

## **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 2018 to 31 March 2019.

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. Please see Appendix A for a more detailed breakdown of the Council's structure and services.

### **Countries of operation and supply**

The organisation currently operates in the United Kingdom.

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.

Further, we would expect and may 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, it would undertake further consideration of supply chains in order to take account of potential risks; however, standards of rigour will be consistent across all supply chains, regardless of country or origin.

### **Responsibility**

The Council is committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business. As a Council, our responsibility extends beyond supply chains and our links with third parties, as we have a corporate responsibility to safeguard our citizens directly via interventions by our Community

Protection and Social Services functions, and where citizens utilise Council property and services. The Council's Community Protection function shares intelligence and information and participates in joint investigations with Nottinghamshire Police and other law enforcement partners regarding issues of modern slavery or human trafficking. Adult Social Care is one of a number of agencies who have a responsibility as First Responder to refer people to the National Referral Mechanism if concerns of Modern Day Slavery have been identified and the person has provided their consent for this support. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

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 all of 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.

**Management responsibilities:**

The Council takes the welfare of its employees very seriously and as part of the day to day management role within the Council, there is a requirement that managers will hold regular supervision meetings with employees to make every effort to address and support any personal welfare issues employees may have. The Council also offers confidential access to a 24/7 free and impartial Employee Assistance service, which includes a free counselling function.

**Investigations/due diligence:** In respect of suspected or known incidents of slavery or trafficking we would refer these to the relevant police authority and, where incidents occur in Nottingham, to our colleagues in Community Protection, who are our direct link with the local Vulnerabilities and Commodities Board which has a responsibility for modern slavery. The Council's Property Services department will be vigilant for signs of modern slavery on Council property, and will report this appropriately if they believe that suspicious activity is taking place.

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. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their manager, the police and the Nottingham Health & Care Point if the incident was in Nottingham.

The Council has established joint working arrangements with Nottinghamshire Police and the Gangmasters and Labour Abuse Authority (GLAA). Through the Community Protection Intelligence Team information on suspected offending detected through

frontline CP services is directed to the appropriate intelligence bureau of our partners. Joint operations are routinely undertaken, especially with the Safer Housing service. It is intended to continue to build this model of working over the coming year and to share any best practice identified.

**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 Director of Legal and Governance).
- **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 Nottingham City council Business Charter 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 in turn has its own modern slavery statement. The third party company will vet employment agencies to ensure they are reputable and verify the practices of any new agency it deals with before accepting workers from that agency. If we engage consultants or other agency workers outside the procured process (only for unique and specialist services), we will ensure the verification of their practices is reviewed and we will ensure modern slavery statements are in place for those agencies.
- **Nottingham City Council Procurement Strategy 2018-2023:** The Procurement Strategy 2018-2023 sets out how the Council will continue to drive forward the key objectives of delivering economic, social and environmental benefits to the city through procurement. It includes ethical standards as a core principle for procurement and acknowledges the important role that procurement plays in sourcing in a manner that ensures ethical standards are met, minimises the risk of social exploitation and rewards good employment practices. Our ethical procurement objectives are to ensure the well-being and protection of work forces throughout the supply chain, that people are treated with respect and their rights are protected.
- **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**

We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain. Our due diligence measures include:

- Working with partners to develop our understanding of the risks of modern slavery occurring and to review the supply chain to identify areas of vulnerability and risk. Following good practice guidance in relation to modern slavery.
- Within the category management approach, considering appropriate steps to be taken to mitigate risks, particularly in those areas assessed to be at high risk of modern slavery.
- Taking appropriate measures in the selection of suppliers to enable the exclusion of suppliers with convictions under the Modern Slavery Act.
- Inclusion of appropriate clauses in contracts to require compliance with the requirements of the Modern Slavery Act; these will be applicable to sub-contractors in the supply chain.
- Working collaboratively with suppliers to mitigate the risk of modern slavery and supporting those that identify areas for improvement.
- Monitoring the performance of suppliers against the contract requirements, particularly in areas of identified high risk. Invoking sanctions against suppliers that fail to address performance issues identified or seriously violate the conditions of contract.

### **Safeguarding Nottingham Citizens**

Nottingham City Council has a duty to ensure that its most vulnerable citizens are safeguarded. The Care Act 2014 sets out duties for Nottingham City Council to make enquiries, or cause others to do so if it believes an adult is experiencing or is at risk of abuse or neglect. Adult Social care will undertake an enquiry when a citizen has needs for care and support, is experiencing or at risk of abuse and neglect, and is unable to protect themselves because of these needs. This includes citizens who may be victims of Modern Day Slavery and or trafficking/exploitation.

Children are also victims of Modern slavery as it is a form of organised crime in which individuals including children and young people are treated as commodities and exploited for criminal gain. Grooming methods are used to gain the trust of a child and

their parents, e.g. the promise of a better life or education, which results in a life of abuse, servitude and inhumane treatment.

Modern slavery is often hidden in nature, and goes unnoticed in our communities, with under-reporting a major concern. Children and young people may also be exploited by parents, carers or family members. Often the child or young person will not realise that family members are involved in the exploitation.

Modern slavery is child abuse, and any potential victim of child trafficking or slavery, servitude, or forced or compulsory labour should immediately be referred to Nottingham City Children's Services as they may be suffering significant harm

Nottingham City Council has a duty to notify the Home Office about any potential victims of Modern Slavery by referring them to the National Referral Mechanism (NRM). Victims can be of any nationality, and may include British national children, such as those trafficked for child sexual exploitation or those trafficked as drug carriers internally in the UK. The NRM does not supersede child protection procedures, so existing safeguarding processes should still be followed in tandem with the notifications to the NRM

Adult Social Care has representation on the Domestic and Sexual Violence and Abuse Steering Group and Adult Social Care colleagues have access to both Safeguarding Adults basic awareness training and update/refresher courses provided by both our training department and external partners. We have already provided bespoke modern slavery training for colleagues in our Safeguarding Team and also a number of colleagues who work across front line services.

The Council's Community Protection service is actively working with other Councils across Nottinghamshire to develop a response plan should any large-scale occurrence of modern slavery be discovered within the County, and is working with an external partner to establish a clear support route for victims of modern slavery within the region.

Part of Nottingham's commitment to the detection and prevention of Modern Slavery is demonstrated in the Modern Slavery Victim Pathway project, one of six pilots nationally supporting survivors of slavery/trafficking post NRM. The team works to integrate small numbers of survivors back into the community.

Partnership working around this has revealed a level of exploitation that would not necessarily fit with the traditional description of slavery, but is clear exploitation and sometimes trafficking. This is conforming how we configure services in the short and longer term.

### **Training and awareness-raising**

The Council recognises that colleagues within the organisation and our non-governmental partners should be trained on modern slavery/trafficking in order to raise awareness, learn the pathway and ensure compliance with the Modern Slavery Act 2015.

The Council's Community Protection service is implementing initiatives to raise awareness of modern slavery. A total of 27 free training sessions for Nottingham City Council colleague and non-governmental organisations will be delivered between April 2017 and March 2019 and 823 staff and volunteers from statutory and voluntary sector have benefited from these training sessions.

Basic e-learning continues to be available for all Council colleagues. A total of 523 colleagues have undertaken the e-learning module since its re-launch in November 2018. In addition, the Safeguarding Vulnerable People e-learning module includes Modern Slavery scenario an explanation of Modern slavery under types of abuse.

A Modern Slavery Training plan has been developed and implemented to ensure that all colleagues and partners have access to general awareness training which will encourage a professional curiosity when it comes to identifying slavery and includes the following:

- The basic principles of the Modern Slavery Act 2015
- How colleagues and partners can identify slavery including warning signs and indicators
- What colleagues and partners can do to raise awareness about potential slavery
- What external help is available and details of the National Referral Mechanism (NRM)
- What is the referral path and what local support is available.

The Modern Slavery Training Plan also includes appropriate training for colleagues in specific roles/teams whose roles are likely to bring them into contact with victims and perpetrators. From October 2018 tailored training sessions were delivered to key organisations coming in contact with survivors such as CAMHS, Social Services and Duty Team, Women Services, NHS. Nottingham City Council is a partner in the local Modern Slavery Partnership that delivers two large scale awareness sessions per annum, delivering further information and updates to front line staff and third sector organisations.

### **Promoting and Communicating Modern Slavery Issues**

Information has been made available for all colleagues outlining our duties, potential warning signs and what to do if they have any concerns. This is accessible on the intranet for all colleagues and supplemented by an internal communications campaign which was implemented to raise awareness of modern slavery, what it is and how it might impact on the day to day work of Council employees. As part of this, training courses, including eLearning as well as face to face workshops, were promoted to all colleagues who wished to attend.

The Community Cohesion and Safety Service, from the Community Protection Directorate, Leading the Greater Nottingham Modern Slavery Forum, which brings together local, statutory and non-governmental organisations, who in partnership identify external resources and gaps and make proposal for improvement. Public awareness raising events which target those communities most at risk are currently in the planning stages. The Forum is delivering a couple of workshops a year focusing

on priorities such as victim support, prevention, discovery and integration; also it looks at sharing resources and coordinating the community contribution. In October 2018 for the National Anti-Slavery Day a set of events were delivered in Nottingham including a well-attended awareness workshop with one of the most at risk communities, Roma, a public awareness event to engage over 100 citizens, a third sector workshop and online awareness.

**Declaration**

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 2019.

**Signed:**



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**Ian Curryer, Chief Executive**



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**Eunice Campbell-Clark, Portfolio Holder, Health, HR and Equalities**

**Date:** 5 September 2019

## APPENDIX A

### What is Nottingham City Council's business?

The services that Nottingham City Council provides to the citizens who reside in the City and to colleagues it employs can be broken down into four departmental areas as follows:

- Children and Adults
- Development and Growth
- Commercial and Operations
- Strategy and Resources

These include, but are not limited to:

#### Children and Adults Services

- **Education Strategy** – in schools and further education colleges. This includes employing teachers, teaching assistants, Head Teachers etc.
- **Children's Integrated Services** – including fostering and adoption, safeguarding, children's centres and Youth Offending Team.
- **Adult Social Care** – including safeguarding, specialist support for adults with disabilities, care homes and home care.
- **Public Health** – provides Health Improvement, Health Protection and Commissioning/Services; including tobacco control, substance misuse, sexual health, children and young people, mental health, obesity/physical activity, oral health, long-term conditions, and older people.

#### Development and Growth

- **Planning & Regeneration** – Housing Strategy, new build property applications, extensions, approvals.
- **Traffic and Transport** – including traffic and safety, public transport, Shop mobility, Park and Ride sites, Robin Hood Card and working with private firms providing bus, tram and rail services.
- **Property** – Community Centres, Children's Centres, landlords or NCC property.

#### Commercial and Operations

- **Community Protection** – including Environment Health, Community Safety, Community Protection (and parking regulation and compliance), Community Cohesion, Licensing, Trading Standards, Environmental Health, Safer Housing and Anti-Social Behaviour, CCTV, City Centre management and Housing Licensing and compliance.
- **Sport and Culture** – including Spots and Leisure Centres, Markets and Fairs, Libraries and Museums, theatres and outdoor events (e.g. Splendour, Goose Fair).
- **Neighbourhood Services** – including Parks and Open Spaces (including ground and tree services, Cemeteries and Crematoria), Facilities and Building

Services (including Caretaking, Cleaning and Pest Control), Nottingham Catering (Commercial and Education), Meals at Home, Street scene and Grounds Maintenance, Nottingham Catering and Waste Management (including domestic waste collection, commercial collection and recycling).

- **Commercial Infrastructure and Energy Services** – Highways maintenance and Energy Services

### **Strategy and Resources**

- **Strategy & Policy** – including Analysis & Insight for the city and the Council's IT service
- **Commissioning & Procurement** – including commissioning services, Contracting and Procurement, Communications & Marketing
- **Finance** – including Audit and Risk, Strategic Finance, Commercial Finance including council Tax and Housing Benefit.
- **HR & Customer** – including HR and OD services (equalities and inclusion, recruitment, organisational development, development and change, pensions, employee wellbeing, employee relations, and data and management), Civic, Coronial and Celebratory services (including registrars and coroners' services) and Customer Services).
- **Legal & Governance** – including legal services, constitutional services, elections, emergency planning, health and safety advisors and information compliance.