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Modern Slavery and Human Trafficking Statement

ID	
Last Review Date	March 2021
Next Review Date	January 2022
Approval	Cabinet and Full Council
Policy Owner	Executive
Policy Author	Lisa Wills
Advice & Guidance	Strategy Unit
Location	Policyhub
Related Documents	https://www.modernslaverypartnership.org.uk/partnership/
Applicability	This policy applies to all employees in the City Council, (except those in schools), including elected members and the International Port.

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 to ensure there is no slavery or human trafficking in its own business operations and/or in its supply chains. For the avoidance of doubt, this statement also applies to Portsmouth International Port.

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>. This statement relates to activities during the financial year April 2020 to March 2021

2. Context and reporting concerns

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

- identification and referral of victims - to report concerns please see 2.5 below
- 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 and with the Police and Crime Commissioner's office 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, Housing and communities, Licensing, Children's Social Care and Adults Social Care.

2.3 Security meetings are held three times per year between port colleagues, MOD, Police, Border Force and other partners to share intelligence.

2.4 The Modern Slavery Steering Group meets when required to monitor the program of continuous improvement set out in item 10.

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 and multi-agency specialist groups (Missing Exploited and Trafficked Group - MET). See links below for further information and **to report concerns about children or adults:**

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/>)

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), Children Act 1989, Care Act 2014, Immigration Act 2016, the Modern Slavery Act 2015.

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/wp-content/uploads/2020/08/Councils-senior-management-structure.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 develop a new procurement strategy that will identify the highest risk existing contracts and map the associated supply chains.

5.4 Strategic contracts will be audited on a rolling basis for compliance. Procurement governance arrangements will be revised to identify contract activity that will trigger the application of additional due diligence in respect of high value, high risk contracts.

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

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 Policy Hub and are also available by contacting the Council direct (please email Lisa.Wills@portsmouthcc.gov.uk)

7.1.2 Whistle blowing policy - through 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.

7.1.3 Employee Code of Conduct - the council's employee code of conduct (Council Constitution, Part 4C) 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/services/council-and-democracy/policies-and-strategies/constitution/>

7.1.4 Recruitment policy - 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. 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 The children and adults safeguarding partnerships 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. 384 staff attended children's safeguarding courses that include modern slavery and exploitation and 367 attended adult safeguarding courses. In addition to social care staff this included housing officers, finance staff, building maintenance staff. In addition to this, a generic video-based e-learning package on Modern Slavery has been made available for PCC staff. A new bespoke e-learning package is in the final stages of development through the Hampshire & Isle Of Wight partnership training sub-group ready for release in April 2021. This course will be advertised to all staff and uptake monitored over the coming year.

9.2 Council Directors agreed to extend training to a wider group of staff following an internal audit in order to increase opportunities for identifying and responding to incidents and reports. Presentations on modern slavery have been made to directorate management teams across the council, including the International Port. Staff from all directorates will carry out the e-learning course developed for Hampshire and IOW

9.3 Elected Council members have their own directory of training available to them and will be able to access the new Modern Slavery e-learning as well as safeguarding workshops. In addition to this the Local Government Association have a Councillor guide to tackling modern slavery that is available on their website [Councillor guide to tackling modern slavery \(local.gov.uk\)](https://www.local.gov.uk/councillor-guide-to-tackling-modern-slavery).

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 2019/20. A follow up audit is planned for xxxx. Work arising from the risks identified, to be undertaken during the 12 month period to March 2022 include:

10.1.1 **Strategic Leadership** - finalising corporate performance indicators including numbers of staff and councillors completing training, % of council contracts audited for compliance, number of referrals from Portsmouth to National Referral Mechanism, as part of a new corporate health monitoring process. Identify director level 'champion' to drive continuous improvement and link to Social Value Strategy.

10.1.2 **Working with partners** - continue to work in active partnership with the Hampshire and Isle of Wight Modern Slavery Partnership to support a

consistent approach across the county. Support work to improve local data analysis and emergency planning procedures.

10.1.3 **Raising awareness** - continue to raise awareness of modern slavery by developing local communication campaign to compliment national Anti-Slavery Activity in October 2020.

10.1.4 **Develop and expand training** - commission universal awareness raising e-learning explaining the signs and impact of early childhood trauma, and exploitation on homeless people and vulnerable adults. Ensure increases in the number of non-social care staff accessing e-learning and/or face to face training on modern slavery.

10.1.5 **Procurement and supply chains** - undertake a minimum of two supply chain audits and develop a longer term audit framework for high risk contracts. Develop a procurement strategy linked with longer term work on social value.

10.1.6 **Policies and processes** - review whistle blowing and recruitment policies in relation to modern slavery and trafficking.

10.1.7 **Enforcement and disruption** - continue to deliver community safety responses and disruption activities, improve local data gathering, working alongside partner agencies such as the police, fire and health services.

Portsmouth City Council

(add signature)

Signature:
Gerald Vernon-Jackson, Leader

Date (date of signature?)