

**Contents:**

Modern Slavery and Human Trafficking Statement

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<b>Approval</b>	Cabinet
<b>Policy Owner</b>	HR, Policy and Performance
<b>Policy Author</b>	Lisa Wills
<b>Advice &amp; Guidance</b>	Strategy Unit
<b>Location</b>	Policyhub
<b>Related Documents</b>	Hampshire and Isle of Wight Modern Slavery Partnership ( <a href="http://www.modernslaverypartnership.org.uk/partnership/">http://www.modernslaverypartnership.org.uk/partnership/</a> )
<b>Applicability</b>	This policy applies to all employees in the City Council, except those in schools

## 1. Introduction

1.1 The Council acknowledges the provisions set out in the Modern Slavery Act (2015) and this statement is made pursuant to section 54(1).

1.2 Portsmouth City Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that the services it commissions (and where applicable, supply chains) are free from slavery and human trafficking.

1.3 This *Modern Slavery and Human Trafficking Statement* sets out the Council's current position and future plans to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and/or in its supply chains. For the avoidance of doubt, this statement also applies to Portsmouth International Port. The statement relates to activities during the financial year April 2018 to March 2019.

1.4 A statement will be issued annually, setting out relevant information in respect of the previous financial year and published on the council's website here: (add link).

## 2. Context

2.1 The council's role in relation to modern slavery is broader than that of other commercial organisations required to publish a transparency statement and can be set out in four areas:

- identification and referral of victims
- supporting victims – this can be through safeguarding children and adults with care and support needs and through housing/ homelessness services
- community safety services, enforcement and disruption activities
- ensuring that procurement processes ensure that supply chains are free from modern slavery

2.2 The Council acknowledges its role in working across the city to raise awareness of the signs of modern slavery, identifying those vulnerable to it and responding with partners to incidents. This work involves a variety of council services and partners including the Port, UK Border Force, Civil Contingencies, Environmental Health and Trading Standards, Licensing, Children's Social Care and Adults Social Care. There are quarterly meetings with port colleagues and Border Force to share intelligence, and the police have a sophisticated database to combat modern day slavery, which could be used to seek prosecution.

2.3 Work to protect children and vulnerable adults who are trafficked and/or exploited is overseen by our local safeguarding boards including referral processes to the national Independent Child Trafficking Advocacy Service (<https://www.portsmouthscb.org.uk/professionals/trafficking/>) and multi-agency specialist groups (Missing Exploited and Trafficked Group - MET). See links below for further information:

Portsmouth Safeguarding Children Board  
(<https://www.portsmouthscb.org.uk/professionals/trafficking/>) and  
Portsmouth Safeguarding Adults Board  
(<http://www.portsmouthsab.uk/abuse/missing-exploited-trafficked/>)

### **3. Legislative framework**

3.1 The Government's approach to tackling modern slavery has been shaped by a number of international laws, conventions and protocols which the UK has opted in to, ratified or is already bound by, including the: 1950 European Convention on Human Rights (ECHR) the Modern Slavery Act 2015, Children Act 1989, Care Act 2014, Immigration Act 2016

### **4. Organisational structure**

4.1 Portsmouth City Council (PCC) is a unitary authority situated in Portsmouth within the geographical county of Hampshire. PCC provides a wide range of statutory and discretionary services, delivered both directly by the Council and through external contractors.

The Council's Structure and Services can be found here:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-senior-management-structure-2018.pdf>

The Council's Constitution can be found here:

<https://www.portsmouth.gov.uk/ext/the-council/policies-and-strategies/constitution>

### **5. Procurement and supply chains and due diligence**

5.1 PCC requires all suppliers of goods or services to have their own policy relating to working practices for modern slavery, or for evidence to be available to ensure their standards are in accordance with the City Council's expectations. We request that our suppliers ensure the same of their own supply chains. Our Supplier Selection Questionnaire includes a requirement to comply with the Modern Slavery Act 2015

5.2 Further, 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.

5.3 PCC is developing a risk assessment and audit framework in relation to our response to modern slavery in order to ensure the most appropriate and effective response.

## 6. Hampshire and Isle of Wight Modern Slavery Partnership

6.1 PCC is an active member of the Hampshire and Isle of Wight Modern Slavery Partnership (<http://www.modernslaverypartnership.org.uk/>) and supports the delivery of the overarching strategy 2017-2020. ([http://www.modernslaverypartnership.org.uk/files/3715/2656/8122/MSP\\_Strategy.pdf](http://www.modernslaverypartnership.org.uk/files/3715/2656/8122/MSP_Strategy.pdf))

## 7. Relevant organisational policies and strategies

7.1 PCC has the following policies that describe its current approach to the identification of modern slavery risks and the steps it takes to prevent slavery and human trafficking in its operations.

7.2 All policies are available to staff on policyhub and are also available by contacting the Council direct.

## 8. Whistleblowing policy

8.1 Though our whistleblowing policy the council encourages all its employees, councilors, contractors, their agents and/or subcontractors, consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council, or the supply chain. The policy is designed to make it easy to make disclosures without fear of discrimination and victimisation.

## 9. Employee Code of Conduct

9.1 The council's employee code of conduct makes clear to employees the actions and behaviour expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.

<https://www.portsmouth.gov.uk/ext/documents-external/cou-part4c-employee-code-of-conduct.pdf>

## 10. Recruitment policy

10.1 The council adheres to robust continuing employment checks/standards, this includes ensuring identities and qualifications, UK address, right to work in the UK, (i.e. people brought into the country illegally will not have a National Insurance number), suitable references and payroll information.

10.2 The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## 11. Safeguarding policies - children and adults

11.1 As previously mentioned, the city council is fully involved in a multi-agency approach to raising awareness of modern slavery and human trafficking coordinated by local safeguarding boards. The boards currently provide city wide governance in relation to identification, referral and support of vulnerable children and adults who may be subject to exploitation.

## 12. Training

12.1 Modern slavery and human trafficking is included within the council's safeguarding training for children and adults. In addition to this an e-learning package is being developed and will be delivered as part of the mandatory training programme for all council employees.

## 13. Auditing and evidence

13.1 The Council is committed to a programme of continuous improvement and is in the process of reviewing and updating the plans, policies and procedures set out below which describe our approach to the identification of modern slavery risks and the steps to be taken to prevent human trafficking and slavery in our services and operations.

These include:

- Developing corporate performance indicators associated with the Council's *Plan on a Page*
- Identification and referral of victims and supporting them e.g. through safeguarding children and adults with care and support needs and through housing/homelessness services
- Undertaking service delivery and ensuring that all supply chains the council procures services from are free from modern slavery, including undertaking risk assessments and audits
- Developing Human resources, training and organisational development policies
- Community safety responses and disruption activities, working alongside partner agencies such as the police

Portsmouth City Council

Signature:  
Gerald Vernon-Jackson, Leader

Date