

Sunderland City Council's Slavery and Human Trafficking Statement 2017-2018

1. The Modern Slavery Act 2015

Section 54(1) of the Modern Slavery Act 2015 (the "Act") requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'.

The Act specifies two legal requirements for statements

- Statements must be published on the organisation's UK website with a link in a prominent place on the UK homepage. The emphasis on visibility is intended to enhance reporting standards, encouraging companies to publicly demonstrate their commitment to addressing modern slavery.
- Statements should be approved by the board or directors (or equivalent management body) and signed by a director (or equivalent). This assigns ownership to senior level management and encourages their proactive involvement in tackling abusive practices in business operations.

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act").

2. Introduction

Sunderland City Council (the Council) is committed to understanding and mitigating risks of slavery and human trafficking in its corporate activities and supply chains. This statement make clear the Council's commitment to tackling modern slavery by setting out the Council's actions to understand all potential modern slavery risks related to its business and the steps it has taken to aim to ensure that there is no slavery or human trafficking in its own business, and its supply chains.

This statement relates to actions and activities during the financial year 1st April 2017 to 31st March 2018.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Act.

3. Organisational Structure and Governance

This statement covers direct employees of the Council (and its wholly owned companies) and services delivered on behalf of the Council by third party organisations, and in the supply chains.

More information about the Council structure and governance is available in the [Council Constitution](#)¹

¹ <https://www.sunderland.gov.uk/constitution>

This statement has been reviewed and approved by the Council's Cabinet.

A statement will be issued annually, setting out relevant information in respect of the previous financial year and published at www.sunderland.gov.uk/safersunderland

4. Compliance with the Act: Relevant Policies, Procedures and Plans

The Council provides a wide range of support and services. It has a zero tolerance approach to any form of modern slavery and trafficking and is committed to acting ethically, with integrity and transparency in all service and business dealings and we expect our employees, supply chain, contractors, and all our partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

This statement includes information on relevant Council policies, procedures and plans that we consider are key in ensuring compliance with the requirements of the Modern Slavery Act 2015.

The Council is in the process of reviewing and updating the plans, policies and procedures set out below which describe our approach to the identification of modern slavery risks and the steps to be taken to prevent human trafficking and slavery in our services and operations. These include:

- The Council's Corporate Plan
- The Council's corporate Modern Slavery Policy which includes signing up to the Co-operative Party Charter Against Modern Slavery
- Identification and referral of victims and supporting them e.g. through safeguarding children and adults with care and support needs and through housing/homelessness services
- Service delivery and ensuring that the supply chains the council procures from are free from modern slavery.
- Human resources and organisational development policies
- Community safety responses and disruption activities, working alongside partner agencies such as the police

4.1 Corporate Plan

The Council's [Corporate Plan 2016-2020](https://www.sunderland.gov.uk/corporate-plan)² has identified three priority areas within which the council is most able to positively influence outcomes for Sunderland, its residents, communities and businesses.

One of the three priority area is **safeguarding our residents**. The plan states that everyone has the right to feel safe. This means preventing and reducing the risk of significant harm to vulnerable children and adults from abuse or other types of exploitation, whilst supporting individuals in maintaining control over their lives and in making informed choices without

² <https://www.sunderland.gov.uk/corporate-plan>

coercion. Safeguarding is everybody's business, with residents, communities, businesses and partners playing a part in preventing, detecting and reporting neglect and abuse.

Our approach in respect of our priorities is underpinned by robust intelligent decision making, effective delivery and performance management arrangements to achieve the best outcomes, ensuring we seek to understand and address the inequality of health, wealth and opportunity in the city.

4.2 Safeguarding

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. The Council is a key partner in multi-agency partnerships to protect and safeguard people and is signed up to the:

- Sunderland Safeguarding Adults policies and procedures produced by the Sunderland Safeguarding Adults Board (SSAB); and
- Sunderland Safeguarding Children policies and procedures produced by the Sunderland Safeguarding Children Board (SSCB).

Safeguarding is everyone's responsibility and all employees and councillors have individual responsibility for ensuring they are familiar with these and work within them including how to make a safeguarding referral so that they are able to respond appropriately where they suspect someone may be a victim of modern slavery.

Sunderland Safeguarding Adults Procedures: Identification, Referral and Supporting Victims:

- The Sunderland [Safeguarding Adults policies and procedures](#)³ include [Modern Day Slavery Guidance](#)⁴ for staff regarding identifying and addressing issues of modern slavery. This advises staff of their duty to report any suspicions of modern slavery or trafficking to the police. Joint working between the police, social services and health is essential in tackling this crime, safeguarding and supporting the victims and prosecuting offenders. If staff suspect that someone is a victim of modern day slavery and they meet the adult safeguarding threshold, local safeguarding children and adults procedures should be followed. The Safeguarding Adults Concern (SAC) form and Threshold Guidance can be accessed via: www.sunderland.gov.uk/safeguarding or on the Sunderland Safeguarding Adults Executive Board website www.sunderlandsab.org.uk. Note: When considering an adult safeguarding referral you must also consider if there are any children involved and if there are, you must also follow the children's safeguarding procedures.
- The crime should also be reported to the local police on 999 in an emergency or 101.
- Once an adult safeguarding referral has been received, there is a duty on the local authority and/or police to make a referral to the National Referral Mechanism (NRM) which is part of the National Crime Agency. The NRM does not supersede child

³ <http://sunderlandsab.org.uk/lms/course/view.php?id=18>

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<http://sunderlandsab.org.uk/lms/pluginfile.php/126/course/section/100/Modern%20Day%20Slavery%20Guidance%20Jul17.pdf>

protection procedures, so existing safeguarding processes should still be followed in tandem with the notifications to the NRM.

Sunderland Safeguarding Children Procedures: Identification, Referral and Supporting Victims:

- If staff suspect that a child is at risk from, or is a victim of modern slavery then the Sunderland [Safeguarding Children policies and procedures](#)⁵⁶ should be followed and a referral should be made to Children's Social Care in accordance with the [Referrals Procedure](#)⁷. An Assessment will be undertaken in order to determine whether they are a Child in Need of services, including the need for protection.
- These procedures also contain information on ['Referring a Potential Victim of Modern Slavery to the National Referral Mechanism](#) (NRM). This advises staff of their duty to report any suspicions of modern slavery or trafficking. The crime should also be reported to the local police on 999 in an emergency or 101.
- Once a child safeguarding referral has been received, there is a duty on the local authority and/or police to make a referral to the National Referral Mechanism (NRM) which is part of the National Crime Agency. The NRM does not supersede child protection procedures, so existing safeguarding processes should still be followed in tandem with the notifications to the NRM.

4.3 Training and Awareness Raising

The Council has a programme of training that all employees should complete, including safeguarding awareness training.

Many Council employees, particularly those in adult and children's social care, come into contact with members of the public on a regular basis. In doing so there is the possibility that they could encounter somebody believed to be at risk of modern slavery and/or trafficking. Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities or socially-excluded groups.

In order for victims to be identified, staff need to be aware of the risks and signs of modern slavery. Training enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and trafficking. Line managers must ensure that safeguarding training is kept up to date as safeguarding is everyone's responsibility. The following training and awareness raising includes:

- The Sunderland Safeguarding Children Board (SSCB) has offered modern slavery training through the following routes:
 - E-learning package on 'Trafficking, Exploitation and Modern Slavery' through Virtual College. This is free and can be booked via the Sunderland Safeguarding Children Board website <https://sunderlandscb.vctms.co.uk/>

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http://www.proceduresonline.com/nesubregion/Sunderland_SCB/p_ch_from_abroad.html?zoom_highlight=modern+day+slavery

⁶ The National Referral Mechanism (NRM) does not supersede child protection procedures, so existing safeguarding processes should still be followed in tandem with the notifications to the NRM.

⁷ http://www.proceduresonline.com/nesubregion/Sunderland_SCB/p_referrals.html

- In 2018, the Sunderland Safeguarding Children Board offered a series of 3 hour workshops on modern slavery delivered by Hope for Justice
<http://hopeforjustice.org/professionals/>
- The Sunderland Safeguarding Adult Board (SSAB) offers safeguarding training. Modern slavery and trafficking is included as a type of abuse in the Sunderland Safeguarding Adult Board training programmes on:
 - 'Alerter' e-learning
 - Raising a Safeguarding Concern
 - Multi-Agency Roles in the Safeguarding Process
 The training is brokered by Tyne and Wear Care Alliance Tel: 0191 548 4015 Email: info.twca@sunderland.gov.uk Website: www.twca.org.uk

4.4 Equality Scheme

The council's [Equality Scheme](#)⁸ sets out the council's approach and commitment to equality and diversity. This includes eliminating unlawful discrimination, harassment and victimisation; advancing equality of opportunity; and fostering good relations between people. We are also committed to ensuring that all of our priorities, policies and practices reflect this. The scheme also sets out the way we aim to understand needs, impacts and outcomes in all that we do through Equality Analysis.

4.5 Whistle-blowing Policy

The Council's [Whistle-blowing policy](#)⁹ encourages all of its employees, customers, other business partners and members of the public to report any serious concerns related to council activity or the supply chains of the Council. The Council's Whistle-blowing Policy is also designed to make it easy for employees to make disclosures, without fear of retaliation. The Council has updated its Whistle-blowing Policy so that staff know they can use this policy to blow the whistle on any suspected examples of modern slavery.

4.6 HR and Recruitment Policies relating to Employees and Elected Members

The Council has a number of HR and recruitment policies that help to reduce the risk of any employees being involved in slavery, either as a victim or as an offender.

- 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 and breaches are investigated and, if appropriate, remedial action taken.
- Recruitment policies and pay: The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and

⁸ https://www.sunderland.gov.uk/media/19604/Equality-Scheme-2017-2021/pdf/Equality_Scheme_2017-21_FINAL_FOR_PUBLICATION.pdf

⁹ <https://www.sunderland.gov.uk/fraud-prevention>

they are paid directly into an appropriate, personal bank account. The Council operates a pay and grading system which ensures that all employees are paid fairly and equitably. In addition to this, the Council complies with the recommendation of the Living Wage Foundation when setting its pay rates for employees.

- Agency Workers: The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency. There has been no requirement to take action as a result of the risk of slavery and human trafficking in the period covered by this statement.
- Councillors' Code of Conduct: The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. Breaches are investigated by the Council's Monitoring Officer.
- Councillors' Declarations of Interests: The Council expects all Councillors to record and declare interests in accordance with the Code of Conduct.
- Councillors' Induction and Training: Councillors complete induction training on election, including equality and diversity training and safeguarding training.

The Head of HR & OD will be responsible for ensuring appropriate recruitment and employment policies are in place and reviewed on an annual basis to ensure they remain current and relevant.

4.7 Community Safety Responses

Sunderland City Council is one of the 6 responsible authorities under the Crime and Disorder Act 1998 that is required to work in partnership to improve community safety; and it does this through the Safer Sunderland Partnership.

The Partnership has a multi-agency delivery plan which sets out its strategic priorities and work areas and includes what partners will do collectively to tackle modern slavery, as part of its wider responses to tackling serious and organised crime, such as

- Strengthened intelligence and information sharing;
- Disruption tactics that make full use of partnership powers in order to disrupt Organised Crime Groups (e.g. powers under Licensing, Housing, Probation and Gain Network);
- Preventing / diverting those at risk of pathway into Serious Organised Crime

The work of the Safer Sunderland Partnership is reported to the Council's Co-ordinating Scrutiny Committee by way of an Annual Report that is published on www.sunderland.gov.uk/safersunderland

4.8 Service Delivery and Procurement and Supply Chains

The Council is committed to ensuring that there is transparency in its service delivery and its approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. The Council expects the same high standards from all of its contractors, suppliers and other partners.

The Council both delivers and procures a wide range of goods and services and so is well placed to make a positive contribution to preventing opportunities for modern slavery via its diverse and varied supply chain.

Given this diversity, the biggest risk to the Council around not being compliant with the Modern Slavery Act is through the procurement of goods and services. Whilst the Council cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act, it will endeavour to eliminate the risks as much as possible.

To ensure our procurement practices do not directly or indirectly support slavery, **Sunderland City Council has signed up to the Co-operative Party Charter Against Modern Slavery** which includes the actions the Council will take to meet each requirement in the Charter. This means that the Council will:

- Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply
- Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance
- Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery
- Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one
- Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery
- Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery
- Review its contractual spending regularly to identify any potential issues with modern slavery
- Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed
- Refer for investigation via the National Crime Agency's (NCA) national referral mechanism (NRM), any of its contractors identified as a cause for concern regarding modern slavery

4.9 Due diligence and supply chain risk analysis

The Council has put in place due diligence processes in relation to slavery and human trafficking in its business and supply chains as it is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to confirm that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

The Council undertakes due diligence when considering taking on new suppliers. In November 2016 the Cabinet office introduced the Supplier Selection Questionnaire to be used in all tenders over the EU thresholds. This requires suppliers to declare any involvement in modern slavery and is used to assess supplier's policies and practices on human trafficking and slavery. This specific self-declaration question regarding compliance

of the Act with potential providers is also included in the quotation process for under EU tender procurement activity conducted by the Council.

The Selection Questionnaire also includes a section detailing human trafficking crimes which constitute grounds for mandatory exclusion, and requires prospective suppliers to make a declaration about any trafficking offences which they have been involved in.

The organisation's due diligence and reviews included:

- mapping the supply chain (top 80% of spend) broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier selected through a tender process; and
- addressed any issues with the relevant supplier.

4.10 Actions and Performance Indicators

Sunderland City Council is in the process of reviewing its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.

5. APPROVAL FOR THIS STATEMENT

This statement was approved at Cabinet on 17th October 2018.

Name (Leader of the Council)

Signature

Cllr Graeme Miller

Date 17th October 2018