect anyone

How in local government do we evaluate the risks in supply chains and ensure appropriate and robust diligence processes both at the point of recruitment and throughout the course of employment, ensuring providers meet their Modern Slavery Act 2015 obligations?

# Oversight – the routes

Local Authority duties are a matter for some debate. Notwithstanding duties and responsibilities (identification, referral, supporting, disruption, supply chain monitoring), the Local Government Association's *'Tackling Modern Slavery: Guidance for Councils'* recommends LAs:

- Provide Modern Slavery Awareness Training for all council personnel in public facing services
- Designate a point of contact to report modern slavery concerns and raise awareness of modern slavery among communities
- Establish clear procurement guidelines
- Collaborate with other councils and agencies

# Tackling Exploitation

Local Authorities can:

1. Provide Modern Slavery Awareness Training for all council personnel in public facing services
2. Designate a point of contact to report modern slavery concerns and raise awareness of modern slavery among communities
- 3. *Establish clear guidelines for procurement and commissioning***
4. Collaborate with other councils and stakeholders
5. Work with providers and supply chains towards minimising the risk of modern slavery by promoting ethical practice and standards
6. Provide guidance and training to providers and the supply chain on ethical practice

# What are the risks?

## Recruitment agency

- i) Demanding exorbitant “fees” paid
- ii) Not completing the required pre employment checks

## Employers

- i) Remuneration: wages are low, withheld, or excessively reduced to cover accommodation and other charges
- ii) Contracts of employment not in line with immigration conditions
- iii) Debt bondage

## Employee

- i) Little or no understanding of UK law, employment rights and language barriers
- ii) Difficulty finding and / unaffordable accommodation

# Examples of action taken

- Enhancing and adding value e.g. signposting and offering training and support to providers
- Establishing a voluntary central register of IR licence holders
- Developing a Modern Slavery Risk Assessment for providers (not mandatory)
- Provide guidance on Modern Slavery reporting procedures
- Promote Whistleblowing to third party organisations
- Broaden safeguarding training to providers and employees
- Develop partnerships understanding of ethical practice

# What is the ask of Government Depts.?

- Advise local authorities when and where a licence is being requested and the number of planned sponsorships so that they can advise where there is an under supply of services
- Provide information to local authorities to enable them to hold a register of where and the number of licences issued (post code based)
- Establish where sponsorships will be deployed in England prior to granting a visa
- Call for joint due diligence between local government and providers to set standards and agree demand
- Provide an overview of all the national organisations with an interest in this area
- Improve the flow and detail of information between local and national government

# What do we need to consider now?

Do we need to recruit to social care from overseas when we already have refugees, asylum seekers and displaced workers already living in this country who do not need sponsoring to work?

Should we not be turning our attention to working with the voluntary and vocational education sector to recruit and train people in social care and act as the point of contact?

Using digital solutions to support better access to information and links with organisations that are already working in this space to improve the understanding of employers as well as employees?



# Questions