



Title of meeting: Cabinet

Date of meeting: 25th June 2024

Subject: Modern Slavery and Human Trafficking Statement

Report by: Natasha Edmunds, Director of Corporate Services

Cabinet Member: Councillor Chris Attwell, Cabinet Member for Central 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 2023/24 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 are 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 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 2024/25 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 worked with Nottingham University's Rights Lab to undertake an analysis of Portsmouth's MDS risk, particularly in relation to Adult Social Care (ASC) contracts. This work resulted in an action plan and a toolkit for ASC with a potential for learning and approach to be adopted and adapted for use by other council services such as construction.

5.2 The plan is for risk assessment and mitigation for modern day slavery to be built into procurement governance processes in line with updating these processes in accordance with new obligations under the Procurement Act 2023 and in preparation for when the Procurement Regulations 2024 come into effect in October 2024.

5.3 Members of the procurement team are also working with departments to consider wider issues associated with the production and delivery of the services that the Council commissions. For example, making the connection between issues identified in respect of human rights violations within production of PPE produced internationally, and suppliers that PCC commission who may inadvertently become part of sustaining that activity, through their own supply chains.



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 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 Border force are being developed with Adult Social Care.
- 6.2 There have been some instances of people smuggling identified through the Port and PIP are being proactive about taking steps to address this.
- 6.3 This has included working with the British Port Association to develop a practical guide to modern slavery that works within the existing Port systems with the intention to have a Port Charter between stakeholders (and provide best practice to other ports).
- 6.4 PIP have also established a Portsmouth Modern Slavery (MS) working group to ensure policies being put in place have an impact within the wider community, in appreciation of the link between MS, trafficking, and serious crime.
- 6.5 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 refresh of the strategic plan (2023-26) is available here: [MSP-Strategy-2023-2026.pdf \(hampshire-pcc.gov.uk\)](https://www.hampshire-pcc.gov.uk/media/123456/MSP-Strategy-2023-2026.pdf)

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 to the NRM has fallen. There was a total of 16 in 2023, compared to 17 in 2022, and 39 in 2021. Although the number of referrals to the NRM is reducing the numbers of potential victims appears to be increasing as reflected by anecdotal evidence of contacts to national support agencies such as the Modern Slavery Helpline, and local intelligence from partners delivering



services such as the [HAVEN](#). The Modern Slavery Helpline annual statistics for 2023 show nationally¹:

- A potential 5,876 victims of modern slavery indicated – a decrease of 10% compared to 2022 (n.6,516).
- A total of 8,367 calls from victims, the public and professionals working in organisations such as the NHS, local government, and businesses – an increase of 14% on 2022 call totals (n.7,315)

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. Having considered options for developing a better understanding, with which to target activity moving forward it has been agreed that the route for this will be via the community safety strategic assessment, which is currently being refreshed. Being part of this assessment is the best way of ensuring Modern Slavery is seen within the context of the wider community safety plan for the city, that is owned by all partners.

10. Training

10.1 Training statistics are provided with a cautionary note in the absence of a learning management system. In the past 12 months manually collected data shows that 237 staff have attended safeguarding training (children and adults) that includes elements of modern slavery and exploitation. A further 650 staff have completed the more detailed Modern Slavery e-learning module. Of those 650, 192 of were not social care employees which is also a significant increase from last year when the figure was 69. Including staff who have undertaken the course in previous years, this brings the total number of current staff to have completed the e-learning course to 737.

10.2 A short animation highlighting hidden vulnerabilities has been included in the Councils induction programme for all new staff since June 2023, and since this time 140 new staff have taken part in the session. The animation has also been made publicly available on the Adult Safeguarding Board website.

¹ Unseen UK (2023) Annual Assessment, executive summary. Available from: [2023-AA-exec-summary-FINAL.pdf \(unseenuk.org\)](#)



- 10.3 Workforce training uptake is monitored by the corporate governance group of senior officers and member training is monitored by the Governance and Audit Committee.

11. Auditing and Programme of continuous improvement

- 11.1 The Council is committed to a programme of scrutiny and continuous improvement and completed a detailed compliance audit during 2019/20. The most recent compliance audit carried out in 2023 reviewed three directorate areas. A report of findings will be submitted for approval to the Governance and Audit Committee. Internal auditing staff continue to include Modern Slavery service audits in regular discussions with senior management teams.
- 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 2024/25:
- 11.2.1 **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.
- 11.2.2 **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 by continuing to 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. Working with Portsmouth City of Sanctuary to become a Council of Sanctuary.
- 11.2.3 **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.
- 11.2.4 **Develop and expand training** - Continue to increase the number of non-social care staff and elected councillors accessing e-learning and/or face to face training on modern slavery.



11.2.5 **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.

11.2.6 **Policies and processes** - continue to ensure that Council policies and procedures remain relevant and reflect the statutory duty and Council's commitment to the agenda.

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 2025. 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 as appendix 2.

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 nor the new Bill announced in the Queen's Speech in 2022 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 11 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.

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Signed by:
Natasha Edmunds
Director of Corporate Services

Appendices:

Appendix 1 - Portsmouth City Council Proposed Modern Slavery and Human Trafficking Statement 2024/25

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
Unseen UK (2023) Annual Assessment, executive summary	2023-AA-exec-summary-FINAL.pdf (unseenuk.org)



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

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Signed by: