

APPENDIX A: MODERN SLAVERY ACTION PLAN (APRIL 2021- MARCH 22) UPDATE

The table below sets out the actions we committed to taking in our Modern Slavery Action Plan between April 2021 and March 2022 and provides an update on our progress to date. It also sets out the next steps that we will take to further combat modern slavery within our organisation and city. These next steps will form the basis of our 2022/23 Modern Slavery Action Plan.

Principle	Action	Update	Next Steps	Responsible Dept.
Training and development	Provide 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.	We provided training to all Corporate Procurement Service and Strategic Commissioning colleagues.	We will provide refreshed training to procurement and commissioning colleagues. We will also create a modern slavery procurement guide to help officers understand modern slavery risks during their procurement activities.	Procurement Service & 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.	Colleagues in Community Connections and other high-risk areas have been offered training in the in the financial year 21/22. A substantial amount of time during 'Safer Plymouth Week' was dedicated to modern slavery.	The next steps for 2022/23 will include rolling out training to Disabled Facilities Grant contractors. We will also aim to provide training to business areas in high-risk sectors such as delivery drivers.	Community Connections in partnership with Safer Plymouth
	Work with HROD to develop Modern Slavery awareness e-learning module as part of wider Safeguarding training.	We have developed a Modern Slavery e-learning course for our employees.	We will roll out our Modern Slavery e-learning course to our	HROD and Procurement Service

			employees and will promote this using our internal communication channels.	
	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.	We have continued to work with our partners to monitor national modern slavery trends. In Plymouth, sexual exploitation and labour exploitation are the most common forms of modern slavery. A substantial amount of time during 'Safer Plymouth Week' was dedicated to modern slavery.	This action is part of our business as usual activity. We will continue to work with our partners to monitor national and local trends to inform the development of further focused training sessions throughout 2022/23.	Community Connections in partnership with Safer Plymouth
Referrals	Continue to promote the referral mechanisms for staff, suppliers and those in our communities for reporting any concerns around modern slavery.	There are generally low levels of modern slavery in Plymouth, however we have continued to promote the referral mechanism. A member of the Community Connections Department has worked closely with the Police to ensure that any issues which have been raised are reported and dealt with quickly and effectively.	We will continue to promote referral mechanisms as this action is part of our business as usual activity. We have included it here so that we do not lose oversight of all the work taking place to tackle modern slavery.	Community Connections in partnership with Safer Plymouth
	Complete referrals into the National Referral Mechanism which is the framework for identifying and referring potential victims of modern slavery and	We make referrals into the National Referral Mechanism where	This action is part of our business as usual activity. We will make	Community Connections in

	ensures they receive appropriate support and protection.	appropriate. This year we have not needed to make any referrals into the National Referral Mechanism.	refers into the National Referral Mechanism when appropriate. We have included this action here so that we do not lose oversight all of the work taking place to tackle modern slavery.	partnership with Safer Plymouth
	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 Service in the financial year 21/22 has not referred any suppliers to the National Crime Agency due to modern slavery concerns.	This action will move forward in 22/23 and will become the shared responsibility of Procurement and responsibility of the contract managers to report any emerging concerns. We will explore putting in place a process for contract managers to feedback their concerns to a central point for the appropriate action to be taken.	Procurement Service, Strategic Commissioning & Policy Team
	Continue to work with Police and other key partners through the National Police operation Aidant 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 has been involved in the National Crime Agencies Operation Aidant. This is a proactive engagement across the city following nationally set themes. Most recently, Operation Aidant focused on takeaways and restaurants delivery as part	The next Operation Aidant will focus on Child Trafficking and will take place in late 2022. The intelligence gathered during these Operations will continue to help shape our understanding of the	Community Connections in partnership with Safer Plymouth

		<p>of a national project. Just under a hundred takeaways and restaurants were visited in a two-week period.</p>	<p>modern slavery risks within the city.</p>	
<p>Procurement</p>	<p>I. Take account of ethical and modern slavery considerations in our procurement activities</p> <ul style="list-style-type: none"> a. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance. 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. 	<p>a. A pass/fail question about Modern Slavery Act 2015 compliance is included as part of our standard tender templates, to be used where applicable. We have not had to reject any tenders/request to participate in procurement activity due to non-compliance with this act.</p> <p>Reference to compliance to relevant legislation is also included within our standard Terms & Conditions.</p> <p>To the Procurement Service’s knowledge, no contracts have been terminated due to breaches with the act.</p> <p>b. Challenging abnormally low tenders has been built into our standard procurement approach.</p> <p>c. Reference to compliance to relevant legislation is</p>	<p>These actions are part of our business as usual activity. We have included them here so that we do not lose oversight of all the work-taking place to prevent modern slavery within our supply chains.</p> <p>Capturing contract termination as a result of non-compliance will be included in the proposed process above.</p>	<p>Procurement Service, Strategic Commissioning & Policy Team</p>

		also included within our standard Terms & Conditions.		
	<p>2. Review its contractual spending regularly to identify any potential issues with modern slavery.</p> <p>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.</p>	<p>We have registered for the Modern Slavery Assessment Tool and are exploring the implications for the Councils supplier base.</p>	<p>We will put forward a proposal to management for use of the tool.</p>	<p>Procurement Service & Strategic commissioning</p>
	<p>3. Take account of ethical and modern slavery considerations in our contractual arrangements and as part of contract management.</p> <p>a. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.</p> <p>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.</p>	<p>a. We have modern slavery website pages within the Procurement pages highlighting the importance of modern slavery to our suppliers.</p> <p>b. We have registered for the Modern Slavery Assessment Tool and are exploring the implications for the Councils supplier base.</p>	<p>We will put forward a proposal to management for use of the tool.</p>	<p>Procurement Service & Strategic commissioning</p>

Whistleblowing	Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	We have published our Whistle-blowing Policy for our employees and have shared communication on this.	We will further raise awareness of our Whistle-blowing Policy.	Policy Team & Corporate Communications
	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.	We have required our tendered contractors to adopt a whistle blowing policy. This is included within our standard Terms & Conditions.	This action is part of our business as usual activity. We have included it here so that we do not lose oversight of all the work-taking place to prevent modern slavery within our supply chains.	Procurement Service & Strategic commissioning
Transparency	Report publicly on the implementation of this policy annually.	We have reviewed our Modern Slavery Policy and have made minor amendments to it.	We will review our Modern Slavery Policy next year and where appropriate update it as required.	ALL
	Through our wider responsibilities, Plymouth City Council will work together with our group of companies.	The Procurement Service procure on behalf of a number of Council owned companies, the pass/fail question about Modern Slavery Act 2015 compliance is included when relevant. We are also actively supporting these organisations in the development of their own	This action is part of our business as usual activity. We have included it here so that we do not lose oversight of all the work-taking place to prevent modern slavery within our supply chains.	Procurement Service & Policy Team

		policies which also consider modern slavery.		
	Develop robust set of KPIs to measure effectiveness of steps being taken.	We have started to develop a set of KPIs to measure our performance.	We will further develop our KPIs and use these to monitor our progress. We will report by exception where we have made formal modern slavery referrals.	All