Draft Modern Day Slavery Policy

Human Resources

PETERBOROUGH
CITY COUNCIL

MODERN SLAVERY POLICY STATEMENT

1.   Purpose & Scope

1.1.   Modern slavery is a crime and a violation of fundamental human rights which Peterborough City Council is committed to preventing in the community, corporate activities and supply chains.

1.2.   Peterborough City Council recognises its responsibilities under the Modern Slavery Act 2015 and the commitments made in this Policy are underpinned by our annual Modern Slavery Act Transparency Statement [**insert link**].

1.3.   This Policy applies to all persons working for or on behalf of Peterborough City Council in any capacity including employees at all levels, agency workers, seconded workers, volunteers, agents, contractors, external consultants and third-party representatives and business partners.

2.   Forms of Modern Slavery

2.1.   The Modern Slavery Act categorises modern slavery as offences of slavery, servitude and forced or compulsory labour.

2.2.   Anti-Slavery international gives the following examples of exploitation:

a) **Forced labour** – any work or services which people are forced to do against their will under the threat of some form of punishment.
b) **Debt bondage** or **bonded labour** – the world's most widespread form of slavery, when people borrow money they cannot repay and are required to work to pay off the debt, then losing control over the conditions of both their employment and the debt.
c) **Human trafficking**– involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
d) **Descent-based slavery** – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.
e) **Child slavery** – child slavery is often confused with child labour, but is much worse. Whilst child labour is harmful for children and hinders their education and development, child slavery occurs when a child's labour is exploited for someone else's gain. It can include child trafficking, child soldiers, child marriage and child domestic slavery.
f) **Forced and early marriage** – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.

2.3. Slavery can affect people of any age, gender or race and the key signs, are generally accepted to include:

a) **Freedom of Movement**: victims of modern slavery might have their movement restricted. It is not normal never to be able to leave the house on your own or always having to follow strict instructions on where you are allowed to go and who you can talk to. People living like this may:

- not be in possession of their passport or other identification documents which could instead be with someone else;
- have a lack of knowledge of the area in which they live and work;
- be collected and dropped off to work at very unusual times to avoid being seen by members of the public;
- have been threatened with harm either directly or through family members against attempting to escape;
- be under the impression that they are bonded by a debt or in a situation of dependence;
- have been forced to engage in work or sexual acts which they have not consented to and which they may have been led to believe is necessary to repay a debt such as for facilitated transport to the UK.

b) **Health and Wellbeing:** some victims are physically abused as a means of control and can often have a lack of possessions. People living like this may:

- display signs of physical harm such as bruising and other injuries;
- look poorly cared for wearing the same clothes every day and/or clothing which is unsuitable to the weather or work;
- live in overcrowded, dirty accommodation;
- be given very little food which can lead to them appearing malnourished and unwell.
- have been deprived of sleep, medical care or other life necessities;
- receive little or no payment for their work and/or someone else may have control of their earnings.

c) **Integration**: Victims may have been told lies about who they can trust and be unsure about who they should believe. A reluctance to seek help doesn't mean they don't want to, they might fear deportation or violence to themselves or their families. People living like this **may**:

- have been threatened by the people who are controlling them, resulting in them being unsure about who they should believe;
- be reluctant to make eye contact or talk to strangers;
- act as if they have been instructed or coached by someone else and/or allow others to speak for them when spoken to directly.
- have limited social interaction outside their immediate environment;
- have limited contact with friends and/or family.

3. Tackling Modern Slavery in our Supply Chains

3.1. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

3.2.   The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3.   You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4.   You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5.   If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

3.6.   If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

3.7.   We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

3.8.   We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

4.   Tackling Modern Slavery in our Communities

4.1.   Training in Modern Slavery, and on the risk our business faces from modern slavery in its supply chains, will be provided to staff.

4.2.   Community education/engagement; linking with community groups to enhance understanding of the subject and developing confidence in seeking help where needed.

5.   Reporting Crimes of Modern Slavery

5.1.   Concerns Identified in Supply Chains

Any supply chain related concerns can be reported in confidence following the below procedure:

- where an immediate response is required by dialling 999;
- in a less urgent situation but as soon as reasonable:
    - complete the form at [link to be inserted]
    - email buyingsupport@peterborough.gov.uk
    - call buying support on 01733 384588/384620/384593

5.2. Concerns Identified in the Community

Avenues for community concerns identified to be reported in confidence need to be established so that such matters can be dealt with with necessary sensitivity.

- where an immediate response is required by dialling 999;

- in a less urgent situation but as soon as reasonably practicable after the concern arises:

  - to their local police force;
  - via the Modern Slavery Helpline **08000 121 700**;
  - via Crimestoppers on 0800 555 111.

5.3. In all Other Cases

Where staff or our partners identify possible examples of modern slavery in a personal capacity they should report their concerns as follows on the referral pathway at Appendix A. (A list of current MDS champions can be found on the Insite web-page **insert link**)

Modern Day Slavery Referral Pathway   **Appendix A**

Flowchart:

- First responder identifies victim
- First responder alerts line manager, MDS Champion for their area
- MDS lead convenes panel with First Responder and MDS Champion → Initiates case on eCins
- Is the victim a child?
  - NO → Is the National Referral Mechanism applicable?
    - YES → Does victim consent to the NRM
      - YES → First Responder/ Champion fill in NRM form with the victim
        - First Responder/ Champion send NRM referral to the Police
        - Police review and refer case to the competent authority (National Crime Agency Modern Slavery Human Trafficking Unit)
        - National team review case - are there reasonable grounds to believe this individual is a potential victim of MDS? → YES → Individual granted access support for 45 days
      - NO → If the victim chooses to remain anonymous n MS1 form should be completed. Existing safeguarding procedures should be followed
    - NO → Follow normal safeguarding procedures
  - YES → Child victims are not subject to the normal NRM process, a child referral form should be completed, found at https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms

    NOTE: NORMAL CHILD PROTECTION PROCESSES SHOULD BE COMPLETED IN TANDEM

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