

Modern Slavery Statement 2025 to 2026

Table of Contents

Introduction	2
Our Business	2
Our Areas of Focus	3
Our Policies	3
South Essex Homes	5
Southend Care Ltd.	5
Our Suppliers	5
Training.....	6
Next Steps	8
<i>Appendix I: Statement from Southend Care Ltd.</i>	<i>9</i>
<i>Appendix II: Readability Scores</i>	<i>13</i>

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps that Southend-on-Sea City Council has taken during 2025/26 to prevent, identify and respond to modern slavery and human trafficking within:

- our organisation
- our partners
- our contractors and subcontractors
- our supply chain

Modern slavery encompasses slavery, servitude, forced or compulsory labour and human trafficking. It remains a hidden crime which can affect people of all ages, genders, ethnicities and backgrounds.

The Council maintains a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically, transparently and with integrity in all our activities and to ensuring that effective systems and controls are in place to minimise the risk of exploitation occurring within our services, commissioned activities and supply chains. This commitment extends beyond compliance and reflects our wider responsibilities to safeguard vulnerable residents, support victims and work collaboratively with our partners to disrupt exploitation.

Our business

Southend-on-Sea is located on the Thames Estuary and benefits from significant transport connectivity, including proximity to major ports, road and rail networks, London Southend Airport and London itself. These characteristics support economic growth but can also create opportunities for organised crime groups involved in exploitation and trafficking.

Southend-on-Sea City Council is a unitary authority serving approximately 185,250 residents (ONS Mid-year population estimates 2024). The Council employs approximately 1,800 staff and spends around £200 million annually on services, supplies and works to deliver statutory and discretionary services for residents, businesses, visitors and partners.

In addition to our responsibilities as an employer, the Council recognises its statutory duties under the Modern Slavery Act 2015, including the Duty to Notify the Home Office where appropriate and the safeguarding responsibilities placed upon local authorities to identify, support and protect victims of exploitation.

Our areas of focus

We deem areas of focus to include:

- children's services
- adult social care
- housing and homelessness services (including social and private housing)
- environmental health and regulatory services
- education
- licencing
- community safety
- youth justice services
- violence against women and girls (VAWG) activity
- public health and safeguarding partnerships

We recognise that people experiencing homelessness or insecure housing arrangements, social exclusion, poverty, mental ill health, substance misuse, domestic abuse and exploitation may be particularly at risk of falling prey to modern slavery.

Local and national intelligence indicates continuing concerns relating to:

- hospitality and food delivery sectors
- car washes, valeting and similar cash-based services
- the sex trade and affiliated establishments
- nail bars and beauty services
- labour exploitation the construction industry (including sub-contractors)
- forced or arranged marriages
- cuckooing
- online exploitation and grooming
- exploitation of vulnerable adults and children

The Council recognises that patterns of exploitation continue to evolve and is committed to working with partners to monitor emerging risks and improve identification and response arrangements.

Our policies

The Council reviews policies and procedures regularly to identify and acknowledge emerging risk and ensure continued compliance with legislative requirements and best practice. These ensure that business is conducted in an ethical and transparent manner and in compliance with the Modern Slavery Act. These include:

1. The [Modern Slavery | Safeguarding Southend Partnership](#) guidance which sets out our stance on modern slavery and explains how employees can identify and report any instances of this and the support pathways.

2. Southend, Essex and Thurrock (SET) Safeguarding guidance which supports the response to modern slavery within Adult Services and associated safeguarding arrangements.
3. We operate a robust Safer Recruitment and Selection Policy. This includes conducting eligibility checks on all employees for their right to work in the UK, to reduce the risk of exploitation and safeguard against human trafficking or individuals being forced to work against their will
4. The Procurement Team is responsible for ensuring all procurement activity complies with the Council's 'Contract Procedure Rules' the Public Contract Regulations 2015 and the Procurement Act 2023.
5. We operate a Whistleblowing Policy that enables all employees to raise concerns about how colleagues are being treated or raise concerns about practices within our business or supply chain, without fear of reprisals.
6. Our 'Code of Conduct' sets behavioural expectations and ethical standards for employees and suppliers.

Governance, Partnerships and Multi-Agency Working

The Council recognises that effective prevention of modern slavery requires coordinated action across multiple agencies and sectors.

During the reporting period, cross service activity has been strengthened through the establishment of a Modern Slavery Working Group comprising representatives from:

- Safeguarding
- Community Safety
- Regulatory Services
- Procurement
- Commissioning
- Adult Social Care
- Children's Services
- Youth Justice Board
- Corporate Policy and Performance

The group supports information sharing, identification of emerging risks, service development and preparation of this statement.

The Council continues to support and participate in partnership structures including:

- Southend Safeguarding Adults Board
- Southend Safeguarding Children Partnership
- Community Safety Partnership
- Health and Wellbeing Board
- Southend Against Modern Slavery (SAMS)
- Eastern Region Anti-Slavery Partnership (ERASP)
- Essex Violence and Vulnerability Unit

- Violence Against Women and Girls (VAWG) strategic groups
- South Essex Homes (including South Essex Property Services SEPS)
- See the Signs, awareness and reporting initiative

Strong data sharing arrangements exist across voluntary organisations, safeguarding, community safety, regulatory and partner agencies to support victim identification, risk management and disruption activity.

Governance and accountability arrangements for overall strategic ownership of modern slavery will continue to be reviewed during 2026/27 in the biannual meetings.

South Essex Homes

South Essex Homes is Southend City Council's Arm's Length Management Organisation responsible for the management and maintenance of around 6000 Council homes housing approximately 11000 residents of Southend.

In addition, South Essex Homes and its subsidiary companies employ 300 staff members. South Essex Homes comply with the requirements of:

- Southend Essex & Thurrock (SET) Safeguarding Adults Guidelines
- SET Safeguarding and Child Protection Procedures

They also have their own Safeguarding Children and Adults Policies which align to SET guidelines.

Southend Care Ltd

Southend Care Ltd is also a local authority trading company that is wholly owned by Southend-on-Sea City Council. Their statement is at Appendix 1.

Our suppliers

We recognise procurement and contract management as important mechanisms for reducing the risk of modern slavery and operate the following systems and controls to safeguard against any form of modern slavery taking place within our supplier chain.

- we maintain a database of registered suppliers as well as a corporate contract register
- we utilise the central government digital platform *Find a Tender* to cross check suppliers
- undertake financial due diligence and financial assessments on key suppliers before allowing them to become a contractual supplier
- an insolvency and financial alert system also tracks increased risks against our key suppliers

- review all Procurement documentation regularly to ensure it aligns with new legislation - the Procurement Act 2023
- Embeds the modern slavery policy in our contracts with suppliers - suppliers are required to declare that no part of their business operations contradict this policy

As part of our contract with suppliers, we also require they confirm to us that:

- they comply with the Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015
- they are a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015
- if they answer yes to the previous question, they are compliant with the annual reporting requirements contained within section 54 of the Act 2015

We operate under the Corporate Contract Procedure Rules (CPRs) and the procurement process. CPRs are ethical procurement requirements that link to the procurement process and tests suppliers on their compliance with the Modern Slavery Act.

In 2023 we revised our Council Procurement and Contract Management Strategy so that Modern Slavery is one of the key areas of focus in relation to better contract management.

In addition, the Corporate Procurement team has put in place both a:

- contract management framework
- contract management manual

The team has also finalised the building of a corporate contract management system. This will be key to ensuring suppliers are monitored by contract managers in terms of compliance. Suppliers receive regular requests to evidence how they are operating their contracts.

Contract managers are expected to monitor supplier performance and seek assurance that suppliers maintain appropriate safeguards within their own operations and supply chains.

The Council continues to develop its approach to supply chain transparency, contract assurance and high-risk supplier monitoring.

Training

Raising awareness remains a key element of the Council's response to modern slavery. During the reporting period, Council officers continued to participate in

training, workshops, conferences and professional networks delivered by regional and national partners, including:

- Southend Against Modern Slavery (SAMS)
- Eastern Region Anti-Slavery Partnership (ERASP)
- Local Government Association Modern Slavery Network
- International Recruitment East
- Unseen
- National anti-slavery forums and safeguarding partnerships

Partner agencies have delivered awareness-raising activity focused on:

- Identifying indicators of exploitation
- Referral pathways and safeguarding responses
- Emerging exploitation trends
- Vulnerable adults and children
- Labour exploitation
- Criminal exploitation
- Online harms

The Council will continue exploring opportunities to expand access to bespoke and online modern slavery training for wider staff groups and partner organisations.

The Corporate Procurement team continues to provide procurement related training and guidance to officers involved in commissioning and contract management and across the business in the form of:

- e-learning, and
- face to face training

This is to raise awareness about the Corporate Contract Procedure Rules (CPRs) and the procurement process.

Advisors within the Corporate Procurement Team have completed specific, in-depth training in Modern Slavery, as this is an element of formal CIPS qualifications. The Ministry of Housing Communities and Local Government (MHCLG) and the Cabinet Office have funded Foundation Contract Management Training, which has been completed by many officers. Ten officers are also engaged in the Contract Management Pioneer Programme, also funded by:

- MHCLG
- The Cabinet Office
- Crown Commercial Services
- Local Government Association (LGA)

This is with a view to pass knowledge on to relevant officers, which is already happening in relation to contract management tools.

Next steps

During 2026/27 we will further embed the importance of the Modern Slavery Act into our business and supply chain procedures, ensuring that our activities and that of our suppliers are committed to complying with the requirements of the Act. We will continue to monitor and audit our policies and procedures to make amendments and update staff where necessary.

To strengthen our response to modern slavery we operate with the following priorities:

1. Continue to strengthen governance and clarify strategic accountability arrangements.
2. Continue to develop the Modern Slavery Working Group and multi-agency collaboration arrangements.
3. Expand workforce training and awareness activity.
4. Improve understanding of emerging threats, including:
 - Online exploitation
 - Cuckooing
 - Criminal exploitation
 - Vulnerability among adults with care and support needs
 - Changing exploitation profiles
5. Continue to improve data collection, analysis and performance reporting to support evidence-based decision making and earlier identification of risk.
6. Continue to strengthen supply chain assurance and contract monitoring arrangements.
7. Continue promoting awareness campaigns and supporting the work of Southend Against Modern Slavery and regional anti-slavery partnerships.
8. Explore opportunities for independent review or external assurance of the Council's modern slavery arrangements.
9. Continue aligning activity across safeguarding teams, community safety, housing, youth justice and the work of the Safer Essex (Southend, Essex and Thurrock) Violence against Women and Girls (VAWG) Steering Group

This statement is made under section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2026.

The contents were agreed by the Corporate Leadership Team with Chief Executive Colin Ansell on the 29th of July 2026.

Appendix 1: Statement from Southend Care Ltd.



Modern Slavery Statement

Introduction

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them to personal or commercial gain.

We have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity to all our business dealings and relationships and to ensuring effective systems and controls are in place to safeguard against any form of modern slavery taking place in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Annual Statement

Southend Care Ltd will publish an annual modern slavery statement, which will be included as an appendix to Southend City Council's statement, as the shareholder. A link to this statement will be on the homepage of the website and will be signed and approved by the Chair of the Board.

The Director of Corporate Services is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Southend Care Ltd has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any parts of its own business.

Organisation Structure

Southend Care Ltd is a Local Authority Trading Company wholly owned by Southend City Council. It was created in April 2017 and employs over 330 staff and supports over 1000 customers per year.

Southend Care Ltd prides itself on working with some of the most vulnerable people in society including those people with very complex and challenging needs. Our positioning reflects this in terms of being a more specialist provider in Southend market and our current portfolio of services includes day opportunities, residential care, supported living, extra care housing, shared lives, reablement, supported employment and acting as the provider of last resort for Southend City Council.

The company is run by a board of Directors, who are passionate about the service we provide and lead by example. There is a Director of Operations who oversees all services, acting as the nominated individual for CQC and provide leadership to all Service Managers. The Director of Corporate Services provides leadership and oversight to the business support functions including finance and HR, ensuring relevant legislation is followed.

Supply Chains

Our statement applies to all individuals working for us on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, contractors, third party representatives and business partners. We expect the same high standards from all our contractors, suppliers and other business partners and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We are committed to ensuring that our suppliers reflect our philosophies on Modern Slavery and comply with the Modern Slavery Act 2015.

All suppliers are required to be approved by a director, and appropriate due diligence checks are undertaken. No new suppliers will be added to the approved supplier list until they have evidenced their adherence to the legislation.

Policies & Practices

We have a suite of policies and procedures that are available on our staff intranet. This includes our Modern Slavery Policy, which lays out our principles and information on how to raise concerns.

In addition, the following relevant policies are in place and reviewed regularly:

- Recruitment & Selection Policy
- Whistleblowing Policy
- Grievance & Dignity at Work Policy

- Equality, diversity and inclusion Policy
- Code of Conduct
- Safeguarding

Employees

Southend Care Ltd also recognises the potential for slavery and human trafficking to affect employees working within its business.

Southend Care Ltd has robust HR policies and procedures in place across all its services. These are regularly reviewed to ensure compliance with employment legislation and prevent unethical working practices. Southend Care is committed to ensure staff are paid fairly and appropriately, and regularly reviews, and benchmarks terms and conditions of employment.

Staff are encouraged to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Whistleblowing policy is there to support staff feel confident in making disclosures without fear of retaliation.

We have a robust recruitment process, which includes verifying the identity of each employee and their right to work in the United Kingdom before commencing employment. We work closely with reputable recruitment agencies and seek written assurances that they adopt the same robust approach, and adherence to the requirements of the Modern Slavery Act 2015.

We offer all employees access to an Employee Assistance service with offers guidance and counselling 24 hours, 365 days per year, in respect of work or personal matters. This is a completely confidential service to our employees.

Risk assessment & management

Our ongoing actions are assessed against policy, and part of our risk assessment includes:

- Monitoring adherence to our Modern Slavery Statement and ensure all stakeholders to the business know how to raise any concerns
- Due diligence process for any new supplier
- Modern Slavery Awareness for staff through the availability of the Home Office

‘Modern Slavery Awareness’ Guidance on our Staff Intranet

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Southend Care Ltd’s slavery and human trafficking statement.

Approved by the Board of Southend Care on 25 June 2025.

Mark Jarman-Howe, Chair of Board

Policy name:	Modern Slavery Statement		
Version number:	42	Date reviewed:	9 June 2025
Policy author:	Liz Farrell	Policy owner:	SCL
Related policies and guidance	Recruitment Policy Policy Whistleblowing Policy Code of Conduct Procurement & Purchasing Safeguarding		

Appendix II: Readability Scores

Flesch Reading Ease: 11.7
Flesch-Kincaid Grade Level: 16.4

This is an estimate. Different tools may score the text slightly differently.

Due to the legislative nature of the document, it includes statutory terms, place names and organisation names as well as longer words that must be retained.