

REPORT OF THE SERVICE DIRECTOR, PLACE AND COMMUNITIES

MODERN SLAVERY AND HUMAN TRAFFICKING

Purpose of the report

1. For Members to consider and approve the content of the Council's Modern Slavery Transparency statement 2022-23. The statement is an updated version of that considered and agreed by Members on 3rd November 2021.
2. To update Members on what is happening across the County in relation to Modern Slavery and to understand the nature, scale and impact of modern slavery and modern trafficking at the local level comparative to the national picture.

Information

Duty

3. Section 54 of the Modern Slavery Act 2015 requires organisations within the UK, with an annual turnover of £36 million and over, to produce an annual Modern Slavery and Human Trafficking transparency statement.
4. Nottinghamshire County Council Modern Slavery and Human Trafficking Statement 2022-2023, Appendix A to this, is part of its commitment to being a good employer and as an exemplar to other employers. The statement can be found on the intranet and internet and 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.
5. Section 54(5) of the Act sets out the types of information that may be included in such a statement; namely:
 - the organisation's structure, its business and its supply chains
 - its policies in relation to modern slavery and human trafficking
 - its due diligence processes in relation to modern slavery and human trafficking in its business and supply chains
 - the parts of its business and supply chains where there is a risk of modern slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk

- its effectiveness in ensuring that modern slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate
 - training regarding modern slavery and human trafficking available to its staff.
6. In addition to the Council's own statement, it will need to retain copies of the statements of other suppliers who are required to publish their own statement, for example, commercial organisations with a total turnover of £36 million per annum. Tender documentation has been amended in order to ask potential suppliers particular questions in tender exercises to ensure that suppliers are meeting this duty before awarding contracts.
 7. To further increase awareness of modern slavery and provide clarity for councils on their role in tackling it the Local Government Association, in December 2017, published - "Modern Slavery – A council guide". A copy of this document can be downloaded at [22.12 Modern slavery WEB 2.pdf \(local.gov.uk\)](#)
 8. Nottinghamshire County Council is committed to understanding the risks presented by slavery. The Communities Team is coordinating the council's response to Modern Slavery which includes:
 - Working with partners to establish referral pathways for victims
 - Contributing to a multi-agency strategy which incorporates early intervention and prevention support for victims of Modern Slavery, training, and awareness for practitioners and first line responders
 - Promoting Anti- Slavery Day, which is every year on October 18th, to raise awareness amongst colleagues, stakeholders, and partner organisations on the impact of Modern Slavery
 9. This Council abhors modern slavery and human trafficking and welcomes measures undertaken by our Trading Standards, Contracts Management and Procurement departments to prevent Modern Slavery, but acknowledges the importance of remaining vigilant against such appalling crimes.
 10. The UK Government's Modern Slavery Act (2015) is the first of its kind in Europe, and, also in the world, to specifically address modern slavery and human trafficking in the 21st century.
 11. Modern slavery is a complex, harmful, and largely hidden crime. In England and Wales, modern slavery covers several different forms of exploitation including human trafficking, labour exploitation, criminal exploitation, sexual exploitation, domestic servitude.
 12. As the nature of the threat has changed, there is a commitment to review the 2014 Modern Slavery Strategy in order to develop a revised strategic approach. This is expected for Spring 2022.
 13. The National Referral Mechanism (NRM) is a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support.

National Picture

14. The 2021 UK Annual Report on Modern Slavery, Published 25 November 2021 reported that:

“2020 was the first time that a year-on-year increase in the number of potential victims referred to the NRM for modern slavery was not seen, thought to be a result of the COVID-19 pandemic and associated restrictions”.
15. Nationally, in total there were 10,613 potential victims were referred to the National Referral Mechanism. 48% of those were adults representing a decrease compared to 2020. However, 47% were children which represented an increase on 2020 figures.
16. The figures for the most common nationality of potential victims in 2020 was UK nationals, accounting for 34% (3,560) of all referrals. The most common forms of exploitation reported were labour exploitation for adults and criminal exploitation for minors.
17. Appendix B to this report shows two graphs. The first graph shows the number of referrals into the National Referral Mechanism from 2014 to 2021 rising to reaching a peak number during quarter 4 of 2019. The number reduced significantly during quarter 1 and 2 for 2020 before rising again to levels close to the 2019 peak. This trend coincides with the Covid 19 pandemic lockdown.
18. The trend lines in the second graph follow the same pattern linked to the timeline for the Covid 19 pandemic for both adults (over 18) referrals and children (17 or under).

Nottinghamshire Picture

19. Across Nottinghamshire there is a significant amount of work being delivered, in partnership to tackle modern slavery. There are strong links between partner agencies and community organisations to raise awareness of modern slavery, how to identify and how to refer cases and where required, provide advice and support to victims.
20. The Slavery Exploitation Team are a Nottingham City Council team. As part of their work, a pilot project covering the South Nottinghamshire area, funded through a Police & Crime Commissioner grant to the Safer Nottinghamshire Board has been operating.
21. Data provided for the period January 2021 to December 2021 records there having been 25 cases referred from the County South pilot area. The number of referrals per borough were 13 in Broxtowe, 9 in Gedling, and 3 in Rushcliffe. The primary type of exploitation recorded were 5 financial, 2 criminal, 1 domestic servitude, 3 sexual, 9 cuckooing, and 5 labour. Of the 25 cases, 6 are recorded as being victims of more than 1 type of exploitation.
22. Most referrals in the County came from the Nottinghamshire Police and Nottinghamshire County Council Adult Social Care.

Data Provision

23. Work is currently being undertaken to drill down into data in order that it be provided at district/borough level in addition to the County and City split.

24. The data will reflect that provided as above in relation to the type(s) of exploitation as well as district/borough location and referring organisation and when provided at this level will better inform local partnership working thereby facilitating the targeting of interventions to meet the local need.

Under-reporting

25. The hidden nature of Modern Slavery leaves significant data and information gaps in order to produce an accurate measure of prevalence. Under reporting of concerns, and therefore under-referring of cases into the NRM, is acknowledged as an issue across Nottinghamshire which is replicated across the UK.
26. The Delivery Action Plan of the Modern Slavery Partnership themed subgroup of the Safer Nottinghamshire Board makes significant reference to raising awareness within agencies, organisations and the community regarding on signs to look out for and how to report concerns and support services available.

Training and Awareness

27. There is an identified need for increased awareness and training pertaining to modern slavery. Working with partners, including Nottingham City, briefing sessions to officers in key positions within different organisations is ongoing in seeking to increase the number of referrals of vulnerable victims.
28. The Council requires all staff working in supply chain management, Procurement and Human Resources professionals to have completed training on modern slavery awareness. The Modern-Day Slavery online training module is available to all staff within the authority through the 'My Learning, My Career' link. Relevant staff within Adult Social Care and Children's Social Care have also received awareness raising sessions seeking to increase identification and referral of cases.
29. In the past year, Modern Day Slavery and Human Trafficking training was commissioned through the County Council with funding from the Office of the Police & Crime Commissioner (OPCC), for both internal staff and external partners. These were delivered by the SnowDrop Project in Spring 2021 in nine virtual sessions. Further half day sessions delivered by Hope for Justice were delivered during Autumn 2021 with more being planned for 2022.
30. Referral data currently being provided is assisting in identifying organisations where further work on awareness raising may need to be undertaken. The Modern Slavery Partnership Group have identified this and included it within their delivery action plan for 2022-2023.

Other Options Considered

31. The Council is required to publish a Modern Slavery and Human Trafficking Statement and would wish to do so as part of its commitment to being a good employer and as an exemplar to other employers (as noted: see Appendix A).

Reasons for Recommendations

32. It is a legal requirement for the Council to comply with section 54 of The Modern Slavery Act 2015, and the recommendations help the Council to discharge that duty.

Statutory and Policy Implications

33. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Crime and Disorder Implications

34. Modern Slavery is a priority of the Safer Nottinghamshire Board (SNB). The Nottinghamshire Modern Slavery Steering Group oversees this work. Modern Slavery has strong links with the Serious Organised Crime (SOC) Board. With improved awareness and training across the partnership, we are likely to see an increase in reported offences, identified offenders and referrals.

Human Resources Implications

35. The last review of all the Council's employment policies and procedures included consideration to how we can further develop our prevention strategies to ensure modern slavery and human trafficking form no part of our workforce. This work is being mirrored by the Council's Procurement Team to apply the same standards to our supply chain and those who deliver services on the Council's behalf.

Human Rights Implications

36. These have been considered in developing the statement which is designed to protect individual and collective rights.

Public Sector Equality Duty implications

37. Equality implications have been considered during the development of the Council's Modern Slavery Statement.

Safeguarding of Children and Adults at Risk Implications

38. The implications for the safeguarding of children and vulnerable adults have been considered in developing the statement which will add an additional layer of prevention for people for whom there may be a risk of modern slavery or human trafficking.
39. The National Referral Mechanism (NRM) is available and is a framework for identifying victims of human trafficking and ensuring they receive appropriate care. A range of agencies may be involved in a trafficking case including the Police, the UK Border Agency (UKBA), local authorities and non-government organisations such as charities.
40. The Office of the Nottinghamshire Police & Crime Commissioner has funded a county caseworker until March 2022, taking referrals for South Nottinghamshire, Broxtowe, Gedling and Rushcliffe where there are concerns about exploitation. They work with partners to support victims and reduce harm. The Caseworker is hosted by the Slavery Exploitation Team (SET) based at Nottingham City Council

RECOMMENDATIONS

That the Committee:

- 1) Consider and agree the updated attached statement in Appendix A which demonstrates the Council's commitment to ensuring that there are no victims of slavery or human trafficking employed directly by the Council, in its commissioned services or supply chains.
- 2) Approve the publication of the updated statement on the public website.
- 3) Endorse and recognise the ongoing partnership work to tackle modern slavery and trafficking across Nottinghamshire.

Derek Higton
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For any enquiries about this report please contact: Mark Walker, Group Manager, Trading Standards and Communities Service, mark.walker@nottscc.gov.uk or on Tel: 0115 9772173

Constitutional Comments (LW 08/02/2022)

41. Communities Committee is the appropriate body to consider the content of the report.

Financial Comments (SES 08/02/2022)

42. There are no specific financial implications arising directly from this report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

[Modern Slavery Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[2021 UK Annual Report on Modern Slavery \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Reed MSA Statement.pdf](#)

Electoral Division(s) and Member(s) Affected

- All