

# TEN COMMITMENTS UPDATE AND ACTION TAKEN

August 2021



Update on the Ten Commitments since 2020 and further action taken (*this progress is embedded in the proposed 2021 Modern Slavery Statement*).

| Ten Commitments   | Progress update  |
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| Annual training for staff of corporate Procurement Team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply | During the last 6 months, the Procurement Service Officers have undergone the updated online training of the CIPS Ethical Procurement and Supply training module. The e-learning course is designed to help procurement and supply chain professionals all over the world, to demonstrate their absolute commitment to, and understanding of, acting ethically on behalf of their organisations. The Procurement Service undertake this training each year   |
| Review its contractual spending regularly to identify any potential issues with modern slavery  | Significant work is in hand to advance the Council's Procurement Service and this includes the implementation of a Procurement Improvement Plan. Furthermore, we are having meaningful discussions at regional level with our Public Sector colleagues to address issues and approaches as one. Such regional level groups include Plymouth Public Procurement Partnership and South West Procurement Board  |
| Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed  | <p>The Council currently has the following webpage where this information can be found:<br/> <a href="https://www.plymouth.gov.uk/crimepreventionandantisocialbehaviour/modernslavery">https://www.plymouth.gov.uk/crimepreventionandantisocialbehaviour/modernslavery</a></p> <p>Further information is available in the published statement which provides transparency about the actions the Council will take. The statement can be found on the 'Doing business with the Council' webpage:<br/> <a href="https://www.plymouth.gov.uk/aboutcouncil/doingbusinesscouncil">https://www.plymouth.gov.uk/aboutcouncil/doingbusinesscouncil</a></p> <p>Local Government Association National Advisory Group for Procurement has provided additional guidance from The Human Trafficking Foundation. The below website contains resources, advice and policy information affecting those working with victims of trafficking and exploitation<br/> <a href="https://www.humantraffickingfoundation.org/">https://www.humantraffickingfoundation.org/</a></p> |
| Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery  | The internal webpage regarding whistleblowing and the current policy is available <a href="#">here</a>   |
| Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery                                   | To date and to our knowledge we have never needed to refer a contractor to the National Crime Agency. Details are provided in the "Tackling Modern Slavery and Human Trafficking Toolkit" found here:<br><a href="https://www.plymouth.gov.uk/crimeandantisocialbehaviour/modernslavery">https://www.plymouth.gov.uk/crimeandantisocialbehaviour/modernslavery</a> created by Plymouth's Community Safety Partnership  |
| Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery  | The following is included regarding whistleblowing within our terms and conditions. "The Supplier shall comply with the Council's whistleblowing procedure, which ensures that employees of the Supplier are able to bring to the attention of the Council malpractice, fraud and breach of laws on the part   |

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|  | of the Supplier without fear of disciplinary and other retribution or discriminatory action. The Council's Whistleblowing Policy can be made available upon request or be found freely on the website <a href="#">here</a>   |
| Report publicly on the implementation of this policy (ten commitments) annually  | Annual attendance at PCC Cabinet and publication or MS Statement   |
| Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for noncompliance   | Plymouth City Council (PCC) terms and conditions cover requirements for Suppliers to act in line with and under the Law and Jurisdiction section which states 'The Contract shall be construed and be subject to English law and the exclusive jurisdiction of the English Courts'                               |
| Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery   | There have not been any specific circumstances in the last 12 months to formally review any contract award as per regulation 69 of the Public Contracts Regulations 2015   |
| Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one  | This is covered under the law and jurisdiction section of Plymouth city councils Terms and conditions  |
| <b>Further Actions</b>   | <b>Progress update</b>   |
| Provide specific training and awareness for staff and partners in high-risk areas to address and highlight the requirements of the Modern Slavery Act  | Community Connections will be working with its partners to deliver awareness and training events alongside other Safer Plymouth priorities during 2021/22. Two training sessions have been carried out over the past 12 months, however due to the impact of COVID-19 other sessions were forced to be cancelled |
| Promote clear referral mechanisms for staff, suppliers and those in our communities for reporting any concerns around modern slavery   | Plymouth City Council's website contains a link for reporting modern slavery concerns. This information has been shared with partners and team members   |
| Complete referrals into the National Referral Mechanism which is the framework for identifying victims of human trafficking and ensures they receive appropriate support and protection  | Community Connections has both completed and been named on Police referrals in to the NRM which ensures that victims receive the support they require and so that we can support victims until such time as they are accepted into the process   |
| Through our wider responsibilities, Plymouth City Council will work together with our group of companies proactively to consider the impact of the Act's requirements and to take positive actions beyond communication and education programmes to ensure there is no modern slavery in its business or in its supply chain | Action to be rolled forward  |
| Take account of ethical and modern slavery considerations in our procurement processes and our contractual arrangements  | This is overarching and can be demonstrated within the progress of the Ten commitments   |