

Title of meeting:	Cabinet
Date of meeting:	27th June 2023
Subject:	Modern Slavery and Human Trafficking Statement
Report by:	Natasha Edmunds, Director of Corporate Services
Wards affected:	All
Key decision:	No
Full Council decision:	Yes - for noting Cabinet decision

1. Purpose of report

The purpose of this report is to provide context to the council's Modern Slavery Transparency Statement, update progress against the 2022/23 improvement plan, and to seek approval to publish the statement (appendix 1) on the council's website as required by the Modern Slavery Act 2015.

2. Recommendations

That Cabinet approves:

- i) **The Modern Slavery and Human Trafficking Statement for the signature of the Leader and publication on the council's website (see appendix 1) and**
- ii) **The programme of work set out in item 11 of this report.**
- iii) **That Full Council be asked to note the decision of the cabinet to approve and publish the statement.**

3. Background

3.1 The Modern Slavery Act 2015 (MSA 2015) applies to England and Wales and includes the offences of human trafficking and slavery, servitude and forced or compulsory labour. The Act consolidated and simplified existing offences and establishes a legal duty under Section 52 for specified public authorities to notify the Home Office where there is reasonable grounds to believe a person may be a victim of modern slavery.

3.2 Section 54 of the MSA 2015 requires commercial organisations carrying out business in the UK, with a turnover of at least £36 million, to prepare and publish a slavery and human trafficking statement for each and every financial year.

3.3 A review of the legislation published in May 2019 recommended that Government should extend section 54 requirements to the public sector and strengthen its public procurement processes. The council published its first statement in advance of this

recommendation in March 2019. The proposed 2023/24 statement is attached at appendix 1.

4. Alignment with the City Vision

4.1 The City Vision sets out where Portsmouth wants to be by 2040. The Modern Slavery and Human Trafficking Statement underpins two key ambitions - to be a healthy happy city and a city with a thriving economy. The programme of work set out below will help the council move towards these ambitions.

5. Procurement

5.1 The PCC procurement team have commissioned Nottingham University's Rights Lab to undertake an analysis of Portsmouth's MDS risk, particularly in relation to Adult Social Care contracts. This work will produce an action plan and a toolkit for ASC but the learning and approach can be adopted and adapted for use by other council services. The plan is for risk assessment and mitigation for modern day slavery to be built into the new procurement processes arising from the national review - <https://bills.parliament.uk/bills/3159> . If new procurements are high risk a series of additional due diligence will be followed, and support provided for suppliers by Unseen (<https://www.unseenuk.org/>) if found to be unable to produce evidence of their approach.

6. Portsmouth International Port (PIP)

6.1 The updated statement also covers the International Port. The multi-agency Solent Portal Maritime Security Group includes representatives from the Portsmouth International Port, Border Force, MOD, ferry operators, DFT and police. The group meets regularly to discuss security incidents, issues, and threat levels, including human trafficking. Modern Slavery is now a standing agenda item and links with the Boarder force are being developed with Adult Social Care.

6.2 Portico (previously MMD) publish a separate statement on their website.

7. Hampshire and Isle of Wight Modern Slavery Partnership

7.1 Portsmouth is an active member of the Hampshire and Isle of Wight Modern Slavery Partnership. Senior managers responsible for adult and children's safeguarding are represented on the core group and other Council staff play an active role in supporting the relevant sub-groups The most recent strategic plan (2020-23) is available [here](#). The strategy is in the process of being updated.

8. Supporting victims

8.1 Support for victims of modern slavery is managed by the children and adults safeguarding partnerships. Comprehensive processes and procedures are in place to ensure the right support is provided. The statement contains links to both safeguarding websites so that concerns can be reported directly.

8.2 Referral information available on the government's website shows that referrals from Portsmouth City Council reduced to 17 in 2022, compared to 39 in 2021, whilst the numbers of potential victims seem to be increasing. The [Modern Slavery Helpline annual statistics](#) for 2022 show nationally:

- A potential 6,516 victims of modern slavery indicated – an increase of 116% compared to 2021
- A total of 7,315 calls from victims, the public and professionals working in organisations such as the NHS, local government and businesses – an increase of 16%

8.3 It is possible however, that the reduction of referrals from Portsmouth could include cases whereby concerns have been raised and investigated and local support put in place rather than referring to the National Referral Mechanism. More work is required to understand the local statistics.

9. Enforcement

9.1 A Restricted 'Problem Profile' for Portsmouth was produced in 2022 but reduced police resources mean this has not been updated. The plan this year is to include data from other council services and partners and use this to target any enforcement activity.

10. Training

10.1 Training statistics are provided with a cautionary note in the absence of the Portsmouth Learning Gateway. In the past 12 months¹ *manually collected* data shows that 699 staff have attended safeguarding training (children and adults) that includes elements of modern slavery and exploitation. A further 93 staff have completed the more detailed Modern Slavery e-learning module, 69 of whom were not social care employees (up from 38 in 21/22). Statistics and process are currently being updated in the e-learning module.

10.2 A short animation highlighting hidden vulnerabilities will be included in the council's induction program for all new staff from June 23. The animation is also available on the Adult Safeguarding Board website: <https://www.portsmouthsab.uk/intro-to-safeguarding/vulnerability/>

10.3 Training uptake is monitored by the Governance and Audit Committee including the number of members undertaking the e-learning course.

11. Auditing and Programme of continuous improvement

11.1 The most recent audit carried out in September 2022, and approved by the Governance and Audit Committee, found improved levels of assurance across the risks identified. Internal Audit staff will include Modern Slavery service audits in regular discussions with senior management teams.

¹ April 2022-March 2023

11.2 Portsmouth's Modern Slavery Steering group, chaired by the Director of Corporate Services, will take forward the improvement programme set out in the statement (item 10). This will be reviewed six monthly alongside the annual review of the statement to ensure appropriate levels of awareness, response and enforcement across the relevant council directorates. The programme of work, under the following headings, will be implemented during 2023/24:

11.2.1 Strategic Leadership - An annual report will be submitted to the Governance and Audit Committee as part of corporate health monitoring process. Regular Modern Slavery working group meetings chaired by the Director of Corporate Services monitor progress against the improvement plan.

11.2.2 Working with partners - the council continues to work in active partnership with the Police and Crime Commissioner for Hampshire and Isle of Wight and local safeguarding boards. PCC also supports the Hampshire and IOW Modern Slavery Partnership; contributes to the review of the 2023 strategy and ensures Portsmouth is represented at an appropriate level at the Modern Slavery Partnership Board and sub-groups. Work is continuing with Police colleagues to improve local data analysis, emergency planning procedures and enforcement operations.

11.2.3 Raising awareness - PCC is continuing to raise awareness of modern slavery by supporting a Hampshire-wide communication campaign to complement annual national Anti-Slavery activity in October.

11.2.4 Develop and expand training - PCC is continuing to increase the number of non-social care staff and elected councilors accessing e-learning and/or face to face training on modern slavery.

11.2.5 Procurement and supply chains - the council continues to undertake a minimum of two supply chain audits per year and develop a longer-term audit framework for high-risk contracts, it is also developing a procurement strategy linked with longer term work on social value.

11.2.6 Policies and processes - review all HR policies associated with identifying and combatting modern slavery.

11.2.7 Enforcement and disruption - continue to support police led community safety responses and disruption activities, improve local data gathering, working alongside partner agencies such as the police, fire service and health services to target enforcement activity.

12. Reasons for recommendations

12.1 The proposed *Modern Slavery and Human Trafficking Statement attached as Appendix 1* sets out the Council's current position and future plans to understand all potential modern slavery risks related to its business and puts in place steps to ensure there is no slavery or human trafficking in its own business and/or in its supply chains, and also to protect and support victims.

12.2 It is important to make and sustain collaborative links with delivering the City Vision and the Social Value Strategy as well as working with the Hampshire and Isle of Wight Modern Slavery Partnership.

12.3 The statement sets out an improvement plan to be completed by the end of March 2024. For the avoidance of doubt, the statement also applies to Portsmouth International Port. Portico (previously known as MMD) prepare a separate statement.

13. Integrated impact assessment (IIA)

13.1 An IIA has been completed and is attached at appendix 3.

14. Legal implications

14.1 The report sets out the basis upon which a public sector organisation is required to prepare and publish an annual statement relevant to the statutory requirements of the Modern Slavery Act 2015.

14.2 Neither the new national modern slavery strategy or the new Bill announced last year in the Queens Speech have progressed.

15. Director of Finance's comments

15.1 There are no financial implications arising from the recommendations in this report. If there are actions arising from the programme of work set out in paragraph 10 or from any other specific initiative aligned to the Modern Slavery and Human Trafficking Statement that require additional resource, a further report will be brought to members as appropriate.

.....
Signed by:
Natasha Edmunds
Director of Corporate Services

Appendices:

Appendix 1 - Portsmouth City Council Proposed Modern Slavery and Human Trafficking Statement 2023/24

Appendix 2 - Integrated impact assessment

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Local Government Association - Tackling Modern Slavery - A council guide	LGA website https://www.local.gov.uk/modern-slavery-council-guide
Councillor Guide to Tackling Modern Slavery	LGA website https://www.local.gov.uk/councillor-guide-tackling-modern-slavery
The Local Government Association guidance re preparing transparency statements.	https://www.local.gov.uk/topics/community-safety/modern-slavery/transparency-statements .

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

.....
Signed by: