

Modern Day Slavery and Human Trafficking Statement

Refresh 2025

Stoke-on-Trent City Council

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 should consider including 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.

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

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

This is a refresh of our Modern Day Slavery Statement, which was first adopted in 2019, reflecting the positive developments that have taken place locally and nationally since then, and highlighting the positive steps that the City Council continues to take towards eradicating Modern Day Slavery in the city.

We continue to 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.

² National Referral Mechanism - www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales

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 mid-year estimate population (2023) from the Office for National Statistics is 263,157, an increase of 6.1% since the 2011 Census.

The Council is committed to its Corporate Strategy 2024-28 : Our City Our Wellbeing, 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 Corporate Strategy.

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 extensive 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.

In addition, all council staff are required to complete Modern Day Slavery e-learning or classroom-based sessions dependent on their role to ensure that the council's approach is embedded across all teams and departments.

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 continues to be delivered to all staff across the Council, to a level commensurate with their role. This mandatory training will ensure all staff are aware of Modern Day Slavery in all of its forms, how to identify victims, and where to make a referral.

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

The city's Community Safety Strategy 2024-27 has for the first time included a specific priority of Modern Slavery. The Strategy sets out the actions that will take place over the lifetime of the Strategy and the data measures that will be used to measure its success. Delivery against the priority is led by Staffordshire Police, which has a dedicated Modern Slavery Unit, and monitored by the multi-agency statutory Community Safety Partnership Board, whose membership includes the Cabinet Member and City Council Directors.

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 ensure that the contractor has complied 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 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.
- 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

It is vital that all of our staff, no matter what their role is – from social workers to waste operatives to accountants – are aware of Modern Day Slavery in all of its forms, and recognise that they may encounter victims of this terrible crime in the course of carrying out their jobs.

We highlighted training and awareness of Modern Day Slavery as a priority in our first Modern Day Slavery Statement, and to ensure that swift and effective progress was made towards our aim of training all staff, Modern Day Slavery training was made mandatory.

We developed a training programme which identifies different levels of need based on an individual's role within the organisation and their level of contact or interaction with members of the public, and potential victims of Modern Day Slavery.

Staff who may encounter victims, or potential perpetrators, of Modern Day Slavery undergo specialist training to ensure that they are fully equipped to identify and refer victims into the National Referral Mechanism. These staff include not only all social workers and other front-line staff, but also office-based staff in areas such as fraud and procurement.

All other staff, who do not work directly with the public, receive awareness training to ensure they are aware of Modern Day Slavery in all of its forms, and how it may affect their roles.

To date, over 2,000 staff have received training, and sessions will continue to be delivered to new and existing staff.

Regular internal communications also ensure that Modern Day Slavery continues to remain at the forefront of the City Council's priorities.