

# MODERN SLAVERY UPDATE 2023/24

Cabinet 12 August 2024



## 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 July 2023, the Immigration Migration 2023 Act was introduced into Law. It changed 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. However with the recent change of Government there will likely be changes as the kings speech indicated a new Bill will be introduced to modernise the asylum and immigration system, establishing a new Border Security Command and delivering enhanced counter terror powers to tackle organised immigration crime [Border Security, Asylum and Immigration Bill]. We will monitor its progress over the next year.

The Council's 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 and 2023. The statistics show that:

- 17,004 potential victims of modern slavery were referred to the Home Office in 2023, similar to the preceding year (16,921) but nonetheless the highest annual number since the NRM began in 2009
- around four-fifths of referrals (81%; 13,704) were sent to the Single Competent Authority (SCA) and the rest (19%; 3,300) to the Immigration Enforcement Competent Authority (IECA) for consideration
- the number of referrals for females (24%; 4,088) were at their highest on record, whereas the number of referrals for males (76%; 12,903) saw a fall from the previous year

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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>

- the number of referrals for child potential victims (44%; 7,432) were at their highest on record, whereas the number for adult potential victims (51%; 8,622) saw a decrease from the previous year
- the most common nationality referred this year was UK (25%; 4,299), whose numbers were at their highest for any year since the NRM began; the second most commonly referred nationality was Albanian (24%; 4,052) and third was Vietnamese (6%; 991)
- 15,247 reasonable grounds and 9,825 conclusive grounds decisions were made this year; of these, 55% of reasonable grounds and 66% of conclusive grounds decisions were positive
- the number of conclusive grounds decisions was the highest annual number made since the NRM began
- the Home Office received 4,929 reports of adult potential victims via the DtN process, the highest number since the DtN began in 2015.

#### 4. MODERN SLAVERY IN PLYMOUTH

Modern slavery is rarely reported in Plymouth. So far in 2024, we have supported our police colleagues with a suspected Modern Slavery Case linked to a restaurant in the city. Those who were in the property declined support except for one male who was supported through the National Referral Mechanism. The most common forms of modern slavery in the city are sexual exploitation and labour exploitation. However, one case in 2023 was suspected domestic servitude.

Despite the low levels of reported 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 represents Plymouth on the Regional Anti-Slavery Partnership alongside Devon and Cornwall Police's Modern Slavery Crime Lead.

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 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. Safer Plymouth will this year review and refresh the partnership Modern Slavery Toolkit. This will support staff in understanding how to spot the signs of vulnerability and take appropriate actions in a timely way.

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 a summary of actions achieved.

**Table one – Actions Achieved**

- Fully understood the Modern Slavery ‘Assessment Tool’ and the potential impacts to the supplier base and initiated a roll out across some Council contracts in the form of a pilot with 5 key suppliers.
- Published a Modern Slavery ‘Procurement guide’ to help officers understand modern slavery risks during their procurement activities.
- Reported by exception on tender submissions which have been omitted due to the tenderer failing on modern slavery exclusion grounds within our standard procurement documentation. No tenders have been excluded on these grounds in this period.
- Developed actions for 2024/25 that will become business as usual
- Reviewed our online training provision for Modern Slavery
- Continued to work with our family of companies to ensure compliance with the Modern Slavery Act (2015) where PCC has facilitated Procurements on their behalf.
- Continued to carry out robust checks on providers prior to using them in high risk areas such as social care.
- 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.
- Commissioned Plymouth HOPE to work with international recruits to ensure they feel safe and confident to report issues

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

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. An area that continues to be 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