

# MODERN SLAVERY STATEMENT 2024/25



## I. INTRODUCTION

This is Plymouth City Council's Modern Slavery Statement for the financial year ending 31 March 2025.

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 24/25, to minimise the risk of modern slavery within our supply chains we have put in place the following:

- 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 Assessment 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.

#### **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 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 24/25, to minimise the risk of modern slavery within our organisation we have: (These are 23/24 actions)

- 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 25/26 we will:

- Complete the Modern Slavery Assessment Tool pilot (Procurement) and consider further roll out. This has been moved to 2025-2026 due to the complexity of the activity and the prioritisation of compliance work related to the Procurement Act 2023.
- Ensure that our responses to Modern Slavery and Human Trafficking linked to vulnerable Adults and Under 18's are effectively coordinated and risks mitigated.
- Continue to promote our modern slavery e-learning course to all employees
- Continue to deliver face to face training package to raise awareness of MS for PCC staff.
- Raise awareness and work with our Community Safety Partnership to refresh and promote the Modern Slavery Tool Kit and roll it out to employees and partners
- PCC to recruit a serious violence prevent officer whose work will include increasing awareness of MS in the city.
- Create an internal process to complement the regional processes to support PCC staff to recognise the signs for MS and report it.
- Scoping the viability of an all age city-wide exploitation strategy which would incorporate all boards.
- Support Devon and Cornwall Police in rolling out operation Aidant

## 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 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](mailto: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](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 agreed by Plymouth City Council's Cabinet on:**

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

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

22 July 2025

**Tracey Lee, Chief Executive**