

## **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 2020 to 31 March 2021. The City Council has been publishing a modern slavery statement for 6 years.

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, social care and locally maintained schools. The Council also works with Academies and 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.

### **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 Care 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 & Inclusion Policies:** The Council has two Equality, Diversity & Inclusion Policies – one for colleagues and one for Nottingham citizens. Both are declarations of the Council's commitment to making equality, diversity and inclusion 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. Our Equality, Diversity & Inclusion policy for colleagues also include details of our Equality, Diversity Strategy and demonstrates our commitment to our colleagues to make the Council fully inclusive.
- **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. The Domestic Abuse Bill, which became law in April 2021 will improve accountability from statutory agencies, including the local authority and criminal justice system by the Domestic Abuse Commissioner monitoring outcomes. The Bill also creates a statutory definition of Domestic Violence Abuse (DVA) including control and coercion and will support positive outcomes for survivors of domestic abuse and their children.

## **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 where appropriate and feasible:

- 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.

Where the citizen(s)' needs do not meet Care Act criteria, support will still be available through the Slavery Exploitation Team (SET) – see below).

Children's Integrated Services have adopted a contextual safeguarding approach that recognises that children often face risks outside of the home, including exploitation

and slavery. It should be noted that this exploitation can also take place within a family setting. Alongside social care and youth justice, the Exploitation and Violence Reduction Hub (situated within Youth Justice) works to intervene early to prevent entry into and support exit from 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. There is a duty to notify the Home Office about adults as well. The NRM form should be used if the adult victim consents to provide personal details and wants government funded specialist support. Where adult victims wish to remain anonymous and do not want the specialist support, an MS1 form is used instead.

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.

### **Slavery Exploitation Team (SET)**

Part of Nottingham's commitment to the detection and prevention of Modern Slavery and Exploitation is demonstrated in SET. The Team, funded until March 2022, is based in Community Protection and takes referrals where there are concerns about exploitation, working with partners to support victims and reduce harm. The team's focus has been to develop a structure through which professionals can refer known or

suspected victims of exploitation, slavery or trafficking and share situations where suspicious activity has been highlighted. Central to the team's current responsibilities is coordination of the monthly SERAC (Slavery Exploitation Risk Assessment Conference) which is chaired by a Det. Supt. from Nottinghamshire Police. The team receives and reviews all referrals to the SERAC, in addition to dealing with queries raised by internal colleagues and external partners. SET seeks to establish the wider background to cases and works with partners to identify action plans. In some cases, the team will become lead agency but more generally this remains with the referring agency.

Activity to promote and communicate exploitation and slavery issues in this reporting period has included delivering presentations highlighting the work of the team and referral pathways at events on Cuckooing and Money Mules. Awareness raising sessions have also been delivered to various internal colleagues (CPOs, Children and Families Direct, Pause, Way 2 Work) and external partners (Notts County Council frontline workers, NHS interpreters, PA Housing, Hope at Home).

The SET is currently supporting the Rights Lab at the University of Nottingham with a research project exploring how learning disabilities and mental health problems intersect with exploitation in Nottingham.

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

The Council approach is part of a multi-agency approach coordinated by the Nottingham and Nottinghamshire Modern Slavery Partnership. A substantial amount of training has been delivered to voluntary, statutory and private sector stakeholders, much of it delivered by Snowdrop. The key future training need has been identified as empowering frontline workers to be more professionally curious and proactive in responding to concerns. Slavery is a business model that is continually evolving to exploit new opportunities and professionals' responses need to keep pace, recognising 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.

Basic e-learning continues to be available for all Council colleagues including the Safeguarding Awareness training which refers to Modern Slavery in the context of a form of abuse and instructs participants how to report all types of abuse if they see it or suspect it. A total of 621 colleagues have undertaken the e-learning module since its re-launch in November 2018. Between 1st April 2020 and 31st March 2021, 257 Council colleagues completed Safeguarding eLearning.

Additionally, Five Modern Slavery training sessions were delivered to 64 attendees between November and December 2020. The full day sessions were organised by Community Cohesion team, and delivered online via Zoom.

Target audience was NGOs – non first responders. The sessions focused on developing an understanding and awareness of:

- what modern day slavery and trafficking are?
- how to spot the signs and what to do if you come into contact with a potential victim?

- available support

Additionally, through the use of case studies, interaction with other local organisations and learning from experience, participants were supported to explore issues faced by individuals who have been enslaved, learn good practice with regards to working with survivors, understand the role of First Responders, the referral pathway and the National Referral Mechanism.

Community Protection Regulation teams have all received training in the identification of Modern Day Slavery. The Council operated three schemes of Housing Licensing covering approximately 28,000 privately rented properties in the City. Regulation of private rented sector housing, including housing licensing schemes, can and has been used effectively to identify and disrupt slavery. The Council has recognised there is an intrinsic link between slavery and housing; however not all housing found to have poor living conditions will involve slavery, but virtually all cases of slavery will involve some form of substandard housing.

Joint working between the teams including general licensing and environmental health teams is integrated operationally, with staff able to identify, manage and refer possible cases when visiting such premises. Cases of slavery have been discovered when the councils have investigated housing complaints relating to unlicensed properties. Labour exploitation has also been known to occur in other licensed premises, beauty treatment establishments, fast food takeaways and the hospitality industry including hotels and restaurants. Licensing of premises and compliance inspections has identified some 'beds in sheds' type set ups.

Nottingham City Council is a partner in the local Modern Slavery Partnership that delivers annual awareness sessions and information and updates to front line staff and third sector organisations. All colleagues and partners have access to general awareness training to 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?

Training delivery is appropriate for colleagues in specific roles/teams whose roles are likely to bring them into contact with victims and perpetrators.

We continue to support new and emerging community groups, and to support groups helping people regularise their EU immigration status as a protective factor against slavery.

### **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, lead 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. The Council also works in partnership with the Rights Lab, which is a team working out of Nottingham University, to support research which aims to improve knowledge and understanding of modern slavery and work towards its abolition.

The online New and Emerging Communities Forum feeds into the Modern Slavery strategic partnership for Nottingham and Nottinghamshire, working to raise awareness of modern slavery including developing promotional materials, posters and flyers. The Forum hosts public awareness raising events which target those communities most at risk, focusing on priorities such as victim support, prevention, discovery and integration; also it looks at sharing resources and coordinating the community contribution. In October 2020 for the National Anti-Slavery Day, The Nottingham and Nottinghamshire Modern Slavery Partnership (a multi-agency partnership of statutory and non-statutory organisations including NCC) published a joint press release. This highlighted concerns that the pandemic had caused an increase in exploitation in Nottingham and the work among organisations including NCCs Slavery Exploitation Team who work with partners in the city to fight modern slavery. The press release was picked up by a number of outlets who subsequently published reports on the issue including BBC East Midlands Today, Notts TV, Radio Nottinghamshire, and some local newspapers, raising awareness of modern slavery within the community.

## **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 2021.

### **Signed:**



**Melbourne Barratt, Chief Executive**



**Sam Webster, Portfolio Holder, Finance & Resources**

**Date:** 09 September 2021

## **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 corporate directorates as follows:

- People
- Growth and City Development
- Resident Services
- Finance and Resources

These include, but are not limited to the following divisions:

#### **People Directorate**

- Education division:
  - Access to Learning
  - SEND and Vulnerable Pupils
  - Virtual School
- Public Health
- Children's Integrated Services division:
  - Children in Care, including Safeguarding and Quality
  - Children's Social Care
  - Children's Strategy and Improvement
  - Early Help
  - Extensive and Specialist Services
- Adult Social Care division:
  - Integration – Adults
  - Quality Assurance and Safeguarding
  - Mental Health and Whole Life Disability
  - Social Care Provision – Adults

#### **Growth and City Development Directorate**

- Planning and Regeneration division:
  - Planning Strategy and Building Control
  - Regeneration and Housing
  - Traffic
- Economic Development and Property division:
  - Asset Management
  - Business Growth
  - Corporate Portfolio and Investment
- Major Projects and Public Transport division:
  - Major Projects
  - Transport Projects and Operations
  - Transport
- Carbon Reduction, Energy and Sustainability division:
  - Enviroenergy and Waste Strategy

#### **Resident Services Directorate**

- Community Protection division:
  - Community Partnerships

- Operations
- Regulations
- Neighbourhood Services division:
  - Facilities and Building Services
  - Highways
  - Nottingham Catering
  - Parking Fleet and Transport Operations
  - Public Realm
  - Waste Services
- Sport and Culture division:
  - Culture and Libraries
  - Markets and Fairs
  - Nottingham Events
  - Sport, Communities and Leisure Centres

### **Finance and Resources Directorate**

- Direct report to Corporate Director:
  - Audit and Risk
  - Commercial Finance
  - Customer Services
  - Strategic Finance
- Legal and Governance division:
  - Corporate Resilience
  - Legal Services
- HR and EDI:
  - HR and Organisational Development
- Procurement and Commissioning:
  - Contracting and Procurement
- Strategy, Performance, Marketing and Comms division:
  - Analysis and Insight
  - Communications and Marketing
  - IT