

South Gloucestershire Council

Modern Slavery Action Plan for Improvement & Development

Where your responses have produced red or amber assessments; please complete the action plan below to detail how your organisation intends to work towards green in these areas.

Key Objective	Current Level	Improvement and /or development planned	Action/s Required	Lead Officer	Deadline	Progress update
1 Clear leadership and accountable structures are in place and visible throughout the organisation						
The strategic lead understands the need to deliver an anti-slavery agenda and there is a clear plan	Amber (03/17)	Agree and implement a clear plan to deliver the anti-slavery agenda	Complete the ASP Self-Assessment and associated draft Action Plan (ie this document).	HSSC	07/04/17	Complete 24/03/17
	Green (04/17)		Meet with the Strategic Safeguarding Manager to review / amend the draft Action Plan (this document).	HSSC	21/04/17	Meeting took place 19/04/17
			Agree responsibilities and working linkages	HSSC/SSSM	21/04/17	Agreed 19/04/17
The executive board or equivalent are aware of the anti-slavery strategy	Red 03/17	Produce, sign and publish a Modern Slavery Policy & Transparency Statement, and communicate this to appropriate boards	Draft policy and statements to be produced and agreed by COMT	HSSC	03/07/17	Agreed 03/07/17
	Amber 06/17		Policy and statements to be formally agreed by Cabinet.	HSSC	04/09/17	Cabinet briefed 17/07/17. Formal statements to be considered 4/9/17
	Green 07/17		Policy and statements to be presented to: a) Safer and Stronger Communities Strategic Partnership b) Safeguarding Adults Board c) Local Safeguarding Children Board	HSSC SSCM HSSC	31/12/17	Following adaptation by Council

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There is a clear awareness of roles and responsibilities throughout the organisation regarding slavery.	Red	To identify and deliver awareness activities / briefings for key frontline service providers, Procurement, Commissioning and Audit Teams.	Produce a briefing document outlining role and responsibility expectations for staff and teams	HSSC	31/08/17	On course for delivery to target
			Role awareness briefings held with Strategic Leads of key frontline service providers ie, Safeguarding, Procurement, Commissioning and Audit Teams.	HSSC	31/07/17	Completed 06/05/2017 but to be revised once policy adopted
			Ensure a process is in place to audit suppliers and sub suppliers	HSP	31/03/18	Information is requested from suppliers in the Standard Selection Questionnaire regarding anti-slavery intentions however this is being reviewed and enhanced to include an annual assessment of contractors based on risk.

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Slavery safeguarding responsibilities are explicit within relevant job descriptions	Red 03/17	To review job roles and responsibilities and ensure relevant job descriptions are amended with clear accountability for Modern Slavery safeguarding actions	Identify roles and jobs that may hold slavery safeguarding responsibilities.	SSSM	N/A	All relevant Role Profiles include awareness of safeguarding responsibilities
	Amber 06/17		Include slavery safeguarding within the scheme of delegated decisions	SSSM	Results of national Slavery Safeguarding pilot delayed by Govt	To be amended in response to results of national Safeguarding Slavery leads pilot scheme
	Green 06/17		Review and amend job descriptions as necessary, to include Modern Slavery safeguarding activities.	HSSC	N/A	All relevant Role Profiles include awareness of safeguarding responsibilities

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The anti-slavery agenda has been embedded within the appropriate Safeguarding processes	Amber	To review safeguarding processes.	Review and amend, where necessary, safeguarding processes to ensure Modern Slavery awareness and actions are prevalent.	SSSM	31/03/18	Modern Slavery is built in as a need code for both adults and children in new recording system. Implementation of latter has been delayed and so arrangements made for it to appear in the current system.

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2 All staff and volunteers have been appropriately trained according to their role						
Staff understand and know how to recognise and refer vulnerable individuals	Red 03/17	To identify and train relevant staff in Modern Slavery recognition and referral processes.	Agree a referral and case logging process for potential victims of Modern Slavery.	HSSC/SSSM	31/03/18	Modern Slavery is built in as a need code for both adults and children in MOSAIC. Implementation of latter has been delayed and so arrangements made for it to appear in the current system.
	Amber 06/17					
A training strategy/plan is in place	Red	To agree a training strategy, training and briefing materials and a training delivery approach.	Produce a tiered approach to a staff training plan that identifies different staff groups, differing training needs and different methods of learning.	HSSC/SSSM	31/12/17	On course for delivery to target
			Review Human Trafficking and Modern Slavery Awareness course and determine the fit within the overall plan.	CSPO	30/06/17	Completed 30/06/17
A variety of training/awareness	Amber	To develop a variety of training and	Publish information on the website and intranet	HSSC/CSPO	01/04/17	Complete 28/03/17

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tools are available to meet varying roles and responsibilities		briefing materials in line with training strategy.	Agree and publish a range of communication tools that meet the needs of different staff groups to include 'new starter' staff induction etc.	HSSC/SSSM	31/09/17	On course for delivery to target
Training courses are informed by lessons learnt	Amber	To continually improve and update training courses.	Review and amend training courses and briefing materials in line with updated policy and lessons learned.	CSPO	31/09/17	On course for delivery to target
There is appropriate staff guidance and literature	Red	To regularly review learning materials for coverage and suitability.	Annually review training strategy/plan and methods of learning for appropriateness.	HSSC/SSSM	30/06/18	To follow agreement of training strategy/plan
3 An appropriate reporting and referral process is in place						
A single point of contact [SPoC] has been identified	Red 03/17 Green 06/17	To identify a lead Officer.	Agree a SPoC for South Glos and communicate role and responsibilities.	SSSM	31/07/17	SSSM will have oversight of referrals
An appropriate internal process has been developed	Amber	To define a reporting and referral process.	Design, agree and communicate an internal reporting and referral process.	SSSM		System currently in development
An audit trail for alerts/referrals exists	Red	To define a referral audit trail.	Design, agree and communicate an audit trail for all internal referrals.	SSSM		System currently in place within Safeguarding processes but to be refined and audit trail added

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Partner agency communication channels have been developed	Red 03/17	To develop communication channels with partner agencies.	Attend Partner agency meetings where cases are discussed.	HSSC/ SSSM	Ongoing	Anti-Slavery Partnership and Serious Organised Crime Disruption Panels being attended. Currently negotiating single route with Police to prevent duplication in systems.
	Amber 06/17		Ensure effective use of secure emails to enable information sharing across agencies.	HSSC/ SSSM	Ongoing	External reporting route using secure emails agreed. Needs integrating to internal processes.
An information sharing protocol is in place to enable appropriate information exchange and working	Red 03/17	To develop an information sharing protocol.	Agree an information sharing protocol with Partner Agencies to aid the flow of two way information.	HSSC		ISA agreed through SOCDP.
	Amber 06/17			SSSM		Route re direct referrals need to be reviewed.

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4 Referrals/alerts are being made and managed effectively						
Referrals/alerts are being managed or overseen by relevant staff	Amber	To effectively manage referrals and ongoing process improvements.	Agree and communicate an operational process to ensure referrals are overseen by relevant staff.	SSSM	31/03/18	Once procedures are ready SSSM will have oversight of referrals
Information on the number, nature and outcome of referrals is being collated	Amber		Identify a recording process for number, nature an outcome of referrals and an associated key point of contact.	SSSM	31/03/18	Once procedures are ready SSSM will have oversight of referrals and collate this data
Information is being shared with relevant partners	Green		Information being provided. Need to develop this to negotiate a single reporting route with Police to prevent duplication and to facilitate two-way flow of information.	HSSC	31/03/17	7 referrals made in 2016/17. 3 to date in 2017/18
A process is in place to identify and develop 'lessons learnt'	Red		Develop and agree a review process and frequency to ensure lessons learned feed the onward development of materials and training.	SSSM	31/03/18	On course for delivery to target

Legend

CSPO – Community Safety Project Officer

HSP – Head of Strategic Procurement

HSSC - Head of Safe and Stronger Communities

SOCDP – Serious Organised Crime Disruption Panel

SSCM – Strong Safer Communities Manager

SSSM –Strategic Safeguarding Service Manager