

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 2016 to 31 March 2017.

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, schools and social care. The Council 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.

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. Should the Council look to procure or import products or services from outside the EU, it would undertake further consideration of supply chains in order to take account of potential risks; however, standards of rigour will be consistent across all supply chains, regardless of country or origin.

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 Services 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 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.

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 Serious and Organised Crime Board which has a responsibility for modern slavery. 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. As part of its safeguarding responsibility the Council has previously commissioned safeguarding training for colleagues across the authority to help identify any signs of potential safeguarding incidents and the relevant referral pathways. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their manager, the police and the relevant safeguarding board if this incident was in Nottingham.

Any investigations in relation to suspected or confirmed modern slavery would be conducted with the support of partners and experts.

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).
- **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 Council has developed a Business Charter which 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 via our in-house recruitment function. Where agency workers are used, these are procured via a third-party company which in turn has its own modern slavery statement. The third party company 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.
- **Nottingham City Council Procurement Strategy 2014-2017:** The Procurement Strategy was developed in 2014 with the key objectives of delivering economic, social and environmental benefits to the city through procurement. The strategy identifies the role played by procurement in minimising the risk of social exploitation within the supply chain by ensuring the Council's ethical standards are met. The Council's ethical procurement objective is to ensure that people in the supply chain are treated with respect and have rights with regards to employment, including rights to freely choose employment, freedom of association and equal opportunities for all. The Procurement Strategy is under review and in the new Procurement Strategy for 2018 onwards, these ethical procurement objectives will be further developed with reference to modern slavery and due diligence measures in relation to the supply chain.
- **Equality & Diversity Policies:** The Council has two Equality and Diversity Policies – one for colleagues and one for Nottingham citizens. Both are declarations of the Council's commitment to making equality and diversity 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.
- **Domestic and Sexual Violence Strategy for Nottingham City 2015:** This policy, held by Nottingham's Crime and Drugs Partnership, includes actions and

aims to reduce instances of domestic and sexual violence in the city and specifically references modern slavery as a potential example of this. The strategy includes the responsibility of partners, including Nottingham City Council, in tackling all aspects of domestic and sexual violence and the strategy details what services are available for support.

Due Diligence of suppliers

The Council understands the important role that procurement plays in sourcing in a manner that enables and rewards good employment practices and does not encourage the use of modern slavery practices. 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:

- Working with partners to develop our understanding of the risks of modern slavery occurring and to review the supply chain to identify areas of vulnerability and risk
- Within the category management approach, considering appropriate steps to be taken through procurement 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 relevant sections of the Modern Slavery Act
- Inclusion of appropriate clauses in contracts to require suppliers to comply with the requirements of the Modern Slavery Act; these will be applicable to sub-contractors in the supply chain
- Working collaboratively with suppliers in mitigating the risk of modern slavery; supporting providers who identify activities that fall below the required standards and agree to make improvements
- Monitoring the performance of suppliers against the contract requirements, particularly in areas of identified high risk. Invoking sanctions against suppliers that fail to address performance issues identified or seriously violate the conditions of contract.
- Training and awareness raising for Procurement and Contract Management colleagues to develop their understanding of the risks within the supply chain. Wherever possible, following good practice guidance that is available in relation to modern slavery.

Safeguarding Nottingham Citizens

Nottingham City Council has a duty to ensure that its most vulnerable citizens are safeguarded, and as part of the day to day work of our Adult Social Care service it is possible that employees will come into direct contact with citizens who are victims of modern slavery and/or human trafficking and exploitation. Separate processes exist in Children's Social Care, as there are separate rigorous procedures in place for the safeguarding of children.

All Adult Social Care Teams within Nottingham City Council hold duties in relation to the safeguarding of adults at risk, this underpins all of the work undertaken by Adult

Social Care. The Care Act 2014 set out new duties in relation to safeguarding adults including adults at risk or survivors of modern slavery. Training was rolled out across the department in relation to both the Care Act and the new statutory duties in relation to adult safeguarding, including modern slavery.

Adult Social Care has representation on the Domestic and Sexual Violence and Abuse Steering Group and all colleagues have access to both Safeguarding Adults basic awareness training and update/refresher courses provided by both our training department and external partners. We have already provided bespoke modern slavery training for colleagues in our Safeguarding Team and also a number of colleagues who work across front line services.

The Council's Community Protection service is actively working with other Councils across Nottinghamshire to develop a response plan should any large-scale occurrence of modern slavery be discovered within the County, and is working with an external partner to establish a clear support route for victims of modern slavery within the region.

Performance indicators

The Council's Community Protection service is implementing initiatives to raise awareness of modern slavery and has already delivered nine sessions from April to November 2017; four sessions for Nottingham City Council colleagues and five for non-governmental organisations (attended by 300 people). In addition to this, basic awareness training for Council colleagues has now been developed by the Learning and Development team in HR and is due to be released in the coming months for access by all colleagues. The Council aspires to review its key performance indicators (KPIs) with a view to incorporating some targets and measures in order to build on this progress.

Training and awareness-raising

The Council recognises that colleagues within the organisation should be trained on modern slavery in order to raise awareness and increase compliance with the Modern Slavery Act 2015.

A Modern Slavery Training Plan is being developed and will be implemented in the next 12 months to ensure that all colleagues have access to general awareness training which will encourage a 'professional curiosity' when it comes to identifying slavery and include the following:

- The basic principles of the Modern Slavery Act 2015
- How colleagues can identify slavery including warning signs and indicators
- What colleagues can do to raise concerns about potential slavery
- What external help is available and details of the National Referral Mechanism (NRM)

The Modern Slavery Training Plan will also include appropriate training for colleagues in specific roles / teams where the risk of slavery is higher.

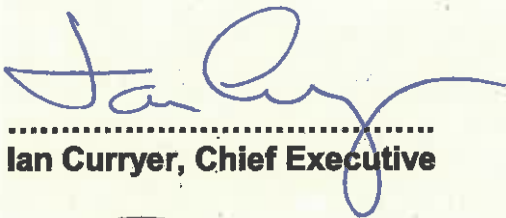
Promoting and Communicating Modern Slavery Issues

In the coming months, we will be making information available for all colleagues outlining our duties, potential warning signs and what to do if they have any concerns. To highlight the availability of this information, an internal communications campaign will be implemented in order 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, training courses will be promoted and employees will be encouraged to attend. Where areas of the Council are identified where there may be an increased risk of colleagues encountering examples of modern slavery, targeted communications will be put in place and training will be mandatory.

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 2017.

Signed:



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Ian Curryer, Chief Executive



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Toby Neal, Portfolio Holder, Community & Customer Services

Date: 27/09/2017

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 departmental areas as follows:

- Children and Adults Services
- Development and Growth
- Commercial and Operations
- Strategy and Resources

These include, but are not limited to:

Children and Adults Services

- Education – in schools and further education colleges. This includes employing teachers, teaching assistants, Head Teachers etc.
- Children's Social Care – including fostering and adoption, safeguarding, children's centres and Youth Offending Team.
- Adult Social Care – including safeguarding, specialist support for adults with disabilities, care homes and home care.
- Public Health – provides Health Improvement, Health Protection and Commissioning/Services; including tobacco control, substance misuse, sexual health, children and young people, mental health, obesity/physical activity, oral health, long-term conditions, and older people.

Development and Growth

- Housing – Housing Strategy and Nottingham City Homes.
- Housing Planning – new build property applications, extensions, approvals.
- Transport – including traffic and safety, public transport, Shopmobility, Park and Ride sites, CityCard and working with private firms providing bus, tram and rail services.
- Energy – Robin Hood Energy (gas and electricity).
- Road Maintenance.
- Property – Community Centres, Children's Centres, landlords or NCC property.

Commercial and Operations

- Community Protection – including Community Protection Officers (CPO), Community Cohesion, Licensing, Trading Standards, Environmental Health, and Safer Housing,.
- Sport and Leisure – including libraries, museums, markets and fairs, parks and open spaces, leisure centres, theatre, outdoor events (e.g. Splendour, Goose Fair).
- Neighbourhood Services – including CCTV, parking, enforcement, fleet and transport, facilities management (furniture, building maintenance and

management), waste collection (household waste collection, commercial collection and recycling)

- Trading Operations – including ground and tree services, catering (education), cleaning and caretaking, PAT testing, waste collection and recycling, confidential waste, pest control and event/hospitality services.
- Crime and Anti-Social Behaviour
- Crematoriums and cemeteries including burials.
- Catering – including Meals at Home service, free school meals, Day Centres, Care Homes, employee coffee bars and cafeterias (Bean Culture, Eat Culture), Events catering.

Strategy and Resources

- Crime and Drugs Partnership.
- Commissioning and Procurement.
- Registrars – births, deaths and marriages.
- Welfare – housing benefits.
- Elections.
- Recruitment.
- IT Service / Finance / Legal / HR – sold service available for schools.
- Marketing & Communications.