

Committee Name and Date of Committee Meeting

Cabinet – 16 October 2023

Report Title

Cabinet's Response to the Scrutiny Review – Modern Slavery

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

No

Strategic Director Approving Submission of the Report

Paul Woodcock, Strategic Director of Regeneration and Environment

Report Author(s)

Steve Parry, Community Safety Officer.

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Ward(s) Affected

Borough-Wide

Report Summary

A Scrutiny spotlight review into Modern Slavery took place with Council Officers and partner agencies on the 1st of November 2022. The recommendations from the meeting, undertaken by the Overview and Scrutiny Management Board, were presented to Cabinet on the 19 June 2022. This report sets out the proposed Cabinet response to the recommendations from the review.

Recommendations

1. That the Cabinet response to the Scrutiny Review Recommendations in respect of Modern Slavery as set out in section 1.4 of this report be approved.

List of Appendices Included

N/A

Background Papers

[Report to Cabinet 19th June 2023, 'Scrutiny Review Recommendations – Modern Slavery](#)

Consideration by any other Council Committee, Scrutiny or Advisory Panel

Cabinet – 19 December 2022

Council Approval Required

No

Exempt from the Press and Public

No

Cabinet’s Response to the Scrutiny Review – Modern Slavery

1. Background

- 1.1 In July 2018, the Council resolved to adopt the Co-operative Party’s Charter against Modern Slavery. 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 emerge. 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 on 1st November 2022. Its methodology and invited witnesses are detailed in Section 2.2 of the report to Cabinet on 19th June 2023.
- 1.4 Nine recommendations emanating from the spotlight review were presented in the report to Cabinet on 19th June 2023. The table below lists those recommendations and how it is proposed they will be addressed, for the consideration and recommended approval of Cabinet:

No	Recommendation	Response	Activity
1	That the Safer Rotherham Partnership (SRP) consider rolling out a targeted learning and development offer/campaign to raise awareness of modern slavery, how to spot the signs and risks and how to raise concerns and make referrals: <ul style="list-style-type: none"> To front line staff across agencies. To elected members. To the public and targeted business such as letting agencies (commercial and residential) 	Recommend that this is Accepted	Continuation and development of the Modern Slavery training offer across the partnership. Discussions have taken place with local training providers to assist in facilitating this. SRP funding is available through 2023/24 to contribute where necessary. A Members Seminar is planned for September 2023, jointly delivered by Community Safety, South Yorkshire Police and the Gangmaster and Labour Abuse Authority.
2	That the SRP considers mapping the local modern slavery landscape to identify high risk industries and ‘hot spots’	Recommend that this is Accepted	Discussions have taken place through the South Yorkshire Modern Slavery Tactical Practitioners Partnership Group and agreement obtained for the South Yorkshire Police

			Modern Slavery Analyst to work with Rotherham on this process. Similar agreement reached with the Gang master's and Labour Abuse Authority ((GLAA). We will also work with Serious Organised Crime officers, both Police and Council in respect of this process.
3	That consideration be given to establishing an RMBC internal governance group, including representation from services who may encounter modern slavery (e.g., Procurement, Licensing, Environmental Health, Trading Standards, Housing, Neighbourhoods and Social Care)	Recommend that this is Accepted	Complete: The first meeting of the Council's Modern Slavery Steering Group was held on Thursday 29 th June 2023. The meeting focussed on agreeing Term of Reference, including membership and frequency of meetings. Four Further meetings have been arranged throughout 2023/2024.
4	That consideration is given to how young adults at risk of experiencing modern slavery are safeguarded during the transition from children to adult services and are age assessed appropriately	Recommend that this is Accepted	Progression to be discussed at the Modern Slavery Steering Group.
5	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) on a timely basis	Recommend that this is Accepted	Local, established homelessness pathways and National Referral Mechanism (NRM) pathway already apply. These existing pathways will be communicated to all partners for clarity. Quality assurance mechanisms will be reviewed to ensure the pathways are effective and there are no barriers to accessing support, which will inform future consideration of any further pathways required.
6	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	Recommend that this is Accepted	At the time of the OSMB review, there was an expectation that the South Yorkshire Modern Slavery Strategic Partnership Group would continue to meet, however regional resources and funding are no longer available. As a result, the Council's Community Safety team will work with local partners to ensure data sharing takes place through the South Yorkshire Modern Slavery Tactical Partnership

			Group, the RMBC Modern Slavery Steering Group and Safer Rotherham Partnership Protecting Vulnerable Adults and Protecting Vulnerable Children's partner groups. Implementing IT systems or linking IT systems can come at significant expense and there are no resources available currently for this work and therefore the focus will remain on strengthening existing processes for sharing information and intelligence. The opportunity for shared IT will be further explored alongside the appropriate funding requirements.
7	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	Recommend that this is Accepted	Training will be developed and delivered to the Council's Contract Managers to assist them to 'spot the signs' of potential employment exploitation, particularly in relation to sub-contracting and supply chains following the award of Council contracts.
8	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	Recommend that this is Accepted	Well established links already exist between the Councils Procurement Service manager and the SYMCA Supply Chain Advisor with regular meetings taking place between the two. The Councils Procurement Service Manager is a core member of the Councils Modern Slavery Steering Group.
9	That consideration be given to allow victim advocates to make recommendations to Housing Assessment Panels on behalf of victims of modern slavery	Recommend that this is Accepted	The process already in place in respect of the Council's Housing Assessment Panels does allow for third party representation and this would include the presentation of advice and recommendations for the panels to consider in respect of victims of modern slavery.

2. Key Issues

2.1 Modern slavery is complex, serious and often related to organised crime. Under Section 17 of the Crime and Disorder Act, councils have a duty to do

all that they can to prevent crime and disorder in their areas, which will include tackling modern slavery and human trafficking.

- 2.2 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 which runs from April 2022 to March 2025.

3. Options considered and recommended proposal

- 3.1 Option 1 – that Cabinet approves the proposed responses to the recommendations as set out at 1.4 of this report. This is the recommended option.
- 3.2 Option 2 – that Cabinet does not accept the proposed responses as set out at 1.4 of this report. In which case further direction will be required in order to identify appropriate actions and associated resources.

4. Consultation on proposal

- 4.1 Where relevant, discussions have taken place with partners in relation to the recommendations and required activity at section 1.4 above This has included the South Yorkshire Modern Slavery Tactical Practitioners Partnership Group, South Yorkshire Police Modern Slavery officers and the Gangmaster's and Labour Abuse Authority.
- 4.2 The Overview and Scrutiny Management Board scrutiny review took evidence from partners including South Yorkshire Police, Gangmaster's and Labour Abuse Authority, Snowdrop Project (South Yorkshire charity that provides support to survivors of modern slavery and human trafficking), Department for Work and Pensions (Economic, Serious and Organised Crime) and Migration Yorkshire.

5. Timetable and Accountability for Implementing this Decision

- 5.1 Implementation of the accepted recommendations will be driven by the Council's newly established Modern Slavery Steering Group with the aim of implementing the activity noted at section 1.4 above by March 2024. The Steering Group is chaired by the Head of Community Safety and Regulatory Services. Progress will be reported to the Safer Rotherham Partnership Protecting Vulnerable Adults Priority Group which is accountable to the Safer Rotherham Partnership Board.
- 5.2 Implementation of any recommendation made to a partner organisation is at the discretion of the relevant partner organisation.

6. Financial and Procurement Advice and Implications

- 6.1 There are no additional financial implications arising from this report with the delivery of the recommendations to be contained within existing budgets.

6.2 Procurement will support activity and offer advice through the Modern Slavery Steering Group.

7. Legal Advice and Implications

7.1 There are no direct implications arising from the specific recommendations detailed in this report, however in approving the proposed responses as set out at paragraph 1.4 of this report the Council will continue to ensure compliance with their legal duties and the commitment made surrounding Modern Slavery.

7.2 As set out at paragraph 2.1 of this report the Council has a duty to consider crime and disorder implications under Section 17 of the Crime & Disorder Act 1988. As Modern Slavery has been adopted as a key crime and disorder priority, the Council [as part of the Safer Rotherham Partnership] has a duty to exercise its various functions with due regard to the likely effect of the exercise of those functions on crime and disorder and a duty to do all that it reasonably can to prevent crime and disorder in its area, specifically in this case Modern Slavery.

7.3 The Council has a number of statutory duties under the Modern Slavery Act 2015 and in adopting the Co-operative Party's Charter against Modern Slavery the Council has made a commitment to also go further, approving the proposed responses to address the recommendations of the spotlight review links to those duties and commitment.

8. Human Resources Advice and Implications

8.1 There are no direct implications arising from the recommendations detailed in this report.

9. Implications for Children and Young People and Vulnerable Adults

9.1 The recommendations links to the following Council Plan themes:

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

In addition, addressing the recommendations links explicitly to the SRP priorities 2022 – 2025 of:

Protecting Vulnerable Children

- Work together with partners and the public to reduce the risk of child sexual exploitation (CSE) and child criminal exploitation (CCE) ensure accurate recording of investigations and quality outcomes.
- Increase understanding of CSE and CCE, reporting, and responses, with professionals and the public through training and awareness raising

- Increase understanding of CSE and CCE, how it affects our communities and how our actions as a partnership improve the lives of children.

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 The Cabinet report, “Scrutiny Review Recommendations – Modern Slavery” of 19 June 2023 noted that members of the OSMB review group paid due regard to equalities and human rights in developing the recommendations.

10.2 A full Equality Impact Assessment was undertaken to support the development of the Safer Rotherham Partnership Plan 2022-25 which includes Modern Slavery and Human Trafficking. This was presented to full Council on 5th October 2022. The report shows how crime and community safety risks were assessed through data analysis, considering victim and offender demographic information. It also describes the consultation process that took place with multiple stakeholders including Equality Act 2010 protected characteristic groups. The Safer Rotherham Partnership plan meets the needs of different communities and groups by driving action to achieve its key priorities which are fully inclusive of protected characteristic groups. It identifies and puts in place actions to protect the most vulnerable people and communities within the Borough. By addressing the crime and community safety issues impacting Rotherham’s diverse communities, the policy is designed to promote equality and good community relations.

11. Implications for CO2 Emissions and Climate Change

11.1 A Carbon Impact Assessment was undertaken to support the development of the Safer Rotherham Partnership Plan 2022-25 which includes Modern Slavery and Human Trafficking. This was presented to full Council on 5th October 2022. The SRP coordinates existing partner activity and resources; therefore no specific impacts have been identified arising from the recommendations detailed in this report.

12. Implications for Partners

12.1 Consideration will be given to the impact the recommendations have on Safer Rotherham Partnership Board members and wider partner organisations. To achieve the most comprehensive coverage across Rotherham, the Council will need support from its partners through existing partnership working arrangements.

13. Risks and Mitigation

13.1 There are no risks directly rising from this report.

14. Accountable Officers

Sam Barstow, Assistant Director, Community Safety and Street Scene
Emma Ellis, Head of Service, Community Safety and Regulatory Services

Approvals obtained on behalf of Statutory Officers: -

	Named Officer	Date
Chief Executive	Sharon Kemp	02/10/23
Strategic Director of Finance & Customer Services (S.151 Officer)	Judith Badger	28/09/23
Assistant Director, Legal Services (Monitoring Officer)	Phil Horsfield	28/09/23

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This report is published on the Council's website.