

# MODERN SLAVERY UPDATE 2022/23

Cabinet - 14 August 2023



## 1. SUMMARY

This paper asks Cabinet to note the progress the Council has made in tackling and preventing modern slavery within the past year. Building on the success of the previous Modern Slavery Statement, this paper summarises the content of the new Modern Slavery Statement, including the further action we plan to take.

## 2. BACKGROUND AND POLICY CONTEXT

Modern slavery is defined by the Government as 'the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.' Modern Slavery is a crime under the Modern Slavery Act 2015<sup>1</sup>. The Modern Slavery Act (2015) (MSA) sets out a range of measures on how modern slavery and human trafficking should be dealt with in the UK.

As reported last year, in May 2022 the Government set out the Modern Slavery Bill within the Queen's Speech. The Bill reflects the recommendations from the Home Office's Second Interim Report from the Independent Review of the MSA which recommended that the MSA be strengthened. The Modern Slavery Bill is continuing its journey through Parliament.

In March 2023, the Immigration Migration Bill was introduced to Parliament. Under current proposals, once enacted, it will change the law so that those who arrive in the UK illegally will not be able to stay here and will instead be detained and then promptly removed, either to their home country or a safe third country. We are following the progress of the Bill through Parliament and aim to better understand its possible impacts on our approach to combatting modern slavery in Plymouth.

The Council's recently refreshed Corporate Plan sets out the vision for the city and showcases our strong commitment to our co-operative values. In June 2023, the Council re-joined the Co-operative Councils' Innovation Network as a full member. We are committed to upholding the commitments set out in [The Co-operative Party's Charter Against Modern Slavery Charter](#) and, these have been embedded into the work which we are doing.

## 3. MODERN SLAVERY NATIONALLY

The National Referral Mechanism (NRM) and Duty to notify (DtN) statistics found below provide a summary of the number of potential victims of modern slavery referred to the NRM nationally during 2022. The statistics show that:

- 16,938 potential victims of modern slavery were referred to the Home Office in 2022, representing a 33% increase compared to the preceding year and the highest annual number since the NRM began in 2009.
- Of all referrals in 2022, 52% (8,854) were for potential victims who claimed exploitation as adults (compared to 50% in the preceding year), whilst 41% (7,019) claimed exploitation as children (compared to 43% in the preceding year).
- Of the 16,938 potential victims referred in this year, 78% were male and 21% were female.

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<sup>1</sup> Definition of modern slavery via Public Health England, (2017) Research and analysis Modern slavery (Online) Available at: <https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health#definition-of-modern-slavery>

- Albanian nationals overtook UK nationals as the most commonly referred nationality in 2022, with Eritrean nationals being the third most referred.
- Overall, potential victims were most commonly referred for labour exploitation only, which accounted for 30% (5,135) of all referrals.

#### 4. MODERN SLAVERY IN PLYMOUTH

Modern slavery is relatively uncommon in Plymouth. So far in 2023, Plymouth City Council has been involved with three enquiries / investigations relating to modern slavery. The most common forms of modern slavery in the city are sexual exploitation and labour exploitation. However one of the cases this year was suspected domestic servitude.

Despite the low levels of modern slavery in the city, the Council is committed to combatting modern slavery. We are committed to ensuring the safety of women and girls in the city following the publication of the Violence Against Women and Girls Commission recommendations.

We are involved in extensive partnership work and work closely with partners such as the Police and Unseen who have extensive experience in this area. Plymouth City Council chairs Plymouth's Local Anti-Slavery Partnership and also represents Plymouth on the Regional Anti-Slavery Partnership alongside Devon & Cornwall Police's Modern Slavery Crime Lead.

Over the past 12 months, Community Connections has been involved in the National Crime Agency's Operation Aidant. This is a proactive engagement across the city following nationally set themes. The last Operation Aidant focused on high sophistication offending, Chinese organised crime groups and sexual exploitation as part of a national project. The next Operation Aidant will focus on labour exploitation and will take place in July 2023. The intelligence gathered during these operations helps to shape our understanding of the modern slavery risks within the city.

We take a trauma informed approach to our work with victims and, though the support provided to victims of modern slavery may vary, there is always a strong focus on the safety and wellbeing of the victim(s). Where appropriate, this includes the provision of temporary accommodation, access to support services, food and clothing provision and, consideration if a referral into the National Referral Mechanism (NRM) is required.

We are committed to continually improving our practices, for example, in January 2023, changes were made to the NRM referral form. This change aimed to assist First Responders in obtaining the details required for a Reasonable Grounds decision to help us ensure that victims receive the appropriate support.

We have also acknowledged the risk of modern slavery facing people fleeing from the war in Ukraine and have put processes in place with our partners to mitigate this risk. An employment pathway is in place for people when they arrive in Plymouth to try to mitigate the risk of modern slavery by ensuring they are connected with the appropriate agencies and are supported to search for legal employment independently. In addition, working with providers we carry out wellbeing and property checks which helps us identify any red flags.

#### 5. OUR PROGRESS AND MODERN SLAVERY STATEMENT

During the past 12 months, the Council has made progress in delivering against the commitments it made in its last Modern Slavery Statement, though it is acknowledged that further work is required to fully mainstream modern slavery within the organisation. **Table One** provides additional details by exception where actions are yet to be completed.

<b>Table One</b>	
<b>Action</b>	<b>Update</b>
Create a modern slavery procurement guide to help officers understand modern slavery risks during their procurement activities	We have started to draft a modern slavery procurement guide and will be publishing a final version shortly.
Roll out modern slavery training to Disabled Facilities Grant contractors. We will also aim to provide training to business areas in high-risk sectors such as delivery drivers.	We have not yet delivered this training as feedback from drivers and representatives of diverse communities are not currently indicating that this is an area of concern. We did however provide training on the 2022 contractors' day.
Bring forward a proposal for use of the Modern Slavery Assessment Tool (MSAT) tool (to include contract non-compliance).	A proposal to adopt the MSAT tool has been drafted. If approved, next steps include the piloting of the tool with a small selection of suppliers.
Refresh the Modern Slavery Tool Kit and share it with employees and partners.	The Modern Slavery Toolkit is a partnership document owned by the Safer Communities Partnership and so, any review would need to be a multi-agency exercise. It is proposed that we postpone the review until the practical and financial implications of the Illegal Migration Bill can be fully understood as it is likely to require significant changes to operational practice.

Our new Modern Slavery Statement for reiterates our commitment to tackling modern slavery and builds upon our progress to date. It can be found in **Appendix A**.

Good progress has been made to ensure that our supply chains are transparent, the most vulnerable members of our community are safeguarded and our employees are supported to identify and tackle modern slavery. One area which has been identified as needing vigilance for risk of exploitation through modern slavery is in the delivery of care and support to vulnerable children and adults, particularly as challenges in the recruitment and retention of the social care workforce continue.

Strategic Commissioning have been working to embed robust systems of intelligence relating to care providers, to ensure that any risks related to modern slavery are picked up as early as possible. This includes robust checks on providers prior to using them for the first time, ongoing vigilance including collecting feedback from staff and service users and the development of an intelligence dashboard for adult services where all available information is scrutinised.

Examples of our other activities during the past 12 months include;

- Providing training for commissioning and procurement colleagues on ethical procurement.
- Continuing to require tendered contractors where applicable, to adopt a whistle-blowing policy.
- Raising awareness of modern slavery amongst employees via internal communications.

## APPENDIX A: MODERN SLAVERY STATEMENT

### 1. INTRODUCTION

This is Plymouth City Council's Modern Slavery Statement for the financial year ending March 31, 2023. 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 as set out in the [Co-operative Party Charter Against Modern Slavery](#) which the Council first signed up to on 17 September 2018.

Plymouth City Council and its group of companies acknowledge the risk that modern slavery poses to individuals and communities. It supports implementation of the Modern Slavery Act (2015), and the strengthening of the legislation as set out in the Queen's Speech in May 2022. It also acknowledges the forthcoming changes to the Government's approach to modern slavery following the introduction of the Immigration Migration Bill to the House of Commons in March 2023.

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. 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.

During the financial year 22/23 we have:

- Undertaken an annual review of our Modern Slavery Policy and checked alignment to our new Corporate Plan.
- Continued to monitor legislation passing through parliament to identify any impacts on how we work with communities.

### 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 £350m across both a local and national supply chain of over 3,500 different organisations. The Council, alongside its family of companies,

delivers a range of services and support to Plymouth residents, communities and businesses.

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

During the financial year 22/23, 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 and commissioning 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.
- Worked with Catered to develop and publish a Corporate Social Responsibility Policy including considerations on Modern Slavery
- Managed our illicit activity risk log 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 and have begun exploring how it can be used within the Council.

To further combat the risk of modern slavery within our supply chains in the financial year 23/24 we will:

- Fully understand the Modern Slavery Assessment Tool and its potential impacts to the supplier base and explore rolling it out across Council contracts.
- 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.
- Continue to work with our family of companies to ensure compliance with the Modern Slavery Act (2015).

- Continue to carry out robust checks on providers prior to using them in high risk areas such as adult social care.
- Develop a bespoke modern slavery dashboard in high risk areas such as adult social care to allow information to be easily accessible and scrutinised.

#### **4. OUR EMPLOYEES AND MEMBERS**

Our belief in democracy, responsibility, fairness and co-operation alongside our commitment to the Nolan Principles of Public Life minimises the likelihood of modern slavery occurring within the Council. We have rigorous procurement and commissioning procedures and HR policies 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.

During the financial year 22/23, 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.
- Provided specific training and awareness for staff and partners in high-risk areas to address and highlight the requirements of the Modern Slavery Act.
- Required commissioning and procurement colleagues to complete the CIPS Ethical Procurement and Supply training module.
- Followed our safeguarding policy and processes when appropriate.
- Refreshed the Council's modern slavery webpages and shared communications to staff on our internal network to raise awareness
- Provided training to members on how they can identify and report suspected modern slavery.

To further reduce the risk of modern slavery within our organisation in the financial year 23/24 we will:

- Continue to raise awareness of modern slavery and promote the referral mechanisms (and any changes arising from the Immigration Bill) for employees, suppliers and those in our communities, for reporting any concerns around modern slavery.
- Continue to promote our modern slavery e-learning course to all employees.
- Refresh the Modern Slavery Tool Kit and share it with employees and partners.
- Publish a modern slavery procurement guide to help officers understand modern slavery risks during their procurement activities.

## **5. UNDERTAKING DUE DILIGENCE AND MANAGING RISK AND PERFORMANCE**

This statement recommitts 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 a Council employee suspects modern slavery they should contact their line manager at the earliest opportunity and report their concerns.

Managers should ensure that Community Connections are aware of any suspected modern slavery cases and should contact the Community Connections Strategic Manager with responsibility for modern slavery (Tracey Naismith, [tracey.naismith@plymouth.gov.uk](mailto:tracey.naismith@plymouth.gov.uk)).

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

Information about the Modern Slavery Act can be found below:

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

## **7. APPROVALS**

**This Statement was approved by Plymouth City Council's Cabinet on:**

**Cllr Tudor Evans, Leader Plymouth City Council**

**This statement was approved by Plymouth City Council's Corporate Management Team on:**

**Tracey Lee, Chief Executive**