

# CABINET

19 January 2021

<b>Title:</b> Modern Slavery Charter Update	
<b>Report of the Cabinet Member for Social Care and Health Integration</b>	
<b>Open Report</b>	<b>For Information</b>
<b>Wards Affected:</b> All	<b>Key Decision:</b> No
<b>Report Author:</b> Hazel North Stephens, Lead Commissioner (Community Safeguarding) Mandeep Mahadeo, Policy and Partnerships Officer	<b>Contact Details:</b> E-mail: <a href="mailto:hazel.northstephens@lbbd.gov.uk">hazel.northstephens@lbbd.gov.uk</a> <a href="mailto:Mandeep.mahadeo@lbbd.gov.uk">Mandeep.mahadeo@lbbd.gov.uk</a>
<b>Accountable Strategic Leadership Directors:</b> Elaine Allegretti, Director of People and Resilience, and Mark Tyson, Director of Strategy & Participation	
<b>Summary</b> <p>Modern slavery and human trafficking are issues of major concern in a globalised world. They are significant safeguarding issues for vulnerable people in our local community, and they require a Council- and community-wide approach to ensuring that they are identified and tackled.</p> <p>This report responds to the need to present a progress update against the commitments in the Modern Slavery Charter. At the same time, this report presents the Council's updated Modern Slavery Statement for 2021/22, which will be available on the Council's website for public view.</p> <p>Recognising that the Council's responsibilities towards tackling modern slavery go further than procurement and employment duties, it also gives a brief overview of how work on modern slavery is being progressing across the Council and its partnerships.</p>	
<b>Recommendation(s)</b> <p>The Cabinet is recommended to:</p> <ul style="list-style-type: none"><li>(i) Note the progress against the Modern Slavery Charter and the account given of the Council's approach as set out in the Modern Slavery Statement 2021/22 at Appendix 1 to the report; and</li><li>(ii) Note the brief on the wider direction of travel relating to Modern Slavery in Barking and Dagenham, including the governance update between partnership boards.</li></ul>	
<b>Reason(s)</b> <p>Modern Slavery is a significant source of safeguarding risk for local vulnerable populations. As well as formal statutory duties to safeguarding children and vulnerable adults from these kinds of risks, the Council's vision, encapsulated in "One borough; One community; No-one left behind" prompts a positive and strong set of actions to tackle them.</p>	

**Well Run Organisation** – Focusing on an efficient and effective operation of the council. All the Council's actions should support its policy aims, including technical and "back-office" activities such as procurement and HR management. The agreement of the Statement and the Charter update demonstrate how these important areas of general business activity are conducted with reference to the safeguarding responsibilities around Modern Slavery.

**Participation and Engagement** – Empowering residents by enabling greater participation in the community and in public services. As the borough focuses its services on 'up-stream' intervention, rather than responding to crisis, it becomes increasingly important that we are supporting the community to identify concerns early, and ensuring that they and our professional staff can see and act on instances of Modern Slavery and Trafficking. Furthermore, that victims get the sensitive and empathic support that they are entitled to when they come to our notice.

**Inclusive growth** – Harness the growth opportunity that arises from our people, our land and our location in ways that protect the environment and enhance prosperity, wellbeing and participation for all Barking & Dagenham residents. As new businesses grow up, both small and large, they will employ people locally. Additionally, the Council will continue to diversify its supply chains as the opportunities increase to commercialise the way the Council operates. In both cases, there needs to be a keen awareness of the possible existence of Modern Slavery in these new employment and supply chains. Furthermore, as the borough grows, and the increased connectivity of the borough brings a more rapid population turnover, it becomes more difficult for statutory services to maintain their sight of the risks that present to vulnerable people, and a partnership with the local community as a responsive source of concerns becomes more important.

**Prevention, Independence and Resilience** – The Council's priority is that children, families and adults in Barking & Dagenham live safe, happy, healthy and independent lives. Young people and adults at risk are safeguarded in the context of their families, peers, schools and communities and safeguarded from exploitation. A priority will always be ensuring that children, young people and vulnerable adults in most need are safe and experience a reduced risk of harm, violence and exploitation. Work has progressed considerably in this space with the advancement of our contextual safeguarding and exploitation approach and this paper sets out our strengthened governance and partnership approach to Modern Slavery.

## 1. Introduction and Background

- 1.1 Modern Slavery and Human Trafficking directly threatens the Council's ambitions to improve outcomes for all residents, leaving no-one behind. The emphasis of our new ways of working are about improving the relationship between residents and the Council, either in their individual interactions or as a community.
- 1.2 This must be based on a better understanding of our residents and the needs and experiences of the most vulnerable in our community. Key to the success of this approach is embedding the message that everyone has a part to play. We know that central to securing a relational and participatory approach to working with residents is being able to understand and respond to their safety.
- 1.3 The context of a global pandemic – COVID 19 – has had massive health, social and economic impacts across the country. Locally, the numbers of residents claiming universal credit has increased dramatically alongside a new situation: furlough.

Unemployment is expected to disproportionately impact migrant workers and those in the informal, garment and hospitality sectors. A reduction in travel means that people on short term visas and limited leave to remain may be unable to return home. This means more challenges as we need to work with and rely on our communities to help us safeguard the most vulnerable.

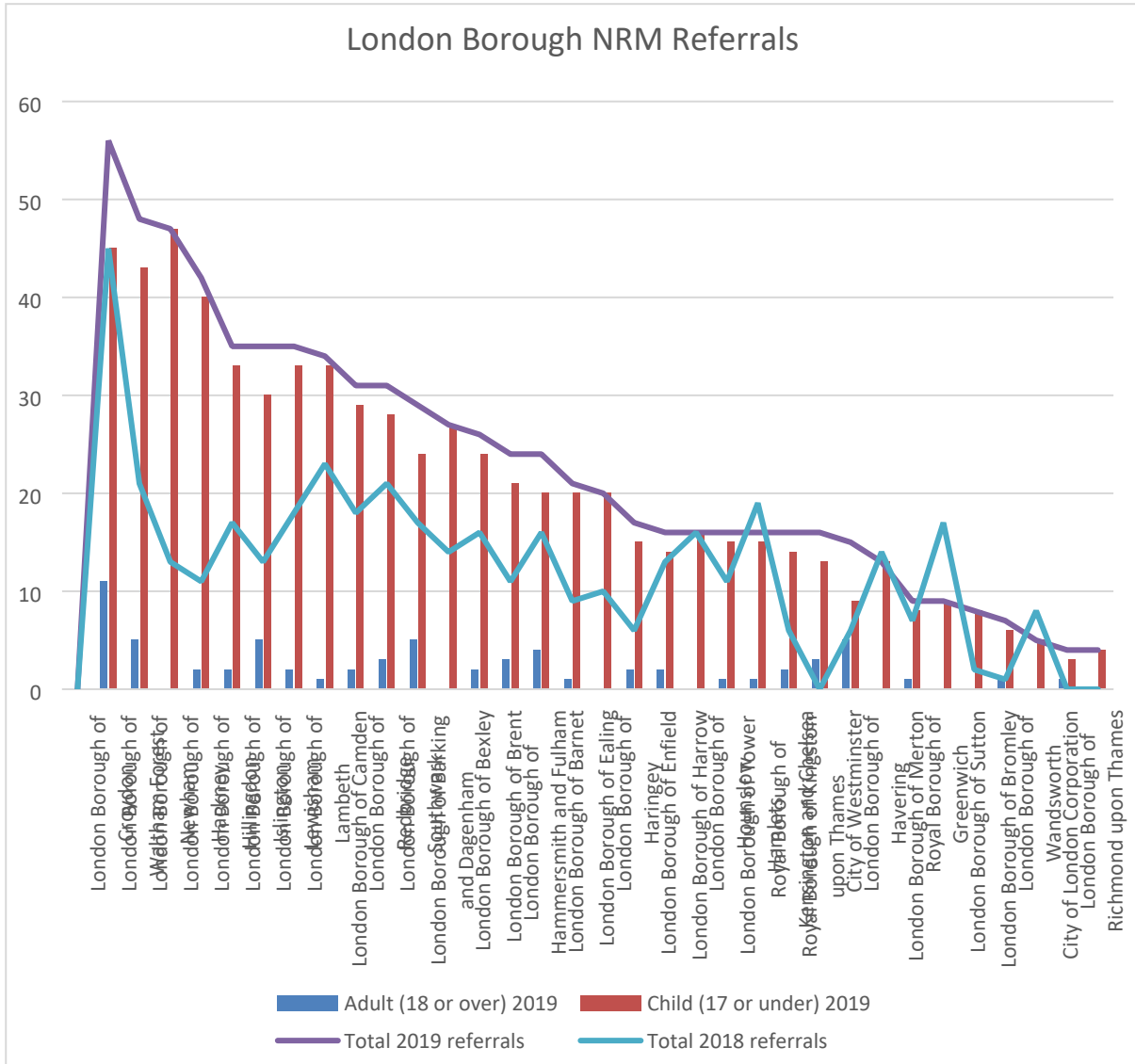
- 1.4 A request was made for an update specific to the Co-operative Modern Slavery charter to come to Cabinet as a progress report. This report forms this update and offers an additional brief on the advanced movement across the partnerships within the borough related to modern slavery and/or human trafficking.
- 1.5 As a human rights issue, Modern Slavery should be viewed through the lens of social inequality and requires a clear oversight of its wider social impacts. There are several obligations on the Council to respond to Modern Slavery and as such the charter should not be viewed in isolation.

## **2. Context**

- 2.1 It is a shocking fact that while most people consider the slave trade to have ended when slavery was abolished in 1833, there are more enslaved people today than ever before in human history. Figures from the International Labour Organisation (ILO) suggest that there are more than 40 million people in modern slavery across the world, with nearly 25 million held in forced labour.
- 2.2 The UK is a source, transit and destination country for modern slavery. The Home Office estimated that in 2013 there were between 10,000 and 13,000 potential victims of modern slavery in the UK. This means that there is a good chance modern slavery is taking place in the towns, cities and villages where we live.
- 2.3 Modern slavery is hidden, often in plain sight; on our high streets, in local businesses, and even suburban streets. Unwittingly, our community may be using victims of modern slavery to wash their cars, paint their nails and lay their drives. They may even be living next door.
- 2.4 The National Crime Agency reports annual figures relating to referrals into the National Referral Mechanism (NRM) - a national framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support. The NRM was introduced in 2009 to meet the UK's obligations under the Council of European Convention on Action against Trafficking in Human Beings. At the core of every country's NRM is the process of locating and identifying "potential victims of trafficking."
- 2.5 The NRM grants a minimum 45-day reflection and recovery period for victims of human trafficking. Trained case owners at UK Human Trafficking Centre decide whether individuals referred to them should be considered to be victims of trafficking according to the definition in the Council of Europe Convention.
- 2.6 In 2018, 6,986 potential victims across the UK were submitted to the NRM which was a 37% increase on the previous year. In 2019 there were 10,627: a 52.1% increase on 2018.
- 2.7 In local context, the Crime and Disorder Strategic Needs Assessment shows that there are several risks from brothels operating, from serious youth violence and

from drug trafficking, sometimes coerced, along so-called “county lines”. All of these are possible routes for modern slavery to exist.

- 2.8 Published data available is limited and the issue is understood to be widely underreported as a result of its hidden nature. This means it is difficult to give a picture as to the scale of the issue in Barking and Dagenham, although we do have access to referral data through the NRM.
- 2.9 In 2018 there were 14 referrals to the NRM for which Barking and Dagenham Council are listed as the First Responding Organisation, all of which were for children. In 2019, there were 27 referrals from Barking and Dagenham – again, all children. This is a 92.9% increase from 2018 to 2019.
- 2.10 For those exploited as children, criminal exploitation is partially driven by an increase in the identification of ‘county lines’ cases. County lines are used to describe drug gangs in large cities expanding their reach to small towns. Often, vulnerable individuals are exploited to transport substances, and mobile phone ‘lines’ are used to communicate drug orders.
- 2.11 Nationally, in quarter 2 2020/21, 409 referrals were flagged as county lines referrals, accounting for 19% of all referrals received in the quarter. The majority (85%) of these referrals were made for male children.
- 2.12 There has been considerable work undertaken in Barking and Dagenham relating to youth violence and county lines and we are able to see from Council systems that there are 26 cases for under 18’s of which 9 have a conclusive grounds decision, and 17 have a reasonable grounds decision. To establish whether a person is a victim of any form of modern slavery (including trafficking) identified in England and Wales, two decisions are made by Competent Authorities within the UK Human Trafficking Centre (UKHTC) and the Home Office:
- A reasonable grounds decision to establish whether someone is a potential victim
  - A conclusive grounds decision on whether they are in fact a victim
- 2.13 It is highly likely that our own criminal exploitation referrals are heavily driven by improved work in children’s care and support to recognise and respond to criminal exploitation and sexual exploitation – both forms of Modern Slavery.
- 2.14 The graph below provides some understanding of how London Boroughs have seen shifts in the numbers of NRM referrals made, and how these shifts are predominantly driven by referrals for children. In 2019, Barking and Dagenham had the 12<sup>th</sup> highest total NRM referrals among the London Borough:



### 3. COVID 19

- 3.1 COVID 19 has had massive ramifications to across the UK. Modern Slavery is no different. For people who are enslaved or vulnerable to slavery, the economic and social disruption caused by the Covid-19 pandemic is affecting their lives in new and profound ways. The challenges of self-isolation, social distancing and satisfactory hygiene are particularly difficult for enslaved people. For children and young people, social isolation may increase their vulnerability to grooming and abuse in the long term.
- 3.2 Fewer people are out and about, and therefore there are fewer people to identify modern slavery and report suspicious activity. Many of the sectors we commonly associate with modern slavery and exploitation were largely shut down (e.g. nail-bars, hand car washes) which means exploited workers could be dumped, forced further into debt bondage or moved to work elsewhere.
- 3.3 Lockdowns to try to halt the spread of the virus have led to mass layoffs, thousands of people furloughed and more people than ever before reliant on universal credit. This exacerbates the vulnerability of communities to Modern Slavery but for those who do not have recourse to public funds it may feel like the only way to survive.

- 3.4 Initially, hate crime increased towards Chinese people and throughout lockdown included Asian Muslim people too. The public narrative around migrants shifted to a focus on closing borders to 'keep safe' – a narrative that builds on the othering of non-white British people and conceptualises migrants as being the threat, rather than the virus itself.
- 3.5 Antislavery.org (national organisation tackling modern slavery in the UK) suggests that the potential risk that someone with symptoms of coronavirus trapped in modern slavery avoids seeking medical help could be a threat to the wider community.
- 3.6 People in slavery are often forced to live in squalid, overcrowded conditions, with many in a room and without access to good washing facilities. This environment can mean potential victims are often too scared to reach out to authorities, even when they are in dire need of accessing essential support, such as healthcare. They fear being criminalised and detained, rather than being protected as a victim of crime. The COVID 19 narrative could present additional barriers, or exacerbate those already existing for potential victims to come forwards.

#### **4. The Co-Operative Modern Slavery Charter**

- 4.1 The Co-operative Party Charter Against Modern Slavery commits councils to proactively vet their own supply chains to ensure there are no instances of Modern Slavery taking place. It sets out 10 commitments for councils to undertake to accomplish this pledge. Details of the charter, its background and commitments can be found here: <https://party.coop/local/councillors/modern-slavery-charter/>
- 4.2 Barking and Dagenham Council signed the Charter in May 2018. Progress against each of the Modern Slavery Charter commitments is shown below:

##### **1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply**

*This is viewed through both procurement and commissioning in Barking and Dagenham due to commissioners taking a strong lead in shaping procurement activity for this Council. Modern Slavery eLearning is available through iLearn for all employees, which so far has been completed by 49 Officers between May 2017 to October 2020. This is particularly low but doesn't reflect additional offers that have been face to face (or online through COVID), or the regionally offered training which has been shared. For example, Hestia, a national charity that provides safe houses to victims of Modern Slavery delivered two sessions of training to our Community Solutions teams. Care and Support staff can also access face to face training through learning and development offers, and we have shared regional and national training opportunities with procurement teams. Next steps will be to start better understanding and recording the training offer, pulling in regionally funded offers wherever possible. Targeting of training will also consider the impact of COVID on services abilities to attend. Enforcement teams for example are particularly keen to undertake training but COVID restrictions and response meant initial plans were not practicable.*

##### **2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.**

*Complete and ongoing: General termination clauses are in [contract templates](#), as well as clear terms about compliance with relevant law. Legal and Procurement teams are building Modern Slavery into the Councils Contract Terms review, which will also ensure guidance and templates are explicit in naming contract termination as a potential sanction for non-compliance. Questions are standard as part of commissioning and contract management.*

**3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.**

*Complete and ongoing: part of standard due diligence processes through commissioners and procurement.*

**4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.**

*The following clause is attached to standard contract terms and conditions: For the avoidance of doubt and without prejudice to the generality of any foregoing provision, the Council actively encourages a policy of inclusive working that embraces all members of the workforce including members of all lawfully recognised trades union. Any evidence of Contractor exclusion of any individual or groups of individuals on the grounds of membership of any trade union (commonly referred to as “Blacklisting”), in relation to this or any other Council contract will be treated as a material breach of contract.*

**5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.**

*Complete – whistleblowing policy included modern slavery and is widely publicised, including being installed as the background on laptops and regularly shown through live screens. There have also been internal communications through staff newsletters.*

**6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.**

*Contracts include requirements around probity and openness but still need to strengthen with specific respect to modern slavery.*

**7. Review its contractual spending regularly to identify any potential issues with modern slavery.**

*All Directors’ annual governance statements report on this. All departments have regular procurement reports through to Procurement Board at which contract performance issues are reviewed.*

**8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.**

*Care and Support has regular contact with providers on a range of issues, and this would be included alongside other safeguarding concerns. More generally, there are open communication channels with providers, which would be used to alert where there were concerns.*

**9. Refer for investigation via the National Crime Agency’s national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.**

*A pathway has been developed for NRM referrals, and this would incorporate*

supplier concerns just like any other concern.

## 10. Report publicly on the implementation of this policy annually.

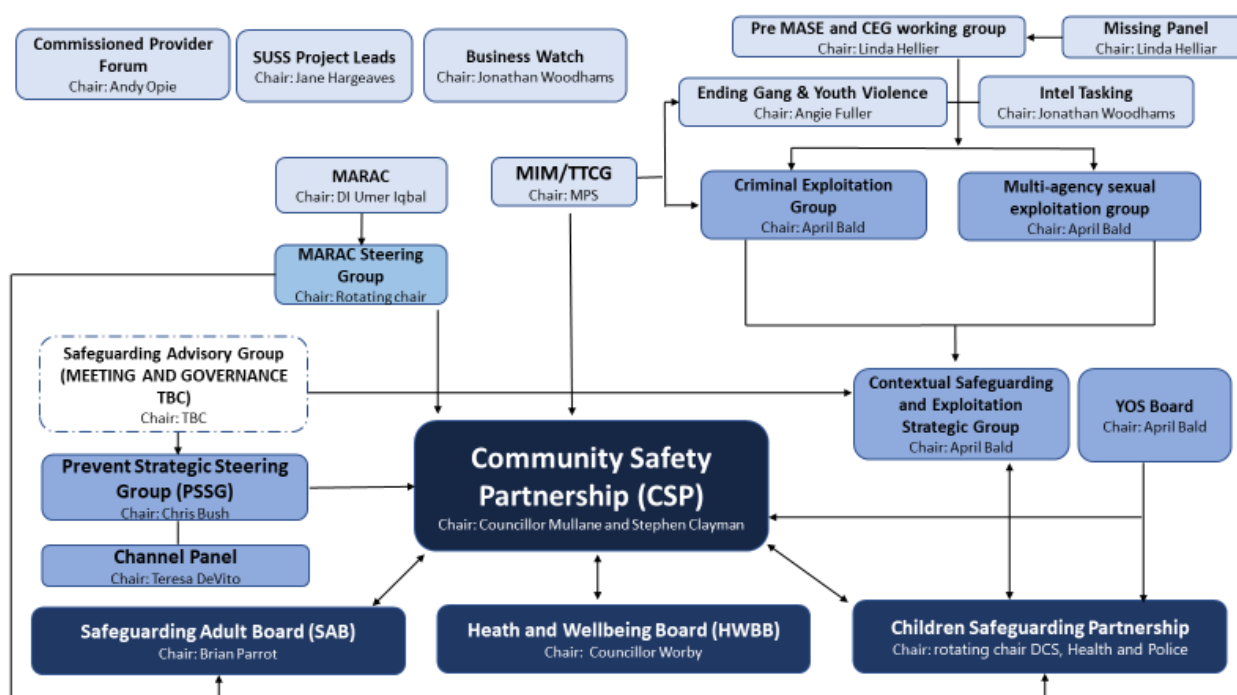
*Our initial Modern Slavery Statement was published in September 2019.*

*Appendix One provides an updated statement to set out commitments as we go forwards in to 2021/22.*

## 5. Direction of Travel in LBBDD beyond the Modern Slavery Charter Commitments

5.1 Modern Slavery impacts all service areas and partnerships, and as such there has been a significant amount of work taking place to understand Modern Slavery as a shared agenda across the partnership boards. It has clear safeguarding implications as well as a community safety requirement. This is not a single agency issue.

5.2 To create an authentic platform to tackle this issue from a united front, governance mapping has been undertaken across the boards to ensure that Modern Slavery (among other shared agendas such as domestic abuse for example), is understood and responded to appropriately:



5.3 The Contextual Safeguarding and Exploitation Strategic Group focuses on Modern Slavery and Exploitation as a core part of its terms of reference, and the work undertaken by the group has led to the development of several operational and strategic groups focused on sexual exploitation, criminal exploitation, gang and youth violence and missing – all forms or correlating factors to potential modern slavery.

5.4 Child victims of trafficking and modern slavery are tracked through the Criminal Exploitation Group (CEG) that meets monthly. The CEG is a multi-agency meeting of senior managers from across the partnership and is chaired by the Operational Director for children's care and support. The purpose of CEG is to have strategic and tactical oversight of child criminal exploitation (CCE) cases, information,



intelligence, and activity across LBBB and for LBBB children placed out of borough. It aims to deliver a partnership response to short, medium, and longer-term themes, trends and patterns emerging from cases applying the VOLT principle - victims, offenders, locations, and trends. Information about child trafficking and modern slavery is disseminated to all new staff through an Exploitation Awareness short course that runs every six weeks. This includes how to refer a child to the NRM

5.5 In order to ensure our systems are capable of recording accurately Liquid Logic leads have developed flags for NRM referrals which are broken down into two categories:

- NRM 2 – reasonable grounds decision. Once referred into the NRM potential survivors should receive a decision on their case within 5 working days – known as a ‘reasonable grounds’ decision.
- NRM 1 – conclusive grounds decision. Where a positive reasonable grounds decision is made, the authority can then decide (within 45 days) if individual is a survivor of modern slavery – this is known as ‘conclusive grounds’ decision.

5.6 This is supported by training days commissioned by the Learning and Development teams to ensure professionals can recognise, respond, and refer appropriately to modern slavery.

5.7 Step up Stay Safe (SUSS), a partnership and cross-service initiative to develop a tiered intervention approach to youth violence which is based on several thematic strands:

- Theme 1: Schools: *Outputs include young people at risk of exclusion are supported by Sparking Purpose. A Stepping Stones transition programme supports young people to successfully transition to secondary school and a cohort of schools are set up with Tootoot (a digital application for youth engagement).*
- Theme 2: Young People’s Voices: *Outputs includes detached youth workers engaging and recruiting 900 young people .80 young people complete programmes with S3A and Box Up Crime. Over 150 young people attend summer provision.*
- Theme 3: Council and Partners: *Outputs include 100 young people to visit the Ben Kinsella Trust and increasing the number of young peoples’ uptake part of diversionary activities annually.*
- Theme 4: Parental & Community Engagement: *Outputs include the recently launched the Lost Hours Campaign. The campaign centres on asking parents to take more responsibility and know where their children are, with its name derived from the ‘lost’ period between 3pm and 7pm, where young people finish school and parents return from work. Although not directly related to Modern Slavery there is a crossover with county lines, for which local NRM referrals have been made.*
- Theme 5: Tiered Intervention Offer: *Outputs include identification of 240 young people (20 per month) identified through the at risk matrix and local intelligence report, to give support and intervention focused on diverting young people away from the criminal justice process.*

- 5.8 The Safeguarding Adults board have named modern slavery and exploitation as an area of development in their work. Definitions of modern slavery and exploitation are understood differently and the criteria for adult safeguarding means that adults are not automatically deemed vulnerable in the same way as children are. An example of differing definitions is the issue of financial exploitation which may not always meet the definition for modern slavery but instead may meet definitions for domestic abuse, elder abuse, or institutional abuse. In some cases, there may be crossovers, for example domestic servitude and exploitation are sometimes factors in domestic abuse.
- 5.9 Cases of modern slavery in adult safeguarding territory (as per the safeguarding adult's legal definition: adults with care and support needs) are not high in volume in Barking and Dagenham. If there was a potential modern slavery case where the victim has care and support needs, the Council would support the investigating authority, (police typically, but occasionally the National Crime Agency) by making sure the victim gets care and support. We may also help to secure evidence if it is within our ability to do so.
- 5.10 The point is to recognise that this can be a difficult topic to define but there is a shared principle through safeguarding adults partners that we see the person behind the definitions, and ensure that people have the support they need. The Safeguarding Adults Board has ensured eLearning is available to all staff and held a learning event following the findings of the 'Drina' safeguarding adult review in 2018.
- 5.11 Adult sexual exploitation is discussed at intelligence meetings with community safety and enforcement teams and this includes better understanding how we ensure support services are embedded into brothel closure operations. There is a plan to create a standard operating protocol to build in support agencies to work to close brothels. This includes Refuge who have significant experience working with Redbridge Council on their tactical operations around sexual exploitation and prostitution.
- 5.12 County Lines Screenings from Henry Blake have been updated and are now being delivered by MSTeams considering the restrictions on face-to-face training. The short film highlights the growing national crisis of 'County Lines' and the serious threat it poses to Britain's children.
- 5.13 We have a strong community and voluntary sector with several support services in the borough, some more specialised in relation to modern slavery and other providing non-specialist work but just as valuable – responding to residents wider needs and assisting their recovery through connection and emotional support:
- Eastern European Resource Centre (EERC) supports Polish, Romanian and other Eastern Europeans victims of modern slavery and other forms of labour exploitation in London. They have three advocates offering comprehensive and victim-centred assistance mostly in Polish and Romanian, including:
    - (1) help with commencing Police and National Referral Mechanism procedures (only upon the victim's informed consent)
    - (2) help with reconnection, employability, and welfare advice, and help with securing the victim's immigration status

(3) facilitation of legal advice and representation, where appropriate.

- Refuge include sexual exploitation as part of the Domestic and Sexual Violence Service. The service predominantly sees domestic abuse cases referred in although there is sometimes crossover with domestic servitude and sexual exploitation in cases. It offers support to adults and has a young person's advocate for 12-17-year olds. We are looking to build the work into a standard operating protocol with community safety and enforcement colleagues to ensure brothel closures do not displace potentially trafficked or exploited workers.
- St Luke's delivered by CGL offers support to adult residents using drugs and/or alcohol. The service is trauma-informed and non-judgemental. There is sometimes a crossover with substance misuse and sexual exploitation and we see this through services like Pause (which provides support to women who have had multiple children taken into care – many of the women have faced domestic abuse/substance misuse/exploitation crossovers) and Advance Wraparound service (which provides support to female offenders who are facing multiple disadvantage).
- Subwise delivered by WDP offers support to young people affected by substance misuse. The Service manager attends the CEG and MASE groups, directly connecting in with wider young people's support in the borough such as Future Youth Zone and the detached youth workers. Its Hidden Harm workers can work with young people from a holistic perspective and are commissioned to be trauma informed.
- There are several other voluntary organisations working to tackle vulnerability to violent crime in the borough and whilst not directly delivering modern slavery specific services, are offering support and connection to residents that might be considered vulnerable to it. This is particularly the case in the arts and culture sector, sports sector and through the massive amount of support available through faith organisations.

5.14 Children's Care and Support intend to present to the community and voluntary sector on the work taking place around contextual safeguarding, and agreements are in place for Policy and Participation to support future collaborative approaches.

## **6. Financial Implications**

Implications completed by: Sandra Pillinger Group Accountant

6.1 This report presents a progress update on the Council's commitment to tackling the issues of modern slavery. There are no direct financial implications.

## **7. Legal Implications**

Implications completed by: Dr Paul Feild, Senior Governance Lawyer

7.1 Local authorities have a duty to notify the secretary of state if they have reasonable grounds to suspect that a person may be a victim of slavery or human trafficking. The Modern Slavery Act 2015 requires that any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK, and is above a specified total turnover, must produce a slavery and human

trafficking statement for each financial year of the organisation. For the purposes of this requirement, 'supply chain' has its everyday meaning. Regulations have set the total turnover threshold at £36m. The statement must set out what steps they have taken during the financial year to ensure that modern slavery is not occurring in their supply chains and in their own organisation.

- 7.2 Following the Modern Slavery Act 2015, there was a consideration as to whether the statement requirement applied to local authorities. The prevailing opinion is that it is not obligatory, indeed a bill was introduced in the House of Lords to clarify the point and specifically included local authorities to be subject, but it did not progress due to lack of time. Our advice is that as the Council's 100% owned companies could well approach that figure or exceed it and so they are obliged to have a statement, then it would be incongruous if the Council as the owner did not commit itself too by also making a modern slavery statement. This is the approach taken by a number of authorities including the East London Waste Authority (of which the Council is a constituent member) with its company ELWA Ltd. Furthermore, as the duty relates to supply chains it would be reasonable to require in all new contractors to the Council subject to the regime to provide proof on request of their compliance.
- 7.3 Work has commenced in revising the Council Contract Rules within the Constitution that could enable the Council to terminate contracts in the event the contractor is convicted of an offence related to modern slavery and business with the Council as is already the case for bribery and corruption for example. Finally, the Council's standard conditions are being re-enforced and already provide for termination in the case of illegality.

## 8. Other Implications

- 8.1 **Risk Management** - The risks associated with allowing modern slavery to enter the Council's supply chain, or its employment, are significant. There are good controls in place presently, but awareness and training need to be maintained in order that practice standards in procurement and employment are upheld.
- 8.2 **Staffing Issues** - The Council has very robust employment procedures that prevent instances of modern slavery from entering the workforce. There is an identified opportunity to improve the communication with suppliers about the Council's stance on prohibitions on union activity.
- 8.3 **Corporate Policy and Equality Impact** - Supporting some of our most vulnerable residents is absolutely core to ensuring that no-one is left behind as we pursue ambitions to grow the borough, build independence and resilience in the population, and become a more participatory and cohesive borough. Modern slavery is an important issue in this context, as set out in this report.
- 8.4 **Safeguarding Adults and Children** - The report's contents are directly related to issues of safeguarding children and vulnerable adults.

### Public Background Papers Used in the Preparation of the Report:

- [Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, Quarter 2 2020 – April to June](#)
- [National Referral Mechanism Statistics UK, End of Year Summary, 2019](#)

### List of appendices:

- Appendix 1: Modern Slavery Statement 2021/22