

APPENDIX B: MODERN SLAVERY STATEMENT 2022

Policy and Intelligence Team



1. INTRODUCTION

This is Plymouth City Council's Modern Slavery Statement for the financial year ending March 31, 2022. This Statement meets the voluntary requirements of Section 54 of the Modern Slavery Act (2015). It explains the steps that the Council took in the past year to identify, prevent and mitigate modern slavery in its operations and supply chains.

Plymouth City Council and its group of companies acknowledge the risk that modern slavery poses to individuals and communities. It supports the implementation of the Modern Slavery Act (2015) and welcomes the forthcoming strengthening of the legislation as set out in the Queen's Speech in May 2022. This will place a stronger emphasis on transparency in combatting modern slavery and ensuring the provision of support for victims.

Plymouth City Council is committed to eliminating the practices and conditions which may allow modern slavery to occur. The Council is part of the [Anti-Slavery Partnership](#) and works with partners and agencies across the South-West Peninsula and takes a collaborative approach to tackling the issue of modern slavery.

Progress has been made in addressing the content required within this Statement as recommended by the Home Office. We have made several commitments within this statement to ensure that we continue to monitor and take steps to tackle modern slavery within the city and our supply chains.

2. OUR POLICIES AND PROCEDURES

Our commitment and overarching approach to tackling modern slavery is set out in our *[Modern Slavery Policy]*. The Council also has several policies and processes which promote transparency and accountability when combatting modern slavery, such as our *[safeguarding]* and *[whistleblowing policies]*.

We encourage our staff to blow the whistle on any suspected examples of modern slavery. The Council's *[Whistleblowing Policy]* can be found on the Council's website. It was publicised at the point of publication of our Modern Slavery Statement. To encourage further use of the policy, it will be regularly publicised internally alongside information on how to spot modern slavery.

3. OUR PROCUREMENT ACTIVITY AND SUPPLY CHAINS

Plymouth City Council is an organisation with over 2,000 employees with an annual contracted spend of approximately £200m across both a local and national supply chain of over 3,500 different organisations. The Council, alongside its family of companies, deliver a range of services and support to our residents, communities and businesses.

The Council works in partnership with Destination Plymouth, Plymouth Waterfront Partnership, Plymouth City Centre Company, Plymouth Science Park amongst others to bring investment into the city and to support our visitor economy.

During the financial year 21/22, to minimise the risk of modern slavery within our supply chains we have:

- Required contractors to comply fully with the Modern Slavery Act (2015), wherever it applies – this is set out within Plymouth City Council (PCC) terms and conditions, which cover the large majority of our procurement activity.
- Required our contractors to adopt a whistle-blowing policy so that they can blow the whistle on any suspected examples of modern slavery.
- Challenged abnormally low tenders as part of our standard procurement approach.
- Carried out an illicit activity risk assessment for the Plymouth and South Hams Freeport to identify the risk of modern slavery from the initiative.
- Highlighted to our suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
- Registered for the Modern Slavery Assessment Tool.
- Required procurement colleagues to complete the CIPS Ethical Procurement and Supply training module.

To further combat the risk of modern slavery within our supply chains in the financial year 22/23 we will:

- Fully understand the Modern Slavery Assessment Tool and its potential impacts to the supplier base.
- Work with our group of companies to ensure compliance with the Modern Slavery Act (2015).

4. OUR EMPLOYEES AND MEMBERS

Our corporate values of being democratic, responsible, fair and collaborative alongside our commitment to the Nolan Principles of Public Life minimises the likelihood of modern slavery occurring within the Council. We have rigorous HR policies and procedures in place and expect high standards and behaviour from all our employees. We acknowledge the important role that our employees and members have in tackling modern slavery.

Our People Strategy 2020 - 2024 sets out our vision for how we will work successfully, both with those who currently work for us and our future colleagues and partner organisations. We are committed to ensuring an equitable, transparent and fair approach to rewarding our employees and are proud of our adoption of the principles of the Foundation Living Wage which sit alongside our job evaluation and grading system. We have recently reviewed our approach to recruitment and selection to ensure that it is fair and accessible for everyone, reflecting our ongoing commitment to equality and diversity.

During the financial year 21/22, to minimise the risk of modern slavery within our organisation we have:

- Ensured the effective implementation and monitoring of our HR policies.
- Provided an employee assistance programme (EAP) to help support employees to deal with difficult and distressing situations including modern slavery.
- Required employees and members to conduct themselves in accordance with the 'Officers Code of Conduct' and 'Councillor's Code of Conduct' respectively.
- Developed a modern slavery e-learning course for all employees which will be rolled out in the coming year.
- Provided specific training and awareness for staff and partners in high-risk areas to address and highlight the requirements of the Modern Slavery Act.
- Followed our safeguarding policy and process when appropriate.

To further reduce the risk of modern slavery within our organisation in the financial year 22/23 we will:

- Continue to raise awareness of modern slavery and promote the referral mechanisms for employees, suppliers and those in our communities for reporting any concerns around modern slavery.
- Refresh the Council's modern slavery webpages.
- Refresh the Modern Slavery Tool Kit and share it with employees and partners.
- Roll out our e-learning modern slavery course to all employees and explore mandating this as part of the induction process for new starters.
- Provide training to members on how to identify and report suspected modern slavery.
- Create a modern slavery procurement guide to help officers understand modern slavery risks during their procurement activities.

- Report by exception on tender submissions which have been omitted due to the tenderer failing on modern slavery exclusion grounds within our standard procurement documentation.

5. UNDERTAKING DUE DILIGENCE AND MANAGING RISK AND PERFORMANCE

This statement recommit us to continue to tackle modern slavery within our organisation and supply chains. This can be found on our website. We will ensure that progress against this statement is tracked and that the take up of any learning and development opportunities is closely monitored.

The Council is prioritising steps to achieve greater supply chain visibility. By increasing the visibility of our supply chains, the council will gain a better understanding of how and where to target our due diligence activity and what measures and goals we will need to set for ourselves in the future.

From an operational perspective, the Council has collaborated extensively with partners to identify and address modern slavery in the city - supporting the identification of victims and working to disrupt offenders.

6. REPORTING CONCERNS

If you suspect that someone is in immediate danger, always contact Devon and Cornwall Police on telephone 999.

If an employee suspects modern slavery they should contact their line manager at their earliest opportunity and report their concerns.

Further information, help and assistance in combatting modern slavery can be found on our website.

Modern Slavery Act: <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

7. APPROVALS

**This Statement was approved by Plymouth City Council's Cabinet on:
Councillor Richard Bingley, Leader Plymouth City Council**

**This statement was approved by Plymouth City Council's Corporate Management Team on:
Tracey Lee, Chief Executive**