

Public Report
Overview and Scrutiny Management Board

Committee Name and Date of Committee Meeting

Overview and Scrutiny Management Board – 19 April 2023

Report Title

Scrutiny Review Recommendations – Modern Slavery

Is this a Key Decision and has it been included on the Forward Plan?

No, but it has been included on the Forward Plan

Strategic Director Approving Submission of the Report

Jo Brown, Assistant Chief Executive

Report Author(s)

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Ward(s) Affected

Borough-Wide

Report Summary

The purpose of this report is to outline the outcomes and findings of the spotlight review into modern slavery. The review was prompted following the Council's adoption of the Charter against Modern Slavery, to examine the effectiveness of partnership interventions which aims to tackle modern slavery in Rotherham.

Recommendations

1. That Overview and Scrutiny approves the following recommendations:

- i. That the Safer Rotherham Partnership (SRP) gives consideration to rolling out a targeted learning and development offer/campaign to raise awareness of modern slavery, how to spot the signs, risks and how to raise concerns and make referrals:
 - a) to front-line staff across key agencies;
 - b) to elected members;
 - c) to the general public and targeted business such as letting agencies (commercial and residential).
- ii. That the SRP gives consideration to mapping the local modern slavery landscape to identify high risk industries and hot spots (using the example of Bristol City Council).
- iii. That consideration is given to establishing an RMBC Internal Governance Group including representation from services who may encounter modern

slavery (for example, Procurement, Licensing, Environmental Health, Training Standards, Neighbourhood teams, Social Care and Housing).

- iv. That consideration is given to how young adults at risk or experiencing modern slavery are safeguarded during the transition from children to adult services and are age assessed appropriately.
- v. That consideration is given to developing referral pathways to ensure that modern slavery victims (both adult and child) have access to appropriate support (housing, advocacy, mental health support) on a timely basis.
- vi. That consideration is given to re-launching the Strategic Partnership information sharing group at the earliest opportunity to improve the way that agencies can share data and intelligence, including examining how IT systems can work better together.
- vii. That consideration is given to widening the levels of investigation and auditing of contracts procured by the Council to focus on the 'layers' of sub-contractors, including binding specifications to audit or 'dip sample' contracts along the supply chain.
- viii. That consideration is given to how the Procurement Team can engage with the South Yorkshire Mayoral Combined Authority (SYMCA) Supply Chain Advisor to improve processes, joint working and awareness.
- ix. That consideration be given to allowing victim advocates to make representations to Housing Assessment Panels on behalf of victims of modern slavery.

2. That the recommendations as approved, be submitted to Cabinet for consideration and response.

3. That the recommendations as approved, be submitted to the Safer Rotherham Partnership for dissemination to the South Yorkshire Modern Slavery Partnership for consideration and response.

List of Appendices Included

N/A

Background Papers

- Council Meeting: Notice of Motion – Modern Slavery, 25 July 2018
- Minutes of meeting – Overview and Scrutiny Management Board .3 November 2021
- References are detailed in paragraph 2.2.7 of the report

Consideration by any other Council Committee, Scrutiny or Advisory Panel

N/A

Council Approval Required

No

Exempt from the Press and Public

No

Scrutiny Review Recommendations – Modern Slavery

1. Background

- 1.1 In July 2018, the Council resolved to adopt the Co-operative Party’s Charter against Modern Slavery¹. The resolution committed the Council to a range of activities, including ensuring contractors and suppliers complied with the Modern Slavery Act 2015; raising awareness of the policy; developing whistle-blowing systems and referral routes to the National Crime Agency should suspicions of illegal activity emerged. A commitment was given to publishing an annual review to report on implementation and activity.
- 1.2 At its meeting in November 2021, the Overview and Scrutiny Management Board (OSMB), considered the annual report of the Safer Rotherham Partnership. In it, the Partnership detailed its commitment to tackling modern slavery and identified it as priority. As over three years had passed since the charter was originally adopted, OSMB agreed to add the issue to its work programme and subsequently decided to hold a spotlight review to examine the effectiveness of partnership interventions to tackle modern slavery in Rotherham.
- 1.3 The spotlight review took place in November 2022. Its methodology and invited witnesses are detailed in Section 2.2 of the report.

2. Key Issues

2.1 What is “Modern Slavery?”

- 2.1.1 The Home Office describes modern slavery as “a serious and brutal crime in which people are treated as commodities and exploited for criminal gain”², adding that its true extent is unknown in the UK and globally.
- 2.1.2 Modern slavery is a complex, serious and often organised crime. Under Section 17 of the Crime and Disorder Act, councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which will include tackling modern slavery and trafficking.
- 2.1.3 The National Crime Agency outlines that modern slavery can take many forms including trafficking, forced labour and servitude. Adult victims are not judged to have given consent to their treatment if they have been coerced or deceived (as victims cannot consent to their own exploitation). Likewise, children under the age of 18 years cannot consent to their own exploitation and are considered to be victims if they have been recruited or transported for the purpose of exploitation.
- 2.1.4 The term modern slavery describes a range of exploitative behaviours which can occur singularly or together. These can include sexual exploitation; domestic servitude with victims forced to work in private households for little or no pay; forced labour in industries such as construction, cleaning (car washes), hospitality, food packaging, agriculture, maritime and beauty (nail

¹ [Modern Slavery Charter](#)

² [Modern Slavery Act 2015](#)

bars); criminal exploitation such as cannabis cultivation or drug trafficking; and other forms of exploitation such as forced begging, benefit fraud, forced marriage and organ removal.³

2.1.5 The Home Office⁴ has reported a steady increase in the number of referrals of potential victims of modern slavery over recent years.

- 4,586 potential victims of modern slavery were referred to the Home Office in quarter 3 2022, representing a 10% increase compared to the preceding quarter (4,169) and a 38% increase from quarter 3 2021 (3,317);
- 79% (3,645) were male and 20% (937) were female;
- 50% (2,303) of referrals were for potential victims who claimed exploitation as adults and 43% (1,984) claimed exploitation as children;
- adult potential victims most commonly claimed labour exploitation (41%; 943), whereas child potential victims were most often referred for criminal exploitation (41%; 808);
- the most common nationalities referred this quarter were Albanian, UK and Eritrean;
- 4,652 reasonable grounds and 1,517 conclusive grounds decisions were issued this quarter; of these, 88% of reasonable grounds and 91% of conclusive grounds decisions were positive.

2.1.6 In 2019, the Safer Rotherham Partnership adopted Modern Slavery as one of its key crime and disorder priorities. This priority has been retained in the Partnership's current three-year plan. Between January 2020 and September 2022, there was a total of 112 potential victims of modern slavery referred into the National Referral Mechanism (NRM) and via the Duty to Notify process (DTN) from Rotherham by first responder organisations. (Source-South Yorkshire Police). The ages of potential victims spanned from 13 – 64 years, with victims coming from the UK as well as overseas. Locally, the most common type of crime was recorded as Child Criminal Exploitation (such as burglary, 'county-lines') and cannabis cultivations.

2.1.7 The South Yorkshire Modern Slavery Partnership (SYMSP) monitors referrals to the NRM and had noted a steady increase in numbers. RMBC engages in regular meetings with SYMSP to share information and intelligence.

2.1.8 Victims of modern slavery and human trafficking can come from a variety of backgrounds and nationalities. Traffickers and those involved in exploitation do not follow a stereotypical profile and indeed many may appear to be outwardly respectable. The Human Trafficking Foundation suggest that people rarely self-identify as victims of slavery/trafficking or easily reveal their experiences. This could be for a variety of reasons including but not limited

³ [Modern Slavery: A Briefing](#)

⁴ [Home Office - Q3 Statistics July-Sept 2022](#)

to fear of reprisals; the impact of trauma; stigma or willingness to consider themselves as a 'victim'⁵.

2.1.9 The review did not examine the effectiveness of the NRM and Duty to Notify processes⁶ or form a judgement on whether these adequately supports victims of modern slavery and trafficking.

2.2 Methodology:

2.2.1 Planning sessions were held in advance of the meeting to determine its scope. Briefing materials and resources were also circulated to inform lines of enquires.

The review itself took place over a single afternoon. Each participant was invited to give a short presentation to outline the focus of their work, highlighting what was working well and key challenges. This was followed by a question-and-answer session and round table discussion. A summary of the discussion and key points raised is outlined in Sections 2.3 and 2.4 of the report.

2.2.2 The key lines of enquiry for the spotlight review were as follows:

- What impact has Modern Slavery Charter had since it was adopted in Rotherham in 2018?
- What is the role of the Partnership in identifying modern slavery? What action is taken to support victims and against offenders?
- How does the partnership work collaboratively and share information on suspected modern slavery?
- What are the major gaps and challenges (and what can be done to address these)?

2.2.3 Specific questions were asked in relation to:

- Procurement/commissioning
- Awareness and levels of confidence within front-line staff, partners, business and the local community
- Data and intelligence sharing
- How the partnership is adapting to recent changes/trends which could impact the nature of modern slavery in Rotherham
- Success of the partnership and working together
- Support for victims

2.2.4 The review links to the following Council Plan themes:

- People are safe, healthy and live well
- Every child able to fulfil their potential

⁵ [What is human trafficking? Human Trafficking Foundation](#)

⁶ [National referral mechanism guidance: adult \(England and Wales\)](#)

2.2.5 In addition, the review links explicitly to Safer Rotherham Partnership priority (2022-25) of Protecting Vulnerable Adults

- Protecting and supporting vulnerable adults... from harm, crime, and becoming victims of exploitation, as well as, preventing them from becoming victims of modern slavery.

2.2.6 The review group consisted of the following members:

- Cllr Maggi Clark (Chair)
- Cllr Tony Browne
- Cllr Gina Monks
- Cllr Lyndsey Pitchley
- Cllr Ken Wyatt

2.2.7 An information pack with the following reports/ briefings was circulated to the review group:

- UK Government *Modern Slavery: A Briefing* (2016)
- Local Government Association *Councillor guide to tackling modern slavery* (2019)
- House of Commons *Library The Modern Slavery Act 2015 five years on* (2020)
- Centre for Social Justice - *It still happens here: fighting UK slavery in the 2020s* (2020)
- Safer Rotherham Partnership *Annual Report 2021-22*

2.2.8 Witnesses were drawn from the Council and its partners. The Chair would like to put on record her thanks for the contribution of each participant and their evident commitment to tackling this issue.

- Cllr Saghir Alam, Chair of the Safer Rotherham Partnership and Cabinet Member for Community Safety, Finance and Customer Services,
- Head of Service, Community Safety and Streetscene, RMBC
- Community Safety Service Manager, RMBC
- Head of Procurement, RMBC
- Housing Services, RMBC
- CYPS Safeguarding (Evolve)
- South Yorkshire Police
- Gangmasters and Labour Abuse Authority
- Snowdrop Project
- DWP (Economic, Serious and Organised Crime)
- Migration Yorkshire (Modern Slavery risks for Unaccompanied Asylum-Seeking Children and Asylum-Seeking Adults)

The Chair would also like to thank officers in the Community Safety Team and Policy, Partnership and Intelligence Team for their work liaising with agencies in advance of the meeting and assistance with planning the review.

2.3 Summary of issues raised:

2.3.1 Community Safety Team, RMBC

Prior to the review group determining the scope of the review, officers in the Community Safety Team helpfully drew together a comprehensive briefing covering the following areas:

The Modern Slavery Charter

- Details of the Motion to Council
- Progress to date

The National Picture

- National referral mechanisms
- First responder organisations
- Duty to notify and consent
- County lines and 'cuckooing'

The Local Picture

- Referral pathways
- Safer Rotherham Partnership
- Agency involvement
- Training and awareness
- Communications

Further details were highlighted in respect of the team's work and working across the partnership.

Three areas of development were identified

- Increase understanding of the potential signs of modern slavery through training and awareness raising with partners to be delivered by the Snowdrop Project and funded through the Safer Rotherham Partnership.
- Raise awareness with the public around the signs of modern slavery and mechanisms for reporting.
- Develop and deliver of a communication strategy for modern slavery, human trafficking, county lines and other associated issues.

2.3.2 Procurement Team, RMBC

An overview of the processes in place to identify modern slavery in procurement since the Charter was introduced in 2018 was given. An area of development for the team was focus on contract management to follow up on queries or suspicions, particularly in relations to sub-suppliers and contractors. It was suggested that 'dip sampling' be built into contractual arrangements to provide levels of confidence that suppliers complied with the conditions of the Modern Slavery Charter.

A cross-service Modern Slavery Governance Group was to be established in the Council. It was important that services who had detailed knowledge of the contract specification and relationship with suppliers were represented to

share intelligence. It was outlined that there was joint activity across the South Yorkshire Combined Mayoral Authority.

It was noted that the Council had processes in place to check abnormally low bids, (which may be an indicator of labour exploitation). Data had been analysed to demonstrate that most bids were submitted within the expected range, however, assurance was given that good oversight was in place to check anomalies. Information was shared with partners, including South Yorkshire Police, if concerns were flagged.

It was recognised that awareness and levels of confidence of front-line staff, partners, business and the local community was an area for development. However, it was noted that since the Charter had been adopted, other local authorities had approached RMBC to understand its procurement processes and learn from its best practice.

2.3.3 Housing Services, RMBC

Part of the Rough Sleeping Team's role was to help identify who is at risk of modern slavery. At the time of the review, the team had a number of new staff so it was important to build capacity and knowledge to identify instances of modern slavery.

Pressures were also acknowledged in respect of the schemes to rehouse Ukrainian families and potential risks of exploitation (e.g. domestic servitude) if housing or employment was insecure.

2.3.4 CYPS Safeguarding (Evolve), RMBC

CYPS work with children and young people at risk of both CSE and CCE – those who are identified as medium and high risk. Often the same young people can be at risk of or become victims of modern slavery. Assurance was given that cases are reviewed regularly with a weekly high-level meeting taking place.

Examples of multi-agency working were given and the training had been well received i.e. exploitation such as modern slavery; know the signs to spot and how to make referrals

2.3.5 South Yorkshire Police (SYP)

This work is located in Serious Organised Crime section. It was noted that the SYP had identified areas of concerns regarding Child Criminal Exploitation (CCE) across South Yorkshire. At the time of the spotlight review, over twenty officers had been trained as victim liaison officers to identify and safeguard potential victims. Examples were given of how the team worked with the districts and partners across South Yorkshire to share intelligence, provide advice and support victims.

Areas for development include how intelligence sharing could be improved, data accuracy and avoiding duplication of tasks across agencies.

2.3.6 Gangmasters and Labour Abuse Authority (GLAA)

An overview of GLAA activity was given, with examples of how it liaised with key partners in SYMSP to protect vulnerable and exploited workers. This included reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision, as well as National Minimum Wage offences and Employment Agencies Acts.

The GLAA investigated all aspects of labour exploitation in England and Wales and also worked with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime. It also had a key role in the delivery of NRM training to partners.

2.3.7 Snowdrop Project

The project is a South Yorkshire based charity, working closely with SYP to provide support to adult victims. Support was offered to potential victims regardless of whether they were going through the NRM process, providing wrap around services and activities.

Areas of development included identifying of single points of contacts in local authorities to lead on training and liaison with staff across services. Further training on the NRM was needed to raise awareness of referral pathways. Barnsley Council was identified as an area of good practice in this field.

The project reported a delay in mental health assessment locally which may impede long term recovery, although once assessment had been completed, mental health support was of good quality.

It was noted that when potential victims had to 're-tell stories' or go through similar processes to multiple agencies, this could exacerbate existing trauma. An example was given from another local authority of potential victims not being reinterviewed as part of their housing assessment process and allowing support from advocates.

The project recommended that further work takes place on transitional safeguarding arrangements to ensure there is earlier referrals to adult services for young people requiring services who are reaching 18

2.3.8 Department for Work and Pensions (Economic, Serious and Organised Crime)

An overview of how processes and training currently work within DWP to identify and prevent modern slavery was outlined. Front of house staff were trained to spot the signs e.g. if an interpreter/family friend comes to court or a meeting and hands over passports and other documentation rather than the attendee. When traffickers are apprehended/identified, the DWP work to reimburse the victims of modern slavery e.g. charge the perpetrator for non-payment of labour. This can include taking assets away from perpetrators.

It was noted that data sharing can be problematic. An example was given of a pilot scheme which co-located a DWP investigator within a multi-agency

unit in Sussex working to tackle modern slavery. This has helped to identify instances of modern slavery and enabled data to be shared much quicker.

2.3.9 Migration Yorkshire

An overview was provided of the work of Migration Yorkshire and the main challenges and issues in relation to unaccompanied asylum seekers and modern slavery (both across South Yorkshire and the UK).

It was outlined that asylum seekers can become victims of modern slavery out of a need to seek work to support themselves or their families (financial support provided by the Government is at a basic subsistence level). Unable to work legally, paid employment would only be available through the underground economy. This is likely to be unregulated with an increased risk of exploitation. Other examples were cited of asylum seekers trafficked from hotels or dispersal accommodation.

It was noted that there are higher numbers of UASC in the systems because of increased arrivals by small boats and delays in processing claims across the asylum system. Councils have been mandated to receive more UASC through the National Transfer Scheme,

There was currently a shortage of suitable accommodation with a number of young people being placed in hotels on the south coast of England. There have been significant numbers of children going missing from hotels over recent years who were at risk of serious exploitation and harm.

There was considerable pressure on local authorities to secure appropriate placements for unaccompanied children. There have been instances elsewhere of age-disputed cases being placed in unregulated placements, which can add to vulnerability.

It was acknowledged that information sharing between Government agencies, accommodation providers and other key agencies was often problematic.

2.4 Summary of points raised in the question-and-answer session

- Clarification was sought about how intelligence was disseminated. There were established protocols to share information between certain partners, e.g Border Force, SYP and DWP. However, this was not replicated across all agencies (e.g. NHS providers, local authorities). It was noted that there were different platforms which often presented difficulties as systems did not 'talk to each other'. However, information was shared through established networks, multi-agency meetings and briefings.
- Both SYP and RMBC staff were aware of the risks of pressure being exercised on people without English as a first language and therefore the need to engage appropriate translators/interpreters was recognised. Appropriate adults would be engaged for children under 18 years. Staff were alert to signs of coercion.
- Checks on car washes, nail bars etc: the NCA, GLAA and SYP have visited car washes and nail bars within Rotherham to investigate

concerns. If there were safeguarding concerns these would be passed on to the relevant bodies.

- SYP analysed data to examine patterns, location and suspected perpetrators. This information was shared at the multi-agency SYMSP. SYP also worked closely with Neighbourhood teams in respect of exploitation and organised crime in 'hotspots'.
- All intelligence reports were broken down into who submits (e.g. GPs, local authorities, members of the public), who it concerns, relevant information and agency contacts. It was noted that with the move to online processes (such as benefit claims), it may be harder to identify concerns because there was no longer face-to-face contact.
- Training and awareness of staff had been disrupted during the pandemic but this was being rolled out again. It was noted that training programmes such as domestic abuse and CSE sessions have common themes of "how to spot the signs" and raise concerns via safeguarding or other routes. GLAA have good working relationships with Housing and Community Protections officers and were key in identifying risks and concerns of modern slavery as unscrupulous landlords can exploit tenants through benefit fraud.
- At present, social workers within local authorities conduct age assessments if children have no documentation. Home Office policy states that unless the claimant's physical appearance/ demeanour 'very strongly suggests that they are significantly over 18 years of age' they should be treated as a child'. However, there is no single reliable method for making precise estimates, and no conclusive medical test so the margin of error can be considerable. It was noted that CYPS only have a certain amount of people trained to conduct assessments and the process is time consuming. It was suggested that some adults may assert or be coerced to state that they are under 18 as they are aware that additional legal and safeguarding protection is given to children in modern slavery and/or asylum claims.
- Clarification was sought on the pathways of support for victims of modern slavery. It was highlighted that police often come into contact with victims first. However, there is often a delay in getting appropriate support until the referral to the NRM 'kicks in' (if victims choose to go through NRM process). It was noted that the NRM process is complex and there is a backlog in processing applications. As with other complex areas of safeguarding, there are risks that victims may 'drop out' and not wish to proceed. Snowdrop offer support for victims who may not wish to make a referral to NRM. Referrals are made into CYPS and ASC teams at same time as NRM assessments. If adults do not meet the NRM criteria, the Complex Lives Team will give support if there is an assessed need.
- It was noted that 'cuckooing' (a practice where people take over a person's home and use the property to facilitate exploitation) is a complex area and victims are often not recognised as modern slavery victims. It was suggested that this was an area that needed a multi-agency response and good intelligence sharing.

- RMBC offer support to children or young people who are not in mainstream education through the NEET and Early Help pathways. If the child is excluded this should be picked up with the Pupil Referral Unit or Elected Home Education Team. Assurance was given that there was regular oversight of children and young people not in education or at risk of exclusion to assess levels of risk and vulnerabilities, including those of criminal exploitation and/or modern slavery.

2.5 Recommendations

2.5.1 By its very nature, this spotlight review was an overview rather than in-depth analysis of the effectiveness of partnership arrangements in place to address modern slavery in Rotherham. In the course of the review, the review group had the opportunity to discuss with partners the key challenges faced in dealing this issue, explore what was working well and exchange ideas on areas for improvement.

2.5.2 The review group thanked the Cabinet Member, officers and partners for their openness in responding to enquiries. They were assured by the evident commitment across the South Yorkshire Modern Slavery Partnership to tackle exploitation. The examples given showed the complexity and sensitivity of this work and the part each agency plays.

2.5.3 It was noted that the Safer Rotherham Partnership Plan 2022-25 cites tackling modern slavery and human trafficking as one of its priorities. The review hopes that the observations and recommendations make a timely contribution to this agenda.

2.5.4 The recommendations are as follows:

- i. That the SRP gives consideration to rolling out a targeted learning and development offer/campaign to raise awareness of modern slavery, how to spot the signs, risks and how to raise concerns and make referrals:
 - a) to front-line staff across key agencies;
 - b) to elected members;
 - c) to the general public and targeted business such as letting agencies (commercial and residential).
- ii. That the SRP gives consideration to mapping the local modern slavery landscape to identify high risk industries and hot spots (using the example of Bristol City Council).
- iii. That consideration is given to establishing an RMBC Internal Governance Group including representation from services who may encounter modern slavery (for example, Procurement, Licensing, Environmental Health, Training Standards, Neighbourhood teams, Social Care and Housing).
- iv. That consideration is given to how young adults at risk or experiencing modern slavery are safeguarded during the transition from children to adult services and are age assessed appropriately.

- v. That consideration is given to developing referral pathways to ensure that modern slavery victims (both adult and child) have access to appropriate support (housing, advocacy, mental health support) on a timely basis.
- vi. That consideration is given to re-launching the Strategic Partnership information sharing group at the earliest opportunity to improve the way that agencies can share data and intelligence, including examining how IT systems can work better together.
- vii. That consideration is given to widening the levels of investigation and auditing of contracts procured by the Council to focus on the 'layers' of sub-contractors, including binding specifications to audit or 'dip sample' contracts along the supply chain.
- viii. That consideration is given to how the Procurement Team can engage with the SYMCA Supply Chain Advisor to improve processes, joint working and awareness.
- ix. That consideration be given to allowing victim advocates to make representations to Housing Assessment Panels on behalf of victims of modern slavery.

3. Options considered and recommended proposal

- 3.1 Members are recommended to approve the recommendations.

4. Consultation on proposal

- 4.1 In its review, the review considered evidence from the Cabinet Member for Community Safety, Finance and Customer Services and officers and key partners. These are outlined in paragraph 2.2.8.

5. Timetable and Accountability for Implementing this Decision

- 5.1 Implementation of any recommendation made to a partner organisation is at the discretion of the relevant partner organisation.
- 5.2 Implementation of recommendations addressed to a directorate of the Council is a matter reserved to the relevant directorate. Timescales for Council directorates responding to scrutiny recommendations are outlined in the Overview and Scrutiny Procedure Rules contained in the Constitution of the Council.

6 Financial and Procurement Advice and Implications

- 6.1 Any financial or procurement implications arising from this report will be considered as part of the Cabinet response to its recommendations.

7. Legal Advice and Implications

- 7.1 There are no legal implications directly arising from this report.

8. Human Resources Advice and Implications

8.1 There are no HR implications directly arising from this report.

9. Implications for Children and Young People and Vulnerable Adults

9.1 The review links to the following Council Plan themes:

- People are safe, healthy and live well
- Every child able to fulfil their potential

9.2 In addition, the review links explicitly to Safer Rotherham Partnership priority (2022-25) of Protecting Vulnerable Adults:

- Protecting and supporting vulnerable adults... from harm, crime, and becoming victims of exploitation, as well as, preventing them from becoming victims of modern slavery.

10. Equalities and Human Rights Advice and Implications

10.1 Members of the OSMB review group have due regard to equalities and human rights in developing recommendations.

11. Implications for CO₂ Emissions and Climate Change

11.1 There are no implications for CO₂ emissions and climate change directly arising from this report.

12. Implications for Partners

12.1 The implications for partners are described in the main sections of the report. Implementation of any recommendation is at the discretion of the relevant partner organisation. The recommendations contained in this report are offered acknowledging the contributions that have been made by each of the partner organisations.

13. Risks and Mitigation

13.1 There are no risks directly arising from this report.

Accountable Officer(s)

Emma Hill, Head of Democratic Services and Statutory Scrutiny Officer
Caroline Webb, Senior Governance Advisor

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