Stockport Council's Modern Slavery Statement 2022/23

Introduction

What is modern slavery?

Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and 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, 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 often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. In the first quarter of 2022 (January to March) for example, the latest period for which data is available, there was a 13% increase in potential victims compared to the previous guarter (September -December 2021). The most common nationalities referred to the Home Office National Referral Mechanism (NRM) were Albanian, UK and Eritrean; 54% (2,036) of potential victims claimed exploitation in the UK and 35% overseas. 54% of potential victims claimed exploitation as adults and 39% (1,471) as children¹. The number of referrals to the NRM this guarter is the highest since it began in 2009.

Types of Modern Slavery

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

Labour exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions or excessive wage deductions, but is not solely about this. 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, an offence can be committed without the element of coercion.

Domestic servitude

Domestic servitude typically involves victims working in a private family home where they are illtreated, 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 very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

¹ Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 1 2022 – January to March second edition (Published 12th May 2022)

Criminal exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pick-pocketing, a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming. Forced removal and trafficking of human organs is an additional category of modern slavery that occurs globally – as yet however, there have been no confirmed cases of organ harvesting in the UK.

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 also be male. Data for Quarter 1 2022 showed that of all referrals to the NRM for adults aged over 18 in England with a sexual element, 85.9% were for females and only 14.1% were for males.

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 NRM, are explained 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 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 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 government has signalled an intention to extend this requirement to the public sector.

Purpose of Stockport Council's Modern Slavery Statement

Stockport Council is 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 publicly signalled this commitment through a council motion, carried with cross-party support, condemning modern slavery, as well as by launching its Modern Slavery Charter², 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. The council's first Modern Slavery Statement was published in April 2019 and this was reviewed and updated in 2021

² Stockport Council launches modern slavery charter - Stockport Council

This therefore is the third iteration of the council's Modern Slavery Statement. It will run from July 2022 to June 2023. It summarises activity undertaken since April 2021 aimed at ensuring that council services, businesses and supply chains do not have links to modern slavery and proposes activity for implementation up to 30th June 2023 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

The council (working with STAR Procurement where appropriate), 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 our role as coordinators of public services, in the joint aim of safeguarding the community.
- **Prevention:** training staff and other public services/community groups, issuing communications, ensuring senior management and member buy-in, issuing statements and getting suppliers to sign up to anti-slavery statements.
- **Detection:** of non-compliance through due diligence, audit and monitoring.
- **Response:** investigating allegations and following the pathway.
- **Evaluation:** through learning from investigations, and the annual updated statement and refreshed commitment.

Review of activity set out in 2021/22 Modern Slavery Statement

As well as setting out activity that had already been undertaken relating to modern slavery, the previous (second) iteration of the council's Modern Slavery Statement set out additional activities to be undertaken to ensure the council's supply chains were not associated with modern slavery.

In order to develop this third iteration of the Modern Slavery Statement, consultation was undertaken with the "action owners" responsible for delivering the actions set out in the 2021/22 statement and to seek their views on future activity that they felt needed to take place. The 2021/22 statement covered the period from January 2021 to June 2022, and activity undertaken since January 2021, is set out in the following tables, by the areas of activity identified above.

Defining and outlining risks relating to modern slavery

Activity proposed in 2021/22 Statement	Activity undertaken since January 2021
The revised version of the Modern Slavery statement will be re- promoted on the intranet when it has been approved by Cabinet. Further external promotion of the Modern Slavery statement will also take place if required (e.g., involving STAR and the Portfolio Holder).	The 2021/22 iteration of the council's Modern Slavery Statement was published on its website (as well as the intranet) in February 2021.
A task and finish group will be set up following the Complex Safeguarding sub-group meeting in October 2020. The group will determine and agree actions to be taken. This will be shared with Internal Audit once agreed.	The action agreed at the Complex Safeguarding Sub Group in October 2020 was for a Task & Finish Group to develop the Safeguarding Partnerships' Modern Slavery Strategy. Work has progressed on developing the strategy, and it is now in its final draft and was signed-off at the Sub Group meeting on 17 th May 2022. The Strategy will also be presented for approval meeting of the Safer Stockport Partnership Board on 23 rd June 2022.

Prevention

Activity proposed in 2021/22 Statement	Activity undertaken since January 2021
Delivery of the "Understanding Exploitation" course (covering a range of topics, including modern slavery) was suspended in March due to the Covid-19 pandemic. Delivery of the course will restart, in late 2020 or early 2021.	Sessions began during 2021/22 and five sessions took place (involving a total of 34 people) the last one being in December 2021.
Clear guidelines will be produced outlining which council job roles require modern slavery training. These will be disseminated to	Modern Slavery training requirements are now incorporated into the training matrices for relevant staff in Adult and Children's Social Care.
managers and added to the intranet and the new mandatory training matrix (currently in development). The Manager Dashboard (also currently being developed) will allow managers to view staff completion rates.	A Manager Dashboard has been developed that incorporates the ability for managers to check that staff required to undertake modern slavery training have done so. This was launched in May 2022.

Prevention

Activity proposed in 2021/22	Activity undertaken since January 2021
Statement Modern slavery aspects will be further embedded within the council's complex safeguarding training offer. Attendance will be monitored, and material evaluated, on an ongoing basis to ensure it is fit for purpose and effectively engages participants.	Two Learning Circles were delivered on Modern Slavery, linking it to the complex safeguarding training offer and advertised by the Joint Training Sub-Group of the Adults and Children's safeguarding partnerships. A total of 26 delegates attended the two sessions. Training on modern slavery and the Safeguarding Partnerships' Modern Slavery Strategy was delivered across Stockport and Greater Manchester as part of World Social Work week and the weeks of action for exploitation. At the March 2022 event there were over 130 attendees from across Greater Manchester and Stockport Children & Adult Social Care Teams. In October 2021, over 400 people attended virtual training delivered across the children and adults partnerships about modern slavery as part of the week of action for exploitation.
All of STAR's new starters, including temporary staff, will continue to undertake the Chartered Institute of Procurement & Supply (CIPS) online course on Ethical Procurement and Supply as part of their induction.	The Ethical Procurement and Supply course now forms part of their induction when the join the organisation.
All STAR staff with involvement in sourcing activities will complete the CIPS online course each year.	This policy is now also in place and is being fully complied with.
In early 2021, the STAR Champion Against Modern Slavery will refresh the in-house Modern Slavery training for all staff (new and old). STAR will kick-start and re- invigorate its review and supplier	Priorities in 2021, for example COVID, Ukraine conflict, cost of living rises has meant that this will now take place in 2022/23. We have also added the modern slavery training to the induction programme for new starters STAR's supplier engagement protocol has been updated to include Modern Slavery aspects and will form
engagement programme that was postponed due to Covid-19. STAR will continue to monitor the need to further the roll out of "Back to Basics" training (which covers Modern Slavery issues and awareness) across the council.	Stakeholder mapping is reviewed to help target key service areas and training has been provided as necessary.

Detection	
Activity proposed in 2021/22 Statement	Activity undertaken since January 2021
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.	No such support has been requested since January 2021. If required, Internal Audit will endeavour to provide it.
STAR Champion Against Modern Slavery will seek to build relationships with GMP's Modern Slavery lead to build collaboration between the two on identifying issues/risks and high-risk suppliers.	The Modern Slavery Champion explored this with GMP. Unfortunately, there were too many data sharing barriers in place to make this possible.
The council's Procurement Handbook is being updated to provide clearer guidance on the actions required from services for procurements less than £25,000 in value, where STAR is not involved.	The Contract Procedure Rules review taken place and the process of updating the handbook is scheduled to be completed by July 2022.

Priority: Response	
Activity proposed in 2021/22	Activity undertaken since January 2021
Statement The council's Whistleblowing Policy will be amended to reference modern slavery. The following will be added	The council's Confidential Reporting ("Whistleblowing") Policy was amended to reference Modern Slavery in 2020.
to the list of examples of potential areas of concern that the Whistleblowing policy can cover:	Subsequently, the Procurement subsection (within the Financial Management section) of the council's
"Activities within the council or its supply chain which may support	Managers Handbook was amended to incorporate specific reference to modern slavery. It states:
slavery and/or human trafficking".	"The council is absolutely committed to preventing slavery and human trafficking in its corporate activities and to making sure that supply chains are free from slavery and human trafficking. The Modern Slavery Statement sets out current activity aimed at making sure that services, businesses and supply chains do not have links to modern slavery. The Statement is on the council's website.
	All employees must report concerns about modern slavery in our supply chains, as well as where concerns about individuals are identified. The council's Whistleblowing Policy can be used to report concerns".

Priority: Response

Activity proposed in 2021/22 Statement	Activity undertaken since January 2021
STAR will refresh the Procurement Handbook and provide clearer guidance to council services on Modern Slavery, on the procurement process and on review and investigation activity.	The Contract Procedure Rules review taken place and the process of updating the handbook is scheduled to be completed by July 2022.
STAR Procurement will review the Contract Procedure Rules (CPR) section of the council's constitution to incorporate an explanation of employees' responsibilities relating to modern slavery and contract management.	Rather than amending the constitution, the Procurement Handbook will be amended to incorporate this amendment (again, by July 2022).
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 such contractors have been identified since publication of the council's first Modern Slavery Statement in April 2019.
STAR will continue to implement its Local Investment Project and Responsible Procurement Strategy to maximise the proportion of spend in STAR's partner boroughs and maximise the % social value on all procurement activity over £25,000 to drive local benefits from its partners suppliers.	This strategy is now being, and will continue to be, implemented as a matter of routine. Local statistics on social value issues for 2021/22 are due for publication in the summer of 2022.

Priority: Evaluation

Activity proposed in 2021/22 Statement	Activity undertaken since January 2021
Findings of the audit of the implementation on the activity set out in the first iteration of the Modern Slavery Statement	The audit found very good levels of compliance, with substantial assurance that its actions were being delivered.
(undertaken by Internal Audit in summer/autumn 2020) will be reported by way of a formal report and summary to CLT and Audit	Its results were reported to the council's Corporate Leadership Team and Audit Committee in December 2020.
Committee.	There will be future audits every three years, with the next one is scheduled for autumn 2023.
The Partnership for Conflict, Crime and Security Research is currently undertaking work on tackling modern slavery in local government supply chains. It expects to publish a set of stakeholder-owned recommendations, following a workshop to be held in January 2021, to help inform UK modern slavery policy. The council will consider these recommendations and any additional activity it needs to undertake to address them.	Though a "virtual workshop" did take place on July 22nd, 2021, no "stakeholder-owned recommendations" from that event have subsequently been made available.

Additional activity relating to modern slavery

As well as identifying progress with activity set out the Modern Slavery Statement, its action owners were asked to identify activity within the 2021/22 iteration of the statement that needed to be carried over into 2022/23, to identify additional activities to be undertaken.

The tables below set out activity that Stockport Council and STAR Procurement will undertake up to the end of June 2023 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.

Area of Activity	Additional Activity Proposed to June 2023
Defining and outlining risks relating to	• The 2022/23 iteration of Stockport Council's Modern Slavery statement will be published on the council's website promoted on the intranet when it has been approved by Cabinet (scheduled for June 2022).
modern slavery	• Further external promotion of the Modern Slavery statement will also take place if required (e.g., involving STAR and the Portfolio Holder).
Prevention	• Continuation of the "Understanding Exploitation" course (covering a range of topics, including modern slavery). Three sessions are scheduled so far in 2022/23 and more can be added should there be sufficient demand.
	• As part of the council's complex safeguarding training offer, three webinars are scheduled to take place (in July 2022, October 2022 and January 2023). These will include material on modern slavery. The sessions will be co-delivered by the Adult Safeguarding Training Manager, the Adult Safeguarding Partnership Business Manager and local authority Workforce Development. All sessions will be targeted at multi-agency practitioners and professionals across the borough.
	• A Manager Dashboard, which incorporates the ability for managers to check that staff required to undertake modern slavery training have done so, is to be launched in May 2022.
	 Modern slavery aspects will be further embedded within the council's complex safeguarding training offer. Attendance will be monitored, and material evaluated, on an ongoing basis to ensure it is fit for purpose and effectively engages participants.
	• Ensure all stakeholders are sighted on final Safeguarding Partnership Modern Slavery Strategy (and its associated delivery plan), and that the strategy is embedded as part of the Stockport Safeguarding Children Partnership & Stockport Safeguarding Adults Partnership Multi-Agency Training Programme. The impact of the strategy and associated training will be monitored and scrutinised by the Safeguarding Partnerships' Complex Safeguarding Sub-Group and Training and Workforce Development Sub- Group. Priorities will include working to identify those at risk of modern slavery to prevent and reduce harm, British citizens as well as those arriving from other countries, such as evacuees and refugees who have recently arrived from Afghanistan and Ukraine.

Area of Activity	Additional Activity Proposed to June 2023
	Share the Safeguarding Partnerships' Modern Slavery Strategy with Safer Stockport Partnership, and seek assurance on the Local Authority's action around the Modern Slavery Statement.
	• All of STAR's new starters, including temporary staff, will continue to undertake the Chartered Institute of Procurement & Supply (CIPS) online course on Ethical Procurement and Supply as part of their induction. In addition, all STAR staff with involvement in sourcing activities will complete course annually.
	 STAR will refresh the in-house Modern Slavery training for all staff – existing staff members as well as new recruits.
	• Relevant modern slavery aspects will be incorporated into STAR's "Meet the Buyer" events.
	• 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.
Detection	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.
	• STAR will complete the Contract Procedure Rules review and ensure that the council's Procurement Handbook is updated to provide clearer guidance on the actions required from services for procurements less than £25,000 in value, where STAR is not involved. This update is scheduled to have taken place by July 2022.

Area of Activity	Additional Activity Proposed to June 2023
Response	• STAR will update the Procurement Handbook to provide clearer guidance to councils on Modern Slavery, on the procurement process and on review and investigation activity (and whether this should fall under contract management responsibility). The handbook will be updated by July 2022.
	• STAR Procurement will review the Procurement Handbook, by July 2022, to incorporate an explanation of employees' responsibilities relating to modern slavery and contract management.
	• 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.
	• STAR will continue to implement its Local Investment Project and Responsible Procurement Strategy to maximise the proportion of spend in STAR's partner boroughs and maximise the % social value on all procurement activity over £25,000 to drive local benefits from its partners suppliers. Statistics on 2021/22 trends are due for publication in the summer of 2022.
Evaluation	• The council has undertaken to conduct an Internal Audit of delivery of actions in the Modern Slavery Statement every three years. The next audit is therefore scheduled for autumn 2023. Preparatory work however will be undertaken in advance of the audit exercise.

Review process

This third iteration of Stockport's Modern Slavery Statement will be reviewed in the spring of 2023 (and annually thereafter). The council's Corporate, Resource Management & Governance Scrutiny Committee will monitor this review process through annual reports, usually to the first committee meeting after the end of each financial year.

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Cllr Mark Hunter, Leader of Stockport Council

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Caroline Simpson, Chief Executive, Stockport Council

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, 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 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, 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, 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.

Reporting processes

If you have suspicions regarding modern slavery or trafficking you can report your concerns via the methods below:

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

You must also make a referral to Barnardo's Independent Child Trafficking Guardianship Service: **0800 043 4303**

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. You will need to obtain the consent of the adult subject before making the referral:

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

National Referral Mechanism

The below flowchart sets out the process, journey and timescales regarding referrals to the National Referral Mechanism.



The referral form can be accessed via: https://www.modernslavery.gov.uk/start

Further guidance on the NRM process can be found at:

https://www.gov.uk/government/publications/human-trafficking-victims-referral-andassessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-ofmodern-slavery-england-and-wales

Whistleblowing Policy

Council staff may use the council's Confidential Reporting Policy (also known as the Whistleblowing Policy) to report their concerns. The policy and reporting form can be accessed 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

Appendix 2: 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
- Public Protection.
- Strategic Housing.

Children's Services

- Adoption.
- Integrated Services.
- Parenting Services.
- Partners in Practice and Innovation.
- Safeguarding and Learning.
- School Effectiveness.
- Special Educational Needs and Disabilities (SEND) and Inclusion.
- Virtual School for Children in Care.

Adult Social Services

- Behaviour Change Commissioning.
- Commissioning and Infrastructure.
- Enablement and Recovery.
- Health Protection.
- Healthy Communities.
- Physical Activity.
- Practice Quality and Workforce Strategy.
- Prevention and Customer Engagement.
- Public Health Intelligence and Early Intervention/Prevention.
- Support & Care Management (including Neighbourhoods, Mental Health & Learning Disability).

Corporate Support Services

- Business Intelligence.
- Business Support (Operational).
- Citizens Services.
- Commissioning and Contracts.
- Communications.
- Electoral Services.
- Financial Accountancy.
- Human Resources and Occupational Development.
- Internal Audit, Risk and Insurance.
- IT.
- Legal Services.
- Management Accountancy.
- Revenues and Benefits.
- Strategy and Design.