



City of
Stoke-on-Trent

Stoke-on-Trent City Council

MODERN DAY SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018-19



INTRODUCTION

Modern Slavery and Human Trafficking is a terrible crime and a serious violation of human rights.

It is a global phenomenon, and one which is now recognised as having a footprint within our local communities.

Stoke-on-Trent is a culturally diverse city, centrally based and with ease of access from other areas of the UK via the motorway network and from abroad. As a consequence, we are reflective of other large cities and attract those with the criminal intent to exploit vulnerable people.

Modern Slavery is complex and can take many forms. Both adults and children can become the victims of labour, sexual and criminal exploitation, domestic servitude and organ harvesting. The perpetrators often use force, fear or fraud to recruit and exploit their victims.

A common feature of all these cases is that human beings are treated as commodities for the sake of the financial reward of their exploiters. This is organised criminality, and in conjunction with our strategic partners we are committed to ensuring a robust response is adopted across the city.

The Modern Day Slavery Act 2015¹ consolidated previous offences relating to trafficking and slavery, and brought in new tools and powers to tackle these crimes. It also placed responsibilities on local authorities and other responsible bodies.

Section 54 of the Modern Day Slavery Act 2015, states that the employer's slavery and human trafficking statement might include information on:

- (a) the organisation's structure, its business and its supply chains;
- (b) its policies in relation to slavery and human trafficking;
- (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- (d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- (f) the training about slavery and human trafficking available to its staff.

¹Modern Day Slavery Act full text - <http://www.legislation.gov.uk/ukpga/2015/30/contents>

Stoke-on-Trent City Council's Modern Day Slavery Statement for 2018-19

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, we have a duty as a Council to notify the Home Office about suspected victims of slavery or human trafficking via the National Referral Mechanism².

We are committed to preventing slavery and human trafficking in our corporate activities, and ensuring that our supply chains are free from slavery and human trafficking.

When procuring goods or services, suppliers' policies and practices on slavery and human trafficking are assessed to ensure that they fulfil the requirements of the Modern Day Slavery Act.

We will ensure our staff and elected council members receive appropriate training and awareness raising to effectively tackle this issue.

We know that we cannot achieve this on our own and will continue to work closely with our strategic partners to build a collaborative approach to Modern Slavery, across Stoke-on-Trent and Staffordshire.

We are satisfied that steps outlined demonstrate the Council's commitment to preventing slavery and human trafficking.

Our approach will be subject to ongoing review, and this statement will be formally refreshed on an annual basis and made available on the council website.

² National Referral Mechanism - <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>

ORGANISATIONAL STRUCTURE

This statement covers the activities of Stoke-on-Trent City Council, which operates only within the United Kingdom.

The Council is a local authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners.

Stoke-on-Trent has a growing population and economy. The latest population estimate for the city according to the 2017 census update is 255,378, an increase of 2.6% since 2011.

Over recent times (2009 to 2016), Stoke-on-Trent has seen saw growth in GVA (Gross Value Added) per Capita of 29.6% - ranking it as the 13th fastest growing economy per capita in the United Kingdom. National growth over the same period was 18.9%.

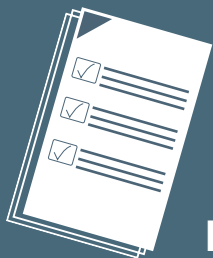
The Council is committed to its Stronger Together Strategic Plan 2016-20, which sets out the vision and overarching priorities and objectives for the council. Preventing and tackling slavery and human trafficking cuts across all of the priorities within the Strategic Plan.

The Council's constitution determines the way in which the Council is organised to carry out its functions. It explains the structures and decision making processes of the Council, and includes the rules and procedures that govern the conduct and expected behaviour of officers and elected members.

The Council holds a central register of all of its contracts and procures goods and services from various suppliers. This is governed by the Council's Contract Procedure rules which require all relevant suppliers to confirm compliance with the Modern Day Slavery Act 2015.

Corporate procurement staff have received training to ensure that, when procuring goods or services, as part of tender evaluation and ongoing contract management, they will consider the potential and likelihood of modern slavery throughout the entire supply chain.

PUTTING THIS STATEMENT INTO PRACTICE



Policies

In addition to this Statement, the Council has a number of policies and procedures that support the requirements of the Modern Slavery Act. They will be reviewed by the relevant service areas on an annual basis to ensure they remain current and relevant.



Investigations

Any concerns regarding modern slavery or human trafficking will be investigated by officers and will be raised with their relevant senior officer in the first instance. The Council has Single Points of Contact for Modern Day Slavery in key business areas such as adult and children's social care, public protection and housing who can further advise on actions to take to support and safeguard victims.



Training

Training and awareness raising has already been undertaken in a number of key business areas of the Council. We are working to ensure that all staff receive training commensurate with their role. This training will ensure we reinforce our existing approach.



Partnership working

The Council works collaboratively with relevant organisations across all sectors to support victims of Modern Slavery. The Council participates in strategic and operational modern day slavery partnership working across Staffordshire.



Supporting victims

We will support victims of modern day slavery and human trafficking through the National Referral Mechanism to ensure that they get the support they need, such as emergency accommodation in a place of safety, and support to rebuild their lives.

RELEVANT POLICIES AND STANDARDS

The council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act, and preventing slavery and human trafficking in our services and operations.

Safeguarding: The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults. The Council uses comprehensive safeguarding policies which all staff and councillors work within. The Council works within multi-agency partnerships to protect and safeguard children and vulnerable adults.

Confidential Reporting Code (Whistle Blowing Policy): The Council encourages all of its employees, 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 Council's Whistleblowing Policy is designed to make it easy to make disclosures without fear of retaliation.

Member and Officer Codes of Conduct: The codes set out in the constitution make it clear to employees and members the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing our supply chain, and any breaches are fully investigated.

Procurement and Contract Rules: The Council is committed to ensuring that its suppliers adhere to the highest standards of ethics. The Council's procurement and contract procedure rules require its contractors to provide confirmation of compliance with the Act.

Recruitment: The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensure they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

Remuneration and Pay: The Council has a pay policy statement which provides transparency with regard to the council's approach to setting the pay of its employees. It operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably. The Council has paid the National Living Wage or higher to its employees since April 2016.

Agency Workers: The Council uses only specified, reputable employment agencies to source labour. It verifies the practices of any new agency before accepting workers from that agency.

DUE DILIGENCE IN COUNCIL BUSINESS AND SUPPLY CHAINS

The Council undertakes a range of measures to ensure that its supply chains are free from modern day slavery, including:

- Maintaining a central register of all of the Council's contracts;
- Applying the Standard Selection Questionnaire (developed by the Crown Commercial Service) which includes a self-certification element to the tendering process. This is used to assess suppliers' policies and practices on slavery and human trafficking, and covers the requirements under the Modern Day Slavery Act. It can also identify whether a supplier has been convicted of an offence under the Act;
- Legal contracts, which suppliers and contractors will enter into with the City Council, will include an additional clause where relevant and appropriate requiring those suppliers and contractors to hold a whistle-blowing policy, to allow staff to report all suspected illegal activity including, but not limited to modern slavery and human trafficking. As with all contracts that are put out to tender, a draft contract is made available at the tender stage so that prospective suppliers and contractors are wholly aware of the Council's position.
- Conducting supplier assessments on a regular basis throughout the life of a contract, including reviews of suppliers' policies and practices on slavery and human trafficking.
- Ongoing contract monitoring includes the potential to invoke sanctions against suppliers who seriously violate the Council's expectations, including the termination of the business relationship. Suppliers guilty of a conviction under the Act will be excluded from participating in the Council's procurement opportunities for a period of five years.
- All invitations to tender for business with the Council will include the following statement:
"We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains. Stoke-on-Trent City Council will not support or deal with any business knowingly involved in slavery or human trafficking".

STAFF TRAINING AND AWARENESS

The Council has developed and adopted a tiered programme of training. This programme was developed in partnership with key agencies across the County, to ensure that a coordinated approach is taken.

The programme will ensure that staff who come into contact with members of the public, or who have safeguarding roles or responsibilities, have a sound understanding of Modern Slavery, are able to recognise the signs and refer their concerns in line with agreed pathways.

Staff will have a good understanding of how and when to refer into the National Referral Mechanism, and how this will provide support for victim of modern day slavery.

The identification and prioritisation of training and development needs in relation to modern slavery is based on:

- The degree and nature of contact practitioners / professionals have with members of the public including children, young people, families and vulnerable adults; and
- The knowledge and understanding of modern slavery that they need to fulfil the requirements of their role, including whether or not they are required to report into the National Referral Mechanism.

Where further training / refresher training is required, this will be built into training plans.