

**Contents:**

Modern Slavery and Human Trafficking Statement

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<b>Approval</b>	Cabinet
<b>Policy Owner</b>	Executive
<b>Policy Author</b>	Lisa Wills, Strategy and Partnership Manager
<b>Advice &amp; Guidance</b>	Strategy Unit
<b>Location</b>	Policyhub
<b>Related Documents</b>	<a href="https://www.modernslaverypartnership.org.uk/partnership/">https://www.modernslaverypartnership.org.uk/partnership/</a>
<b>Applicability</b>	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, the associated 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 improvement plans. The council will identify, understand and mitigate all potential modern slavery risks related to its business and will 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>.

1.5 This statement relates to activities undertaken during the financial year April 2022 to March 2023.

## 2. Context and reporting concerns

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

- identification and referral of victims - to report concerns please see paragraph 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 International Port, UK Border Force, Police, Civil Contingencies, Environmental Health and Trading Standards, Housing, Neighborhoods and Building Services, 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 regularly 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 **how 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 and the Modern Slavery Act 2015.

### 4. Organisational structure (UPDATE)

Portsmouth City Council (PCC) is a unitary authority situated in Portsmouth within the 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 (**LINK TO BE UPDATED**)

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's Supplier Questionnaire (SQ) includes a requirement to comply with the Modern Slavery Act 2015 as per the central government issued SQ template document. Central government are due to issue a new SQ document that strengthens the commitment of the questionnaire asking for copies of statements from all new suppliers identified as commercial organisation under the Modern Slavery Act 2015, and consider retrospective application to existing high risk areas identified by the [Labour Exploitation - Industry profiles - sectors at risk - GLAA](#).

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.<sup>1</sup>

5.3 The PCC procurement team have also 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>.

On a case-by-case basis individual procurements will be assessed for modern slavery risk. High risk contracts will include project specific quality questions relating to modern slavery for tenderers to provide assurances on supply chain management and contract delivery in relation to mitigating against instances of modern slavery.

5.4 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. Procurement governance arrangements will be revised to monitor new contract activity that will trigger the application of additional due diligence in respect of high value, high risk contracts in industries identified by the [Labour Exploitation - Industry profiles - sectors at risk - GLAA](#).

5.4 Strategic contracts will be audited on a rolling basis for compliance. The first supply chain audit was carried out with support from the Housing, Neighbourhoods and Building Services in May 2022.

5.5 Survivors of Modern Slavery are included as beneficiaries of the local social value procurement policy approved by the Council in March 2021 (available on request).

## **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 ( <https://www.hampshire-pcc.gov.uk/msp>). We are working with partners to develop an updated strategy<sup>2</sup>.

## **7. Relevant organisational policies, procedures, and strategies**

7.1 PCC has the following policies that are relevant to the identification of modern slavery risks and the steps it takes to prevent slavery and human

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<sup>1</sup> The government remains committed to the European Convention on Human Rights - <https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/human-rights-act-reform-a-modern-bill-of-rights-consultation>

<sup>2</sup> The current strategy can be found [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)

trafficking in its operations. All policies are readily available to staff and are also available by contacting the Council direct (please email [Lisa.Wills@portsmouthcc.gov.uk](mailto:Lisa.Wills@portsmouthcc.gov.uk) )

7.1.2 Whistle blowing policy - the council encourages all its employees, councillors, 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/or victimisation. The policy was reviewed in January 2022.

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 behavior expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behavior 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. The recruitment policy is due to be updated shortly.

7.1.5 Fraud and Anti-corruption policy - this requires staff to perform business activities with due diligence in a transparent and ethical manner and to encourage the reporting of suspected wrongdoing.

## **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 abuse or exploitation. Portsmouth Multi-agency Safeguarding Hubs for children and adults will assess the need for referral to the National Referral Mechanism. 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 staff working in children and adult services. This training is mandatory for the social care workforce and is consistent with that of other local authorities across the county. In the past 12 months<sup>3</sup> 699 social care staff

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<sup>3</sup> April 2022-March 2023 - data source Learning and Development

attended these safeguarding courses. This includes 462 staff from other areas of the council: housing officers, finance staff, building maintenance staff etc.

Council Directors agreed to extend training to a wider group of staff, following an internal audit. This will increase opportunities for identifying and responding to incidents and reports. A focused video-based e-learning package on Modern Slavery, and a Skills Booster course are also available to PCC staff and councillors. In the past 12 months (April 22-31 March 23) 93 staff took these courses - 69 of whom were not social care employees (up from 38 in 21/22). In total, since January 2020, 155 staff have completed the e-learning course. Training uptake is monitored by the Governance and Audit Committee.

9.2 A Modern Slavery update is included in regular community safety briefings to directorate management teams and a short animation highlighting hidden vulnerabilities has been commissioned and 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/>

9.3 Elected Council members have their own directory of training and will be able to access the new Modern Slavery e-learning as well as safeguarding workshops and the Skills Booster course. 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 \(local.gov.uk\)](#). All Councillors have also been offered face to face training.

## 10. Auditing and evidence

10.1 The Council is committed to a programme of scrutiny and continuous improvement and completed a detailed compliance audit during 2019/20. 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 auditing staff will include Modern Slavery service audits in regular discussions with senior management teams. The improvement programme is based on risks identified during the latest audit as well as discussion at regular working group meetings, chaired by the Director of Corporate Services. The programme for 2023/24 includes:

10.1.1 **Strategic Leadership** - An annual report is 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 monitors the improvement plan.

10.1.2 **Working with partners** - continue to work in active partnership with the Police and Crime Commissioner for Hampshire and Isle of Wight and local safeguarding boards. Support the Hampshire and Isle Of Wight Modern Slavery Partnership; contribute to the review of the 2023 strategy and ensure Portsmouth is represented at an appropriate level at the Modern Slavery Partnership Board and sub-groups. Work with Police colleagues to improve local data analysis, emergency planning procedures and enforcement operations.

10.1.3 **Raising awareness** - continue to raise awareness of modern slavery by supporting Hampshire-wide communication campaign to compliment annual national Anti-Slavery activity in October and expanding training across the organization.

10.1.4 **Develop and expand training** - Continue to increase the number of non-social care staff and elected councilors accessing e-learning and/or face to face training on modern slavery.

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

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

10.1.7 **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.

This statement was approved by Portsmouth City Council on 18<sup>th</sup> July 2023.

(add signature)

Signature:  
Leader

Date (date of signature)