

Contents:

Modern Slavery and Human Trafficking Statement

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Approval	Cabinet
Policy Owner	Executive
Policy Author	Caroline Hopper, Corporate Projects Manager
Advice & Guidance	Strategy Unit
Location	Policyhub
Related Documents	
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, 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 2023 to March 2024.

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

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](#) (under 'Documents')

4.2 The Council's constitution can be found [here](#)

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 which has been updated to strengthen the commitment of the questionnaire from optional to mandatory asking for copies of statements from all new suppliers identified as commercial organisation under the Modern Slavery Act 2015. In addition PCC will 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.¹

5.3 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.

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.

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 Directorate 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 strategy².

7. Relevant organisational policies, procedures, and strategies

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

² The current strategy can be found https://www.modernslaverypartnership.org.uk/files/2115/9169/7447/Hamp_MSP_Strategy.pdf

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 trafficking in its operations. All policies are readily available to staff and are also available by contacting the Council direct (please email Caroline.Hopper@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 Behaviors and Values - In July 23 the Council launched a refreshed behaviours framework setting out universal behaviours associated with core values of respect, integrity, collaboration, inclusion and being people-focused. It shows how all staff contribute to the success of the council and it creates a guide to encourage and model positive behaviours that are both central to enabling everyone to be at their best in the workplace, and integral to good safeguarding.

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. Recruitment policies were last updated in March 2024.

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 months³ 237 staff attended these safeguarding courses. This includes 59 staff from other areas of the council: housing officers, library 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 (1st April 23 - 31st March 24) 650 staff took these courses which is a significant increase from the previous year. 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. This increase has been a result of a concerted effort to ensure that frontline staff in relevant departments undertake the training. The Council is in the process of procuring a new digital learning platform, once this system is in place it will be possible to start monitoring take up as a % of those who are required to undertake the training in key service areas.

9.2 A Modern Slavery update is included in regular community safety briefings to directorate management teams and a short animation highlighting hidden vulnerabilities is now included in the council's induction program for all new staff. The animation has been shown as part of the Welcome to PCC (W2PCC) induction session since June 23, and since this time 140 new staff have taken part in the session. 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 \(local.gov.uk\)](https://www.local.gov.uk/councillor-guide-to-tackling-modern-slavery). 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 compliance audit carried out in 2023 reviewed three directorate

³ April 2023-March 2024 - data source Learning and Development

areas. A report of findings will be submitted for approval to the Governance and Audit Committee. 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 2024/25 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 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.

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

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 16th July 2024.

(add signature)

Signature:
Leader

Date (date of signature)

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