



## **Bristol Modern Slavery Transparency Statement 2021-2022**

Bristol City Council is committed to the implementation of the Modern Slavery Act 2015 and is committed to eliminating practices and conditions which may foster modern slavery.

This statement outlines the Council's actions to understand and address all potential modern slavery risks and to put in place steps that are aimed at ensuring that this does not occur in our own business and supply chains. Modern slavery includes slavery, human trafficking, forced and compulsory labour, servitude, and organ harvesting for profit.

As set out in our [Corporate Strategy 2018/2023](#) we want Bristol to be an inclusive City of Sanctuary where everyone feels safe and that they belong. This recognises the skills, experiences, and the positive social and economic contributions everyone can make. Critical to the inclusive and sustainable growth of our City, is the eradication of exploitation in all its forms. Bristol City Council has zero tolerance towards modern slavery.

As part of Local Government, the Council recognises our responsibility to take a robust approach. We work collaboratively with our partners to identify and support victims and to disrupt and bring to justice the perpetrators of such crimes across the city. We take very seriously, our responsibility to safeguard the most vulnerable in society, to build strong and resilient communities – to ensure there is no modern slavery in our supply chains.

As an employer, the Council has a Duty to Notify the Secretary of State of potential victims of slavery as introduced by Section 52 of the Modern Slavery Act 2015.

This statement sets out the Council's actions to understand all potential modern slavery risks related to our organisation and to put in place steps that are aimed at ensuring there is no slavery in our business or our supply chains.

Our plans for 2021 - 2022 are as follows:

### **1. Organisation Structure and Supply Chains**

The Council is a unitary authority providing all local government services for its 686,000 citizens, from waste collections and clean-up teams to public health, education, and social care. 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.

Our work with our supply chains reinforces our zero-tolerance ethos to modern slavery. The relationships with many of our suppliers and group of companies have been established over several years. For new contracts, we undertake proportionate due diligence of suppliers, including mandatory checks and binding contractual commitments with the Modern Slavery Act.

## **2. Policies in Relation to Modern Slavery**

Bristol City Council has a robust approach to safeguarding children, young people, and vulnerable adults. All staff are expected to play a part in safeguarding. We also work closely with our partners to ensure that modern slavery is integrated into safeguarding work within the City. Our key policies that relate to modern slavery include the following:

### **Safeguarding policies**

- Keeping Bristol Safe Partnership Strategic Plan 2020-2023
- Keeping Bristol Safe Partnership Safeguarding Children Procedures
- Guidance for agencies working with adults at risk
- Regional Adults Safeguarding Policy – includes modern slavery and human trafficking
- Refugee, Asylum Seeker, and Inclusion Strategy 2019

### **HR policies**

- Whistle blowing Policy
- Code of Conduct for Employees
- Draft Bristol City Council Corporate Safeguarding Policy 2021
- Health and Safety
- Recruitment

### **Procurement**

- Bristol City Council Procurement Rules

We will review existing corporate responsibility policies to ensure they meet the requirements of the Modern Slavery Act 2015 and consider any additional policies that may be needed.

## **3. Due diligence processes**

We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain. These measures include:

- Working with partners to develop our understanding of the risks of modern slavery occurring and reviewing the supply chain to identify areas of vulnerability and risk.
- Considering appropriate steps within the category management and commissioning processes to mitigate risks, particularly in those areas assessed to be at high risk of modern slavery.
- Requesting confirmation for all appropriate procurements to ensure that bidders meet the Modern Slavery Act 2015 requirements.

- Taking appropriate measures in the selection of suppliers and to exclude bidders who fail to evidence their compliance with the required legislation.
- Challenging any abnormally low-cost tenders to reduce the risk that they rely upon a potential supplier committing modern slavery.
- Ensuring the inclusion of contractual clauses as appropriate, to be certain of compliance with the requirements of the Modern Slavery Act, including passing these responsibilities to subcontractors in the supply chain.
- Requesting any suppliers found not meeting the required standard to take action to improve; and where this is not forthcoming taking action to terminate, with due reference to the contractual terms and conditions.

#### **4. Risk Assessment and Risk Management**

Risk management will be based on the approach set out in the Government Commercial Functions' "Tackling Modern Slavery in Government Supply Chains Guide for Commercial & Procurement Professionals". [Governments Procurement Policy Note & Guidance](#)

Utilising this guidance will allow us to focus supply chain compliance activity on the highest risk industries, including due diligence at both procurement and contract management stages.

#### **5. What Bristol City Council Are Doing / Have Done So Far**

Since the adoption of the Modern Slavery Act 2015, Bristol City Council has been active in our commitment to support the aims of the Act and has undertaken the following activities:

- The Council is signed up to the [Co-operative Party Charter Against Modern Slavery](#)  
This shows our commitment to proactively vetting our supply chain to ensure there is no modern slavery taking place.
- We are fulfilling our duties as a designated First Responder Organisation under the National Referral Mechanism. We achieve this by ensuring that we have appropriately trained staff who will identify potential victims and who will deliver an effective service to victims, to include an informed option of a referral into the National Referral Mechanism.
- We deliver training that provides staff with a level of awareness on modern slavery in line with section 52 of the Modern Slavery Act 2015, and the Duty to Notify the Home Office, in relation to anyone who is a potential victim of human trafficking and/or modern slavery. We also acknowledge that potential victims include both adults, children, non-UK nationals and UK nationals.

- We regularly publish updates of relevant information and guidance documents and promote the modern slavery helpline contact numbers on the Bristol City Council website, [Modern Slavery Website page](#) and intranet to enable victims, citizens and staff to identify and report incidents or concerns in relation to modern slavery.
- Bristol City Council Officers are active partners in the Avon and Somerset Anti-Slavery Partnership. Under partnership arrangements, we work collaboratively with a wide range of partners such as Avon and Somerset Constabulary and Unseen, which is a national charity that provides safe housing and outreach services for survivors and operates the UK's Modern Slavery helpline. This partnership working includes information sharing, the disruption of perpetrators, the provision of integrated, sustainable, and effective interventions for potential victims, through a multi-agency approach.
- We have made a commitment to support vulnerable migrants. Bristol is a City of Sanctuary and welcomes asylum seekers. We can evidence our commitment through the implementation of the Refugee and Asylum Seeker Inclusion Strategy 2019 and action plan.

## **6. Looking Forward - What we intend to do**

In addition to the work we have already undertaken and are fully committed to, we will continue to build on our current approach to make improvements to safeguard individuals and communities from modern slavery in Bristol.

Our plans for 2021/2022 include:

### **Partnership working**

- Develop an overarching Bristol City Council Corporate Safeguarding Policy that incorporates a response to modern slavery.
- Review existing internal corporate responsibility policies and consider whether they already address the issues that are required by the Act and if not, consider what additional amendments or policies we may need.
- Undertake a mapping exercise on high-risk industries and hotspots that relate to Bristol City with the intention of working collaboratively with partners to disrupt perpetrators of modern slavery and to support victims. We will share good practice with the Avon and Somerset Anti-Slavery Partnership.
- Develop our victim focussed approach to modern slavery & human trafficking. Not only will this include providing for the health and wellbeing needs of victims while they are in the care of the Council but will also include working to ensure that Council services meet the needs of all victims and potential victims of modern slavery and human trafficking in Bristol.
- Through our ongoing learning and raised awareness, we will consider the experiences and needs of victims of modern slavery and human trafficking in future policies and decisions and incorporate this into our assessment by utilising tools such as Equality Impact Assessments.

- Work proactively with our One City partners to support identified victims of Modern Slavery and we will act, wherever possible, against perpetrators through Serious Organised Crime Group Disruption Panels.
- Work with our wholly-owned companies to ensure they continue to safeguard individuals and communities from modern slavery within their own operations.

### **Supply Chain Engagement**

- Ensure that we are consistently adopting the procurement planning checklist - [‘Tackling Modern Slavery in Government Supply Chains’](#).
- Identification and management of risks in procurement will take place by mapping our supply chains and carrying out high level risk assessments. We will use our contract management framework to be explicit in our implementation of initiatives to tackle modern slavery.
- Run a campaign to enable our suppliers to undertake Modern Slavery Self-assessment compliance in line with Crown Commercial Services’ [Modern Slavery Assessment Tool](#). [This will](#) both raise awareness of modern slavery issues and will drive-up standards within our supply chain to positively contribute to eliminating modern slavery.
- Work proactively with our suppliers and partners (including our wholly-owned companies) to help understand our collective responsibilities in relation to modern slavery and we will require our supply chain to ensure they fulfil their obligations as set out within the Modern Slavery Act. We will seek to use a variety of methods do this, such as, through supplier days, supplier newsletters and podcasts.
- Take a proactive approach and take account of ethical and modern slavery considerations in our procurement processes and our contractual arrangements.
- Undertake an annual audit of a sample of our prime suppliers to check both compliance with Modern Slavery legislation and ethical practice relating to modern slavery.

### **Workforce Engagement and Training**

- Our learning and development plan for our staff will be reviewed and updated. This will involve the inclusion of modern slavery awareness training within the mandatory induction training modules for all staff and Councillors. This will be embedded with the Safeguarding training for children and adults.
- We will also provide regular awareness raising and refresher training for all staff and provide specific tailored training for our key front-line staff and those identified as being in crucial roles such as First Responders. This will be supported by an updated provision of online training for modern slavery and human trafficking for Councillors and staff.

- We will provide targeted modern slavery supply chain and contract management training for relevant staff, including procurement teams, contract managers, trading standards, compliance, legal and finance teams.
- We will actively promote awareness raising and publish clear referral mechanisms for staff, suppliers, and those in our communities for reporting any concerns around modern slavery and human trafficking.

**6. Key performance indicators to measure effectiveness of steps being taken**

We will set up a task group to meet quarterly to monitor delivery, record progress and achievements, and identify further areas for improvement. Our progress on our plans for 2021- 2022 will be monitored by the Bristol City Council Corporate Safeguarding Group who will report into the Corporate Leadership Board.

To measure effectiveness the following will be monitored:

- the Proactis contract management system will track when Modern Slavery risks will be assessed during the life of a contract. The system will provide automated prompts so the contract owner/manager can ensure the obligations around modern slavery are met and reportable.
- numbers of staff and Councillors who have completed the mandatory induction training and the numbers of First Responder staff who have undertaken the initial and refresher modern slavery and human trafficking training.

This statement is made with reference to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Bristol City Council’s Modern Slavery Statement for the financial year ending 31 March 2022.

The Bristol City Council Modern Slavery Transparency Statement has been approved by Cabinet.



..... Signed

Mayor of Bristol, Marvin Rees.... Designation

25/10/2021..... Date