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Modern Slavery and Human Trafficking Statement

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| ID | |
| Last Review Date | April 2022 |
| Next Review Date | April 2023 |
| Approval | Cabinet |
| Policy Owner | Executive |
| Policy Author | Lisa Wills |
| Advice & Guidance | Strategy Unit |
| Location | Policyhub |
| Related Documents | https://www.hampshire-pcc.gov.uk/msp |
| Applicability | This policy applies to all employees at Portsmouth 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 undertaken during the financial year April 2021 to March 2022.

2. Context and reporting concerns

- 2.1. The council's role in relation to modern slavery is broader than other 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 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 when 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.portsmouthscp.org.uk/7-information-for-professionals-and-volunteers/7-6-missing-exploitation-trafficking-contextual-safeguarding/>)
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)

4.1. 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.

4.2. The council's senior management structure can be found here
<https://www.portsmouth.gov.uk/services/council-and-democracy/transparency/transparency-agenda/>

4.3. 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 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.¹
- 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. 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>) and supports the delivery of the overarching strategy 2020-2023. [https://www.hampshire-pcc.gov.uk/wp-content/uploads/2021/09/Hamp MSP Strategy AUG 2021 update.pdf](https://www.hampshire-pcc.gov.uk/wp-content/uploads/2021/09/Hamp_MSP_Strategy_AUG_2021_update.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)
- 7.1.1. Whistle blowing policy - through our 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 victimisation. The policy was reviewed in January 2022.

¹ 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>

- 7.1.2. 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/>
- 7.1.3. 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 bought 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 in 2022.
- 7.1.4. 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 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 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 months² 540 staff attended children's safeguarding courses that include modern slavery and exploitation and 592 attended adult safeguarding courses. In addition to social care staff these totals include 451 staff from other areas of the council; housing officers, finance staff, building maintenance staff.

A video-based e-learning package on Modern Slavery, and a Skills Booster course are available to PCC staff and councillors. In the past 12 months 168 staff took these courses - 103 of whom were not social care employees. Training uptake is monitored by the Governance and Audit Committee.

- 9.2. Council directors agreed to extend training to a wider group of staff, following an internal audit, to increase opportunities for identifying and responding to incidents and reports. A Modern Slavery update is included in regular community safety briefings to directorate management teams.

² April 2021-March 2022

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).

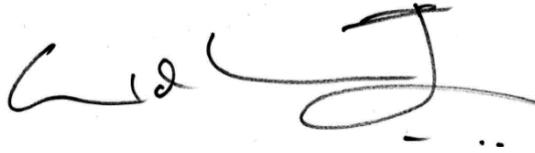
10. Auditing and evidence

10.1. The council is committed to a programme of scrutiny and continuous improvement and completed a detailed compliance audit during 2019/20. A second follow up audit is planned for 2022/23. The improvement programme is based on risks identified during the 2019/20 audit as well as discussion at regular working group meetings, chaired by the Director of Corporate Services. The programme for 2022/23 includes:

- 10.1.1. **Strategic Leadership** - Quarterly reporting on agreed measures to the Governance and Audit Committee as part of corporate health monitoring process. Regular Modern Slavery working group meetings to monitor the improvement plan.
- 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 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** - develop universal awareness raising by explaining the signs and impact of early childhood trauma and exploitation of children, homeless people and vulnerable adults. Increase the number of non-social care staff and elected councillors accessing e-learning and/or face to face training on modern slavery.
- 10.1.5. **Procurement and supply chains** - strengthen wording of pre-qualifying questionnaire asking for copies of statements from all new suppliers and consider retrospective application to existing high risk areas identified by the [Labour Exploitation - Industry profiles - sectors at risk - GLAA](#). 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 deliver community safety responses and disruption activities, improve local data gathering, working alongside partner agencies such as the police, fire and health services.

This statement was approved by Portsmouth City Council on 19th July 2022.

Signature:
Leader

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Date: 5/10/2022