MODERN SLAVERY ACTION PLAN (APRIL 2021- MARCH 22)

DRAFT

Principle	Action	Responsible Dept.
Training and development	Annual training for staff of Corporate Procurement Service and Strategic Commissioning to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Procurement & Strategic Commissioning
	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
	Work with HROD to develop Modern Slavery awareness e-learning module as part of wider Safeguarding training.	HROD
	Continue to monitor national and local trends to target focused training sessions 'Identifying the Signs and Making Referrals'. Conduct Safer Plymouth training events with key partners to increase the awareness.	Community Connections
Referrals	Continue to promote the referral mechanisms for staff, suppliers and those in our communities for reporting any concerns around modern slavery.	Community Connections
	Complete referrals into the National Referral Mechanism which is the framework for identifying and referring potential victims of modern slavery and ensures they receive appropriate support and protection.	Community Connections
	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.	Procurement & Strategic Commissioning
	Continue to work with Police and other key partners through the National Police operation Aident by targeting key locations across the city to proactively identify victims and offer support to them before their vulnerabilities are exploited and work with businesses most effective.	Community Connections
Procurement	I. Take account of ethical and modern slavery considerations in our procurement activities	Procurement & Strategic commissioning
	a. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for noncompliance.	

	b. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	
	c. 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.	
	2. Review its contractual spending regularly to identify any potential issues with modern slavery.	Procurement
	a. MODERN SLAVERY ASSESSMENT TOOL (MSAT) Registry and utilisation - The Government has developed MSAT – a free modern slavery risk identification and management tool for public bodies to use with their suppliers. The tool gives suppliers tailored good practice recommendations to improve their anti-slavery activity, from how they conduct risk assessments to ensuring their due diligence helps prevent debt bondage. MSAT can provide an individual supplier with a maximum of 35 tailored recommendations based on the six themes in the Home Office's modern slavery guidance.	
	3. Take account of ethical and modern slavery considerations in our contractual arrangements and as part of contract management.	Procurement & Strategic commissioning
	a. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	
	b. work in partnership with existing suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains through use of the MSAT tool.	
Whistleblowing	Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	CEX
	Require tendered contractors where applicable to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.	Procurement & Strategic commissioning
Transparency	Report publicly on the implementation of this policy annually.	CEX
	Through our wider responsibilities, Plymouth City Council will work together with our group of companies.	Procurement & CEX
	Develop robust set of KPI's to measure effectiveness of steps being taken.	All