

Appendix 1

Stockport Council's Modern Slavery Statement 2019/20 (DRAFT)

Introduction

What is modern slavery?

Modern Slavery is defined as a situation where traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Although this often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. In 2016 in the UK, for example, the third largest victim group was UK nationals.

Modern Slavery Act 2015

Section 52 of the Act imposes a duty on a number of public authorities, including Councils, to notify the Home Office of any individuals they encounter that they believe may be victims of slavery or human trafficking. Notification methods, including the National Referral Mechanism (NRM), are explained on the Government website¹.

Existing safeguarding processes however should still be followed alongside such a notification, as a "duty to notify" referral should not be relied upon to safeguard victims. Current local reporting mechanisms are set out in Appendix 1 and Council staff should report concerns regarding modern slavery via those processes. Notification to the Home Office, as well as other agencies such as the Police, will follow receipt of appropriate reports via local mechanisms.

The element of the legislation relating to Modern Slavery Statements is Section 54 of the Act. This requires commercial organisations with an annual turnover of £36m or more to produce and review annual Modern Slavery Statements that set out the steps they are taking, or plan to take, to ensure that their business and supply chains do not have links to modern slavery. Councils and other public sector organisations are not currently required to produce such statements.

Purpose of Stockport Council's Modern Slavery Statement

Stockport Council is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. The Council has publically signalled this commitment through a Council motion, carried with cross-party support, that condemns the practice of modern slavery, as well as by launching its Modern Slavery Charter (based on the Co-operative Party's model charter on modern slavery) which aims to ensure that the Council has robust procedures in place to guard against supporting modern slavery. One of the commitments set out in the Charter is to produce a Stockport Council Modern Slavery Statement and to review it annually to ensure it remains current.

This Modern Slavery Statement therefore sets out current activity aimed at ensuring that the Council's services, businesses and supply chains do not have links to modern slavery

¹ <https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>

and proposes additional activity for implementation up to 31st March 2020 to mitigate the risk of such links.

Stockport Council

This statement covers the activities of Stockport Council, which is a unitary authority providing all local government services within the Borough of Stockport. The Council manages a wide range of services, delivered both directly by the Council and through external contractors, with a large and diverse supply chain. A key partner in this work is STAR Procurement, the shared procurement service for Stockport, Tameside, Trafford and Rochdale Councils. The Council's main services are listed in Appendix 2.

Countries of operation and supply

Stockport Council only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered low, the Council remains vigilant and will take all steps available to manage the risks that are presented.

Responsibility

Councils' responsibilities regarding modern slavery will generally relate to the following three areas of activity:

- **Awareness:** ensuring Council staff have a broad understanding of issues relating to modern slavery, potential indicators of modern slavery (some of which are listed in Appendix 1) and what to do if they know or suspect individuals are victims of modern slavery. If any staff members, in the course of their work, experience any concerns regarding modern slavery or human trafficking, they should be aware of the appropriate reporting process, which may result in referral to the Police and into appropriate safeguarding processes, alongside notification to the Home Office.
- **Complex safeguarding:** the term "complex safeguarding" describes criminal activity (often organised) or behaviour associated with criminality, where there is exploitation and/or a clear or implied safeguarding concern. Working with and protecting people identified as being victims of modern slavery therefore falls into the category of complex safeguarding.
- **Supply chains:** ensuring that the Council's business, procurement and contract management processes and supply chains are free of links to modern slavery.

Although the main purpose of this Modern Slavery Statement is to highlight issues relating to the Council's supply chains, it also addresses issues relating to safeguarding and awareness raising. The table below summarises the Council's responsibilities applying to these three areas of anti-slavery activity.

Anti-Slavery Activity	Responsibilities
Awareness	Communications Any internal or public information or awareness raising is the responsibility of the Corporate Marketing and Communications Team. Training

	Ensuring relevant staff members have access to appropriate training relating to modern slavery is the responsibility of the People and Organisational Development Service.
Complex Safeguarding	Safeguarding matters relating to modern slavery are the responsibility of the Safeguarding and Learning Service, along with Children's and Adult Social Care. A multiagency Complex Safeguarding Sub-Group has been established to address these issues in Stockport.
Supply chains	<p>Recruitment and Employment Policy Responsibility for ensuring that policies are in place to prevent modern slavery in Council services and reviewing these on an annual basis to ensure that they remain current and relevant, sits with the People and Organisational Development Service.</p> <p>Procurement The Council's procurement strategy and strategic procurement function is provided by STAR Procurement, a shared procurement service between Rochdale, Stockport, Tameside, and Trafford Councils.</p> <p>STAR Procurement helps its partners (and the organisations they work with) to arrange contracts for any supplies, services, or building works that cannot be provided in-house. Suppliers delivering these contracts can be from the public, private, voluntary or community sectors.</p> <p>Contract management Once goods and services have been procured (usually with support from STAR Procurement), officers across all Council service areas who are managing contracts should be alert to the potential risk of modern slavery or human trafficking associated with those contracts and to be able to act appropriately should any such links be suspected or identified.</p>

Current Policy and Practice

A number of Council services are already undertaking work that addresses issues relating to modern slavery. This is summarised in the table below, by the three areas of activity previously identified.

Anti-Slavery Activity	Current Policy and Practice
Awareness	<p>Communications Following the passing of the Modern Slavery motion by Stockport Council on 13th September 2018, the Council issued a media release that highlighted its commitment to ensuring that public money does not end up supporting the exploitation of vulnerable people through modern slavery.</p> <p>Training</p>

	<p>The “Modern Slavery and Human Trafficking” e-learning package is available on the Learning Pool². It is currently not mandatory for any staff. Topics currently covered in this package are:</p> <ul style="list-style-type: none"> • Overview of modern slavery and human trafficking. • The law relating to modern slavery and human trafficking. • Potential indicators of modern slavery. • How to raise concerns. • Child victims. • Adult victims. <p>This learning package is provided by a national organisation and includes neither Stockport-specific content (e.g. on how to report concerns locally) nor issues relating to supply chains and procurement.</p> <p>Other, more in-depth, classroom-based training packages include elements relating to modern slavery. These are generally aimed at those whose work includes significant safeguarding elements and, again, do not address supply chains and procurement.</p>
Complex Safeguarding	<p>Development of Complex Safeguarding Strategy</p> <p>The Complex Safeguarding Sub-Group covers work across all ages. “Complex safeguarding” cases are those that involve an element of criminality – including modern slavery and human trafficking. The Group is currently working on its first Complex Safeguarding Strategy.</p>
Supply chains	<p>Ensuring Compliance with the Modern Slavery Act</p> <p>STAR Procurement has been proactive in ensuring compliance with the Modern Slavery Act 2015. Key actions include:</p> <ul style="list-style-type: none"> • Publishing and promoting guidance to suppliers on its website and social media. • Providing staff training and briefings via team meetings on what suppliers must do to comply with the Modern Slavery Act. • Attending external training events covering this issue. • Adopting the standard documentation and wording provided by Government via Crown Commercial Services in its OJEU³ and high-risk sub-OJEU procurement documentation. The Supplier Assessment Questionnaire is in two parts: <ul style="list-style-type: none"> ○ Part 1 simply verifies whether the supplier is caught by the legislation (i.e. if its annual turnover is £36m or more).

² The Learning Pool is the Council’s online training resource. This site lists the Council’s range of courses, both e-learning and classroom based, and enables staff to register on these.

³ Official Journal of the European Union. All tenders from the public sector valued above a certain financial threshold must be included in this publication.

	<ul style="list-style-type: none"> ○ Part 2 then seeks to confirm that any supplier caught by the legislation is compliant with their annual reporting obligations. • Rejecting suppliers in these procurement exercises that do not meet the minimum standards required by law. • Regardless of contract value, challenging abnormally low tenders or quotations received to ensure no breaches of labour laws or human trafficking are taking place. • Using standard contract terms and conditions that contain provisions to terminate contracts for a breach of Public Contracts Regulations 2015 (including child labour and other forms of human trafficking), and if there is a risk or a genuine belief that reputational damage to the Council will occur as a result of the contract continuing. • Including advice in the Procurement Handbook regarding abnormally low tenders/quotations. <p>Engagement of Agency Staff</p> <p>When Stockport Council engages agency staff, it does so, primarily, via a Greater Manchester wide arrangement. This is contracted out and the contract is retendered every 3 to 4 years. The current contract ends on 28th January 2020, with the potential to extend for a further year.</p> <p>The Reed Group is the current supplier. It operates an “umbrella” arrangement within which it may identify staff through a range of employment agencies.</p> <p>Reed and its subsidiaries have a Modern Slavery Statement that sets out how the company ensures its business and supply chains do not have links to modern slavery. Should any other supplier win the contract in future, that supplier will be required to demonstrate that they fulfil their requirements under Section 54 of the Modern Slavery Act 2015.</p>
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Additional activity for 2019/20 relating to modern slavery

By the end of March 2020, services across Stockport Council will undertake a number of additional activities aimed at improving its ability to identify and address issues relating to modern slavery and human trafficking, particularly with regard to its supply chains. This is summarised below, again, by the three broad areas of activity.

Anti-Slavery Activity	Additional Activity Proposed for 2018/19
Awareness	<p>Communication</p> <ul style="list-style-type: none"> • To accompany the launch and publication of Stockport Council’s Modern Slavery Statement, the Marketing and Communications Team will undertake an exercise to raise awareness of Modern Slavery issues amongst Council staff (for example through the Connect newsletter). This will include reference to internal training opportunities

	<p>for staff relating to modern slavery (see Training section below).</p> <ul style="list-style-type: none"> Press and media work to coincide with the adoption of the Modern Slavery Statement, involving STAR and with input from the relevant Portfolio Holder. <p>Reporting concerns</p> <ul style="list-style-type: none"> Ensuring that Council staff know how to report concerns relating to modern slavery to the relevant parties within the Council and that a clear process for doing so exists (see Appendix 1). This will include reporting concerns about modern slavery in our supply chains, as well as where concerns about individuals are identified. This will be incorporated in communications, training, the Council's Whistleblowing Policy and in the Council's Employee Handbook in relation to procurement and contract management. <p>Training</p> <ul style="list-style-type: none"> Reviewing and updating the current Modern Slavery and Human Trafficking e-learning module to include issues relating to procurement and supply chains, as well as local mechanisms for reporting and logging concerns regarding modern slavery. Development of a specific training package on "complex safeguarding", to be introduced in 2018, will include a module on modern slavery. Development of a "Modern Slavery Training Matrix" setting out Council employees who will be required (or recommended to) undertake training.
Complex Safeguarding	<p>A Complex Safeguarding Strategy 2018-2020 is currently being drafted. Due to the breadth and scope of the areas within complex safeguarding, the work to develop and deliver each strategy and work plan will take place between 2018 and 2020. However, it will include activity relating to modern slavery such as:</p> <ul style="list-style-type: none"> Establishing a Modern Slavery and Trafficking Task & Finish Group. It will develop a work programme on the issue and will report to a Joint Complex Safeguarding Sub-Group which will oversee and support work relating to a range of complex safeguarding categories. Awareness raising across Children's and Adults' Services. Development of a Training Strategy and programme on complex safeguarding that includes modules on modern slavery that will be incorporated into the Modern Slavery Training Matrix referenced in the Awareness section above.
Supply chains	<p>Procurement</p> <p>STAR Procurement is intending to take a number of actions over the coming year that are in line with commitments set out in the Co-operative</p>

Party's Charter on Modern Slavery, which all the STAR partner Councils (including Stockport) have pledged to adopt.

- Ensure those responsible in STAR Procurement for sourcing and contract management develop an understanding of modern slavery through undertaking the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
- Where the requirements of the Modern Slavery Act 2015 apply, include clauses in relevant documentation which set out that contract termination is a potential sanction for non-compliance.
- Continue to challenge abnormally low-cost tenders to ensure they do not rely on the potential contractor practising modern slavery and review, and if necessary update, the Procurement Handbook to ensure the process for doing this is sufficiently clear.
- Include clauses in relevant standard documentation that highlight to suppliers that their contracted workers should be free to join a trade union and should not be treated unfairly for belonging to one.
- Likewise, including clauses in relevant standard documentation that set out a requirement for its tendered contractors to adopt a whistle-blowing policy that enables their staff to report any suspected examples of modern slavery.
- Enhancing processes for regular review of contractual spending to identify potential issues with modern slavery. For example by including risk analysis regarding modern slavery, with appropriate vetting & auditing of suppliers, and due diligence being undertaken in a planned and proportionate manner pre-contract award and mid-contract as necessary.
- Introducing appropriate staff training and identifying a dedicated Modern Slavery Champion to enhance the process of highlighting identified risks concerning modern slavery to its suppliers and, where necessary, referring them to the relevant agencies to address such risks.
- Continuing to refer any of its contractors identified as a cause for concern regarding modern slavery for investigation via the NRM and enhancing this process via additional staff training and the Modern Slavery Champion function.

STAR Procurement will also be reviewing the Contract Procedure Rules section of the Council's constitution to incorporate an explanation of employees' responsibilities relating to modern slavery and contract management.

	<p>Contract Management</p> <p>STAR Procurement is also looking into a number of aspects connected with Contract Management, including:</p> <ul style="list-style-type: none"> • Reviewing options for working with partner authorities to improve contract management practice. This may present an opportunity to address this in some instances where concerns or risks are potentially greater. • Developing training for council staff on contract management, including, amongst other things, aspects relating to Modern Slavery. Stockport Council is the pilot authority for this STAR-led training. Relevant training will be incorporated into the Modern Slavery Training Matrix referenced in the Awareness section above. <p>Strategic Commissioning</p> <p>The Council is currently working with STAR Procurement to develop a Strategic Commissioning approach that will consolidate commissioning activity across its services and Directorates (and potentially alongside a range of local partners). This will be a four-year strategy operating from 1st April 2019. One element of this work, which links to the Council's work on inclusive growth, focuses on the potential for maximising retention of wealth within the Borough by commissioning from local providers whenever it is feasible and sufficiently cost-effective to do so. The approach will also emphasise the Council's commitment to ensuring its supply chains do not have links to modern slavery and will incorporate guidance and actions aimed at facilitating delivery of that commitment.</p> <p>Finance</p> <ul style="list-style-type: none"> • Development and implementation of a procedure for each Council service area to undertake a risk assessment relating to modern slavery and human trafficking whenever they procure goods or services. The appropriate Head of Service should sign off these assessments, which will be recorded and held centrally to demonstrate the corporate responsibility for modern slavery risk analysis. • Once this risk assessment procedure has been developed and introduced, compliance will be reviewed as part of the annual internal audit plan.
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Review process

The Council will renew the Modern Slavery Statement after the end of each financial year and each new annual version of the Statement will include an overview of progress with actions during the previous year as well as actions the Council intends to implement in the current year. The Council's Corporate, Resource Management & Governance Scrutiny Committee will monitor this review process through annual reports to Committee after the end of each financial year.

**Cllr Alex Ganotis,
Leader of Stockport Council**

**Pam Smith
Chief Executive, Stockport Council**

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Appendix 1: Potential Indicators of Modern Slavery and reporting processes

Practical Guidance

In the course of employment with the Council, staff may come across situations and people that cause concern. This section gives practical guidance to assist with deciding if someone may have been trafficked or is the victim of modern slavery.

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic service, forced labour, criminal activity or have their organs removed to be sold. There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they cannot speak the language, have their travel and identity documents removed and are told that if they try to attempt an escape they or their families will be harmed.

Key indicators of modern slavery or trafficking include:

- Is the person in possession of his or her own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else?
- Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of his or her earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?

- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of trafficking. Often you will build up a picture of the person's circumstances that may indicate that something is not quite right. If you have a suspicion, report it.

Reporting process

If you have suspicions regarding modern slavery or trafficking, please report your concerns through one of the methods below. This information will also be incorporated into the Council's Whistleblowing Policy to ensure staff with concerns regarding modern slavery are signposted from there appropriately.

Child safeguarding

If your concerns involve children or young people (aged 18 or under) in any way, please report these concerns to the Multi-Agency Safeguarding and Support Hub (MASSH) using the online reporting form available on the "Contacting the MASSH" page on the Council's website, accessible via the link below:

<https://www.stockport.gov.uk/contacting-the-massh>

Adult safeguarding

If no children or young people are involved and your concerns relate to the exploitation of adults, you should alert the Adult Social Care Team via one of the numbers on the link below, again on the Council's website:

<https://www.stockport.gov.uk/concerns-about-an-adult/report-a-concern-about-an-adult>

Contracts and supply chains

If you are managing a contract on behalf of the Council and you have any suspicions regarding modern slavery that relate to any organisation providing goods or services to the Council (or further along the supply chain), you should report these concerns to STAR Procurement through their Champion Against Modern Slavery via the "general enquiries" email address below. STAR Procurement will engage with the appropriate Category Manager and address your enquiry.

procurement@star-procurement.gov.uk

Appendix 2: Stockport Council Services

The Services that Stockport Council provides are summarised below, by Directorate.

Children and Family Services

- Stockport Family Service.
- Joint Safeguarding and Learning Unit.
- School Effectiveness.

- Special Educational Needs, Disability and Inclusion.
- Commissioning School Places.
- Post 16 Education and Participation.
- Continuing Education.
- Road Safety.

Adult Services

- Neighbourhoods (social care delivered via local neighbourhood teams).
- Boroughwide (social care services delivered via teams that operate across the Borough).
- Learning Disability.
- Autism.
- Mental Health.
- Safeguarding.
- Commissioning.

Health

- Health Protection.
- Healthy Place.
- Public Health Leadership.
- Public Health Intelligence.
- Behaviour Change.
- Early Intervention and Prevention.
- Healthy Communities.
- Workforce.

Place

- Culture & Leisure.
- Growth.
- Highways & Transport.
- Learning & Employment.
- Place Management.
- Planning.
- Public Safety and Protection.
- Strategic Housing.
- Traffic Services.

Corporate & Support Services

- Business Support.
- Electoral Services.
- Estate and Asset Management.
- Finance.
- Information, Advice and Guidance.
- Information Technology.
- Investment and Development Account.
- Legal & Democratic Governance.
- Library Service.
- People and Organisational Development.
- Policy, Performance and Reform.

- Events and Trading.
- Revenues, Benefits and Welfare Reform.
- STAR Procurement (managed via Finance)