

Decision Pathway – Report



PURPOSE: Key decision

MEETING: Cabinet

DATE: 05 October 2021

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| TITLE | Modern Slavery Transparency Statement Approval and Publication | | |
| Ward(s) | City-wide | | |
| Author: Clare Sims | Job title: Safer Communities Manager | | |
| Cabinet lead: Cllr Craig & Cllr Cheney | Executive Director lead: Hugh Evans | | |
| Proposal origin: BCC Staff | | | |
| Decision maker: Mayor Decision forum: Cabinet | | | |
| Purpose of Report: <ol style="list-style-type: none">1. To seek Cabinet approval for Bristol City Council to have a Modern Slavery Transparency Statement.2. To seek Cabinet approval of the draft Modern Slavery Transparency Statement for 2021- 2022.3. To make Cabinet aware of the commitment to review and publish Modern Slavery Statements on an annual basis. | | | |
| Evidence Base: <ol style="list-style-type: none">1. Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. It can take many forms and the key types are labour and criminal exploitation, human trafficking, sexual exploitation, organ harvesting and domestic servitude. Victims are very often hidden away, though sometimes in plain sight, may be unable to leave their situation, or may not come forward because of threats, fear, or shame.2. Due to its hidden nature, producing an accurate measure of prevalence on a national and local level is difficult. The Office of National Statistics March 2021 conclude that currently there is no definitive source of data or suitable method available to accurately quantify the number of victims of modern slavery in the UK. However, greater awareness, increases in reporting and improvements in police recording are likely to have contributed to identifying and helping more potential victims since the introduction of the Modern Slavery Act in 2015. The Home Office has just reported that during 2020 10,613 potential victims of modern slavery were referred to the National Referral Mechanism (NRM); a similar number to 2019. The plateau in referral numbers is primarily thought to result from the COVID-19 pandemic and associated restrictions. Just under half of these referrals (48%; 5,087) were for individuals who claimed they were exploited as adults, whilst 47% (4,946) were for individuals who claimed they were exploited as children. It is widely recognised numbers are severely under reported and the majority of victims do not seek help. The National Crime Agency has suggested that there are tens of thousands of victims in the UK at any one time.3. Measuring and monitoring the prevalence of modern slavery over time is important in assessing its scale and the effectiveness of policies and measures to stop or prevent it. It can also highlight the improvements to our data collation, services, and the resources, needed to support the victims involved.4. Section 54 of the Modern Slavery Act 2015 requires commercial organisations within the UK, with an annual | | | |

turnover of £36 million and over, to produce an annual modern slavery statement. This statement must explain the steps they have taken and plans going forward on an annual basis to ensure that there is no modern slavery in their organisations and supply chains.

5. Statements have been badged as both a legal and awareness measure. They highlight how UK companies are responding to and complying with the Modern Slavery Act 2015. They also indicate the level of corporate acknowledgement of the undetected prevalence of modern slavery.
6. In addition, organisations are strongly encouraged to publish their statements on the Home Office modern slavery statement registry which has been recently introduced. The Home Office have announced their intention to make this mandatory in the future.
7. Currently Councils are not legally required to publish a modern slavery statement; however, at the present time, over half do so on a voluntary basis. Last September the government announced that they intended to extend the current legislation to include a duty on public sector organisations to also publish annual statements.
8. The Local Government Association (LGA) guidance states that Councils have a key role to play in tackling modern slavery, to include identifying and supporting victims and working in partnership locally. Councils' roles can be separated into four distinct 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 and disruption activities; ensuring that the supply chains councils procure from are free from modern slavery.
9. Councils are also one of the designated First Responder organisations in the UK that help identify and refer potential victims for support and protection. Referrals are made to the NRM (where there is victim consent) so that the government can assess each case to determine if the person has been a victim of modern slavery. In addition, in England and Wales there is also a duty to notify the Home Office of any potential victim of modern slavery or human trafficking, and this can be done without a victim's personal details if they do not consent. This contributes to the national data of prevalence in the UK.
10. Agreeing and publishing a modern slavery statement before the end of 2021 will ensure that we are ahead of the legal requirement. This will also provide us with a framework to formally evaluate and improve our current practice and set out our objectives to take forward into 2022 as well as reinforcing our commitment to ensure that there is no modern slavery in our supply chain. Overall, this will drive forward our understanding of the extent of these crimes in Bristol, improve our collaboration with our key officers and partners to disrupt offenders and help bring them to justice and improve our ability to identify and support victims in our city.
11. Modern slavery intersects with many of the different sectors within our Council and with many members of our workforce. Many of our key front-line officers may come across it while going about their everyday activities. This Statement includes a recognition of and commitment towards raising the awareness of our workforce to enable them to spot the signs and know what action to take. This will involve working together to consider and ensure we have a joined-up approach to the issues across our services.
12. The MSAT (Modern Slavery Assessment Tool) is a modern slavery risk identification and management tool developed and championed by the Home Office in partnership with the Crown Commercial Service. It has been designed to help public sector organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have procured. Once the MSAT has been completed, suppliers receive tailored recommendations generated from their responses that they will then need to acknowledge. After each suggested recommendation has been responded to, the assessment can be shared with customers like Bristol City Council. The recommendation is to adopt the MSAT as the Council's preferred method of

evaluating modern slavery risks in our supply chain.

That Cabinet:

- 1) Approve the Bristol City Council Modern Slavery Transparency Statement 2021/2022.
- 2) Note the Statement will be reviewed on an annual basis and will be published.
- 3) Note the Statement will be taken to Full Council for information.
- 4) Endorse the adoption of Crown Commercial Services' Modern Slavery Assessment Tool as the preferred method of evaluating any risks in the Councils' supply chain as outlined in this report.

Corporate Strategy alignment:

The aims of the Home Office strategy to tackle modern slavery are very much aligned to that within Bristol City Councils' Corporate Strategy. Our vision is to play a leading role in driving a city of hope and aspiration where everyone can share in its success and our activities are based around the four themes of Empowering and Caring, Fair, and Inclusive, Well Connected and Wellbeing. One of the main principles underpinning the Corporate Strategy is to contribute to safer communities, including zero-tolerance to abuse or crime based on gender, disability, race, age, religion, or sexuality. Inevitably the Councils' Modern Slavery Statement will build on and further drive our commitment to tackling these crimes and protect our citizens and make Bristol a safer place for all.

1. Tackling modern slavery will contribute to the aim of making a fairer and more inclusive Bristol and serve to reduce many of the negative outcomes associated with inequality. It will also improve people's quality of life and have a beneficial impact on mental and physical health.
2. Empowering and Caring – harnessing the power of Bristol's diverse communities, we will come together to raise awareness and raise action to disrupt and tackle modern slavery and support victims.
3. Wellbeing – the Corporate Strategy recognises how important it is that all citizens have equal access to a safe city and protection from crimes associated with modern slavery – this in turn will have a positive impact on health, education, the local economy, and community safety.
4. Working with our partner organisations and our communities to implement a strategy on modern slavery, we will complement the Councils' wider role as a strategic influencer and lead. The adoption of and successful delivery of a coherent approach to tackling modern slavery will in fact, to a larger or lesser extent, see the support of all the themes as set out in the Corporate Strategy (Empowering and Caring; Fairness and Inclusion; Well Connected; Wellbeing).

City Benefits:

1. Improved health – preventing and tackling modern slavery both within our communities, for citizens and through our supply chain will help to reduce inequalities, harm, and exploitation, which would also help support a more inclusive and safer city. There are benefits of working together to prevent, identify and support potential victims being targeted or drawn in modern slavery.
2. Reduction in crime - reducing crime of this nature will have longstanding positive impacts on the health and well-being of individuals and communities in the city and serve to make Bristol safer, feel safer and protect victims.
3. Equality – there is no typical victim of slavery – victims can be men, women and children of all ages, ethnicities and nationalities and cuts across the population. However, it is more prevalent amongst the most vulnerable, and within minority or socially excluded groups. Poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances are some of the key drivers that contribute to vulnerability. Safer communities will create more opportunities for citizens through inward investment,

leading to social investments such as employment and a confident way of life.

Consultation Details:

1. The Modern Slavery Transparency Statement has been produced by following the Home Office guidance, LGA guidance and good practice identified across other Local Authorities. This Statement was developed through the work of a task and finish group which included colleagues from Public Health, Procurement and Safer Communities.
2. A draft version of the Statement and the underpinning action plan was circulated to Service Directors in May 2021. This provided internal stakeholders including those services who will 'own' several of our commitments with an opportunity to feed into the Statement and action plan and confirm their commitment in delivery.
3. Guidance has been provided by the Avon and Somerset Anti-Slavery Partnership Co-ordinator from Unseen (Unseen are an anti-slavery charity UK wide).
4. Direct consultation with our safeguarding managers due to their safeguarding role and prevalence of staff who are First Responders to improve the victim referrals pathways for adult and children and to ensure are transparent.

Background Documents:

Modern Slavery Guidance for Wales and England (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland

[Modern Slavery: Statutory Guidance for England and Wales \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

Transparency Statements: A practical Guide

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide#annex-e---information-in-a-slavery-and-human-trafficking-statement>

Local Government Association – Modern Slavery

[Modern slavery | Local Government Association](#)

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| Revenue Cost | £ | Source of Revenue Funding | Insert specific service budget name |
| Capital Cost | £ | Source of Capital Funding | e.g., grant/ prudential borrowing etc. |
| One off cost <input type="checkbox"/> | Ongoing cost <input type="checkbox"/> | Saving Proposal <input type="checkbox"/> | Income generation proposal <input type="checkbox"/> |

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:

It is expected that the implementation of the statement and any associated action plan will also be managed within Council approved budgets with cross directorate support and contribution as required. Should any actions require additional funding any investment will be the subject of a separate decision report and/ or considered as part of the annual budget setting process.

Finance Business Partner: Denise Hunt, Finance Business Partner, People Directorate.

Date: 27.07.21

2. Legal Advice:

The Modern Slavery Act provides that a slavery and human trafficking statement should include details of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

The statement may include information about the organisation's structure, its business and its supply chains; its

policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk; its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate and the training about slavery and human trafficking available to its staff. Bristol City Councils Modern Slavery Statement (Appendix A) includes this information and the steps the Council will take in the future.

Legal Team Leader: Sarah Sharland, Team Leader, Legal.

Date: 20.07.21

3. Implications on IT:

No direct impact on IT/Digital Transformation arising from this report.

IT Team Leader: Simon Oliver, Digital Transformation Director.

Date: 19.07.21

4. HR Advice:

The report does not raise any significant HR implications for Bristol City Council employees. However, the statement will include a commitment to raising awareness amongst our workforce to ensure they know the signs and what to do going forward. It may be appropriate to provide relevant training for employees when required.

HR Partner: Laura Laing, HR Business Partner, People. Adults, Children's, Education and Public Health.

Date: 19.07.21

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| EDM Sign-off | Hugh Evans | 11/08/2021 |
| Cabinet Member sign-off | Cllr Asher Craig | 12/08/2021 |
| For Key Decisions - Mayor's Office sign-off | N/A | N/A |

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| Appendix A – Further essential background / detail on the proposal Bristol Council Modern Slavery Transparency Statement 2021- 2022 | YES |
| Appendix B – Details of consultation carried out - internal and external | NO |
| Appendix C – Summary of any engagement with scrutiny | NO |
| Appendix D – Risk assessment | NO |
| Appendix E – Equalities screening / impact assessment of proposal | YES |
| Appendix F – Eco-impact screening/ impact assessment of proposal | NO |
| Appendix G – Financial Advice | NO |
| Appendix H – Legal Advice | NO |
| Appendix I – Exempt Information | No |
| Appendix J – HR advice | NO |
| Appendix K – ICT | NO |
| Appendix L – Procurement | NO |