

Modern Slavery Steering Group Action Plan - Post Overview and Scrutiny Management Board
'Spotlight Review' which took place in November 2022.

No:	Action:	Lead Action Owner:	By When:	Progress Update:	Status:
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:				
1a	To front line staff across agencies.	Steve Parry	Apr-24	<p>Training proposal developed by the 'Snowdrop Project' to deliver bespoke training to Front Line Staff, Single Point of Contact Officers (SPOC's) and Elected Members. Dates and funding to be agreed. A refreshed programme of 'Introduction to Human Trafficking' training courses for front line staff began in 2022-23, delivered by the Snowdrop Project. Three dates were delivered as follows:</p> <p>15th November 2022 7th December 2022 18th January 2023</p> <p>October 2023 - Meeting to be held 18 October to progress training delivery for remainder of 2023 and into Training 2024-</p> <p>Rotherham Safeguarding Adults Board commissions training on Modern Slavery and Human Trafficking as part of their annual training offer to partners. This is available to front-line workers and managers. Community Safety Officers were involved in the quality assurance of lesson plans as part of the commissioning process in 2023. The course duration is three hours. The course aim of the course is to help participants to understand human trafficking and the concept of modern slavery and its various forms.</p> <p>Objectives</p> <ul style="list-style-type: none"> • Define and explain the meanings of adult and child trafficking, human exploitation and modern slavery. • Be aware of and make sure to respect the rights of victims of human trafficking and modern slavery. • Act in line with your own responsibilities as a professional and be aware of the responsibilities of other authorities in the United Kingdom e.g. Prevent and Channel Panel. • Understand County Lines. <p>Currently four courses are commissioned per year. Safer Rotherham Partnership social media content is regularly posted to raise awareness of modern slavery. Further work is still needed to target communications at the public and businesses. December 2023 - As part of Safeguarding Adults Week the GLAA delivered a 'labour exploitation in the care sector' presentation to colleagues working in the care sector. Further training is planned.</p>	Action progressing and on track
1b	To elected members.	Steve Parry	Apr-24	<p>Member Seminar arranged for 21st November 2023, jointly delivered by RMBC, SY Police and Gangmasters & Labour Abuse Authority (GLAA)</p> <p>December 2023- This seminar took place. Member Seminars to be provided annually - 2024 date(s) to be agreed/confirmed.</p>	Action progressing and on track
1c	To the public and targeted business such as letting agencies	Steve Parry	Apr-24	<p>Safer Rotherham Partnership social media content is regularly posted to raise awareness of modern slavery. Further work is still needed to target communications at the public and businesses and is being considered as part of the 2024 training programme.</p>	Action progressing and on track
2	That the SRP considers mapping the local modern slavery landscape to identify high risk industries and 'hot spots'	Steve Parry	Jan-24	<p>June 2023 – 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 Gangmasters and Labour Abuse Authority (GLAA). The Council will also work with Serious Organised Crime officers, both Police and Council in respect of this process.</p> <p>October 2023 - Discussions have taken place at the county-wide South Yorkshire Modern Slavery Tactical Partnership Group in respect of this and the Police Analyst is about to commence work on preparing a 'product' for all four local authorities. Due to the level of work involved it may be late this year or early next before completion.</p> <p>December 2023 - Product still not available.</p>	Action progressing and on track

3	That consideration be given to establishing an RMBC internal governance group, including representation from services who may encounter modern slavery	Emma Ellis	Jun-23	The first meeting of the Council's Modern Slavery Steering Group chaired by Head of Service, Community Safety and Regulatory Services was held on Thursday 29 th June 2023. The meeting focussed on agreeing Term of Reference, including membership and frequency of meetings. The group now meets on a regular basis with meetings set for the remainder of 2023/2024.	Action completed
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	Andrew Wells/Kevin Buck	Apr-24	December 2023 - Andrew Wells and Kelly White, both core members of the MS Steering Group to meet to discuss and report back to group in due course.	Action progressing and on track
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	Steve Parry	Jun-23	October 2023 - Local, established homelessness pathways and National Referral Mechanism (NRM) pathway already apply. These existing pathways will be communicated to all partners and included in future training development for clarity. Quality assurance mechanisms will be reviewed to ensure the pathways are effective and there are no barriers to accessing support.	Action completed
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	Emma Ellis/Steve Parry	Jan-24	Although the Strategic South Yorkshire Modern Slavery Group has not met for over 12 months, the county-wide South Yorkshire Modern Slavery Tactical Practitioners Partnership Group, chaired by South Yorkshire Police has continued to meet on a regular basis. Approaches have been made with partners to recommence the South Yorkshire Strategic Group meetings, although yet, no date has been set. Community Safety team will 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. The steering group will continue to explore opportunities to share information and intelligence to improve outcomes. October 2023 - No change in respect of the re-introduction of the South Yorkshire Modern	Action progressing and on track
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	Karen Middlebrook/Steve Parry	Feb-24	As part of the overall training programme, the GLAA have agreed to deliver training to appropriate Council Contract and Procurement Managers in respect of labour exploitation. Delivery style and required content has been discussed through the Modern Slavery Steering Group. Anticipated that training will be delivered during spring - summer 2024. Next steps in relation to auditing contracts will be monitored through the Modern Slavery Steering Group.	Action progressing and on track
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	Karen Middlebrook	Jun-23	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.	Action completed
9	That consideration be given to allow victim advocates to make recommendations to Housing	Sandra Tolley	Jun-23	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 by victim advocates for the panels to consider in respect of victims of modern slavery.	Action completed
COMPLETED ACTIONS					

	Council Actions:	Action owner	Progress note:	
	Incorporate the recommendations of the Council's Overview and Scrutiny Management Board Modern Slavery and Human Trafficking Spotlight Review (November 2022) within this action plan and agree action owners to ensure timely implementation	Emma Ellis, Head of Service, Community Safety and Regulatory Services	Recommendations received and incorporated into Modern Slavery Action Plan, as above and overseen by the Councils Modern Slavery Steering Group.	
	Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	Karen Middlebrook	All relevant officers have now completed the course and passed the exam. Will seek to renew the training on an 3-yearly cycle.	
	Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance. (Section 54 of the Modern Slavery Act is a transparency in supply chains measure that requires businesses who a) carry on a business, or part of a business in the UK; b) supply goods and services; and c) have an annual turnover of £36million or more to produce an annual statement on the steps they are taking to prevent modern slavery in their supply chains and own organisation.)	Karen Middlebrook / Legal	<p>For all tenders undertaken above the EU threshold, the Council is mandated to the use the Selection Questionnaire (SQ) set by Central Government. One of the sections within this SQ is compliance with the Modern Slavery Act. For these types of tender, anyone failing to comply with the Act will not be shortlisted.</p> <p>The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act. The use of this tool has identified some suppliers, where direct engagement is now taking place through the Contract Managers within service areas to put them in a compliant manner.</p> <p>Further work is required by Legal to strengthen the Council's Terms and Conditions in this regard.</p> <p>Processes also require development in relation to contracts that are below threshold or where they are a call off from a framework agreement.</p> <p>The Council is now addressing this as contracts expire. New terms and conditions are drafted by Legal Services and entered into by all parties.</p> <p>Now complete and in place.</p>	

<p>Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.</p> <p>(Low cost tenders can be a sign of exploitation and should be challenged. Local Authorities can use Regulation 69 of the Public Contracts Regulations 2015 (Abnormally low tenders) which means they can require tenderers to explain the price or costs proposed in the tender.)</p>	Karen Middlebrook / Sam Barstow	<p>If the Council receives an abnormally low tender it would challenge this in accordance with Regulation 69 and this is detailed in the Council's tender template documentation for above threshold tenders.</p> <p>Working relationships within the Council have been strengthened with Procurement and Community Safety to try and tie this link. A list of high risk industries has been gathered and an understanding between the 2 teams that where an abnormally low tender is received in any of these industries, dialogue to take place to determine an agreed course of action.</p> <p>Further guidance has been developed.</p>	
<p>Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.</p>	Karen Middlebrook / Sam Barstow	<p>Transparency within supply chains is supported and positively endorsed by Trade Unions and both national and local levels. Work has been done to include a section in the Council's updated tendering document that's highlights to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.</p>	
<p>Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery</p>	Karen Middlebrook / Sam Barstow	<p>The Whistleblowing policy has been updated to include explicit reference to modern slavery. The Council's whistleblowing and serious misconduct policy is publicised and available on the internet and clear reference is made within the policy to modern slavery.</p>	
<p>Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery</p>	Karen Middlebrook / Sam Barstow	<p>Work complete to streamline standard wording around Safeguarding within the Councils template tender documentation. The safeguarding section (8) of the Council's 'Invitation to Tender' document has been updated in respect of the policies that tendering organisations have in place. This includes the requirement for a 'Whistleblowing policy that is accessible to staff and volunteers'. (Section 8.2(1))</p>	
<p>Review its contractual spending regularly to identify any potential issues with modern slavery.</p>	Karen Middlebrook / Sam Barstow	<p>The Council has signed up to TISCreport.org to help track suppliers and their compliance with the Act.</p> <p>The Councils Modern Slavery Lead is a member of the Councils Commissioning Board and guidance has been developed for Commissioning Officers or those with relevant responsibilities.</p>	
<p>Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed</p> <p>(It's important that suppliers also have aware of what modern slavery is, what the signs are and how they can tackle)</p>	Karen Middlebrook / Sam Barstow	<p>The Council has made systematic contact with non-compliant companies as identified through TISC-report. In many cases companies are found to be compliant however publications are not linked or verified so work is ongoing to support suppliers</p> <p>Linked with the action above and follow-up with companies however this now needs further review.</p>	

	<p>Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery. (This reiterates the duty for local councils to report concerns using the national referral mechanism, and a public commitment they will do that for their own contractors too)</p>	Sam Barstow	A system is in place to support referrals regarding companies of concern.	
	Report publicly on the implementation of this policy annually	Sam Barstow	A report is presented annually to Cabinet in respect of the Modern Slavery Transparency Statement.	
	<p>Confirm Policy Arrangements both in relation to Childrens and Adult (To ensure that effective Policy is in place which makes clear reference to modern slavery in relation to safeguarding practice/procedure)</p>	Vicky Schofield/Andrew Wells	Complete.	
	<p>Develop an outline plan for compliance against the MS Charter requirements. (Ensure that the Procurement service is working toward compliance with the commitments made within the MS Charter)</p>	Karen Middlebrook / Legal	Complete.	
	Explore available specialists training with wider Safeguarding Training	Sharon Clarke	All levels of Social Workers have had training and confirming that persons whom have "No recourse to public funds" are covered within the procedures.	
	Ensure basic e-learning is available to front line staff and manager	Steve Parry	E learning provided on the Directions Councils website	

	Ensure engagement in wider partnership activity to disrupt, prevent and address modern slavery	Steve Parry	Council in regular attendance at appropriate/relevant meetings.	
	Establish operational links to support response to intelligence and information (Engage with the Home Office, Gang Master Licensing Authority, SYP and Border Force to ensure that proactive operational links are in place and that Rotherham benefits from operational partnership activity)	Sam Barstow	Ongoing links established and continue through existing structures.	
	Develop a robust Transparency Statement on behalf of the Council	Sam Barstow	A refreshed Modern Slavery Transparency Statement is presented to Cabinet annually for approval prior to publication on the Councils website	
	Confirm Policy Arrangements both in relation to Children's and Adult. (Ensure that effective Policy is in place which makes clear reference to Modern Slavery (MS) in relation to safeguarding practice/procedure)	Vicky Schofield/Andrew Wells	Complete	
	Develop an outline plan for compliance against the MS Charter requirements. (Ensure that the Procurement service is working toward compliance with the commitments made within the MS Charter)	Karen Middlebrook / Legal	Complete	

	<p>Improve the Councils ability to identify and respond to (MS).</p> <p>(Working with partners, seek opportunities to enhance the expertise and ability within the Council to respond to Modern Day Slavery)</p>	Steve Parry	<p>The Council is a member of the South Yorkshire (MS) Partnership</p> <p>It also is represented on the South Yorkshire (MS) Practitioners Group and the county-wide and local Organised Crime Boards.</p> <p>A total of 11 Council officers have now been trained as (MS) Single Points of Contact Officers (SPOC's). This has significantly increased knowledge and expertise within the Council to identify and respond to (MS).</p> <p>Through work with the South Yorkshire (MS) Partnership, a detailed quarterly report is now to be presented to the Safer Rotherham Partnership Board to inform its activities in tackling (MS).</p>	
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--