

Southampton City Council Modern Slavery Statement

1. Introduction

1.1 The Council acknowledges the provisions set out in the Modern Slavery Act (2015) and this statement is made pursuant to section 54(1).

1.2 Southampton City Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that the services it commissions (and where applicable, supply chains) are free from slavery and human trafficking.

1.3 This Modern Slavery and Human Trafficking Statement sets out the Council's current position and future plans to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and/or in its supply chains. The statement relates to activities during the financial year April 2020 to March 2021.

1.4 A statement will be issued annually, setting out relevant information in respect of the previous financial year and published on this page.

2. Context

2.1 The council's role in relation to modern slavery is broader than that of other commercial organisations required to publish a transparency statement, and can be set out in four areas:

- identification and referral of victims
- supporting victims – this can be through safeguarding children and adults with care and support needs and through housing/homelessness services
- community safety services, enforcement and disruption activities both independently and with partners
- making sure procurement processes and supply chains are free from modern slavery

2.2 The Council acknowledges its role in working across the city to raise awareness of the signs of modern slavery, identifying those vulnerable to it and responding with partners to reports and incidents. This work involves a variety of council services and partners including; the Port, UK Border Force, Gangmaster and Labour abuse Authority, Police, Civil Contingencies, Environmental Health, Trading Standards, Port Health, Community Safety, Licensing, Children's Social Care and Adults Social Care.

2.3 The Council services will liaise with other stakeholders (including the police) to share intelligence which may support enforcement action by the appropriate enforcement authority against those responsible for modern slavery.

2.4 The Modern Slavery Working Group has been established to monitor the program of continuous improvement set out in item 10 and will report into the Southampton Safeguarding Adult's Board.

2.5 Work to protect children and vulnerable adults who are trafficked and/or exploited is overseen by our Southampton Safeguarding Children's Partnership and Southampton Safeguarding Adult's Board, including referral processes to the national referral mechanism and local multi-agency specialist groups (Missing Exploited and Trafficked Group – MET).

See links below for further information:

2.5.1 **Southampton Safeguarding Children Partnership** at:

<http://southamptonlscb.co.uk/>

2.5.2 **Southampton Safeguarding Adults Board** at:

<http://southamptonlsab.org.uk/>

3. Legislative framework

3.1 The Government's approach to tackling modern slavery has been shaped by a number of international laws, conventions and protocols which the UK has opted in to, ratified or is already bound by, including the: 1950 European Convention on Human Rights (ECHR) the Modern Slavery Act 2015, Children Act 1989, Care Act 2014, Immigration Act 2016.

4. Organisational structure

Southampton City Council (SCC) is a unitary authority situated in Southampton within the geographical county of Hampshire. SCC provides a wide range of statutory and discretionary services, delivered both directly by the Council and through external contractors.

4.1 The Council's senior management structure can be found at:

<https://www.southampton.gov.uk/council-democracy/senior-leadership/>

4.2 The Council's constitution can be found at:

<https://www.southampton.gov.uk/council-democracy/meetings/council-constitution.aspx>

5. Procurement and supply chains and due diligence

5.1 As part of its procurement processes, SCC expects that all suppliers of goods and services comply with all applicable laws, statutes, regulations and codes including the Modern Slavery Act 2015. Suppliers are also expected to have their own anti-slavery policy and to publish their own Slavery and Human Trafficking

Statement (where applicable). Contract terms and conditions set out the requirements of contractors and subcontractors in relation to ensuring there is no slavery or human trafficking in their business.

5.2 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.

5.3 The majority of contracts let and managed by the council are low risk for labour exploitation. The programme of continuous improvement includes a plan to identify the highest risk existing contracts and map the associated supply chains.

6. Hampshire and Isle of Wight Modern Slavery Partnership

6.1 SCC is an active member of the Hampshire and Isle of Wight Modern Slavery Partnership details of which can be found at:

<https://www.modernslaverypartnership.org.uk/>

7. Relevant organisational policies and strategies

7.1 SCC has the following policies that describe its current approach to the identification of modern slavery risks and the steps it takes to prevent slavery and human trafficking in its operations. All policies are available to staff on the staff intranet and are also available by contacting the Council direct or online.

7.2 Southampton City Council's Whistle blowing policy and guidance can be located at:

<https://www.southampton.gov.uk/council-democracy/corp-governance/duty-act-policy.aspx>

7.2.1 Through our whistle blowing policy the council encourages all its employees, councillors, contractors, their agents and/or subcontractors, consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council, or the supply chain. The policy is designed to make it easy to make disclosures without fear of discrimination and victimisation.

7.3 The council's employee code of conduct makes clear to employees the actions and behaviours expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.

7.4 The council adheres to robust continuing employment checks/standards, which includes ensuring identities and qualifications, UK address, right to work in the UK, (i.e. people bought into the country illegally will not have a National Insurance number), suitable references and payroll information.

7.4.2 The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Managers who for any reason need to recruit outside of this framework should seek to ensure that agencies providing staff have robust and transparent recruitment practices, that mitigate the risks of modern slavery and human trafficking.

8. Safeguarding policies and procedures - children and adults

8.1 The council is fully involved in a multi-agency approach to raising awareness of modern slavery and human trafficking coordinated by local safeguarding boards. The boards currently provide city wide governance in relation to identification, referral and support of vulnerable children and adults who may be subject to exploitation. Please refer to the links previously provided for details.

9. Training

9.1 Modern slavery and human trafficking is included within the council's safeguarding training for children and adults. This training is mandatory for the social care workforce and is consistent across the county through the 4LSCB* and 4LSAB* executive groups. In addition to this an e-learning package is being developed in partnership across Hampshire and will be delivered as part of the mandatory training programme for all council employees.

**The 4LSAB and 4LSCB refer to representatives from the four separate local authorities that make up Hampshire and the Isle of Wight (Portsmouth, Southampton, IOW and Hampshire County) who meet regularly to agree consistent policies and procedures across the area.*

9.2 Training should also be included in an annual programme designed to support elected members of the council.

10. Auditing and evidence

10.1 The Council is committed to a programme of scrutiny and continuous improvement. This includes:

- Working in active partnership with the Hampshire and Isle of Wight Modern Slavery Partnership to support a consistent approach and response to modern slavery and trafficking
 - Raising awareness of modern slavery by developing improved internal and external communications
 - Extending the current and developing training to a wider staff group and developing universal multi-agency safeguarding training as mandatory for all council staff
 - Focus on ensuring that all supply chains are free from modern slavery, including undertaking local risk assessments and audits
 - Establish risk assessment processes in non-social care related directorates).
 - Deliver community safety responses and disruption activities, working alongside partner agencies such as the police, fire and health services.

- Locally this activity will be reviewed at a Modern Slavery Working-Group and overseen by the Southampton Safeguarding Adults Board, with additional scrutiny held at both the Safe City Partnership and Southampton Safeguarding Children's Partnership.