

Southampton City Council Modern Slavery Statement 2024/25

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 ongoing 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 previous fiscal year April 2022 to March 2023.

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

1.5 SCC working with the Hampshire and Isle of Wight Modern Slavery Partnership recognise that there are many different types of exploitation and areas that are considered high risk – these include, but are not limited to:

SEXUAL EXPLOITATION: Adult entertainment industry, brothels, hotels, lap/pole dancing clubs, massage parlours, online streaming, saunas, street-based prostitution,

LABOUR EXPLOITATION: Agricultural farms, begging, cannabis farm (domestic house/warehouse), car wash, care homes, construction industry, catering trade (restaurants/take-aways), distributing charity bags, factories (e.g. fruit picking, chicken factories, etc.), market stalls/boot sales, nail bars, scrap metal dealers, sea farers, ship crews.

DOMESTIC SERVITUDE: child carers – nanny/au pair, cleaners, maids.

EU STATUS EXPLOITATION: forced marriage, sham marriage

FORCED CRIMINALITY: begging, cannabis cultivation, illegally working, sham marriage, theft.

FINANCIAL EXPLOITATION: benefit fraud, pay day loan

ORGAN HARVESTING: removal of eggs for black market sale, removal of organs for black market sale.

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 via a Prevention and Awareness Sub- Group. The Modern Slavery Working Group will ensure that the activities of the Hampshire and Isle of Wight Modern Slavery Partnership are cascaded locally.

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). This work is undertaken in partnership with the Hampshire and Isle of Wight Modern Slavery Partnership to support consistent practices and approaches on a pan Hampshire Basis.

3. Legislative framework

3.1 The Government's approach to tackling modern slavery has been shaped by several 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>

4.3 Strategic oversight for Modern Slavery within Southampton City Council is led by the Stronger Communities Team.

5. Procurement and supply chains and due diligence

5.1 Southampton City Council is a unitary authority with a population of just over 260,000. We spend the Council's budget on external goods, services and works ranging from construction of new buildings and facilities management, cleaning, supply of IT equipment, clothing, and foods to care services and a wide range of other support, professional and people-based services.

These goods, services and works are procured from a wide variety of local, national, and international organisations, businesses, and voluntary sector organisations.

Each supplier in turn may have its own supply chain. Our challenge is to ensure compliance and best practice - not only within our organisation and our suppliers but also in their supply chains.

5.2 As part of our procurement processes, Southampton City Council expects that all suppliers of goods and services comply with all applicable laws, statutes, regulations, and codes including the Modern Slavery Act 2015. Furthermore, 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 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 sub-contractors in relation to ensuring that there is no slavery or human trafficking in their business.

5.4 According to the 2017 Global Estimates of Modern Slavery, globally, most cases of forced labour occur in domestic work, construction, manufacturing, agriculture, forestry, and fishing. According to Gangmasters and Labour Abuse Authority forced labour offences in the UK apply regardless of the victim's immigration status or entitlement to work in the UK. Key factors considered which can indicate an industry is high risk include, recruitment of workers through agents, low wage employment.

The use of seasonal or temporary workers; all of which are likely to affect the vulnerability of workers to become victims of labour abuse and in worst cases, Modern Slavery. People who are subject to forced labour are typically made to work in sectors such as:

- agriculture
- food processing and packaging
- construction
- warehousing and logistics
- hotels, catering, cleaning, and other service industries
- manufacturing (in sweatshops).

5.5 The majority of contracts let and managed by the council are low risk for labour exploitation.

5.6 Southampton City Council sets social value high on the agenda by going beyond the requirements of the legislation and considering social value across all spend over £10,000, in accordance with our Social Value and Green City Procurement Policy, which can be found on our website at the following link. Embedding social value into procurement process at <https://www.southampton.gov.uk/business-licensing/supply-council/social-value/>

5.7 In measuring our performance Financial Year 2024/2025 Southampton City Council aims are detailed below with achievements noted for this year's statement.

5.7.1 Aim: To implement a new procurement and contract management system to provide a mechanism for consistent recording and reporting on Modern Slavery within the council's supply chain.

Achievement: The procurement and contract management system Proactis system went live in October 2021.

5.7.2 Aim: To identify the council's high-risk existing contracts and their associated supply chains.

Achievement: Through desk top analysis undertaken in November 2021 it is understood that the contracts which are expected to be highest risk to the council are within the cleaning and construction sectors.

5.7.3 Aim: For all contract managers within the Supplier Management Service to have undertaken Tackling modern slavery in public sector supply chains E-learning.

Achievement: During December 2021, all the contract managers within the Supplier Management Service undertook the E-learning course developed by the government to help public sector commercial staff identify and mitigate modern slavery risks in their procurements. The training covers how to undertake audits and helps with identifying high risk areas of supply and covers practical steps staff can take throughout the commercial lifecycle to identify and mitigate Modern Slavery risks.

5.7.4. Aim: For the council to have has trained its procurement team to understand Modern Slavery through the Chartered Institute of Procurement and Supply's (CIPS) course on Ethical Procurement and Supply.

Achievement: In February 2022, the council successfully gained its certificate of achievement from CIPS which allows the council to use the CIPS Ethics Mark.

5.7.5 Aim: To record the number of contracts where Modern Slavery has been identified.

Achievement: In the last year there have been no complaints/concerns raised or reported of Modern Slavery or human trafficking within our contracts or supply chains.

5.8 Measuring our performance Financial Year 2024/2025

5.8.1 Aim: To contact all the council suppliers and ask them to self-certify if they are a relevant organisation under the Modern Slavery Act 2015 and if so, how they comply. To record the outcome on the procurement and contract management system, Proactis.

5.8.2 Aim: To ask relevant organisations to complete the Modern Slavery Assessment Tool (“MSAT”) at <https://supplierregistration.cabinetoffice.gov.uk/msat>, and from their responses identify potential risks to the council through suppliers’ completion of the MSAT. Engagement to be prioritised with low scoring suppliers with a particular focus on the cleaning and construction sectors.

5.8.3 Aim: To map the associated supply chains of the low scoring suppliers and undertake further audit if after engagement, they still appear to be deemed as high risk.

5.8.4 Aim: To ensure that Ethical Procurement and Supply training for the council’s procurement team is refreshed during the fiscal year and the CIPS Ethics Mark is upheld.

5.8.5 Aim: To record the number of contracts where Modern Slavery is identified, how it results in action, and the lessons learned moving forward.

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 below for details:

Southampton Safeguarding Children Partnership at:

<https://southamptonscp.org.uk/modern-slavery/>

Southampton Safeguarding Adults Board at:

<https://southamptonlsab.org.uk/modern-slavery-2/>

8.2 Concerns about children and families believed to be at risk of modern slavery can be reported to the Children's Resource Service at:

<https://www.southampton.gov.uk/health-social-care/children/child-social-care/childrens-resource-service/>

8.3 Concerns about a vulnerable adult believed to be at risk of modern slavery can be made at:

<https://www.southampton.gov.uk/health-social-care/adults/help-for-vulnerable-adults/>

8.4 Detailed information about what to do about Modern Slavery can be found at the Hampshire Modern Slavery Partnerships web pages at:

<https://www.hampshire-pcc.gov.uk/mSP>

8.5 Staff who as first responders need to complete a referral to the National Referral Mechanism, can find additional information at:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

8.6 Home Office guidance on what to do if you think someone is a victim of modern slavery can be found at:

<https://www.gov.uk/government/publications/modern-slavery-duty-to-notify>

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 all officers who as 'first responders' may be required to complete a referral as part of the National Referral Mechanism (see appendix one and two). This includes but is not exclusive to all social workers, housing staff, employment and skills teams and finance.

Modern slavery and human trafficking are included within the council's safeguarding training for staff working in children and adult services. This includes 577 staff from all areas of the council: housing officers, finance staff, building maintenance staff etc completing Modern Slavery training.

A focused video-based e-learning package on Modern Slavery, and a Skills Booster course are also available to SCC staff and councillors. In the past 12 months (April 22-31 March 23) 93 staff took these courses – 69 of whom were not social care employees (up from 38 in 21/22). In total, since January 2020, 155 staff have completed the full e-learning course. Training uptake is monitored by the Governance and Audit Committee. This is a consistent approach across the county agreed through the 4LSCB* and 4LSAB* executive groups.

**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 In addition to this an e-learning package has been developed for use across Hampshire and will be delivered by SCC as part of a mandatory training programme for most council employees. Training will also be included in an annual programme designed to support elected members of the council. Southampton City Council staff can access this training via their My Learning account. All newly inducted SCC staff will have to complete the e-learning essentials for Modern Slavery, this was in place from December 2023.

9.3 There is a wealth of training about Modern Slavery that can be accessed via the Hampshire Modern Slavery Partnership at <https://www.hampshire-pcc.gov.uk/msp/training-resources>.

9.4 Further resources can be found on the Department of Health pages at <https://www.e-lfh.org.uk/programmes/modern-slavery/>

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. Data will be collated regarding referrals made to the NRM from April 2024.

10.2 An internal audit of SCC's compliance with the Modern Slavery Act 2006 was undertaken in 2021 as part of an annual audit plan.

11. National Registration

11.1 A copy of this statement will be registered on HM Government's Modern Slavery registry service at: <https://modern-slavery-statement-registry.service.gov.uk/>
<https://modern-slavery-statement-registry.service.gov.uk/search-results?Search=Southampton+%amp;y=2021&s=1>

12. Annual Review

12.1 The statement will be reviewed annually and republished in April each year.

Appendix One

Identification of Exploitation / Modern Slavery / Human Trafficking concerns Inter Agency Referral / Contact Form with CERAF or CERAF information submitted to Children's Reception Team and or MASH for new referrals Strategy discussion takes place between Police, Children's Services and Health (MASH), Specialist MET Teams. Invitation to be sent to Non-Government Organisations including Independent Child Trafficking Guardians (ICTG), Education to share views and responsibilities. Include all relevant organisations to share identified risks with other safeguarding forums or meetings under S.47 Children Act 1989 to inform their risk assessments, safeguarding and NRM process. **Modern Slavery Child**

Victim Pathway National Referral Mechanism (NRM) for New Referrals ESCALATION Process – In the multi-agency meeting involving key partners there should be a majority decision around exploitation of the subject. Therefore, it is likely that an NRM would be submitted even without agreement of all of the partners. A decision will be made if there are indicators of trafficking A referral to ICTG will be considered. Identify who will be first responder to complete the NRM Identify which agency will complete the NRM and set timescale for submission, & record decision on RMS. Police to e-mail Children's Services to advise the outcome of the meeting and decision for recording on Children's Services IT systems. Strategy Discussion to be considered

Appendix Two - How to report a Victim of Modern Slavery

Factsheet with this extract can be located at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560826/6.2286_HO_LL_factsheet_duty_to_notify_copy_V3.pdf