

Modern Slavery Statement

Introduction

This statement sets out Nottingham City Council's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022. The City Council has been publishing a modern slavery statement for 7 years.

As part of the public sector, Nottingham City Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Council is committed to improving its practices to combat and prevent slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Nottingham City Council is a unitary authority providing all local government services for its 300,000+ citizens, from waste collections and clean-up teams to public health, social care and locally maintained schools. The Council also works with Academies and manages a wide range of services, delivered both directly by the Council and through external contractors, with a large and diverse supply chain. Please see Appendix A for a more detailed breakdown of the Council's structure and services.

Countries of operation and supply

The organisation currently operates in the United Kingdom.

Nottingham City Council would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with the City Council's expectations. We would request that our suppliers ensure the same of their own supply chains.

Responsibility

The Council is committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business. As a Council, our responsibility extends beyond supply chains and our links with third parties, as we have a corporate responsibility to safeguard our citizens directly via interventions by our Community Protection and Social Care functions, and where citizens utilise Council property and services. The Council's Community Protection function shares intelligence and information and participates in joint investigations with Nottinghamshire Police and other law enforcement partners regarding issues of modern slavery or human trafficking. The Council has a First Responder¹ duty to refer people to the National Referral Mechanism if concerns of Modern Day Slavery have been identified and the person has provided their consent for this support. The National Referral Mechanism

¹ Selected agencies that can refer into the National Referral Mechanism

(NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

The Council has a range of policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in all of its operations. The Interagency Safeguarding Children Procedures of the Nottingham City Safeguarding Children Partnership has a chapter that provides guidance to all colleagues on Safeguarding children from modern slavery.

Policies: Council policies are developed by officers employed by the authority and are then agreed by a relevant board or committee, which would include councillors, senior officers and partner organisations.

Risk assessments: Organisational responsibility for human rights would be cross-council. Modern slavery risk analysis would be provided by our colleagues in Community Protection who are actively developing strategies and safeguards around this.

Management responsibilities: The Council takes the welfare of its employees very seriously and as part of the day to day management role within the Council, there is a requirement that managers will hold regular supervision meetings with employees to make every effort to address and support any personal welfare issues employees may have. The Council also offers confidential access to a 24/7 free and impartial Employee Assistance service, which includes a free counselling function.

Investigations/due diligence: In respect of suspected or known incidents of slavery or trafficking we would refer these to the relevant police authority and, where incidents occur in Nottingham, to our colleagues in Community Protection, who are our direct link with the local Vulnerabilities and Commodities Group which has a responsibility for modern slavery and is part of the Nottingham Crime and Drugs Partnership. The Council's Property Services department will be vigilant for signs of modern slavery on Council property, and will report this appropriately if they believe that suspicious activity is taking place.

The Council actively works to ensure the safeguarding of all vulnerable people and recognises at-risk groups including workers in certain roles such as cleaning and care work, and large numbers of adults in multiple occupancy domestic properties. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their manager, the police and the Nottingham Health & Care Point if the incident was in Nottingham.

The Council has established joint working arrangements with Nottinghamshire Police and the Gangmasters and Labour Abuse Authority (GLAA). Through the Community Protection Intelligence Team information on suspected offending detected through frontline CP services is directed to the appropriate intelligence bureau of our partners. Joint operations are routinely undertaken, especially with the Safer Housing service. It is intended to continue to build this model of working over the coming year and to share any best practice identified.

Specific policies which apply (copies are available on request):

- **Whistleblowing Policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via either their manager or via the Council's Monitoring Officer (currently the Director of Legal and Governance) or the Council's Internal Audit Section.
- **Employee Code of Conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour, including when managing its supply chain.
- **Business Charter Policy:** The Nottingham City Council Business Charter encourages signatories to work together to improve the economic, social and environmental wellbeing of the city. Under the principles of the Business Charter, signatories are asked to commit to employing the highest ethical standards and operating in a fair and transparent way. This includes supporting staff development and the well-being and protection of workforces. Mechanisms are in place to implement the Business Charter through contracts procured and through organisations signing up voluntarily to its principles.
- **Recruitment Policy:** The organisation directly recruits its employees through our people managers in the organisation by means of an advertising platform through East Midlands Shared Services. Where agency workers are used, these are procured via a managed service provider for agency workers who in turn, have their own modern slavery statement. The managed service provider will vet employment agencies to ensure they are reputable and verify the practices of any new agency it deals with before accepting workers from that agency. If we engage other agency workers outside the procured process (only for unique and specialist services), we will ensure the verification of their practices is reviewed and we will ensure modern slavery statements are in place for those agencies. Any consultants engaged to deliver work on behalf of the Council will follow the same approach. This may not always be relevant if the consultant is self-employed.
- **Nottingham City Council Procurement Strategy 2018-2023:** The Procurement Strategy 2018-2023 sets out how the Council will continue to drive forward the key objectives of delivering economic, social and environmental benefits to the city through procurement. It includes ethical standards as a core principle for procurement and acknowledges the important role that procurement plays in sourcing in a manner that ensures ethical standards are met, minimises the risk of social exploitation and rewards good employment practices. Our ethical procurement objectives are to ensure the well-being and protection of work forces throughout the supply chain, that people are treated with respect and their rights are protected.
- **Equality, Diversity & Inclusion Policies:** Nottingham City Council has an Equality, Diversity & Inclusion Policy in place for colleagues and Nottingham citizens. This is a declaration of the Council's commitment to making equality,

diversity and inclusion an integral part of the Council's business as usual. This includes a commitment to use our influence and purchasing power to help make equality a reality for all, and to take action to eradicate discrimination and inequality when delivering services, when employing others to deliver services on our behalf and when providing funding to others to provide services. Our Equality, Diversity & Inclusion policy also include details of our Equality, Diversity Strategy and demonstrates our commitment to make Nottingham City Council fully inclusive.

- **Domestic and Sexual Violence Strategy for Nottingham City 2021-2024:** This policy, held by Nottingham's Crime and Drugs Partnership (CDP) forms Part 4 of the Statutory Duty for Nottingham City Council and includes actions and aims to reduce instances of domestic and sexual violence in the city and specifically references modern slavery. The Domestic Abuse Act 2021 provides a new definition of domestic abuse, including economic abuse and recognises children as survivors in their own right. The strategy outlines the governance of the partnership, including Nottingham City Council, and organisations' roles in tackling domestic and sexual violence and abuse. These under the Part 4 of the Statutory Duty from the Domestic Abuse Act 2021 include the requirement for a Local Partnership Board, a Needs Assessment, Commissioning of Services and a Strategy. Nottingham City Council signed up to the Office of the Police and Crime Commissioner's Violence Against Women and Girls Strategy, which was drafted in 2021 and includes modern slavery. The strategy is currently being refreshed and is due to be agreed at the CDP in the autumn or winter of 2022.

Due Diligence of suppliers

We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain. Our due diligence measures include where appropriate and feasible:

- Following good practice guidance in relation to modern slavery in the supply chain.
- Within the category management approach, considering appropriate steps to be taken to mitigate risks, particularly in those areas assessed to be at high risk of modern slavery.
- Taking appropriate measures in the selection of suppliers to enable the exclusion of suppliers with convictions under the Modern Slavery Act.
- Where appropriate, asking organisations bidding for tenders about the methods they will employ to ensure abuses of human rights (including modern slavery) are not present with the supply chain.
- Inclusion of appropriate clauses in contracts to require compliance with the requirements of the Modern Slavery Act; these will be applicable to sub-contractors in the supply chain.
- Working collaboratively with suppliers to mitigate the risk of modern slavery and supporting those that identify areas for improvement.
- Monitoring the performance of suppliers against the contract requirements, and invoking sanctions against suppliers that fail to address performance issues identified or seriously violate the conditions of contract.

Safeguarding Nottingham Citizens

Nottingham City Council Adult Social Care Department has a duty to ensure that its most at risk citizens are safeguarded. The Care Act 2014 sets out duties for Nottingham City Council to make enquiries, or cause others to do so if it believes an adult is experiencing or is at risk of abuse or neglect. Adult Social care will undertake an enquiry when a citizen has needs for care and support, is experiencing or at risk of abuse and neglect, and is unable to protect themselves because of these needs. This includes citizens who may be victims of Modern Day Slavery and or trafficking/exploitation.

Where the citizen(s)' needs do not meet Care Act criteria, support will still be available through the Slavery Exploitation Team (SET) – see below).

Children's Integrated Services have adopted a contextual safeguarding approach that recognises that children often face risks outside of the home, including exploitation and slavery. It should be noted that this exploitation can also take place within a family setting. Alongside social care and youth justice, the Exploitation and Violence Reduction Hub (situated within Youth Justice) works to intervene early to prevent entry into and support exit from exploitation.

Children are also victims of Modern slavery as it is a form of organised crime in which individuals including children and young people are treated as commodities and exploited for criminal gain. Grooming methods are used to gain the trust of a child and their parents, e.g. the promise of a better life or education, which results in a life of abuse, servitude and inhumane treatment.

Modern slavery is often hidden in nature, and goes unnoticed in our communities, with under-reporting a major concern. Children and young people may also be exploited by parents, carers or family members. Often the child or young person will not realise that family members are involved in the exploitation.

Modern slavery is child abuse, and any potential victim of child trafficking or slavery, servitude, or forced or compulsory labour should immediately be referred to Nottingham City Children's Services as they may be suffering significant harm

Nottingham City Council has a duty to notify the Home Office about any potential victims of Modern Slavery by referring them to the National Referral Mechanism (NRM). Victims can be of any nationality, and may include British national children, such as those trafficked for child sexual exploitation or those trafficked as drug carriers internally in the UK. The NRM does not supersede child protection procedures, so existing safeguarding processes should still be followed in tandem with the notifications to the NRM. There is a duty to notify the Home Office about adults as well. The NRM form should be used if the adult victim consents to provide personal details and wants government funded specialist support. Where adult victims wish to remain anonymous and do not want the specialist support, an MS1 form is used instead.

The Interagency Safeguarding Children Procedures of the Nottingham City Safeguarding Children Partnership has a chapter that provides guidance to all colleagues on Safeguarding children from modern slavery.

The Adult Social Care Training and Development Team has recently reviewed NRM pathways, with the Slavery Exploitation Team to ensure there is a clear process for colleagues to follow. Refresher information and updates on this process will be disseminated to refresh and embed this process.

Adult Social Care colleagues have access to Safeguarding Adults Basic Awareness training which includes Modern Day Slavery, and newly Qualified Social Workers receive a bespoke training session led by the Slavery Exploitation Team. The City Adult Safeguarding Team colleagues attend the regular SERAC meetings to contribute to the Multi-Disciplinary process if there is a MDS case that is allocated to a Social Worker. Where appropriate, the City Adult Safeguarding Team hold Multi-Agency Strategy meetings if they are working with a citizen who is experiencing Modern Day Slavery. When the Adult Safeguarding Team are undertaking safeguarding enquiries they work with both the citizen and the partner agencies to include the Police, Health and Housing to look at protective options that will assist the citizen.

Slavery Exploitation Team (SET)

Part of Nottingham's commitment to the detection and prevention of Modern Slavery and Exploitation is demonstrated in SET. The Team is based in Community Protection and takes referrals where there are concerns about exploitation, working with partners to support victims and reduce harm. The team's focus has been to develop a structure through which professionals can refer known or suspected victims of exploitation, slavery or trafficking and share situations where suspicious activity has been highlighted. Central to the team's current responsibilities is coordination and chairing of the monthly SERAC (Slavery Exploitation Risk Assessment Conference). The team receives and reviews all referrals to the SERAC, in addition to dealing with queries raised by internal colleagues and external partners. SET seeks to establish the wider background to cases and works with partners to identify action plans. In some cases, the team will become lead agency but more generally this remains with the referring agency. Joint agency visits are also supported by the team to offer a 'victim-centered approach' from first intervention.

Activity to promote and communicate exploitation and slavery issues in this reporting period has included delivering presentations highlighting the work of the team and referral pathways to various internal colleagues (CPOs, Adult Safeguarding, Children and Families Direct, Way 2 Work) and external partners (Notts County Council frontline workers, DWP, housing providers). The team also now deliver workshops to all ASYE social workers and has worked with the Safeguarding Adults Board to create 7 minute briefings on Cuckooing and Perceptions Vs Reality of slavery and exploitation.

The SET recently worked with the Rights Lab at the University of Nottingham for a research project exploring how learning disabilities and mental health problems intersect with exploitation in Nottingham.

Training and awareness-raising

The Council approach is part of a multi-agency approach coordinated by the Nottingham and Nottinghamshire Modern Slavery Partnership. The key future training need has been identified as empowering frontline workers to be more professionally curious and proactive in responding to concerns. Slavery is a business model that is continually evolving to exploit new opportunities and professionals' responses need to keep pace, recognising that colleagues within the organisation and our non-governmental partners should be trained on modern slavery/trafficking in order to raise awareness, learn the pathway and ensure compliance with the Modern Slavery Act 2015.

Basic e-learning continues to be available for all Council colleagues including the Safeguarding Awareness training which refers to Modern Slavery in the context of a form of abuse and instructs participants how to report all types of abuse if they see it or suspect it. A total of 1924 colleagues have undertaken the e-learning module since its re-launch in November 2018. Between 1st April 2021 and 31st March 2022, 432 Council colleagues completed Safeguarding eLearning. More specific Understanding Modern Slavery e-learning is also available with a total of 505 colleagues having undertaken the module since it was launched. Between 1st April 2021 and 31st March 2022 49 colleagues completed the Understanding Modern Slavery module.

Community Protection Regulation teams have all received training in the identification of Modern Day Slavery. The Council operated three schemes of Housing Licensing covering approximately 28,000 privately rented properties in the City. Regulation of private rented sector housing, including housing licensing schemes, can and has been used effectively to identify and disrupt slavery. The Council has recognised there is an intrinsic link between slavery and housing; however not all housing found to have poor living conditions will involve slavery, but virtually all cases of slavery will involve some form of substandard housing.

Joint working between the teams including general licensing and environmental health teams is integrated operationally, with staff able to identify, manage and refer possible cases when visiting such premises. Cases of slavery have been discovered when the councils have investigated housing complaints relating to unlicensed properties. Labour exploitation has also been known to occur in other licensed premises, beauty treatment establishments, fast food takeaways and the hospitality industry including hotels and restaurants. Licensing of premises and compliance inspections has identified some 'beds in sheds' type set ups.

Promoting and Communicating Modern Slavery Issues

Information has been made available for all colleagues outlining our duties, potential warning signs and what to do if they have any concerns. This is accessible on the intranet for all colleagues and supplemented by an internal communications campaign which was implemented to raise awareness of modern slavery, what it is and how it might impact on the day to day work of Council employees. As part of this eLearning, was also promoted to all colleagues who wished to attend.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nottingham City Council's modern slavery and human trafficking statement for the financial year ending 31 March 2022.

Signed:

A handwritten signature in black ink, appearing to be 'MB', with a long horizontal stroke extending to the right.

Melbourne Barrett, Chief Executive

A handwritten signature in black ink, appearing to be 'TJN', with a long horizontal stroke extending to the right.

Toby Neal, Portfolio Holder, Human Resources

Date: 15th September 2022

APPENDIX A

What is Nottingham City Council's business?

The services that Nottingham City Council provides to the citizens who reside in the City and to colleagues it employs can be broken down into four corporate directorates as follows:

- People
- Growth and City Development
- Resident Services
- Finance and Resources

These include, but are not limited to the following divisions:

People Directorate

- Education strategy division:
 - Access to Learning
 - SEND and Vulnerable Pupils
 - Virtual School
- Public Health
- Children's Integrated Services division:
 - Children in Care, including Safeguarding and Quality
 - Children's Social Care
 - Children's Strategy and Improvement
 - Early Help
 - Extensive and Specialist Services
- Adult Social Care division:
 - Integration – Adults
 - Quality Assurance and Safeguarding
 - Mental Health and Whole Life Disability
 - Social Care Provision – Adults

Growth and City Development Directorate

- Planning and Regeneration division:
 - Planning Strategy and Building Control
 - Regeneration and Housing
 - Traffic
- Economic Development and Property division:
 - Economic Strategy
 - Employment and Skills
 - Asset Management
 - Business Growth
 - Corporate Portfolio and Investment
- Major Projects and Public Transport division:
 - Major Programmes
 - Transport Projects and Operations
 - Transport Strategy
- Carbon Reduction, Energy and Sustainability division:
 - Enviroenergy and Waste Strategy
 - Midlands Energy Hub

Resident Services Directorate

- Community Protection division:
 - Community Partnerships
 - Operations
 - Regulations
- Neighbourhood Services division:
 - Facilities and Building Services
 - Highways
 - Nottingham Catering
 - Parking Fleet and Transport Operations
 - Public Realm
 - Waste Services
- Sport and Culture division:
 - Culture and Libraries
 - Markets and Fairs
 - Nottingham Events
 - Sport, Communities and Leisure Centres

Finance and Resources Directorate

- Direct report to Corporate Director:
 - Audit and Risk
 - Commercial Finance
 - Customer Services
 - Strategic Finance
 - IT
- Legal and Governance division:
 - Corporate Resilience
 - Legal Services
- HR and EDI:
 - HR and Organisational Development
 - EDI
- Commissioning and Procurement:
 - Contracting and Procurement
- Strategy and Policy division:
 - Strategic Insight and Analysis
 - Communications and Marketing