

Gloucestershire County Council

Modern Slavery Policy

1.0 Policy Statement

Gloucestershire County Council, including Gloucestershire Fire and Rescue Service, is committed to using its powers, influence and responsibilities to prevent and act against identified slavery and human trafficking in its corporate activities, supply chains and the wider community. The council is committed to ensuring its staff, partners and suppliers are aware of their duty to comply with their duties under the Modern Slavery Act 2015 and is committed to implementing the Charter Against Modern Slavery.

2.0 Commitment

Gloucestershire County Council will:

- Work through our partnerships to raise awareness of modern slavery and how partners can work together to tackle it
- Work with partners to identify, refer and support victims of modern slavery
- Support victims through our child and adult safeguarding services
- Work with Gloucestershire Constabulary and other law enforcement agencies to help disrupt the illegal act of modern slavery and human trafficking, and bring to justice perpetrators of such crimes across the County
- Encourage fair pay and working conditions in our own operations and our supply chains
- Review and report on implementation of this policy annually.

3.0 Duty to Notify and National Referral Mechanism

Gloucestershire County Council is a 'first responder organisation'. This means that the Council has a statutory responsibility to:

- Identify potential victims of modern slavery and recognise the indicators of modern slavery
- Gather information in order to understand what has happened to them

- Refer victims into the National Referral Mechanism (NRM) via the online process
- Provide a point of contact for the Competent Authorities to assist with the Reasonable Grounds and Conclusive Grounds decisions and to request a reconsideration.

Under this duty:

If the potential victim is under 18, or may be under 18, a referral must be made using the National Referral Mechanism (NRM). Child victims do not have to consent to be referred into the NRM.

If the potential victim is over 18, their consent is required in order for a referral to be made to the NRM. If an adult does not consent to enter the NRM a Duty to Notify referral should be completed using the same online process

4.0 Gloucestershire County Council Referral Pathway

If a Gloucestershire County Council Employee suspects a case of Modern Slavery, the below pathway will be followed:

Is someone in immediate danger?

Yes- Call 999

No- See Below

Is the individual under 18?

Yes:

1. [Report a child protection concern | Gloucestershire County Council](#)
2. Report the case to police by **calling 101** or via the [Gloucestershire police online crime reporting service](#)

No:

1. If safe to do so, gather information about the concern. Only speak to a potential victim alone and in a safe space. If this is not possible, gather contact details and make an appointment. If this is not possible, still report the concern using the below channels.
2. Email the details to with the subject line 'Modern Slavery' to **SafeguardingAdultsServices@gloucestershire.gov.uk**

3. Report the case to police by **calling 101** or via the [Gloucestershire police online crime reporting service](#)
4. Ring the [Unseen Modern Slavery Helpline](#) for advice if needed (0800 012 1700)

5.0 Roles and Responsibilities:

Gloucestershire County Council has allocated the following further roles and responsibilities in order to meet our statutory duties.

- Corporate Leadership Team will review this policy annually, and produce a Modern Slavery Statement in compliance with the Modern Slavery Act 2015
- Directors have a responsibility to ensure that staff undertake e-learning in Modern Slavery, and understand any role-specific responsibilities they hold in relation to modern slavery
- Frontline staff in relevant roles (Fire & Rescue, Trading Standards Children's social care, Adult social care, Teams working directly with Asylum Seekers and Refugees) should be able to recognise exploitation in all forms as a safeguarding issue, and to respond to concerns accordingly
- Commissioners and contract managers are responsible for ensuring that all suppliers confirm their compliance with the requirements set out in section 54 of the Act.
- Procurement staff must undertake training on Ethical Procurement and Supply in order to be able to offer advice to commissioners and contract managers on how to assess and manage the risk of modern slavery.
- All staff have a responsibility to speak out as soon as possible if they have a concern relating to this policy, either directly to their line manager or via the Council's Whistleblowing arrangements.
- All staff must ensure that they read, understand and comply with this policy and undertake the e-learning provided by the organisation.

Any breach of this policy will be dealt with under the Council's disciplinary procedures.

6.0 Related Policies

- Whistleblowing Policy
- Anti-fraud and Corruption Policy
- Safeguarding Policies and Procedures
- Code of Conduct for Employees
- Code of Conduct for Members

The above policies are available on Staffnet.

For Further Guidance see:

- Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) (Home Office, July 2023)

7.0 Lead Officers:

- Emily White- Director of Quality, Performance and Strategy for Adult Social Care and Chair of Gloucestershire Anti-Slavery Partnership
- Head of Strategic Procurement – Rachael Maughan
- Lead points of contact for Children’s Safeguarding – Claire Connolly, Head of Service (Front Door Service) and Jane Price, Child Exploitation Coordinator
- Lead point of contact for Adult Safeguarding – Sarah Jasper, Head of Safeguarding Adults Services
- Lead point of contact for Community Safety / Gloucestershire Fire & Rescue Service (Nick Ashcroft, Area Manager)
- Lead point of contact for Asylum Seekers and Refugees – Siobhan Farmer, Director of Public Health

8.0 Document Information

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| Owner: | Emily White, Director of Quality, Performance & Strategy |
| Author: | Rob Ayliffe, Director of Policy, Performance & Governance |
| Reviewer: | Abigail Glyn, Corporate Policy Officer |
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Version History

| Version | Version date | Summary of Changes |
|----------------|---------------------|--|
| 1.0 | June 2024 | Approved by Rob Ayliffe, Director Policy, Performance and Governance |
| 2.0 | October 2025 | Updated referral pathway included. Updates to lead officers Accessibility standards applied to policy. |