

Nottinghamshire County Council's Modern Slavery and Human Trafficking statement

Introduction

Nottinghamshire County Council is absolutely 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 and businesses and our supply chains. This includes an update of action and activity that has taken place since the statement was reported to Policy Committee in January 2018.

As part of Local Government, Nottinghamshire County Council recognises that we have a responsibility to take a robust approach to slavery and human trafficking. 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.

Organisational structure and supply chains

This statement covers the activities of Nottinghamshire County Council. The statement covers 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.

The Council has worked with the University of Nottingham to carry out a risk profile assessment into the Council's supply chains in care home service provision. This aims to ensure that these are robust and slavery-free in regard to the recruitment and retention of care workers who provide nursing and residential care staff. A training course was also made available to front line staff within the Direct Payments Service of the risks of Modern Day Slavery. As result of this further measures have been put in place to further reduce the risk in that regard.

Countries of operation and supply

Nottinghamshire County Council only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low, the Council remains vigilant and will take all steps available to manage the risks presented.

High-risk activities

The Council has determined that there are no areas of its business that are considered to be at high risk of slavery or human trafficking:

Responsibility

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

- **Policies:** Service Director, Customers, Governance and Employees 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.
- **Training:** Awareness of the issue of human trafficking and modern slavery have been raised in the Chief Executive's blog. E-learning material is available to all staff within the authority.
- A Modern Day Slavery Seminar was held on 23rd January 2019 presented by Paul Elms, Head of Prevention of the Gangmasters & Labour Association for senior officers and elected members highlighting the work that has and still is being carried out in order to reduce modern day slavery throughout the Country
- **Partnership:** The Council is a partner at the Safer Nottinghamshire Board Modern Slavery Steering Group. The Council is also represented at the East Midlands Strategic Migration Partnership Anti Human Trafficking Partnership.

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.

- **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. Our managed service provider's Modern Slavery statement will sit as

an appendix to the Council's statement when published in January 2018.

Practical Guidance

In the course of our employment with the Council, we may come across situations and people that cause us concern. This section seeks to give some practical guidance to assist with deciding if someone may have been trafficked or is the victim of modern slavery.

Victims are trafficked all over the world for little or no money, including to and within the UK. They can be forced to work in the sex trade, domestic service, and forced labour, criminal activity or have their organs removed to be sold. There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they cannot speak the language, have their travel and identity documents removed and are told that if they try to attempt an escape, they or their families will be harmed.

Key indicators of trafficking include:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of trafficking. Often you will build up a picture of the person's circumstances which may indicate that something is not quite right. **If you have a suspicion, report it.**

What should I do if I suspect someone is being trafficked or the victim of slavery?

If a member of staff is approached by a person identifying as a victim of modern slavery, or if a staff member considers that a person may be a potential victim of modern slavery, then if they have the victim's explicit consent, they should contact Nottinghamshire Police on 101.

If this is an emergency situation then staff should call Police on 999.

If the potential victim indicates that they are unwilling to engage with the Police then staff should contact the **Red Cross** on 0771 073 3051.

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can also contact the Modern Slavery Helpline 08000 121 700.

Please contact the Nottinghamshire Multi Agency Safeguarding Hub (MASH) to discuss your concerns under the adults safeguarding procedures on 0300 500 8080.

For potential child victims of trafficking please call the MASH on 0300 500 8090 or the NSPCC Child Trafficking Advice Centre on 0808 800 5000.

Out of office hours, you can contact the Emergency Duty Team on 0300 456 4546

Please be aware not all victims may want to be rescued and there may be instances where reporting a suspected trafficking case puts the potential victim at risk.

Due diligence

Nottinghamshire County Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. This is the responsibility of the individual contract managers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier assessments on an annual basis focusing on financial stability, covering insurance, compliance with various employment policies and which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier to cover all the issues in the previous bullet point;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans for example to demonstrate compliance with safer recruitment requirements;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- invoking sanctions against suppliers who fail to improve their performance in line with an action plan or who seriously violate our expectations of suppliers, including the termination of the business relationship.
- All invitations to tender for business with the Council include the following statement:

"We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains. NCC will not support or deal with any business knowingly involved in slavery or human trafficking. We use the Crown Commercial Services Standard Selection

Questionnaire which includes a self- certification element to our tendering processors these are used to assess suppliers' policies and practices on slavery and human trafficking."

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 or working in HR or Procurement within the Council to complete training on modern slavery.

The modern slavery training will cover:

- our business' purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Nottinghamshire County Council;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- the steps we should take if suppliers or contractors do not implement anti- slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising Programme

- As well as training staff, we have raised awareness of modern slavery issues by entries in the Chief Executive's blog including a link to the Gangmaster and Labour Abuse Authority website.

Modern Slavery in Adult Social care

The County Council has worked with the Modern Slavery International Rights Lab at Nottingham University which looked at a pilot study to evaluate the modern slavery risk in the Council's adult social care supply chains. Two supply chains were selected for investigation: the commissioning of Residential Care and Nursing Homes and the use of Direct Payment Support Service Providers.

As a result of this work further safeguarding has been proposed in an updated Data and Barring Service Policy in relation to Direct Payments to Personal Assistants.

Local Government Association (LGA)

The Local Government Association published guidelines in December 2017 for Councils tackling modern day slavery. The link can be found below:

<https://www.local.gov.uk/modern-slavery-council-guide>

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