

Modern Slavery and Human Trafficking Statement

Introduction

Nottinghamshire County Council (NCC) is committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

This statement sets out Nottinghamshire County Council's actions to understand all potential modern slavery risks related to our services and businesses, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own services, businesses and our supply chains. This statement covers the activities of Nottinghamshire County Council, which includes direct employees of the Council, agency workers engaged through the Council's managed service and services delivered on behalf of the Council by third party organisations and in the council's supply chains.

Organisational structure and supply chains

Nottinghamshire County Council is part of a two-tier authority based in the East Midlands region of England in the UK, encompassing seven district and borough councils with 800,000+ citizens. The Council provides many local government services including public health, social services, schools, trading standards and licensing, highways, refuse etc. **Human resources, procurement and contract management** play a key role in our work to ensure our corporate activities and supply chains are free from modern slavery and human trafficking.

Human Resources

As part of Local Government, we pay our own employees the Living Wage Foundation living wage as part of our ongoing commitment to treating people fairly and to raise workers out of poverty. Whilst we do not require our suppliers to match this commitment, we do ask them to consider its adoption for their workforces.

NCC has also implemented a consistent and inclusive system for conducting the prescribed Right to Work document checks, in order to fulfil the legal requirement of all UK employers.

REED who provide us a recruitment support service have their own annual Modern Slavery Statement - [REED MSA Statement 2020v7.pdf](#)

Procurement & Contract Management

NCC would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the Council's expectations. We would request that our suppliers ensure the same of their own supply chains.

NCC undertakes due diligence when considering taking on new suppliers. In addition, the Council has been doing considerable work to develop a corporate approach to contract management. A Contract Management Toolkit was launched in October 2020 which offers guidance and tools to contract managers on each stage of a contract's lifecycle. Modern Slavery due diligence is clearly identified in the Pre-Procurement checklist. Furthermore, dedicated HR and Procurement support is available to

contract managers in areas where a service is deemed to be at a higher risk of Modern Slavery or Human Trafficking.

Children & Young people

Young people at risk of modern slavery and trafficking are supported through the safeguarding children's partnership Criminal Exploitation pathway. For those at low risk there are methods to identify and intervene early to divert into positive activities and disrupt the exploitation. When young people have become entrenched in exploitation, they will be supported on child protection plans with multi-agency meetings held on a regular basis to focus on plans to support the child and disrupt the exploitation. Those at highest risk are discussed at a monthly senior management panel to ensure partnership risk management plans are robust.

Partnership

The Council is a partner at the Safer Nottinghamshire Board (SNB), Modern Slavery Steering Group and the Serious Organised Crime (SOC) Board. The Modern Slavery Steering Group sets the countywide action plan for this area of work, informed, and is led by the University of Nottingham who completed a problem profile in 2019.

Relevant Policies

Nottinghamshire County Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Day Slavery Act.

- **Safeguarding policies** – adults, children and young people have policies in place to address their safety from many aspects. The Multi-Agency Safeguarding Hub (MASH) deals with cases of vulnerable adults that may need to be referred into the SERAC.
- **Whistleblowing policy** - The organisation 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 organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** - Nottinghamshire County Council's code makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain.
- **Expectations of Suppliers** - Nottinghamshire County Council is committed to ensuring that its suppliers 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. We work with suppliers to ensure that they meet the required standards. However, serious violations of the Council's supplier expectations will lead to the termination of the business relationship.
- **Agency workers managed service** - The Council uses only specified, reputable employment agencies to source labour and always through its managed service provider, verifies the practices of any new agency it is using before accepting workers from that agency. The contractual audit process with the managed service provider supplies the required evidence of panel supplier abilities to comply. There has been no requirement to take action as a result of the risk of slavery and human trafficking in the period covered by this statement.

Due diligence

Nottinghamshire County Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

Responsibility

Responsibility for the Council's anti-slavery initiatives is as follows:

- **Policies:** Service Director, Customers, Governance and Employees in the Chief Executives Department will be responsible for ensuring appropriate recruitment and employment policies are in place and reviewed on an annual basis to ensure they remain current and relevant.
- **Risk assessments:** To be undertaken by the relevant service area where there is deemed to be a risk of modern slavery or human trafficking, with the support of colleagues within HR and procurement. The risk assessment will be signed off by the appropriate service director and held centrally and demonstrate the corporate responsibility for human rights and modern slavery risk analysis.
- **Investigations / due diligence:** Any concerns regarding modern slavery or human trafficking should be raised with the Service Director, Customers, Governance and Employees in the first instance.

Performance indicators

Nottinghamshire County Council has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we have:

- ✓ required all new staff working in supply chain management, Procurement and HR professionals to have completed training on modern slavery as part of their induction;
- ✓ reviewed the system for supply chain verification currently in place, whereby we evaluate potential suppliers before they enter the supply chain; and
- ✓ continue to review our existing supply chains by contract managers, whereby we evaluate all existing suppliers.

Training

The organisation requires all staff responsible for supply chain managers, those working in HR or Procurement within the Council to complete training on modern slavery.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nottinghamshire County Council's modern slavery and human trafficking statement for the financial year ending 31 March 2022.