

Modern Slavery Statement

Introduction

This statement sets out Nottingham City Council's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

As part of the public sector, Nottingham City Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Council is committed to improving its practices to combat and prevent slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Nottingham City Council is a unitary authority providing all local government services for its 300,000+ citizens, from waste collections and clean-up teams to public health, schools and social care. The Council manages a wide range of services, delivered both directly by the Council and through external contractors, with a large and diverse supply chain.

Countries of operation and supply

The organisation currently operates in the United Kingdom.

We would expect and request assurance that the practices of companies and organisations operating within the EU adhere to Article 4 of the European Convention on Human Rights, concerning the prohibition of slavery and forced labour. Should the Council look to procure or import products or services from outside the EU which could pose an increased risk of slavery or human trafficking, it would undertake further consideration of supply chains in order to take account of potential risks.

Nottingham City Council would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the City Council's expectations. We would request that our suppliers ensure the same of their own supply chains.

Responsibility

As a Council we are committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business.

The Council has a range of policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations.

Policies: Council policies are developed by officers employed by the authority and are then agreed by a relevant board or committee, which would include councillors, senior officers and partner organisations.

Risk assessments: Organisational responsibility for human rights would be cross-council. Modern slavery risk analysis would be provided by our colleagues in Community Protection who are actively developing strategies and safeguards around this.

Investigations/due diligence: In respect of suspected or known incidents of slavery of trafficking we would refer these to the relevant police authority and also to our colleagues in Community Protection if in Nottingham who are our direct link with the local Serious and Organised Crime Board which has a responsibility for modern slavery.

The Council actively works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain roles such as cleaning and care work, and large numbers of adults in multiple occupancy domestic properties. As part of its safeguarding responsibility the Council has previously commissioned safeguarding training for colleagues across the authority to help identify any signs of potential safeguarding incidents and the relevant referral pathways. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their manager, the police and the relevant safeguarding board if this incident was in Nottingham.

Any investigations in relation to suspected or confirmed modern slavery would be conducted with the support of partners and experts.

Specific policies which apply (copies are available on request):

- **Whistleblowing Policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via either their manager or via the Council's Monitoring Officer (currently the Corporate Director of Resilience).
- **Employee Code of Conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour, including when managing its supply chain.
- **Business Charter Policy:** The Council has developed a Business Charter which encourages signatories to work together to improve the economic, social and environmental wellbeing of the city. Under the principles of the Business Charter, signatories are asked to commit to employing the highest ethical standards and operating in a fair and transparent way. This includes supporting

staff development and the well-being and protection of workforces. Mechanisms are in place to implement the Business Charter through contracts procured and through organisations signing up voluntarily to its principles.

- **Recruitment Policy:** The organisation directly recruits its employees via our in-house recruitment function. Where agency workers are used, these are procured via a third-party company which vets employment agencies to ensure they are reputable and always verifies the practices of any new agency it deals with before accepting workers from that agency.
- **Nottingham City Council Procurement Strategy 2014-2017:** The Procurement Strategy was developed in 2014 with the key objectives of delivering economic, social and environmental benefits to the city through procurement. The strategy identifies the role played by procurement in minimising the risk of social exploitation within the supply chain by ensuring the Council's ethical standards are met. The Council's ethical procurement objective is to ensure that people in the supply chain are treated with respect and have rights with regards to employment, including rights to freely choose employment, freedom of association and equal opportunities for all. These objectives will be further developed in the Procurement Strategy in future.
- **Equality & Diversity Policies:** The Council has two Equality and Diversity Policies – one for colleagues and one for Nottingham citizens. Both are declarations of the Council's commitment to making equality and diversity an integral part of the Council's business as usual. This includes a commitment to use our influence and purchasing power to help make equality a reality for all, and to take action to eradicate discrimination and inequality when delivering services, when employing others to deliver services on our behalf and when providing funding to others to provide services.
- **Domestic and Sexual Violence Strategy for Nottingham City 2015:** This policy, held by Nottingham's Crime and Drugs Partnership, includes actions and aims to reduce instances of domestic and sexual violence in the city and specifically references modern slavery as a potential example of this. The strategy includes the responsibility of partners, including Nottingham City Council, in tackling all aspects of domestic and sexual violence and the strategy details what services are available for support.

Due diligence of suppliers

As part of our initiative to identify and mitigate the risks of slavery and human trafficking, the Council undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Council's due diligence and reviews include:

- taking steps to improve substandard suppliers' practices, requiring them to implement action plans
- invoking sanctions against suppliers that either fail to improve their performance in line with an action plan or seriously violate our supplier conditions of contract, including the termination of the business relationship
- developing appropriate clauses and wording for all relevant documents where it is deemed appropriate to detail the Council's approach following the implementation of the Modern Slavery Act. In relation to the supply chain, this includes robust contract clauses and questions in the supplier selection process which enable the

exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act.

Performance indicators

The Council is reviewing its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.

Training and awareness-raising

The Council recognises that certain colleagues within the organisation should be required to complete training on modern slavery in order to raise awareness and increase compliance with the Modern Slavery Act 2015. At present, no training is in place however within the next 12 months the Council will take steps to review this position and put appropriate training in place specific to modern slavery outside of the training already provided in its existing policies.

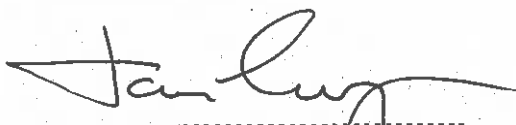
This will include considering awareness of the following;

- the basic principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation, and
- what external help is available, for example through the Modern Slavery Helpline.

We will also make available information for all colleagues outlining our duties, potential warning signs and what to do if they have any concerns.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nottingham City Council's modern slavery and human trafficking statement for the financial year ending 31 March 2016.

Signed:



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Ian Curryer, Chief Executive



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Nicola Heaton, Portfolio Holder, Communities

Date: 29 September 2016