



Nottingham
City Council

MODERN SLAVERY STATEMENT 2025/26

Reporting Period

1 April 2025 to 31 March 2026

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Modern Slavery Statement

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Introduction

Nottingham City Council has a zero-tolerance approach to modern slavery, servitude, forced labour and human trafficking. The Council is committed to acting ethically, transparently and collaboratively to prevent exploitation across its operations, workforce, commissioned services and supply chains.

This statement describes the actions undertaken by Nottingham City Council between 1 April 2025 and 31 March 2026 to identify, prevent and respond to modern slavery and human trafficking. It is published in accordance with Section 54 of the Modern Slavery Act 2015.

The Council recognises that modern slavery remains a significant safeguarding and human rights issue. During the reporting period, the Council continued to work with partners, suppliers and communities to identify exploitation, protect victims and strengthen measures to reduce the risk of modern slavery occurring within its activities and supply chains.

Governance and Responsibilities

The Council is committed to eliminating modern slavery and human trafficking from its operations and supply chains.

Responsibility for preventing, identifying and responding to modern slavery is shared across a number of Council services, including Community Protection, Adult Social Care, Children's Services, Housing Services, Commercial and Procurement Services and Human Resources.

The Council worked closely with Nottinghamshire Police, the Gangmasters and Labour Abuse Authority (GLAA), safeguarding partners and other statutory agencies to identify, investigate and address concerns relating to modern slavery and exploitation.

As a designated First Responder organisation, the Council continued to fulfil its duty to identify and refer potential victims through the National Referral Mechanism (NRM).

Organisational Structure and Supply Chains

Nottingham City Council is a unitary authority serving more than 300,000 citizens and delivering a broad range of services both directly and through commissioned and contracted providers. Details of the Council's structure and services are set out in Appendix A.

The Council operates solely within the United Kingdom. Whilst the majority of suppliers are UK-based organisations, the Council recognises that supply chains supporting the delivery of services can be complex and may extend internationally through contractors and subcontractors.

The Council expects all suppliers, contractors and service providers to operate ethically and comply with legislation designed to prevent modern slavery, labour exploitation and human trafficking.

Policies and Procedures

During the reporting period, the Council maintained a range of policies, strategies and procedures that supported its commitment to preventing modern slavery and promoting ethical employment practices.

Employment and Governance Policies

Whistleblowing Policy

The Whistleblowing Policy enables employees, contractors and others working on behalf of the Council to raise concerns without fear of victimisation, discrimination or disadvantage.

Concerns relating to suspected modern slavery, labour exploitation or unethical practices may be raised through management, safeguarding routes, the Monitoring Officer, Internal Audit and Counter Fraud, the Whistleblowing Policy or relevant external agencies.

Employee Code of Conduct

The Employee Code of Conduct sets out the standards of behaviour expected of employees and reinforces the requirement to act with integrity, professionalism and accountability.

Recruitment Policy

The Council recruited employees through East Midlands Shared Services and utilised a managed service provider for agency workers. Identity verification, right-to-work checks and other pre-employment checks were undertaken to minimise the risk of labour exploitation.

Equality, Diversity and Inclusion Policies

The Council continued to promote equality, inclusion and fair treatment through its Equality, Diversity and Inclusion policies and practices.

Commercial and Procurement Framework

Commercial and Procurement Strategy 2025-2029

The Commercial and Procurement Strategy supports the delivery of economic, social and environmental benefits through procurement activities whilst promoting ethical standards and reducing the risk of exploitation within supply chains.

Business Charter

The Nottingham City Council Business Charter promotes ethical business practices, transparency, workforce development and responsible employment standards.

Construction Charter

The Construction Charter supports responsible procurement practices and encourages signatories and their supply chains to maintain high standards relating to employment practices, health and safety, training and workforce engagement.

Safeguarding Framework

Domestic and Sexual Violence Strategy 2021-2030

The strategy forms part of the Council's wider safeguarding & commissioning frameworks and recognises links between exploitation, domestic violence and abuse and modern slavery.

Risk Assessment, Due Diligence and Supply Chain Management

During the reporting period, the Council continued to assess and manage the risk of modern slavery across its operations, commissioned services and supply chains.

Whilst the risk within the Council's directly employed workforce was considered relatively low due to established recruitment, employment and safeguarding controls, the Council recognised that risks may arise within commissioned services, contracted activities and wider supply chains.

The following were identified as presenting a higher risk of modern slavery and labour exploitation:

- Construction and capital projects
- Adult social care and commissioned care services
- Cleaning, catering and security services
- Waste management and environmental services

- Temporary and agency labour
- Transport and hospitality sectors.

These sectors were considered higher risk due to their reliance on lower-paid labour, migrant labour, agency workers, subcontracting arrangements, labour-intensive activities and complex supply chains.

To mitigate these risks, the Council:

- Applied modern slavery considerations within procurement and commissioning processes.
- Followed best practice guidance relating to modern slavery risks within supply chains.
- Undertook supplier due diligence and risk assessments where appropriate.
- Excluded suppliers with relevant convictions under the Modern Slavery Act 2015 in accordance with procurement regulations and procedures.
- Sought assurance from suppliers regarding measures in place to prevent modern slavery and labour exploitation.
- Included contractual clauses requiring compliance with the Modern Slavery Act 2015 and extending those obligations to subcontractors where appropriate.
- Worked with suppliers to address identified risks and support continuous improvement.
- Monitored supplier performance through established contract management arrangements and took action where contractual requirements were not met.
- Utilised approved recruitment agencies and maintained robust right-to-work and pre-employment checking procedures.
- Maintained whistleblowing, safeguarding and reporting mechanisms to enable concerns to be raised and addressed.
- Worked with partner agencies to identify, safeguard and support potential victims.

Partnership Working

During the reporting period, Nottingham City Council continued to adopt a multi-agency approach to tackling modern slavery and labour exploitation.

The Council worked closely with Nottinghamshire Police, the GLAA, safeguarding partnerships, housing providers, health organisations and voluntary sector partners to identify risks, support victims and investigate concerns.

Information relating to suspected offences was shared through established intelligence arrangements and joint operations were undertaken where appropriate.

The Council also continued to participate in multi-agency Slavery Exploitation Risk Assessment Conference (SERAC) meetings, which enabled partners to review risks, coordinate interventions and agree actions to safeguard vulnerable individuals.

Identifying and Supporting Victims

Adult Safeguarding

Under the Care Act 2014, the Council has statutory responsibilities to investigate or arrange investigations where adults with care and support needs may be experiencing abuse or neglect, including modern slavery and trafficking.

Where individuals did not meet Care Act eligibility criteria, support and advice remained available through specialist services including the Slavery Exploitation Team (SET).

Children's Services

Children's Integrated Services continued to operate a contextual safeguarding approach, recognising risks that may occur outside the family home, including exploitation, trafficking and modern slavery.

The Adolescence Service worked to prevent exploitation and support young people to exit situations of harm.

The Council recognises modern slavery as a form of child abuse. Clear referral pathways remained in place to ensure concerns were reported promptly and referred to the appropriate safeguarding service. Where appropriate, referrals were made into the National Referral Mechanism.

Staff were supported through inter-agency safeguarding procedures and guidance relating to modern slavery and child exploitation.

Slavery Exploitation Team (SET)

Nottingham's commitment to detecting and preventing exploitation continued to be demonstrated through the work of the Slavery Exploitation Team (SET).

During the reporting period, SET:

- Received and coordinated referrals relating to exploitation, trafficking and modern slavery.
- Worked with partner agencies to identify victims and manage risk.

- Developed and maintained referral pathways for known or suspected cases.
- Coordinated and chaired monthly SERAC meetings.
- Supported the development of multi-agency action plans.
- Undertook joint agency visits to support a victim-centred approach.
- Delivered presentations and workshops to internal colleagues and external partners.
- Worked with the Safeguarding Adults Board to develop awareness resources and briefings.

The Nottingham model continued to be recognised within Local Government Association guidance as an example of good practice.

Housing Services

Housing Services managed approximately 24,727 properties during the reporting period and continued to work closely with Nottinghamshire Police, SET and safeguarding partners.

As part of the multi-agency SERAC arrangements, Housing Services supported activity aimed at identifying exploitation, supporting victims and addressing risks within communities.

During 2025/26, the Tenancy and Estate Management Team managed ten cases relating to modern slavery and exploitation.

Housing staff received training relating to modern slavery, county lines, exploitation, domestic abuse and safeguarding. Mandatory Equality, Diversity and Inclusion and safeguarding training remained in place for Housing Services employees.

The Housing Services Modern Slavery and Exploitation Procedure continued to provide guidance regarding the response to reports of exploitation and partnership working arrangements.

Training and Awareness Raising

The Slavery Exploitation Team (SET) also contributed to raising awareness through presentations, workshops and engagement activities with internal colleagues and external partners.

During the reporting period, the Council continued to raise awareness of modern slavery through safeguarding and equality training, targeted learning opportunities and partnership working.

Mandatory safeguarding e-learning remained available to all employees and included information on recognising and reporting modern slavery as a form of abuse.

Since its introduction, 5,070 colleagues have completed the Safeguarding Awareness module, including 173 colleagues during the reporting period.

Since launch, 884 colleagues have completed the Understanding Modern Slavery e-learning module.

SET worked with National Referral Mechanism training providers and partner organisations to support specialist learning opportunities covering both national and local referral pathways.

Training was also delivered to Communities Protection teams and Housing Services staff to strengthen understanding of exploitation risks and referral arrangements.

Measuring Effectiveness

During the reporting period, the Council monitored the effectiveness of its response through:

- Safeguarding activity relating to exploitation and modern slavery.
- Referrals managed through SET.
- Multi-agency SERAC activity.
- National Referral Mechanism referrals.
- Staff training completion rates.
- Supplier assurance and contract management activity.
- Housing Services case management activity.
- Partnership working with statutory and voluntary sector organisations.

These arrangements supported the identification of potential victims, informed safeguarding interventions and strengthened the Council's overall response to modern slavery and exploitation.

Declaration

During the reporting period, Nottingham City Council continued to strengthen its arrangements for identifying, preventing and responding to modern slavery and human trafficking. Activity undertaken across safeguarding, community protection, housing, procurement and partnership working has supported the Council's commitment to protecting vulnerable individuals and promoting ethical employment practices.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Nottingham City Council's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.



Sajeeda Rose
Chief Executive



Councillor Ethan Radford
Executive Member for HR and Equalities

Date: **25 / 09 / 2026**

Appendix A.

Nottingham City Council Services

Nottingham City Council provides services to its citizens and employees through five corporate directorates, in addition to the Chief Executive's Office:

- Adult Social Care and Health
- Children and Education Services
- Communities, Environment, and Resident Services
- Finance and Resources
- Growth and City Development

These include, but are not limited to the following divisions:

Adult Social Care and Health

- Public Health
- Adult Social Care division:
 - Quality Assurance and Safeguarding
 - Mental Health and Whole Life Disability
 - Social Care Provision – Adults
 - Access and Prevention
- Commissioning and Partnerships division:
 - Commissioning
 - Contracts, Quality and Personalisation
 - Business Strategy, Development and Performance

Children and Education Services

- Education strategy division:
 - Inclusive Learning
 - SEND and Vulnerable Pupils
 - Virtual School
 - Education Psychology
 - School Improvement
 - Sufficiency and Place Planning
- Children's Integrated Services division:
 - Locality 1 (North) – Children in Need and Child Protection
 - Locality 2 (South) – Children in Need and Child Protection and Family Time
 - Children in Care and Care Leavers
 - Children's Regulated Services

- Quality Assurance and Safeguarding
- Children's Commissioning and Partnerships
- Children's Transformation
- Family Help
- Children with Disabilities
- Front Door and EDT (inc. M.A.S.H.)

Communities, Environment and Resident Services Directorate

- Communities division:
 - Community Protection
 - Environmental Health and Public Protection
 - Community Safety
 - Neighbourhoods
 - Culture, Libraries and Heritage
 - Tourism and Events
 - Sport and Leisure
 - Theatre Royal Concert Hall
 - Sold Services to Schools
 - Nottingham Catering
- Environment and Sustainability division:
 - Midlands NetZero Hub
 - Carbon Reduction Projects & Policy
 - Sustainable Warmth Programmes
 - NetZero Programmes
- Resident Services division:
 - Highways and Public Realm
 - Fleet, SHEQ and Bereavement Services
 - Waste and Cleansing Services
 - Green Spaces and Natural Environment
 - District Heating
 - PFI

Finance and Resources Directorate

- Customer Services
 - Service Delivery
 - Customer Access
 - Process Improvement
 - Tenant Experience
 - Nottingham Revenue and Benefits
 - Change & Transformation
 - Coroners
- Finance
 - Directorate Business Partnering
 - Commercial Finance
 - Financial Strategy
 - Transactional Accounting
 - Technical Finance
 - Systems Development

- Commercial and Procurement
 - Risk, assurance and insurance
- HR & EDI
 - Directorate Business Partnering
 - Development and Change
 - EDI
 - Organisational HR (Policy, Pay and Reward)
 - HR Systems
 - Pensions
 - Employee Wellbeing
 - Recruitment
 - Strategic Workforce Planning
- Legal and Governance
 - Emergency Planning / Resilience
 - Governance
 - Legal
 - Information Compliance
 - Conveyancing, Planning, Litigation
 - Electoral Services
- IT
- Policy, Performance & Communications
 - Chief Executive's Office
 - Strategy and Policy division:
 - Analysis and Insight
 - Communications and Marketing
 - Major Projects

Growth and City Development Directorate

- Planning and Transport Division:
 - Transport Strategy
 - Parking
 - Planning Strategy and Building Control
 - Traffic and Flood Risk Management
 - Transport Projects and Operations
 - Development Management
 - Major Projects
- Corporate Landlord and Economic Development
 - Economic Development
 - Property
 - Building Services and Facilities Management
- Housing Division:
 - Housing & Regeneration
 - Housing Solutions
 - Housing Services (NCH)