

Appendix 1

Modern Slavery and Human Trafficking Statement 2023 - 2024

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 the commitment to seek assurance that 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, to fulfil the legal requirement of all UK employers. REED who provides us a recruitment support service have their own annual Modern Slavery Statement - [Reed MSA Statement.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.

Safeguarding

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 minimal 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.

Vulnerable Adults

Nottinghamshire County Council Adult Social Care & Public Health Department has a duty under the Care Act 2014 to make enquiries, or cause others to do so, if it believes an adult is experiencing or is at risk of abuse or neglect. Adult Social care will undertake an enquiry when a person has needs for care and support, is experiencing or at risk of abuse and neglect, and is unable to protect themselves because of these needs. This includes people who may be victims of modern-day slavery and trafficking and / or exploitation.

In those circumstances where peoples' needs do not meet Care Act eligibility criteria, they will be signposted to alternative support from a range of partner agencies, potentially including the SERAC (Serious Exploitation Risk Assessment Conference), a service currently rolling out across the County that provides a multi-agency response to suspected victims of exploitation and slavery.

The Council has a duty to notify the Home Office about any potential adult victims of modern slavery (which encompasses human trafficking, slavery, servitude, and forced or compulsory labour) by either referring them to the National Referral Mechanism (NRM) if they consent, or via the Duty to Notify (DtN) if they do not.

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. The work focuses on four strategic themes: Pursue, Prevent, Protect and Prepare and are in line with Government's Modern Slavery Strategy 2015, to reduce the threat and vulnerability to victims in Nottinghamshire.

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 key in meeting the requirements of the Modern-Day Slavery Act.

- **Safeguarding policies** – adults, children and young people's services have policies in place to address the safety of the people they work with.

- **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 was no requirement to act because of the risk of slavery and human trafficking in the period covered by this statement.

Equality and Diversity

As a major employer and provider of services Nottinghamshire County Council are committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services. To support our commitment to equality, we embed equality and diversity into our everyday business. We expect all our Councillors, managers, employees, and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers.

Due diligence

Nottinghamshire County Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of modern slavery are referred to the police and the Designated Modern Slavery Lead.

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) considering 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 Council has a programme of training for all employees including Safeguarding Awareness Training, enabling officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking. A specific modern slavery awareness E-learning course is available to all staff and is designed to help raise awareness and understanding of Modern Slavery and Human Trafficking and to help recognise their role in identifying and reporting concerns.

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 2023 - 2024.

Cllr John Cottee
Cabinet Member for Communities