

**Contents:**

Modern Slavery and Human Trafficking Statement

<b>ID</b>	
<b>Last Review Date</b>	March 2020
<b>Next Review Date</b>	January 2021
<b>Approval</b>	Cabinet
<b>Policy Owner</b>	Executive
<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="https://www.modernslaverypartnership.org.uk/files/2115/9169/7447/Hamp_MSP_Strategy.p">https://www.modernslaverypartnership.org.uk/files/2115/9169/7447/Hamp_MSP_Strategy.p</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) and the recommendations arising from an independent review published in May 2019.

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 2019 to March 2020.

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: <https://www.portsmouth.gov.uk/ext/your-council/policies-and-strategies/modern-slavery-and-human-trafficking-statement>.

## 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 both independently and with partners
- making sure procurement processes and 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 reports and incidents. This work involves a variety of council services and partners including the Port, UK Border Force, Police, Civil Contingencies, Environmental Health and Trading Standards, Licensing, Children's Social Care and Adults Social Care.

2.3 There are quarterly meetings between port colleagues and the Border Force to share intelligence, and the police have a sophisticated database to combat modern day slavery, which could be used to seek prosecution.

2.4 The Modern Slavery Steering Group has been established to monitor the program of continuous improvement set out in item X.

2.5 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:

2.5.1 Portsmouth Safeguarding Children Partnership  
(<https://www.portsmouthscb.org.uk/professionals/trafficking/>) and

2.5.2 Portsmouth Safeguarding Adults Board  
(<http://www.portsmouthsab.uk/abuse/missing-exploited-trafficked/>)

2.6 Reporting suspected modern slavery - please follow the links to the Portsmouth Safeguarding Children Partnership and Portsmouth Adult Safeguarding Board above.

### **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**

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.

4.1 The Council's senior management structure can be found here:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-senior-managment-structure-2019.pdf>

4.2 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 The majority of contracts let and managed by the council are low risk for labour exploitation. The programme of continuous improvement includes a plan to identify the highest risk existing contracts and map the associated supply chains.

## **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 2020-2023.

[https://www.modernslaverypartnership.org.uk/files/2115/9169/7447/Hamp\\_MSP\\_Strategy.pdf](https://www.modernslaverypartnership.org.uk/files/2115/9169/7447/Hamp_MSP_Strategy.pdf)

## **7. Relevant organisational policies, procedures 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. All policies are available to staff on Policyhub and are also available by contacting the Council direct (please email [Lisa.Wills@portsmouthcc.gov.uk](mailto:Lisa.Wills@portsmouthcc.gov.uk))

### **7.3 Whistle blowing policy**

7.3.1 Though our whistle blowing 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.

### **7.4 Employee Code of Conduct**

7.4.1 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>

### **7.5 Recruitment policy**

7.5.1 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 bought into the country illegally will not have a National Insurance number), suitable references and payroll information.

7.5.2 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.

## **8. Safeguarding policies and procedures - children and adults**

8.1 As previously mentioned, the 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. Please refer to the links previously provided for details.

## **9. Training**

9.1 Modern slavery and human trafficking is included within the council's safeguarding training for children and adults. This training is mandatory for the social care workforce and is consistent across the county through the 4LSCB<sup>1</sup> and 4LSAB executive groups. In addition to this an e-learning package is being developed in partnership across Hampshire, and will be delivered as part of the mandatory training programme for all council employees.

9.2 Council Directors have agreed to extend training to a wider group of staff following an internal audit (see below) in order to increase opportunities for identifying and responding to incidents and reports.

9.3 Training is also included in an annual programme designed to support elected members of the council.

## **10. Auditing and evidence**

10.1 The Council is committed to a programme of scrutiny and continuous improvement and has completed a detailed compliance audit during 2019. Findings from the audit were considered by council directors in May 2020<sup>2</sup> and a follow up audit circulated in June. Work arising from the risks identified, to be undertaken during this 12 month period include:

- Finalising corporate performance indicators as part of a new corporate health monitoring process.
- Working in active partnership with the Hampshire and Isle of Wight Modern Slavery Partnership to support a consistent approach and response to modern slavery and trafficking

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<sup>1</sup> 4LSAB and 4LSCB refer to representatives from the four separate local authorities that make up Hampshire and the Isle of Wight (Portsmouth, Southampton, IOW and Hampshire County) who meet regularly to agree consistent policies and procedures across the area.

<sup>2</sup> Timeline delayed due to Covid 19 pandemic

- Raising awareness of modern slavery by developing improved internal and external communications
- Extending the current and developing training to a wider staff group and developing universal multi-agency safeguarding training as mandatory for all council staff.
- Focus on ensuring that all supply chains are free from modern slavery, including undertaking local risk assessments and audits
- Establish risk assessment processes in non-social care related directorates).
- Deliver community safety responses and disruption activities, working alongside partner agencies such as the police, fire and health services.

Portsmouth City Council

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Signature:  
Gerald Vernon-Jackson, Leader

Date

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