

MODERN SLAVERY STATEMENT 2023/24



I. INTRODUCTION

This is Plymouth City Council's Modern Slavery Statement for the financial year ending March 31, 2024.

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 Illegal Migration Act 2023 ([Modern Slavery Factsheet](#)) which received Royal Assent on 20 July 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.

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 23/24, to minimise the risk of modern slavery within our supply chains we have:

- 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.
- Reviewed and updated our Modern Slavery 'Tool Kit' with Safer Plymouth
- 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 adult 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.

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 23/24, 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 24/25 we will:

- Complete the Modern Slavery Assessment Tool pilot
- Analyse the results of the Modern Slavery Assessment Tool pilot and consider further roll out
- 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.
- Work with our Community Safety Partnership to refresh the Modern Slavery Tool Kit and roll it out to employees and partners.
- Work together to strengthen internal pathways between the Community Safety Partnership, Adult Safeguarding Boards and Plymouth Children's Safeguarding Partnership to ensure that our responses to Modern Slavery and Human Trafficking linked to vulnerable Adults and Under 18's are effectively coordinated and risks mitigated
- Embed the Modern Slavery Procurement Guide within Procurement processes.
- Monitor and review our policy and procedures to ensure they are consistent with the with Immigration Act (2024).
- Progress a collaborative pilot with police modern slavery unit.
- Learn from operational experiences locally.
- Support Devon and Cornwall Police in rolling out operation Aidant – the NCA intensification weeks linked to tackling Modern Slavery across communities.

5. UNDERTAKING DUE DILIGENCE AND MANAGING RISK AND PERFORMANCE

This statement recommits 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 (community.connection@plymouth.gov.uk) is aware of any suspected modern slavery cases. The Plymouth City Council lead person is the Head of Community Safety (Tracey Naismith, 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 agreed by Plymouth City Council's Cabinet on:

12 August 2024 (subject to agreement at Cabinet meeting on 12 August 2024)

Cllr Tudor Evans, Leader Plymouth City Council

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

30 July 2024

Tracey Lee, Chief Executive