



**STOCKPORT**  
METROPOLITAN BOROUGH COUNCIL

# Stockport Council's Modern Slavery Statement 2024/25

Preventing, Protecting and Detecting  
through Procurement



Ambitious Stockport, creating opportunities *for everyone*

# Introduction

## Scope of the Modern Slavery Statement

Stockport Council's 2024/25 Modern Slavery Statement sets out what the council is doing, and plans to do, to ensure its supply chains do not have connections to modern slavery. The statement does touch on issues such as awareness-raising and how to report suspected modern slavery, but its principal focus is on procurement rather than tackling modern slavery itself. [Stockport Modern Slavery and Human Trafficking Strategy](#), sets out local priorities relating to issues such as enforcement and safeguarding victims.

## What is modern slavery?

Modern slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact is often devastating for the victims. Modern slavery comprises slavery, servitude, forced or compulsory labour and human trafficking. The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights. The perpetrators seeking to take advantage of them could be private individuals, people running small businesses or part of a wider organised crime network. For adult victims, there will be some element of coercion involved, such as threats, use of force, deception or abuse of power. Although this can involve an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

## Types of Modern Slavery

Modern slavery takes many different forms. The prevalence of different types of modern slavery will vary by region and change over time. In the UK to date however, there have been four broad ways in which perpetrators have sought to exploit victims. In each case the victim may or may not have been moved (trafficked), either from another country, or within the UK, to be exploited.

### Labour exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions or excessive wage deductions. Modern slavery however involves more than poor pay and conditions. In order to constitute modern slavery, there will also be some form of coercion, meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person however, an offence can be committed even without the element of coercion.

### Domestic servitude

Domestic servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is difficult for them to leave, for example because of threats, the perpetrator holding their passport or using a position of power over the victim.

### Sexual exploitation

Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment, and they may be moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are usually female but can be male.

## Criminal exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims may be coerced into shoplifting, pick-pocketing, a sham marriage, benefit fraud, begging or drug cultivation (e.g. cannabis farming). "County lines" cases have become increasingly prevalent since 2020 – this relates to drug gangs in large cities expanding their reach to small towns. Gangs will often exploit young and other vulnerable individuals by getting them to transport substances. Mobile phone "lines" are used to communicate drug orders.

## Organ harvesting

Forced removal and trafficking of human organs is another type of modern slavery that occurs globally. Though there have been no confirmed cases of organ harvesting in the UK, in May 2023 three people received substantial prison sentences for conspiring to traffic a man into the UK to remove his kidney.

## **Modern Slavery Act 2015**

Under UK legislation, all modern slavery offences are punishable by a maximum sentence of life imprisonment. Section 52 of the act imposes a duty on several 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 in Appendix 2 and, in more detail, on the [Government website](#).

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 also set out in Appendix 2 and council staff should report concerns regarding modern slavery via those processes as well as the NRM.

Section 54 of the act relates to Modern Slavery Statements. 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 planning to take, to ensure that their business and supply chains do not have links to modern slavery. Though councils and other public sector organisations are not currently required to produce such statements, the previous government did signal an intention to extend this requirement to the public sector and (as at October 2024) the recently-elected Labour government is considering updating the legislation to cover public sector organisations, including councils, under the full provisions of the law.

# Current trends relating to modern slavery

## National context

In the second quarter of 2024 (April-June), the latest period for which data is available, the [Home Office National Referral Mechanism \(NRM\)](#) received 4,316 referrals of potential victims of modern slavery. This represents a 5% decrease in referrals compared to the previous quarter (4,521) and an 8% increase from April to June 2023 (3,992). Within these:

- The most commonly-referred nationalities were UK (26% of referrals), Albanian (13% of referrals) and Vietnamese (13%).
- Where the age group of the exploited individuals was known, 66% were adults (aged 18+) and 34% were aged 17 or under.
- Whilst most referrals of the non-UK nationals were adults, 78% of referrals relating to UK nationals involved people aged 17 or under. Around half of those involved young people (predominantly male) being exploited by criminal gangs in “county lines” activity.

## Stockport context

Recorded incidence of modern slavery is relatively low within Stockport. Between April 2023 and March 2024, Greater Manchester Police (GMP) logged 46 modern slavery enquiries<sup>1</sup> relating to Stockport (compared to 35 in the previous year). These 46 enquiries accounted for 6.5% of the 699 enquiries across GM (though the district enquiries came from was not known in 176 of these cases). The 46 Stockport enquiries related to:

- Criminal exploitation (34 enquiries<sup>2</sup>; 74% of the 46).
- Labour exploitation (7; 15%).
- Sexual exploitation (3; 7%).
- Domestic servitude (1; 2%).
- Unknown (1; 2%).

The alleged victim’s age and nationality were known for 30 of these 46 enquiries.

- The overwhelming majority (24; 80%) were British.
- The only other nationality to feature more than once was Albanian (2; 7%).
- Alleged victims were adults in 13 (43%) cases; 17 (57%) were young people aged under 18.
- Only one of the six (17%) non-British alleged victims was a young person.
- However, 17 (71%) of the British alleged victims were young people.

The predominant theme running through these enquiries is being involved in the dealing or delivery of drugs (“county lines”). Other forms of criminal exploitation featured much less frequently.

There are no currently-known instances of modern slavery activity being linked with apparently legitimate businesses, including any with links to the council’s supply chains.

<sup>1</sup> A modern slavery enquiry is defined as any crime, incident, intelligence log or referral made known to police in relation to potential modern slavery. The reason for using enquiries (rather than recorded crimes or NRM referrals only) is to provide a more holistic overview of modern slavery in GM. Note however that GMP is currently reviewing the definition to exclude those for which intelligence appears less substantial. Numbers of enquiries will therefore reduce slightly. Applying the new criteria to 2024/25 Stockport data, for example, would see the number reduce from 46 to 38.

<sup>2</sup> Three of these related to cannabis cultivation.

During the last three years, over 300 Ukrainian and Afghan evacuees and several hundred asylum seekers have been placed in Stockport. They all arrived without a home or work and the latter group had no access to finance and they, in particular, may be vulnerable to unscrupulous organisations or individuals who might seek to exploit them. The council works very closely with voluntary agencies, as well as other statutory partners such as NHS providers and GMP, to welcome these new residents and support them with issues relating to, for example, health, general welfare (including clothing and other essentials), education for children and access to community groups and activities.

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# Stockport Council's Modern Slavery Statement

## Purpose of the statement

Stockport Council is committed to preventing modern slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from modern slavery and human trafficking. In September 2018, the council publicly signalled this commitment through a council motion, carried with cross-party support, that condemned the practice of modern slavery. The motion also committed to signing up to a Modern Slavery Charter, 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 was to produce a Stockport Council Modern Slavery Statement and to review it annually to ensure it remains current. The council's first Modern Slavery Statement was published in April 2019 and it has been reviewed and updated approximately annually since then.

This is the fifth iteration of the council's Modern Slavery Statement. It will run from October 2024 to September 2025. It summarises activity undertaken since 1<sup>st</sup> October 2023 aimed at ensuring council services, businesses and supply chains do not have links to modern slavery. It also proposes activity for implementation up to 30<sup>th</sup> September 2025 to mitigate the risk of such links.

## Stockport Council's responsibilities and related actions

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. It has a large and diverse supply chain. A key partner in this work is STAR Procurement, the shared procurement service for Stockport, Knowsley, Rochdale, St. Helens, Tameside and Trafford Councils. The council's main services are listed in Appendix 3.

## Responsibility

The council (working with STAR Procurement), has responsibilities relating to modern slavery that fall within the following broad areas of activity:

- **Defining and outlining** the risks in the supply chain, in its role as coordinator of public services, in the joint aim of safeguarding the community.
- **Prevention:** training commissioners, contract managers, staff and other public services/ community groups, issuing communications, ensuring senior management and member buy-in, issuing statements and encouraging suppliers to adopt anti-slavery statements.
- **Detection:** of non-compliance through due diligence, audit and monitoring.
- **Response:** investigating allegations and following the reporting pathway.
- **Evaluation:** through learning from investigations and the annually-updated statement.

**Review of activity set out in 2023/24 Modern Slavery Statement**

In order to develop this fifth iteration of the Modern Slavery Statement, consultation was undertaken with the “action owners” responsible for delivering the actions set out in the 2023/24 statement to review progress with those actions and to seek their views on future activity that they felt needed to take place. Activity undertaken since the adoption of the 2023/24 statement is set out in the following tables, by the areas of activity identified above. Where actions have become embedded into everyday practice this is indicated below. Though such activities will continue to be undertaken into 2024/25 and beyond, they will generally be excluded from subsequent Modern Slavery Statement action plans as they develop into “business as usual”.

<b>Responsibility: Defining and outlining risks relating to modern slavery</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
The 2023/24 iteration of Stockport Council’s Modern Slavery statement will be published on the council’s website and promoted on the intranet when Cabinet (scheduled for September 2023) has approved it.	The statement was added to the council’s website on 18 <sup>th</sup> October 2023.  <a href="https://www.stockport.gov.uk/documents/modern-slavery-statement">https://www.stockport.gov.uk/documents/modern-slavery-statement</a>
It will also be shared with the Strategic Commissioning Group, Category Management Teams and commissioners and contract managers.	The statement was discussed at the Strategic Commissioning Group meeting on 16 <sup>th</sup> October 2023 and a mid-year update on progress (to 31 <sup>st</sup> March 2024) with actions set out in the statement was presented to the group on 15 <sup>th</sup> April 2024.
Further external promotion of the Modern Slavery Statement also take place if required (e.g., involving STAR and the Portfolio Holder).	No additional promotion was required or undertaken during the year. Additional promotion of the Modern Slavery Statement is planned for the latter part of 2024 however through Stockport Review Extra (the council’s regular e-newsletter).

<b>Responsibility: Prevention</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
Continuation of the “Understanding Exploitation” course (covering a range of topics, including modern slavery). Another session is scheduled for 11 <sup>th</sup> October 2023 and more can be added should there be sufficient demand.	The Safeguarding Partnership now co-delivers Modern Slavery and Human Trafficking sessions alongside GMP. The most recent session took place on 12 <sup>th</sup> September 2024 and the next one is scheduled for 3 <sup>rd</sup> December 2024. Further sessions will be scheduled via Learning Pool throughout 2025. The content of the training course is updated ahead of each session to ensure the training is relevant and appropriate for staff. It references recent local learning, case studies and changes to legislation.

<b>Responsibility: Prevention</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
<p>Supporting the council's complex safeguarding training offer, and building on previous learning circles held in 2022, two classroom sessions were scheduled – one took place in June 2023 and another is planned for October 2023. These include material on human trafficking and modern slavery. The sessions will be co-delivered by the Adult Safeguarding Training Manager and the Adult Safeguarding Partnership Business Manager. The sessions are targeted at multi-agency practitioners and professionals across the borough.</p>	<p>The multi-agency training to raise awareness of Modern Slavery and Human Trafficking has continued to be delivered by the Safeguarding Partnership. Since September 2023, further sessions were delivered in October 2023, June 2024 and September 2024. A further session has been arranged for December 2024 with additional courses to be arranged in 2025. The training package has been redesigned to delivered by jointly by council Safeguarding staff and GMP's Modern Slavery Coordinator.</p> <p>A brief overview of modern slavery was also included in the Risk Matrix and Thresholds Training delivered by Adult Safeguarding Partnership on two occasions in March 2024.</p>
<p>Training in relation to Modern Slavery, the Modern Slavery Charter and the council's Modern Slavery Statement will be added to the council's Member Training Programme.</p>	<p>Discussions are underway to identify an appropriate external provider. The intention is to agree the provider in autumn 2024 with training to be introduced early in 2025.</p>
<p>A new Manager Dashboard (including a facility for managers to check that staff required to do so have undertaken modern slavery training) was trialled in Adult Social Care in summer 2023. It will be evaluated and options for rolling it out across the council considered.</p>	<p>The Training Dashboard continues to be used across Adult Social Care, with ongoing work to improve the quality of the data and the detail of training requirements for each role. This covers a range of issues, including details of relevant modern slavery training for each role. Managers now therefore have the appropriate tool to review their team's training needs generally, including modern slavery, and this is now very much "business as usual".</p> <p>Children's Social Care have expressed an interest in deploying the dashboard in the Family Hubs service.</p>



<b>Responsibility: Prevention</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
<p>Monitoring delivery of the multi-agency <a href="#">Stockport Modern Slavery and Human Trafficking Strategy</a> through quarterly meetings of the Complex Safeguarding Sub-Group. Escalation and assurance reporting to take place to the One Stockport Safety Partnership and Safeguarding Children and Adults Partnership Executive Boards.</p>	<p>The council's multi-agency training has been updated and is now co-delivered by colleagues from GMP.</p> <p>A presentation was received from Adult Social Care at the Safeguarding Partnership Board in December 2023 regarding risks of overseas recruitment in the care sector, and work to understand the local position is underway.</p> <p>The Safeguarding Adults Partnership Board received a joint presentation from Adult Social Care, GMP and Stockport Homes Group in June 2024 which looked at the risks around human trafficking and modern slavery in the care sector, specifically related to overseas recruitment.</p>
<p>STAR's new starters, including temporary staff, will undertake the Chartered Institute of Procurement and Supply (CIPS) online course on Ethical Procurement and Supply during their induction. All STAR staff involved in sourcing activities will complete the course annually.</p>	<p>This is now "business as usual" for STAR. During the year, STAR worked to renew its CIPS Corporate Ethical Procurement and Supply accreditation, which it achieved on 5<sup>th</sup> August 2024.</p>
<p>Council contract managers should also undertake the CIPS online course on Ethical Procurement and Supply annually.</p>	<p>The CIPS Ethical Test is free for CIPS members. As part of its work to maintain the CIPS Corporate Ethical Procurement and Supply standard, STAR investigated costs of this training for non-members (including council staff) as well as other alternatives.</p> <p>Reference to modern slavery will be included in the contract management training which is in the process of being tested. This will be available to all commissioners.</p>
<p>STAR will refresh its in-house Modern Slavery training for all staff in 2024/25 (existing staff members and new recruits) following enactment of the Procurement Bill and subsequent secondary legislation in 2023/24.</p>	<p>The Procurement Act 2023 implementation has been delayed until February 2025. Work on this has been paused until the secondary legislation has been published to ensure that the training reflects this legislation appropriately.</p>
<p>STAR will undertake stakeholder mapping across the council, on an ongoing basis, to identify the need for "Back to Basics" training (which covers Modern Slavery issues and awareness). STAR will also provide such training as and when necessary.</p>	<p>As with the work to refresh in-house training, work on this has been paused until the secondary legislation has been published to ensure this exercise reflects this legislation appropriately</p>
<p>Relevant modern slavery aspects will be incorporated into STAR's "Meet the Buyer" events.</p>	<p>A "Meet the Buyer" event planned for 3<sup>rd</sup> October 2024 will include material aimed at raising awareness of modern slavery.</p>

<b>Responsibility: Prevention</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
<p>The Strategic Commissioning Group will make recommendations for contract management training to include ongoing vigilance by contract managers to identify suppliers and supply chains that may be at risk of modern slavery practices and liaise with STAR to report for investigation via the National Referral Mechanism.</p>	<p>A training needs analysis has been undertaken by the Strategic Commissioning and Contract Performance Manager to understand and prioritise training needs of the category management teams. Contract management training was highlighted as an area of high priority. A slide deck, which includes a reference to ethical procurement, has been produced and tested with category management teams. Feedback is now being considered and will inform the final training package.</p> <p>A contract management checklist for commissioners has been produced and is currently undergoing quality assurance.</p> <p>The importance of consistent contract management has been highlighted in the latest round of the council's Senior Management Teams' (SMTs) category management plan inputs. SMTs have been encouraged to challenge contract managers, to ensure high standards of contract management are maintained and to confirm where contract management resources can be located.</p> <p>The contract management training has been drafted and is in the process of being tested. Modern slavery considerations are included in the training package.</p> <p>The modern slavery internal audit also includes recommendations which should help to address these gaps.</p>

<b>Responsibility: Detection</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
<p>The council's Internal Audit and Risk Service will continue to provide guidance on the template format for the risk assessment and advice on risk considerations on an ongoing basis.</p>	<p>No support was requested in the last year, but if support were needed, Internal Audit would endeavour to provide it.</p> <p>This is now part of Internal Audit's established "business as usual" and the action does not need to be included in future iterations of the modern slavery statement.</p>

<b>Responsibility: Response</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
STAR will refer any of its contractors identified as a cause for concern regarding modern slavery for investigation via the National Referral Mechanism. This process will be enhanced via additional staff training and by the Champion Against Modern Slavery function.	No contractors were identified as a cause for concern between October 2023 and September 2024.

<b>Responsibility: Evaluation</b>	
<b>Actions in 2023/24 statement</b>	<b>Activity undertaken since September 2023</b>
The council has undertaken to audit delivery of actions in its Modern Slavery Statement on a regular basis. The Internal Audit team will liaise with management to undertake an audit early in the 2024/25 audit cycle, though some preparatory work may be done in 2023/24.	The audit was undertaken between July and September 2024. An overview of its findings, recommendations and proposed actions relevant to the Modern Slavery Statement are set out below.

### **Modern Slavery Internal Audit Review**

In 2020/21 the council’s Internal Audit service undertook an audit covering the implementation of the actions set out in the first iteration of the council’s Modern Slavery Statement (published in 2019). At that time, a decision was taken to undertake audits relating to the Modern Slavery Statement’s actions every three to four years. The second such audit was therefore undertaken between July and September 2024. A summary of the audit will be presented to the council’s Audit Committee later in 2024. Key aspects of that audit are summarised below.

The audit covered the period up to the end of July 2024 and its objectives were to assess and review the following processes:

- Strategic management and leadership, including organisational understanding and documenting of the risks from modern slavery to the council and to the wider population of the borough.
- Policies, procedures and operational arrangements for managing the risks of modern slavery.
- The effectiveness of training for relevant colleagues.
- The effectiveness of joint working with relevant partners, including police and health colleagues, around modern slavery.

The audit identified six recommendations, summarised below:

1. Teams across the council involved in addressing modern slavery should work together to develop an oversight of the risks to the council, in order to address these risks holistically.
2. Both STAR and Stockport Council management should ensure that all staff involved in procurement are reminded regularly of the requirements set out in STAR guidance.

3. A toolkit should be developed for councils containing guidance on how to respond when modern slavery is identified either within their supply chain, or within an establishment in their borough for which they must take responsibility, such as a care home.
4. Standard operating procedures for reporting concerns relating to modern slavery for use across the council should be developed (this may be addressed via recommendation 1).
5. Some of the council's safeguarding policies need to be updated.
6. Management of both Place and Social Care directorates should consider which of their staff would benefit from formal training relating to modern slavery.

Actions proposed in the audit report that have also been included in the statement are show in ***bold italics*** in the "Activity for 2024/25" section below

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**Activity for 2024/25**

As well as identifying progress with activity set out the Modern Slavery Statement, responsible officers were asked to identify activity within the 2023/24 iteration of the statement that needed to be carried over into 2024/25 and to identify any additional activities to be undertaken.

The tables below sets out activity that Stockport Council and STAR Procurement will undertake up to the end of September 2025 aimed at improving their ability to identify and address issues relating to modern slavery and human trafficking, particularly regarding its supply chains. This is summarised below, by the broad areas of activity. Actions from 2023/24 that have become embedded into everyday activity will generally be excluded from future action plan as they are now “business as usual”.

A number of additional actions were identified by the audit exercise (referenced above) conducted by the council’s Internal Audit team. Several actions identified through the audit are also included in the tables below (and are shown in **bold italics**).

Area of activity	Actions proposed for October 2024 to September 2025
<p><b>Defining and outlining risks relating to modern slavery</b></p>	<ul style="list-style-type: none"> <li>• The 2024/25 iteration of Stockport Council’s Modern Slavery will be published on the council’s website and promoted on the intranet when Cabinet has approved it (scheduled for 5<sup>th</sup> November 2024).</li> <li>• The review of the 2023/24 statement and the draft 2024/25 statement will be discussed at the Strategic Commissioning Group meeting on 14th October 2024. The group will maintain oversight of the delivery of the refreshed statement’s action plan, including a mid-year progress report in spring 2025.</li> <li>• Promotion of Modern Slavery Statement is planned through Stockport Review EXTRA (the council’s regular e-newsletter) in the second half of 2024.</li> <li>• Further external promotion of the Modern Slavery statement will also take place if required (e.g., involving STAR and the Portfolio Holder).</li> <li>• <b><i>The council’s Audit and Risk Team will work with managers across the council to develop a deeper understanding of the risks faced by the council around modern slavery. As a first step, the Risk Manager will deliver a workshop to relevant staff across the council during 2024/25.</i></b></li> </ul>
<p><b>Prevention</b></p>	<ul style="list-style-type: none"> <li>• Continued co-delivery (with GMP) of the “Understanding Exploitation” course. This covers a range of topics, including modern slavery and human trafficking. The next session is arranged for 3<sup>rd</sup> December 2024. Further sessions will be scheduled via Learning Pool throughout 2025. The content of the training course is updated ahead of each session to ensure the training is relevant and appropriate for staff, referencing recent local learning, case studies and changes to legislation.</li> <li>• Member training and awareness-raising relating to modern slavery will be introduced. An external provider will agreed during the autumn of 2024 with a view to the training beginning in early 2025.</li> </ul>

Area of activity	Actions proposed for October 2024 to September 2025
<p>Prevention</p>	<ul style="list-style-type: none"> <li>• Supporting the council’s complex safeguarding training offer, and building on previous learning circles held in 2022, three classroom sessions that included material on human trafficking and modern slavery took place (in June 2023, October 2023 and June 2024). A further session is scheduled for December 2024, with additional courses to be arranged in 2025. The sessions will be co-delivered by the Adult Safeguarding Training Manager and the Adult Safeguarding Partnership Business Manager and are targeted at multi-agency practitioners and professionals across the borough.</li> <li>• Monitoring delivery of the multi-agency <a href="#">Stockport Modern Slavery and Human Trafficking Strategy</a> through quarterly meetings of the Complex Safeguarding Sub-Group. Escalation and assurance reporting to take place to the One Stockport Safety Partnership and Safeguarding Children and Adults Partnership Executive Boards.</li> <li>• STAR’s new starters, including temporary staff, will undertake the CIPS online course on Ethical Procurement and Supply as part of their induction. All STAR staff involved in sourcing activities will complete the course annually.</li> <li>• Council-wide contact management training will reference the CIPS online training around ethical procurement and, in particular, refer to Modern Slavery. Where appropriate, individual contract managers will request to undertake the CIPS training.</li> <li>• STAR will refresh its in-house Modern Slavery training for all staff in 2024/25 – existing staff members as well as new recruits – following implementation of the Procurement Act 2023 and subsequent secondary legislation anticipated in 2024/25. The course will be refreshed once details of the secondary legislation are known and course contents can be designed to reflect it.</li> <li>• STAR will undertake stakeholder mapping across the council, on an ongoing basis, to identify the need for “Back to Basics” training (which covers Modern Slavery issues and awareness). STAR will also provide such training as and when necessary. As with the in-house training, this exercise has been delayed as the Procurement Bill secondary legislation is still awaited.</li> <li>• Relevant modern slavery aspects will be incorporated into STAR’s “Meet the Buyer” events. One such event has already been scheduled for 3<sup>rd</sup> October 2024 and relevant information and awareness-raising material has been included within the course content.</li> <li>• <b>STAR will provide a refresher course (or similar) to its staff by end of December 2024 on requirements around obtaining a Modern Slavery and Responsible Procurement Statement for all contracts over £25,000, regardless of route to market.</b></li> </ul>

Area of activity	Actions proposed for October 2024 to September 2025
Detection	<ul style="list-style-type: none"> <li>• <b><i>The council's Strategic Commissioning and Contract Performance Manager and its Strategic Commissioning Group will develop Contract Management training, including an element on ethical procurement (which covers modern slavery). This training will be delivered to all commissioners and contract managers across the council.</i></b></li> </ul>
Response	<ul style="list-style-type: none"> <li>• STAR will refer any of its contractors identified as a cause for concern regarding modern slavery for investigation via the National Referral Mechanism. This process will be enhanced via additional staff training and through the Champion Against Modern Slavery function.</li> <li>• <b><i>STAR will develop a Modern Slavery Toolkit to better support services if modern slavery is identified within their supply chain.</i></b></li> </ul>
Evaluation	<ul style="list-style-type: none"> <li>• The Internal Audit team carried out a review between July and September 2024. The findings from the audit have been shared with the relevant managers, and an action plan will be agreed based on the recommendations of the audit. A number of actions have already been identified following the audit, and they are identified above in <b><i>bold italics</i></b>.</li> </ul>

**Review process**

This fifth iteration of Stockport's Modern Slavery Statement will be reviewed in summer/autumn 2025 (and annually thereafter). The council's Corporate, Resource Management & Governance Scrutiny Committee will monitor this review process through annual reports to Scrutiny.

**Cllr Mark Hunter,**  
**Leader of Stockport Council**

**Michael Cullen,**  
**Chief Executive, Stockport Council**

## Appendix 1: Potential indicators of modern slavery

### 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, 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 (though to date there has been no evidence of organ harvesting in the UK). There is no typical victim and sometimes victims do not understand that they are being exploited and they are entitled to help. Victims are often trafficked to a 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, who they must pay back through working or providing services?
- Do they receive little or no payment for their work? Is someone else in control of their wages?
- 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, even if person displays a one or more of the indicators of trafficking set out above, they may not necessarily be a victim of trafficking. Often however, you may build up a picture of the person's circumstances that suggest something is not quite right – so if you have suspicions, report them.



## Appendix 2: Reporting processes

This appendix sets out how professionals (including council officers) and members of the public can report suspicions regarding modern slavery or trafficking. Note that as well as the local referral processes set out below, a range of professionals (including council officers) should also make a referral into the Home Office National Referral Mechanism (described later in this appendix).

### Child safeguarding

If 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 processes available on the “Contacting the MASSH” page on the council’s website, accessible via the link below. This includes separate processes for members of the public and professionals to follow.

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

### Adult safeguarding

If no children or young people are involved and concerns relate to the exploitation of adults, you should alert the Adult Social Care Team via one of the numbers on the link below, on the council’s website. This also includes separate processes for members of the public and professionals.

<https://www.stockport.gov.uk/report-suspected-abuse-or-neglect>

### Stockport Council Confidential Reporting (“Whistleblowing”) Policy

Council staff may use the council’s Confidential Reporting Policy (also known as the “Whistleblowing” Policy) to report their concerns. Council staff can access the policy and reporting form through the link below on the council intranet:

<https://stockportcouncil.sharepoint.com/kb/Pages/DGW-Introduction.aspx>

### 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 your usual STAR contact, who will liaise with their Modern Slavery Champion as appropriate. If you are unsure who to contact at STAR, please contact the organisation via one of the methods suggested on its “Contact Us” page:

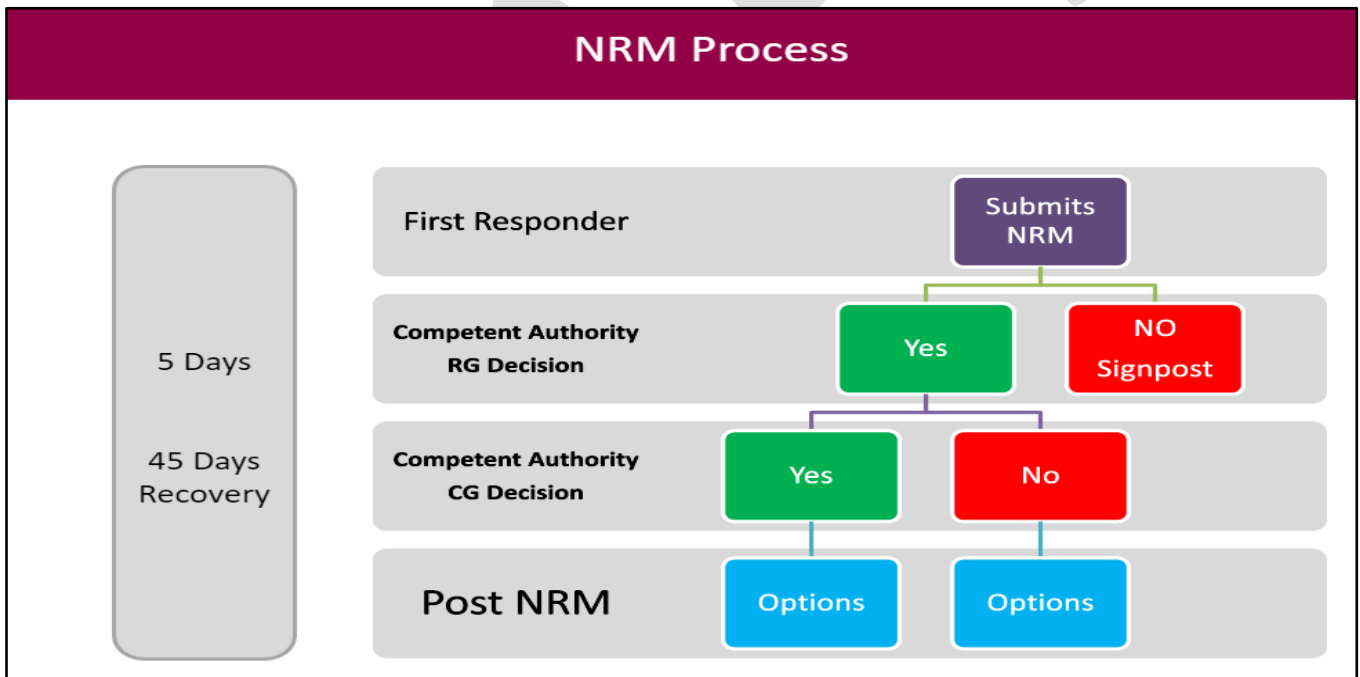
<https://www.star-procurement.gov.uk/contact-us.aspx>

National Referral Mechanism

Several organisations (known “First Responders”), including councils, have a duty to notify the Home Office of any people they think may be victims of slavery or human trafficking via a referral process known as the National Referral Mechanism (NRM). Council officers should therefore make a referral into the NRM as soon as they have any concerns or suspicions of modern slavery. At that point, the officer should make it clear whether or not the individual has consented to the referral and whether they agree to access any support which would follow on from the referral.

Existing safeguarding processes however (such as those outlined above) should still be followed alongside NRM referrals, as a “duty to notify” referral should not be relied upon to safeguard victims.

The diagram below summarises the process, journey and timescales regarding referrals to the National Referral Mechanism. This is taken from a training presentation used in “learning circles” organised by Stockport’s Safeguarding Adults Partnership. A Reasonable Grounds decision (RG) is made by the Home Office based on the initial information provided, which can lead to immediate help and support. This then moves to a more detailed investigation which leads to a Conclusive Grounds (CG) decision which would enable further support including 45 days move on support for the victim.



Note that only organisations designated as “First Responders” are eligible to make NRM referrals. These are set out below.

- Local authorities.
- Police forces.
- Certain parts of the Home Office.
- UK Visas and Immigration.
- Border Force.
- Immigration Enforcement.
- National Crime Agency.

- Gangmasters and Labour Abuse Authority (GLAA).
- Salvation Army.
- Migrant Help.
- Medaille Trust.
- Kalayaan.
- Barnardo's.
- Unseen.
- NSPCC (Child Trafficking Advice Centre).
- Bawso.
- New Pathways.
- Refugee Council.

The referral form can be accessed [here](#).

Further guidance on the NRM process can be found [here](#).

Though members of the public and organisations which are not designated “First Responders” cannot make NRM referrals, they can report concerns to the Home Office via the Modern Slavery helpline (0800 0121 700) and should also follow the local processes set out above to alert the relevant safeguarding team.

## Appendix 3: Stockport Council services

The services that Stockport Council provides are summarised below, by directorate.

### Place

- Culture and Leisure.
- Development and Regeneration.
- Economy, Work and Skills.
- Estates and Asset Management.
- Highways and Transport.
- Neighbourhoods and Public Protection.
- Strategic Housing.

### Children's Services

- Adoption.
- Family Help and Integration.
- Children's Social Care.
- Early Years and Neighbourhoods.
- Safeguarding and Learning.
- School Effectiveness.
- Special Educational Needs and Disabilities (SEND) and Inclusion.
- Virtual School for Children in Care.

### Adult Social Services

- Adult Social Care Commissioning.
- Enablement and Recovery.
- Practice Quality and Workforce Strategy.
- Prevention and Customer Engagement.
- Mental Health, Learning Disability and Autism.
- Active Recovery Communities & Home (ARCH).

### Public Health

- Health Protection.
- Behaviour Change Commissioning.
- Healthy Communities.
- Physical Activity.
- Public Health Intelligence and Early Intervention/Prevention.
- Infection Control.
- Fair and Inclusive Stockport.

### Corporate Support Services

- Business Intelligence.
- Business Support (Operational).
- Citizens Services.
- Strategic Commissioning and Contracts.
- Communications.
- Electoral Services.
- Financial and Management Accountancy.

- Human Resources and Occupational Development.
- Internal Audit, Risk and Insurance.
- IT.
- Legal Services.
- Revenues and Benefits.
- Strategy and Transformation.

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