

REPORT OF THE SERVICE DIRECTOR, PLACE AND COMMUNITIES

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Purpose of the Report

1. The purpose of this report is for Members to consider and approve the content of the Council's Modern Slavery statement. The statement is an updated version of that considered and agreed by Members on 30 September 2020.

Information

2. At the Full Council meeting on 15th October 2020, a motion was passed that resolved:
3. This Council abhors modern slavery and human trafficking and has taken an active role in raising awareness of these crimes - which are often hiding in plain sight - with members, officers, and partners. This Council 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.
4. The motion therefore instructed the Chief Executive to undertake work confirming that all the Council's service providers, partners, and suppliers comply with the Council's values. This report reflects one that the Chief Executive took to update members on this work to a meeting of the Policy Committee on 21 April 2021.
5. 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.
6. The legislation is intended to enhance support and protection for victims, to provide law enforcement tools to target slave drivers, to ensure perpetrators can be severely punished, and includes provision to encourage business to undertake action to ensure their end-to-end supply chains are slavery free. The Act also established the UK's first ever Independent Anti-slavery Commissioner to drive forward the law enforcement response.
7. Section 54 of the Modern Slavery Act 2015 was brought into force on 29 October 2015 and requires employers to produce a Modern Slavery statement for financial years ending on or after 31 March 2016. Section 54 of the Act states that an employer's slavery and human trafficking statement should include the following information:
 - Details of the Council's structure, business, and supply chains
 - The policy in relation to slavery and human trafficking
 - Due diligence processes in relation to slavery and human trafficking in business and supply chains

- Identification of the level of risk of slavery and human trafficking and how the identified risk will be managed
 - How performance in ensuring that slavery and human trafficking are not taking place in our business or supply chains is measured
 - What training on slavery and human trafficking is available to employees.
8. The UK Government produces an Annual Report on Modern Slavery. The most recent version can be found here [2020 UK annual report on modern slavery \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629222/2020-uk-annual-report-on-modern-slavery.pdf)

Our Approach

9. The Council publishes an annual Modern Slavery and Human Trafficking Statement (Appendix A) as 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.
10. 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 i.e. 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.
11. In order 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 https://www.local.gov.uk/sites/default/files/documents/22.12_Modern_slavery_WEB%202.pdf
12. 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

Staff Training

13. 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.

14. The system for supply chain verification currently in place, where potential suppliers are evaluated before they enter the supply chain, has been reviewed, and our existing supply chains, whereby all existing suppliers are evaluated, have also been subject to review.
15. 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. This was delivered by the SnowDrop Project in Spring 2021 over nine virtual sessions.
16. Over 150 professionals including 60 NCC staff representing services including Trading Standards & the Communities, Adults, Children's & Young People Services, Safeguarding, Youth Justice, Family Service, Independent Chair Service, Public Health and Environmental Health. This training included the requirement and process of reporting under the National Referral Model (NRM).

Procurement

17. Nottinghamshire County Council undertakes due diligence when considering taking on new suppliers. As part of every procurement process our Standard Selection Questionnaire, Section 7 focusses on supplier compliance with the annual reporting requirement as set out in the Modern Slavery Act 2015 and requests evidence. A recent example of this is through the detailed and comprehensive response submitted by The Reed Group which was awarded the Temporary Agency Worker contract in September 2020.
18. 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.

Contract Management

19. Regular reviews of existing supply chains and annual due diligence is the responsibility of the individual Contract Manager. The Council undertook an exercise in 2021 to seek assurance on the level of due diligence undertaken across different areas. This review also included the Council's companies namely Via, Arc and Inspire.
20. Responses to the review were received from key service areas that are responsible for managing key contracts across the Council. This represents over 60% of our total annual contract value. The findings show many areas of good practice and awareness which include:
 - The Council's companies, partners and their supply chains provide the Council with an updated Modern Slavery annually at the request of the Contract Manager
 - Comprehensive documentation in place outlining the referral process if there is an identification or concern of Modern Slavery.
 - Assurance to show that regular quality assurance visits/ checks are completed through which Modern Slavery may be identified.
21. The Council's Contract Managers could not identify any known issues surrounding human trafficking or modern slavery with their suppliers, or the supply chain and many voiced

confidences in the Council's evaluation and selection process as a reliable underpinning to ensuring suppliers were compliant

22. The Contract Management Project Group Work has been newly established to lead the work on strengthening contract management within the Council and implementing the Contract Management Toolkit. The key aim will be to share best practice and embed a consistent approach to Modern Slavery.
23. As a result of work jointly undertaken with the University of Nottingham on a pilot study to evaluate any potential modern slavery risk in the use of Direct Payment (DP) Support Service Providers, guidance have now been included within the DP policy, staff guidance and e-learning module – 'Issues related to Modern Day Slavery to be aware of when employing Personal Assistants'.

County Case Examples

24. Examples from the past year of the impact of the work that is being undertaken on tackling Modern Slavery in Nottinghamshire include:
- An adult male was discussed at Gedling's Complex Case Panel [CCP] and concerns were raised about financial exploitation leaving him unable to pay rent and access food/necessities. Vulnerabilities included a suspected (but undiagnosed) mental health condition, substance abuse, unemployment, and social mobility vulnerabilities. Agencies involved in the case were: Gedling Local Mental Health Team, Nottinghamshire Police, and the Slavery Exploitation Team. The case was heard at the Serious Exploitation Risk Assessment Conference [SERAC] and outcomes included: the police Fraud Protect team visiting the male to offer supportive interventions including awareness raising; warnings and intelligence being placed on agency systems; the individual being moved to a safe accommodation elsewhere.
 - A referral was made to the Slavery Exploitation Team by Nottingham University Hospitals for a male whose property was being subjected to Cuckooing (local drug dealers had taken over in order to operate from his home). Vulnerabilities included alcohol dependence, unemployment and ongoing health issues. Agencies involved included: Nottinghamshire Police (NPT), Broxtowe Housing, Social Care, Slavery Exploitation Team. The case was due to be heard at SERAC, but a group agency discussion resulted in engagement with the male's family who were able to support him to move to a place of safety prior to the meeting. His property was also secured.

Other Options Considered

25. 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

26. 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

27. 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

28. Modern Slavery is one of the priorities of the Safer Nottinghamshire Board (SNB). The county Modern Slavery Steering Group oversees this work, linked into that of the Serious Organised Crime (SOC) Board. With improved awareness and training across the partnership, we are likely to see an increase in offences and referrals.

Human Resources Implications

29. 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

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

Public Sector Equality Duty implications

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

Safeguarding of Children and Adults at Risk Implications

32. The implications for vulnerable adults and children 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.

33. There is a National Referral Mechanism (NRM) 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 such as the Police, the UK Border Agency (UKBA), local authorities and non-government organisations such as charities.

34. The Office of the Nottinghamshire Police & Crime Commissioner has extended funding for a county caseworker until March 2022, taking referrals for South Nottinghamshire, Broxtowe, Gedling and Rushcliffe where there are concerns about adult exploitation, and work with partners to support victims and reduce harm. The Caseworker is hosted by the Slavery Exploitation Team (SET) based at Nottingham City Council.

Implications for Service Users

35. The statement will help to minimise the risk of modern slavery and human trafficking for service users and encourage early identification and action on potential issues.

RECOMMENDATIONS

It is recommended 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) Considers any additional information members would like to receive.

Derek Higton
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Constitutional Comments (EP 22/10/21)

36. The Communities Committee is the appropriate body to consider and approve the contents of this report.

Financial Comments (SES 28/09/2021)

37. 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](#)
- [Contract Management Toolkit](#)
- [The Reed Group- Anti Slavery and Human Trafficking Statement 2020](#)
- [2020 UK annual report on modern slavery \(publishing.service.gov.uk\)](#)

Electoral Division(s) and Member(s) Affected

- All