

MODERN SLAVERY UPDATE 2024/25

Cabinet 11 August 2025



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 2015¹. 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 previously reported, 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 a new Bill, the "Border Security, Asylum and Immigration Bill" has been introduced into Parliament which will modernise the asylum and immigration system. As at June 2025 it's due for a third reading in the House of Lords. We will continue to monitor its progress.

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 2024. The statistics show that:

- 19,125 potential victims of modern slavery were referred to the Home Office in 2024, representing a 13% increase compared to the preceding year (16,990)
- the number of referrals made in this year is the highest in a year since the NRM began, overtaking the record from the previous year
- 14,790 (77%) were sent to the Single Competent Authority (SCA) for consideration and 4,335 (23%) were sent to the Immigration Enforcement Competent Authority (IECA)
- the most common nationalities referred this year were UK (23%; 4,441), Albanian (13%; 2,492) and Vietnamese (11%; 2,153)
- 20,090 reasonable grounds and 17,304 conclusive grounds decisions were made this year; of these, 53% of reasonable grounds and 56% of conclusive grounds decisions were positive
- the number of conclusive grounds decisions made was the highest in a year since the NRM began, representing a 78% increase compared to the preceding year
- there were 17,168 cases which have been issued a positive reasonable grounds decision and are awaiting a conclusive grounds decision, as of the end of 2024
- the Home Office received 5,598 reports of adult potential victims via the DtN process

¹ 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 DtN reports received this year is the highest in a year since the NRM began, overtaking the record from the previous year

4. MODERN SLAVERY IN PLYMOUTH

Although Plymouth-specific figures aren't broken out in the national reports, local authorities, police, and NGOs in the Southwest region—including Devon and Cornwall—are active participants in identifying and supporting victims. Plymouth, as a port city, is particularly vulnerable to exploitation linked to forced labour, domestic servitude, and trafficking.

It is assessed that MS is still under reported in the city, however Plymouth City Council (PCC) and police continue to work together to deploy to intelligence led investigations. In February 2025, police and PCC staff deployed in a day of action that saw victims of MS identified in both pop-up brothels and in car washes. Several people were arrested, and a number of victims were safeguarded in a victim centred, trauma informed approach.

We assess that sexual exploitation in brothels, labour exploitation within fast food establishments, and criminal exploitation related to drug cultivation are currently the greatest risks within the city. There have been several investigations reflecting these themes and intelligence submissions continue to identify these crime types as prevalent within the city.

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
<p>During the financial year 24/25, to minimise the risk of modern slavery within our supply chains we have put in place the following:</p> <ul style="list-style-type: none">• Monitored and reviewed our policy and procedures to ensure they are consistent with the with Immigration Act (2024).• Guidance on how to consider modern slavery effectively and appropriately at each stage of the procurement cycle has been published• All procurement professionals remain up to date with CIPS Ethics training.• Tender templates have been updated to include additional optional modern slavery questions aligning with central government good practice.• Tender templates have been updated to enable the Council to investigate modern slavery concerns as part of challenging abnormally low tenders.• Trained 8 First Responders from different departments to allow deployment to potential victims of MS. These staff are comfortable dealing with victims of MS in trauma informed way whilst using National Referral Mechanism to identify, support, and protect victims.• Continued to promote our modern slavery e-learning course to all employees.• Developed and delivered a face to face training package to raise awareness of MS for PCC staff.• Completed the Modern Slavery <u>Assessment</u> Tool Kit pilot (Safer Plymouth)• Worked with our Community Safety Partnership to refresh the Modern Slavery Tool Kit and roll it out in 2025/26 to employees and partners.• 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.• Completed a collaborative pilot with police MS tactical advisors to support with Modern Slavery and PCC have now a MS Tactical Advisor trained that can deploy into multiagency

investigations and can provide guidance to PCC staff on victim safeguarding, evidence gathering and first response to potential victims.

- The Community Safety Team recruited a MS subject matter expert to complete a review of all MS policy and procedures who is starting September 2025.
- Learned from operational experiences locally.
- Supported Devon and Cornwall Police in rolling out operation Aidant – the NCA intensification weeks linked to tackling Modern Slavery across communities. This is an ongoing project.

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.