

## **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 2022 to 31 March 2023. The City Council has been publishing a modern slavery statement for 8 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, in accordance with a partnership Information Sharing Agreement. The Council has a First Responder<sup>1</sup> duty to refer people to the National Referral Mechanism if concerns of modern day slavery have been identified and the person

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<sup>1</sup> Selected agencies that can refer into the National Referral Mechanism

has provided their consent for this support. 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 our 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 the Communities division, who are our direct link with the local Vulnerabilities and Commodities Group which has a responsibility for modern slavery and is part of the Safer Stronger Nottingham 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 construction, 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 Performance and Intelligence Team information on suspected offending detected through frontline Communities services is directed to the appropriate intelligence bureau of our partners. Joint operations are routinely undertaken, especially with the Safer Housing service.

**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. The Council's Code of Conduct was updated in July 2022 to reflect the behaviours in the revised Individual Performance Appraisal Framework.
- **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.
- **Construction Charter:** The organisation recognises its role of being a responsible client when procuring and engaging construction contractors. The measures set out within the Construction Charter protect against exploitation in the supply chain/reduce the potential for modern slavery to present. It does so by requesting signatories, and their supply chain, agree to commit to working with the appropriate trade unions in order to achieve the highest standards in respect of; direct employment status, health and safety, standards of work, apprenticeship training and implementation of appropriate national agreed terms and conditions of employment.
- **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 Community Safety Team (CST) 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. Under Part 4 of the Statutory Duty from the Domestic Abuse Act 2021 these include the requirement for a Local Partnership Board, a Needs Assessment, Commissioning of Services and a Strategy. Nottingham City Council signed up to the Nottinghamshire Violence Against Women and Girls Strategy, which includes modern slavery, and was refreshed and agreed by Corporate Leadership and the CST Board in 2023.

### **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 within the supply chain, such as supply chain mapping.
- 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 Health and Social Care division 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 Health and 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).

The Children's Integrated Services division has 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 at an early stage 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 other 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 Integrated 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 Health and Social Care Training and Development Team continue to ensure there are clear processes in place for colleagues to refer via the NRM process. NRM process guidance is contained within the Local Authority's Adult Safeguarding resource area and is made available to all staff. Refresher information and updates on NRM processes continued to be disseminated.

Adult Health and Social Care colleagues have access to Adult Safeguarding training which includes modern day slavery, and newly qualified Social Workers undertake a bespoke training session in partnership with the Slavery Exploitation Team. The Adult Social Care Training and Development Team have also developed 7-minute briefings and further training resources covering topics relating to both modern slavery and human trafficking. Colleagues and citizens can also access resources contained on ASK Lion which details the signs of modern slavery, modern slavery laws and information on how to make a referral.

The City Adult Safeguarding Team colleagues attend the regular SERAC (Slavery Exploitation Risk Assessment Conference) meetings to contribute to the Multi-Disciplinary process if there is a modern day slavery 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 Safety 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) meetings.

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 (Community Protection Officers, Adult Safeguarding, Children and Families Direct, Way 2 Work) and external partners (housing providers, mental health services, drug and alcohol support services, social work university students, midwives). The team also deliver workshops to all ASYE (assessed and supported year in employment) Social Workers and has worked with the Safeguarding Adults Board to create 7 minute briefings on Making Safeguarding Personal and Safer Internet Use.

A case study of the Nottingham model is included in the LGA 2022 refreshed guidance on Tackling Modern Slavery as an example of best practice.

## **Housing Services**

The City's Housing Services function, which maintained 24,896 properties in 2022/23, transferred in-house from 1<sup>st</sup> April 2023. Preparations were put in place for the transfer of the service and to review and share practices and training.

From a case management perspective, Housing Services works in close partnership with Nottinghamshire Police and the Council's Slavery Exploitation Team (SET).

Housing Services is also part of the multi-agency partnership Serious Exploitation Risk Assessment Conference (SERAC), enabling the service to take a proactive role in tackling modern slavery and build networks within the City of Nottingham to support Council tenants who are affected by or are victims of modern slavery.

Housing Patch Managers and Area Housing Managers have undertaken modern slavery training with a key focus on drugs, gangs, county lines and exploitation and how these feed into modern slavery and exploitation. All Housing Services colleagues undertake compulsory Equality, Diversity and Inclusion (EDI) training which includes a module on Modern Day Slavery and exploitation, and signposts to further e-Learning on Modern Day Slavery and human trafficking. The Housing Services Modern Slavery and Exploitation Procedure sets out how Housing Services will respond to reports of modern slavery, how it will support tenants who are victims and how it will work with partners to take action against perpetrators.

## **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 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 human 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 Protecting People (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 2,500 colleagues have undertaken the e-learning module since its re-launch in November 2018. Between 1st April 2022 and 31st March 2023, 705 Council colleagues completed Safeguarding eLearning. More specific Understanding Modern Slavery e-learning is also available with a total of 586 colleagues having completed the module since it was launched.

Through the Modern Slavery Partnership, NCCs Slavery Exploitation Team (SET) is working on collaborating with NRM training providers to ensure as many people as possible receive this alongside the local pathways training.

Communities Regulation teams have all received training in the identification of Modern Day Slavery. The Council operated schemes of Housing Licensing covering approximately 36,000 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 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 Council has 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 2023.

**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 'A Wynter', with a stylized 'A' and 'W'.

**(Cllr) Audra Wynter, Portfolio Holder, Finance and Human Resources**

**Date: 28<sup>th</sup> September 2023**

## **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 five corporate directorates as follows:

- Chief Executive's
- People
- Growth and City Development
- Communities, Environment, and 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
  - Sold Services to Schools
  - Nottingham Catering
- Public Health
- Children's Integrated Services division:
  - Children in Care
  - Safeguarding Partnerships and Quality Assurance
  - Children's Social Care
  - Strategy and Improvement
  - Early Help
  - First Response
  - Extensive and Specialist Services
- Adult Social Care division:
  - 
  - Quality Assurance and Safeguarding
  - Mental Health and Whole Life Disability
  - Social Care Provision – Adults
  - Access and Prevention
- Commissioning and Partnerships division:
  - Commissioning
  - Business Strategy, Development and Performance

#### **Growth and City Development Directorate**

- Planning and Transport division:
  - Transport Strategy
  - Parking
  - Planning Strategy and Building Control
- Traffic and Flood Risk Management
- Transport Projects and Operations
- Development Management

- Economic Development and Property division:
  - Economic Strategy
  - Employment and Skills
  - Asset Management
  - Business Growth
  - Corporate Portfolio and Investment
  - Property
  - Building Services and Facilities Management
  - Major Projects
  - 
  -
- Housing Services division:
  - Housing and Regeneration
  - Council housing function

### **Communities, Environment and Resident Services Directorate**

- Community division:
  - Community Protection
  - Environmental Health and Public Protection
  - Community Safety
  - Communities
- Environment and Sustainability division:
  - Enviroenergy and Waste Strategy
  - Midlands Energy Hub
- Resident Services division:
  - Highways
  - 
  - Fleet and Depot Operations
  - 
  - Waste and Cleansing Services
  - Spaces and Natural Environment
- Sport, Culture and Tourism division:
  - Culture and Libraries
  - Tourism and Events
  - Sport and Leisure
  - Theatre Royal Concert Hall

### **Finance and Resources Directorate**

- Direct report to Corporate Director:
  - Internal Audit and Risk
  - Commercial Finance
  - Strategic Finance
  - IT
- Legal and Governance division:
  - Corporate Resilience
  - Legal Services
  - Governance
- HR and EDI:

- Commercial Procurement and Contract Management:
  - Procurement
  - Commercial Oversight and Governance
- Customer Services
  - Nottingham Revenue and Benefits
  - Coroners

Chief Executive's Directorate:

- Strategy and Policy division:
  - Analysis and Insight
  - Communications and Marketing