

Slavery and Human Trafficking Statement

1 October 2022 to 30 September 2023



1.0 Introduction

The Modern Slavery Act 2015 requires commercial organisations with an annual turnover of more than £36million to report on the steps they have taken to ensure that modern slavery is not taking place in their business or its supply chains. Although as a local authority, the Council is exempt from this requirement, the Council has chosen to publish an annual statement to provide transparency and demonstrate commitment to tackling modern slavery.

The Modern Slavery Act 2015 places specific responsibilities on every organisation to ensure that slavery and human trafficking does not exist within the supply chain, and in any part of the business. Organisations need to demonstrate accountability through transparency to protect workers (both adults and children) from being abused and exploited, which in turn will bring greater confidence to customers and service users.

Modern slavery is a violation of human rights and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking, and includes:

- **Forced labour** – Coerced, deceived or forced into working for little or no pay
- **Sexual exploitation** – Coerced, deceived or forced into providing sexual services
- **Domestic servitude** – Coerced, deceived or forced into working within a home environment for little or no pay
- **Criminal exploitation** – Coerced, deceived or forced into criminal activities (including begging, stealing and growing or selling drugs)
- **Forced or sham marriage** – Coerced, deceived or forced into marriage
- **Organ harvesting** – Coerced, deceived or forced into removing internal organs for another person's gain.

Addressing human trafficking and modern slavery is also a stated priority within the city's Community Safety Strategy. The Council is committed to improving its practices to prevent slavery and human trafficking and understands its responsibilities to residents, service users, employees and the local community. It has a strong set of core values, at the heart of which is protecting the local community while enabling growth and investment. The Council expects suppliers, partners and third parties to adhere to the same values and principles to combat slavery and human trafficking.

This statement sets out Manchester City Council's arrangements and procedures that exist to eradicate slavery or human trafficking.

Manchester City Council is a local authority that provides a wide range of services, alongside its partners, for the local community.

Some of these service provisions are for the most vulnerable people in society, and as such the Council has a statutory and high level of moral duty and care embedded within all its policies and practices.

In 2016, consultation with the residents of Manchester led to the Council setting out its strategy for Manchester, **Our Manchester – The Manchester Strategy**. This is the vision the whole city is working towards.

Over the **first five years of the strategy**, Manchester made significant progress, going from strength to strength towards its vision. However, some challenges remain and the COVID-19 pandemic put us in a very different place. So, halfway through the Our Manchester Strategy, our priorities were reset for the **next five years to 2025**, acknowledging – but looking beyond – current challenges, to make sure the city achieves its ambition.

Our vision is for Manchester to be in the top flight of world-class cities by 2025 and to be somewhere that is:

- Thriving
- Highly skilled
- Progressive and equitable
- Liveable and zero-carbon
- Connected.

The collective progress of this strategy can be seen through **The State of the City Report**.

2.0 Organisation structure and supply chains

2.1 The Council's **constitution** sets out how the Council operates, how decisions are made, and the procedures followed to ensure that these are efficient, transparent and accountable to local people. Some of these processes are required by the law, while others are a matter for the Council to choose.

The constitution sets out:

- The rules and procedures to be followed by the Council and committees when conducting their business
- The decision-making powers of the Executive and Committees
- The financial and contract regulations
- The scheme of delegation to chief officers
- The rights of the public to inspect reports and background documents
- Codes of conduct for councillors and employees
- Members' interests and members' allowances.

The constitution is made up of seven parts:

- Summary and explanation
- Articles of the constitution
- Responsibility functions
- Rules of procedure
- Financial procedures
- Codes and protocol
- Members' allowances.

- 2.2 Employees have the freedom of association with the right to join an independent trade union or other workers' association and to carry out reasonable representative functions in the workplace.
- 2.3 The Council chairs multi-agency partnerships to protect and safeguard people. The Greater Manchester Combined Authority (GMCA) has delivered conferences on modern slavery and human trafficking to highlight how to prevent abuse and neglect, detect and report incidents, and provide support for victims.
- 2.4 Alongside the Police and Clinical Commissioning Group (NHS), the Council is a key statutory agency in the Modern Slavery and Human Trafficking Subgroup, which delivers the strategy on behalf of the safeguarding partnership. The group has an action plan in place covering awareness-raising, training and prevention, and a partnership working group is in place to implement actions.

Agencies include: GMCA, Greater Manchester Police, NHS, Manchester Action on Street Health (MASH), Medaille Trust, Barnards, AFRUCA, and City Hearts.

2.5 The Council's Ethical Procurement Policy sets out the conduct we expect from our supply chain in regard to the following areas:

- Working with Manchester City Council
- Improving labour conditions in the supply chain
- Responsible supply chain
- The legal context for Ethical Procurement.

3.0 Policies in relation to slavery and human trafficking

The Council is not exempt from this requirement and as an employer has in place the following measures to prevent modern slavery within the Council:

- Our recruitment processes require the completion of relevant employment checks and standards, which include eligibility to work in the UK and Disclosure and Barring Services (DBS) checks; suitable references are requested and followed up.
- We operate a job-evaluation scheme to ensure all employees are paid fairly and equitably.
- We offer a dedicated Wellbeing programme that gives colleagues access to an Employee Assistance Programme and a wide range of other wellbeing and mental health tools so that they have the appropriate resources and support if they need it.
- Our agency workers are sourced via a Framework Agreement, which procures a third party to verify the practices of any agency it uses before accepting workers from that agency.
- We are committed to paying the Manchester Living Wage and became a Real Living Wage Accredited Organisation in November 2019.

- Our code of conduct for employees sets out both the expectations of staff and the organisation. This is the Council's constitution.
- We offer our officers an e-learning suite on Modern Slavery and human trafficking.
- Our **whistleblowing** process provides a confidential channel for reporting concerns and investigating any breaches of policies and procedures. Whistleblowing referrals are overseen by the Internal Audit Team. The outcome of investigations raised through whistleblowing are reported to the relevant Strategic Director, City Solicitor and Chief Executive. The Council's whistleblowing policy is reviewed periodically by the Internal Audit Team. No whistleblowing concerns or referrals were raised in 2021 in relation to modern slavery.
- We have adopted policies and procedures to ensure full commitment to preventing fraud, bribery and corruption in the organisation through the **Counter fraud and irregularity strategy policy**.
- We recognise our responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults through a comprehensive Safeguarding Policy agreed by the Manchester Safeguarding Partnership: the **Manchester safeguarding standard**.
- We are committed to Equality and Diversity and actively seek to eradicate discrimination and inequality when delivering services and when goods and/or services are supplied on the Council's behalf. Details can be found in the **Equality Objectives 2020 – 2024**.

The Council has in place the following measures to prevent modern slavery within its supply chain:

- Since the Social Value Act was implemented in 2012, we have led in generating social value through our procurement, our own operations and the wider influence we have with organisations across the city. Our **Social Value Policy** sets out our social value priorities.
- Our **Ethical Procurement Policy** sets out the context for ethical practices and the ethical core objectives that we have agreed to deliver through commissioning and procurement activities. In accordance with our policy we expect our suppliers, service providers and contractors to observe the policy's provisions and to demonstrate a similar commitment to an ongoing programme of ensuring and, where necessary, improving ethical practices locally and globally.

- We encourage our suppliers to sign up to Greater Manchester's Combined Authorities' [Good Employment Charter](#).
- We are signed up to the following charters, covenants and codes:
 - Unite Union Charter for Ethical Employment Standards in the Voluntary and Community Sector
 - Unite Union Construction Charter
 - Prompt Payment Code
 - Care Leaver Covenant
 - Armed Forces Covenant.

4.0 Due diligence processes

- 4.1 The Council has a legal duty to co-operate with the Anti-Slavery Commissioner in any way the Commissioner deems necessary to support their function. In doing so, the Council may be required to provide the Commissioner with personal and/or confidential information.
- 4.2 Section 52 of the Modern Slavery Act 2015 requires police, immigration and local authority staff to report to the Secretary of State all instances of having reasonable grounds to believe a person may be a victim of slavery or human trafficking.

A notification to the Secretary of State must include the information listed in Schedules 1 and 2 of the Modern Slavery Act 2015 (Duty to Notify) Regulations 2015 (SI 2015/1743), where such information is in the possession or control of the public authority:

Schedule 1

This includes information such as the name of the public authority making the notification, whether the suspected slavery or trafficking has been referred to the police, the type of conduct involved, and whether the conduct involved the victim committing an offence.

Schedule 2

This lists additional information that must be provided where the victim is either under the age of 18, or is over 18 and has consented to the disclosure of that information in the notification; this includes the victim's name and date of birth and the name of the perpetrator.

- 4.3 Contract management is devolved across the Council. A practical, risk-based approach to managing supply chains will be achieved in the identified key high-risk areas by working with suppliers to monitor and mitigate these risks where practical.
- 4.4 As a Contracting Authority, the Council undertakes procurement in compliance with the UK Public Contract Regulations 2015. The Standard Selection Questionnaire used in all competitive tenders includes a requirement to declare and evidence (where applicable) compliance with the Modern Slavery Act 2015. The Council's due diligence and reviews include:
 - Requiring suppliers covered by the Act to self-certify that they comply with the Modern Slavery Act, as part of the tender process.
- 4.5 All tender processes have been revised and require all tenderers and subsequent suppliers to verify within the tender process the following:
 - If not covered by the Act, to verify they have a programme to assure that slavery and human trafficking do not exist in their operations and supply chain.
 - They have a programme to assure that slavery and human trafficking do not exist in their supply chain **{{Query similar sense}} {{In the UK, program is used only for a computer program; program is the US spelling of programme}}**
 - They have processes in place to check whether their subcontractors or suppliers have been convicted or had a notice served upon them for infringement of The Modern Slavery Act 2015.
 - They pay the Real Living Wage and they have processes in place to ensure this requirement is reflected throughout their supply chains.
 - They operate a whistle-blowing process that is actively promoted within their organisation and by their subcontractors and suppliers (where applicable) to report any incidents of breaches or suspected breaches of the Modern Slavery Act 2015.

- They have processes in place to check whether their subcontractors and suppliers operate a whistleblowing process that is actively promoted within their organisation/business to report any incidents of breaches or suspected breaches of the Modern Slavery Act 2015.

4.6 The Council also requires suppliers to confirm as part of the tender process the following:

- They recognise trade unions, accept persons who have membership of a trade union into the workforce, and encourage employees to join a trade union of their own choosing.

4.7 The Council's Terms and Conditions for all new contracts include:

- Provision for compliance with the Modern Slavery Act and enabling contract suspension/termination in the event of a breach, where deemed necessary.
- A whistleblowing policy that complies with the applicable Law. The policy sets out procedures by which staff can confidently report concerns about illegal, unethical or otherwise unacceptable conduct and ensures that it enables the staff to bypass the level of management at which the problem may exist.

5.0 Risk assessment and management

5.1 The Council acknowledges the influence it has through its buying power and the need to ensure that buying decisions and purchasing practices consider ethical and environmental elements when determining best value. Part of this responsibility is ensuring suppliers understand and act in accordance with Council values, outlined in the Council's Ethical Procurement Policy, and take modern slavery and exploitation seriously.

5.2 We recognise that the main risk of slavery and human trafficking is in the high-spend supply chain areas of Construction, IT, Highways, Children's Services, Adult Services, Street Cleaning Refuge/Waste. These areas constitute a large area of the Council's expenditure and, as such, presents areas of influence in reducing the risks of modern slavery occurring in the supply chain.

5.3 Through work on our supplier engagement we will be addressing each area of spend in turn to look at the strategies our supply chain has in place to ensure the risk of slavery and human trafficking is minimised.

5.4 **Construction**

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.
- We have monthly contract meetings with our contractors, which includes their performance against the Council's Ethical Policy.
- For major projects, there is a requirement for suppliers to register and sign up to a 'considerate constructor scheme'. This is to encourage suppliers to conform to the code of practice and to strive for improvement around the following three areas:
 - Respect within the community
 - Care for the environment
 - Value of the workforce.

5.5 **IT**

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.
- We will review our most important IT contracts and place a stronger emphasis on management of modern slavery and human trafficking risk in the performance review conversations with our IT suppliers.

5.6 **Highways**

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.
- We have monthly contract meetings with our contractors and suppliers, which includes their performance against the Council's Ethical Policy.

- For major projects, there is a requirement for suppliers to register and sign up to a 'considerate constructor scheme'. This is to encourage suppliers to conform to the code of practice and to strive for improvement around the following three areas:
 - Respect within the community
 - Care for the environment
 - Value of the workforce.
- We will be awarding a new major framework to deliver highway improvement work, which will include specific KPIs related to modern slavery that contractors will be required to adhere to. This framework will be used for 99% of our work once established.

5.7 Children's Services

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.
- We complete a comprehensive review of staffing, their rights to work, DBS and training completed if alerted to a safeguarding risk or staffing anomaly.
- We ensure our providers' staff are on the employment register for the organisation.

5.8 Adults' Services

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.
- We complete a comprehensive review of staffing, their rights to work, DBS and training completed if alerted to a safeguarding risk or staffing anomaly.
- We will ensure our providers' staff are on the employment register for the organisation.

5.9 Street Cleaning/Refuge and Waste

- We take slavery and human trafficking into account before a contract is awarded through the Council's tendering process.

- Our contractors are required to attend regular Contract Management meetings as set out in the contract performance KPIs, which include their performance against the Council's Ethical Policy.

6.0 Key performance indicators to measure effectiveness of steps being taken

- 6.1 The Council's policies are embedded throughout the organisation, and in its procurement process the next step will be to develop KPIs to help understand whether the actions we are taking are working well within our own organisation and within our supply chain and where we need to improve.
- 6.2 100% of Senior Leadership Team who have undertaken the Council's e-learning course by 31 August 2023.

7.0 Training on modern slavery and trafficking

- 7.1 The Council's Procurement Team have completed a programme of mandatory training on modern slavery.
- 7.2 Awareness-raising of modern slavery and human trafficking is a priority for the Safeguarding Partnership and is an integral part of the Safeguarding Partnership training plan.
- 7.3 Councillors have completed online training, raising awareness of modern slavery and human trafficking, and how it can be identified within the supply chain.
- 7.4 We have two e-learning modules that are available for all officers to complete on modern slavery and human trafficking and modern-day slavery.

8.0 Action plan for 2022/2023

The Council's action plan will be reviewed by Procurement after nine months. The results of the review will be reported in the Council's Modern Slavery and Human Trafficking Statement for 2023, which is approved and signed off by the Chief Executive, Deputy Chief Executive/City Treasurer, the Council's Senior Management Team and members.

Actions for 2022/2023		Lead	Due date
1	Procure a system to monitor delivery of social value.	Procurement	31 July 2023
2	Build on work done to develop contract registers to create visible pipeline of procurement projects to maximise visibility of opportunities to improve delivery of services and social value opportunities.	Procurement	Ongoing
3	Continue to develop processes, including social value questionnaire and supplier profile.	Procurement	Ongoing
4	Formalise process for monitoring and report of the action plan for future statements.	Procurement Executive	31 August 2023
5	Amend the procurement process to include request for copy of tenderers' Anti-Slavery Policy.	Procurement	31 October 2022
6	Commit to ensure that our staff understand what modern slavery and human trafficking are, are able to identify associated red flags, and are aware of the actions they must take should they have any concerns. We will do this by promoting e-learning to all officers, including new starters.	Human Resources	31 August 2023
7	Publish a business-wide communication for all colleagues about modern slavery and human trafficking, including how to identify and report slavery and human trafficking.	Human Resources	31 August 2023
8	Endeavour to have 100% of our Senior Leadership Team undertake the Council's e-learning course on slavery and human trafficking.	Human Resources	31 August 2023

9	Continue to establish our own framework to deliver highway improvement work; this will include specific KPIs related to modern slavery that contractors will be required to adhere to.	Highways	31 August 2023
10	Organise an internal workshop to brief all our contract managers on this very subject to ensure in the first instance they are all aware of its importance.	Highway	31 August 2023
11	Organise formal meetings with contractors/suppliers to monitor their relevant practices and processes.	Highways	31 August 2023
12	Establish a preset agenda and criteria for monitoring Highway's contracts so there is a consistent approach across all contracts and all contract managers.	Highways	31 August 2023
13	Ensure the Children's Commissioning team complete training in recognising risk regarding slavery and human trafficking.	Children's Services	31 July 2023
14	Continue to promote awareness of modern-day slavery and human trafficking to staff members.	Adult Services	Ongoing
15	Identify KPIs to understand if the actions taken by the Council are working well and where improvement might be required.	Human Resources Procurement	31 July 2023
16	Review our most important IT contracts and place a stronger emphasis on management of modern slavery and human trafficking risk in the performance review conversations with our IT suppliers.	ICT	31 July 023
17	Award a new major framework to deliver construction work, which will include	Capital Programmes	31 December 2022

specific KPIs related to modern slavery that contractors will be required to adhere to.		
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Chief Executive Statement

Manchester City Council is extremely passionate about this issue and takes its responsibilities very seriously. The Council is fully committed to strengthening and improving its own practices and to ensuring that slavery and human trafficking do not exist within its supply chain or within the city's communities. We will continue to publish our slavery and human trafficking statement and will review this at regular intervals to ensure that it remains fit for purpose



Chief Executive, Joanne Roney OBE
1 October 2022