

Modern Slavery Transparency Statement (2025 / 2026)

Covering the Financial Year 1 April 2025 to 31 March 2026

Endorsed by Cabinet 30 July 2026

PART A: Introduction

1. South Tyneside Council is committed to understanding and mitigating the risks of slavery and human trafficking in our corporate activities and supply chains.
2. By publishing an annual transparency statement, detailing activities undertaken over the latest financial year relating to Modern Slavery mitigation, the Council can keep stakeholders up to date and ensure continued compliance with the obligations arising from section 54 of the Modern Slavery Act 2015.

Organisational Structure and Supply Chains:

3. This statement covers the activities and supply chains of South Tyneside Council, including direct employees of the Council and services delivered on behalf of the Council by third party organisations. More information about the Council structure and governance is available in the Council Constitution.

Areas of operation and supply and high-risk activities:

4. South Tyneside Council operates within the United Kingdom. While the Council has a high level of confidence that policies and processes are in place to protect against risks of slavery in the supply chains with regards to Tier 1 suppliers, and where appropriate to extend to its subcontractors if utilised. It is more difficult to be confident about links further up the supply chain. Social value is also monitored closely by the Procurement Service and this can include modern slavery requirements. Higher risk categories identified by the procurement team include:

- cleaning,
- events catering,
- construction (particularly demolition, asbestos removal, groundworks, clearance/stripping work),
- clothing manufacture (particularly involving imported textiles), security (manned guards),
- domestic furniture supply and manufacture, environmental (waste management, recycling),
- horticultural (grounds maintenance and plant nurseries),
- some social care/personal services (including taxis),
- recruitment (agency staff provision, particularly into some of the other areas on this list), and
- dry imported foods (rice, cocoa, etc).

5. South Tyneside Council engages in a wide range of business activities, from refuse collection to the delivery of social care. None of these sectors and activities are classified as high risk for labour exploitation (although Council is aware of reports of slavery identified within privately-run care agencies within the UK care sector in recent years). Additionally, certain Council frontline workers, such as those in

housing, public protection or public health, particularly those working with vulnerable populations and undertaking checks on private premises, may be more likely to encounter victims or perpetrators. The new 2026-2028 South Tyneside Modern Slavery Strategy sets out ways to raise awareness amongst these service areas and engage staff to help us tackle modern slavery.

6. Intelligence indicates that Modern Slavery and other exploitation cases have been identified in recent years within South Tyneside and the wider North East area. Referrals into the National Referral Mechanism have again increased over the last year, both nationally and regionally. The Council remains vigilant to the ongoing threat of Modern Slavery and to the potential that Modern Slavery could be taking place undetected in South Tyneside.

Responsibility:

7. Each Director is responsible for ensuring risks of Modern Slavery are understood and mitigated against in their service areas, and for using appropriate resources to prevent and disrupt slavery and to support and protect victims. A cross-service Modern Slavery Coordination Group meets on a quarterly basis to identify opportunities for and progress improvements relating to combating modern slavery in the South Tyneside area and in the Council's business and supply lines.

8. Any concerns regarding modern slavery or human trafficking in the organisation or supply chains should be raised with the Director of Business and Resources.

PART B: Modern slavery policies and initiatives implemented to date

9. South Tyneside Council has a number of policies in place which protect employees and supply lines against the risk of modern slavery within the organisation. These include:

- **Employee Code of Conduct** - Enshrined within the Council Constitution, this code sets out actions and behaviours expected of employees when representing the organisation.
- **'Speak Out' Whistleblowing Policy** - This policy supports employees, contractors and partners with concerns about any aspect of the Council's work to come forward and voice these concerns.
- **Equality, Diversity, Inclusion and Belonging Strategy and associated Policies** – The Council maintains a number of policies, strategies and processes (such as Equality Impact Assessment templates) which describe how the organisation intends on meeting its obligations under the 2010 Equality Act, including protecting people with protected characteristics from discrimination and advancing equality of opportunity.
- **Recruitment Policies** - The Council has a range of robust, transparent and regularly-reviewed procedures in place for the recruitment and vetting of new employees, ensuring they are able to confirm their identities and qualifications, and that they are paid directly into an appropriate, personal bank account.
- **Anti-Poverty Strategy** – The South Tyneside Anti-Poverty Strategy sets out work that the Council and South Tyneside Partnership are doing to support residents with the cost of living. Among other commitments, the Strategy sets out plans to improve financial support and address in-work poverty, including

committing the Council to explore becoming a Real Living Wage employer and encouraging other organisations to do so.

- **Responsible Procurement** - Responsible procurement, as set out in the South Tyneside Council Procurement Strategy 2021-24 (which will soon be refreshed), is an integral duty in the Council's procurement process, ensuring ethical, honest and fair procurement. The Procurement Strategy sets out commitments which comply with UK, EU and international sourcing standards, promoting fair trade, fair pricing policies and good employment practices, and committing to regularly review contracted spending to identify any potential issues with modern slavery, and to consider termination of a contract with a supplier awarded a contract who is later found to be in breach of the Modern Slavery Act.
- **Responsible Investment** - The Tyne and Wear Pensions Fund, which South Tyneside Council administers, also has a Corporate Governance and Responsible Investment Policy which is aligned to the United Nations Principles for Responsible Investment which encourages active incorporation of environmental, social and governance issues into the investment decision-making processes. The Fund's pooling partner, Border to Coast, has its own modern slavery statement and regularly engages with the global companies in which it invests on how they approach modern slavery in relation to their workforce development and supply chain labour risk to improve disclosures and enhance labour standards.
- **Safeguarding Policies and Procedures** - The South Tyneside Safeguarding Adults Board and Safeguarding Children Partnership maintain and adhere to a comprehensive library of policies, procedures and best practice (<https://www.southtynesidesafeguardingapp.co.uk/> and <https://www.proceduresonline.com/nesubregion/> <https://nesubregion.trixonline.co.uk/>)

10. South Tyneside Council was one of the first in the region to establish a comprehensive Modern Slavery Strategy which sets out actions to be taken to reduce the risks of slavery within our services, businesses, supply chains and communities.

11. The Strategy goes beyond the minimum statutory requirements of setting out actions taken to mitigate internal business and supply chain risks. It also sets out plans to strengthen the Council's community safety roles, as well as ambitions to leverage the Council's influence and networks to increase community and local business awareness of risks and signs of exploitation. Self-assessment using the LGA Modern Slavery Matrix indicates that South Tyneside is in a strong position relative to its peers in respect of its Modern-Slavery strategy and planning.

12. This transparency statement, as well as ensuring compliance with s54 of the Modern Slavery Act, provides an annual opportunity to set out progress made against the ambitions presented in the South Tyneside Modern Slavery Strategy and the associated work programme of the Modern Slavery Coordination Group.

Progress to date against the Modern Slavery Strategy Objectives and Action Areas:

IDENTIFY:

Frontline Council workers working with vulnerable populations or visiting private housing and premises are well placed to recognise signs that a person may be being exploited.

As such the Council has a clear opportunity to help identify potential victims by ensuring staff across these functions are knowledgeable about what to look for and how to report concerns.

What we have delivered:

- In recent years, the Council has continued to improve staff and elected member awareness of Modern Slavery and increase employees' ability and confidence in recognising and reporting concerns, including:
 - Making an engaging Modern Slavery e-learning module available to all employees and elected members through the online e-learning platform
 - Regularly communicating the availability and importance of raising awareness of modern slavery via All-Staff Briefings and other communications, as well as new Staff Intranet, sharing guidance, contact information and links to more in-depth training courses and government resources
 - Developing and sharing resources on modern slavery awareness for non-desk-based staff, including a new information leaflet which has been shared with non-desk based staff.
 - Distributing awareness-raising information via the Council's employee networks, including the Women's Network, Neurodiversity and Disability, Carers, Multicultural Network, Age Network, Armed Forces Network, and newest networks the Confident Women's Community, Men's Network and Early Careers Network.
 - Sharing function-specific information and resources on modern slavery with managers in service areas with a role to play in identifying slavery (including in Adult Social Care and Commissioning, in response to recent reports of increases in slavery identified within the UK care market).
 - Equipping Elected Members with information and advice on their potential role in recognising and responding to modern slavery, including through modern slavery-specific members communications sessions, as well as through regular safeguarding training.
 - Delivering a training programme for multi-agency professionals on safeguarding against different types of exploitation, including Modern Slavery and closely-related activities such as County Lines, through e-learning, virtual sessions and face-to-face sessions as part of our training programme for 2025/26, with a total of 2229 attendees completing training, including:
 - E-learning:
 - Child and Adult Sexual Exploitation -194 attendees
 - Child Criminal Exploitation, Gangs and County Lines- 72 attendees
 - Child Exploitation and Extra-Familial Harm -68 attendees
 - Modern slavery and Trafficking- 48 attendees
 - Level 2 Safeguarding children -376 attendees
 - Level 3 Safeguarding Children-284 attendees
 - Level 2 Safeguarding Adults- 305 attendees

- Level 3 Safeguarding Adults- 247 attendees
- Virtual Training
 - Safeguarding Adults from Abuse- 34 attendees
 - Disrupting Exploitation – 21 attendees
- Face to Face sessions
 - Missing Children and the Links to Exploitation- 30 attendees
 - Safeguarding Adults a Multi-Agency responsibility- 251 attendees
 - Safeguarding Children a Multi-Agency Responsibility – 208 attendees
 - Safeguarding in the Digital Age – 61 attendees
 - Safeguarding Children from Sexual abuse – 30 attendees

RESPOND

As a provider of key social and health services, the Council has a range of statutory duties in identifying, responding to and supporting adults and children who may be at risk of exploitation and modern slavery. This includes Adult and Children's Social Care, Public Health, Public Protection and Housing services, all of which contribute to a coordinated, multi-agency response.

Council services continue to play a central role within the Multi-Agency Safeguarding Hub (MASH), supporting timely information sharing and decision-making where children and young people may be at risk. The PREM (Partnership Reduction of Exploitation and Missing) process also remains a key mechanism for bringing partners together to assess risk, coordinate disruption activity and reduce exploitation linked to missing episodes.

For adults, multi-agency safeguarding responses are coordinated through the Safeguarding Adults Board, with established routes such as Complex Adult Risk Management meetings, Multi-Agency Risk Assessment Conferences and other intelligence-sharing forums ensuring that risks are identified early and managed effectively.

Where incidents of modern slavery are identified locally, services respond through the multi-agency Modern Slavery, Trafficking and Exploitation response plan, setting out clear expectations for immediate support and longer-term safeguarding.

What we have achieved:

- The Council, Safeguarding Children Partnership and Safeguarding Adults Board have continued to strengthen the multi-agency response to exploitation through the Joint Strategic Exploitation Group (JSEG), which provides oversight of emerging risks, performance data and strategic priorities across children and adults. The group has maintained a strong focus on disruption, intelligence sharing and partnership accountability.
- There has been measurable progress in understanding and responding to missing and exploitation risks in children. Multi-agency work, including the introduction of the Safe Return model and improved partnership working, has contributed to a downward trend in missing episodes and increased stability for some cared for children.
- Within Adult Social Care, Complex Adult Risk Management (CARM) meetings provide a structured, multi-agency framework to coordinate responses to adults experiencing complex risk, including where there are concerns relating to

exploitation or modern slavery. CARM supports information sharing, risk planning and defensible decision-making in situations where risk is high and engagement may be limited.

- Work has progressed to strengthen understanding of exploitation through improved use of data and intelligence. This includes ongoing work between partners to align police and local authority datasets, identify trends and develop a more consistent picture of risk across the system.
- The partnership has continued to develop and refine the PREM process, including reviewing thresholds, improving multi-agency awareness and delivering training sessions to support consistent application across services.
- Significant activity has taken place to improve disruption of perpetrators and protect victims. This includes strengthened links with police exploitation teams, county lines activity, and the development of harm reduction plans through multi-agency forums.
- There has been a sustained focus on contextual safeguarding and harm outside the home. This includes engagement with local businesses and communities, mapping of local hotspots, and increased partnership activity to address risks within public spaces and peer groups.
- Multi-agency audits and learning activity have been undertaken, including work linked to the Casey Review, regional audit activity and the Missing Benchmarking Tool. These have identified both strengths and areas for development and are informing ongoing improvement activity.
- Training and awareness raising across the partnership has been strengthened, including sessions on exploitation, PREM, and emerging issues such as online harm and the use of vapes in exploitation.
- Targeted work has been undertaken with vulnerable groups, including through the Poverty Group and services supporting asylum, refugee and migrant communities, ensuring that exploitation risks are recognised and addressed within wider vulnerability agendas.
- Exploitation awareness continues to be embedded across community settings, including Welcoming Spaces and partnership forums, ensuring that frontline staff and volunteers are equipped to recognise and respond to concerns.
- This work is underpinned by Adult Social Care practice frameworks which promote person-centred, strengths-based conversations alongside professional curiosity and evidence-based risk assessment when exploitation is suspect.
- While progress has been made, there remain challenges in developing a fully aligned and consistent multi-agency dataset, particularly in relation to adult exploitation. There is a continued need to strengthen understanding and consistent use of PREM across all partners. Further work is required to develop the adult exploitation offer and strengthen transitions between children's and adult services. Capacity across agencies continues to impact the pace of some audit and improvement activity, although this remains a focus for the partnership going forward.

DISRUPT

Local authorities have special functions and powers with regards to upholding trading standards, regulating and licensing certain activities and inspecting premises

for health and safety (such as hospitality and agriculture premises). It is important that the officers involved in these services in South Tyneside have a good awareness of how they can use these functions to support police operations, including into potential modern slavery and trafficking cases.

What we have achieved:

- Officers in services with special regulatory and inspection powers (ranging from planning to trading standards to environmental health) are trained and experienced in how to contribute to police investigations and disruption operations.
- In addition to regional training, in-house modern slavery-specific training has been delivered to relevant teams, including to the new Business and Community Responder Team, and Annual Review check in processes are being used by managers to encourage e-learning uptake.
- Routine inspections of businesses across the borough are conducted on a risk-assessed basis, with officers trained to recognise and report modern slavery and other exploitation concerns.
- Representatives from a range of services with a regulatory role are involved with and exchange intelligence with a range of regional groups working on tackling slavery and exploitation. Over 2025-26, South Tyneside Officers have attended early meetings of the newly-established Anti-Slavery Network for the region.
- Additionally, Council officers from a range of services participate in the Community Tension Monitoring group bringing together multi-agency and cross-service partners.

PREVENT

As an organisation responsible for managing sizable amounts of public funds, employing workers and procuring and commissioning a range of goods and services, it is critical important that South Tyneside Council is confident it has the right checks and balances to ensure it doesn't inadvertently contribute to slavery in its business or supply chains.

What we have achieved:

- The Procurement Strategy (2021-24) places a particular focus upon Modern Slavery prevention.
- The Council has ensured Modern Slavery Act compliance is a routine part of all procurement due diligence, including by requiring suppliers to confirm annual modern slavery reporting requirements and declare any trafficking offences as part of the Supplier Selection Questionnaire.
- Contract terms and conditions have been tightened over recent years to include for potential termination of contract for any supplier found to be in breach of the Modern Slavery Act. This has included tightening clauses around subcontractors and putting greater responsibility on tier 1 suppliers for their subcontractors or material providers.
- The Council has secured assurances that Neutral Vendor contracts provide appropriate protection for agency workers.
- On a regional level, the North-East Procurement Organisation (NEPO) have implemented a regional Modern Slavery Pledge and South Tyneside officers

are closely involved in NEPO work that is currently underway on a regional Environment Social and Governance strategy which will include modern slavery prevention considerations.

- In light of the recent national increase in modern slavery reports within the care sector, over recent years, the Commissioning Team have undertaken work to assess risks in the local care system, including surveying local care homes to understand numbers of non-UK workers and developing a questionnaire to seek further assurance about the processes and knowledge levels of local care sector employers with regards to modern slavery prevention.

ENGAGE

The Council has a key role in convening and influencing the wider South Tyneside community, including partners, businesses and residents. It therefore has a range of opportunities to mobilise stakeholders to join in with tackling slavery, including by using external communications channels and community networks to share information and raise awareness about modern slavery and exploitation.

What we have achieved:

- The Council contributes to national awareness raising campaigns about modern slavery and trafficking (such as sharing press releases and social media messages on World Day Against Trafficking) and regularly includes information on modern slavery in public facing communications such as the Residents Newsletter.
- Business advice around Modern Slavery mitigation has been shared with organisations engaged with the South Tyneside Pledge.
- Information and advice on the indicators of slavery and how to report concerns have been shared with voluntary and community sector partners in the Multi-Agency Poverty Group, including a presentation delivered to members in September 2025.
- This awareness raising and engagement activity has, over 2025/26, prompted at least one partner to engage with the Council and Northumbria Police about a potential modern slavery concern within the local community.

COORDINATE

There are a wide range of Council services and functions with a role to play in tackling modern slavery in different ways, so it is important that information is shared appropriately across the organisation and that activity is coordinated and complementary. Especially because modern slavery is a hidden crime, it is also important that the Council has a good understanding of to what extent its efforts are effective in reducing risks and supporting victims.

What we have achieved:

- A new South Tyneside Council Modern Slavery Strategy has been developed for 2026-28, with input from a wide range of services and partners, including via discussion at the Community Safety Partnership in January 2026.

- The Modern Slavery Steering Group has piloted a new theme-based approach to meetings and has in recent months reviewed service-based approaches to modern slavery including Public Health, Children's Social Care, Housing and more.
- The Council has contributed to early meetings of a new regional Anti-Slavery Network coordinated by the Police and Crime Commissioner's Office and Northumbria Police.

Part C: Practical Guidance on Slavery and Trafficking:

Recognising modern day slavery and trafficking:

The true extent of modern slavery is unknown, but the latest Global Slavery Index (2023) estimated there were 122,000 victims of modern slavery in the UK and the latest available annual Home Office data shows that were 19,125 potential victims of human trafficking and modern slavery identified through the National Referral Mechanism in 2024 (a 13% increase compared to 2023).

Victims are forced against their will to work for little or no pay for the benefit of others. They are often abused or threatened and stripped of their rights. There is no typical victim of slavery. Victims can be men, women or children of all ages and nationalities. Many victims are foreign nationals who are brought into the UK specifically so that they can be exploited for the benefit of others, however, a high proportion of people referred via the NRM are UK nationals (with 23% of NRM referrals for UK nationals). Albanian, at 23% of referrals, and Vietnamese, at 11%, were the next most common nationalities, with Eritrean, Sudanese, Indian, Iranian, Somali, Afghan and Syrian people also represented in high numbers. Particular circumstances may make individuals being more vulnerable to slavery or trafficking, for example there might be increased risks for those with a lack of knowledge of understanding of the law or of their rights, or those lacking an established network of people they can look to for support – for example, people who have recently migrated to the local area, or individuals who are socially isolated and face barriers such as language barriers or learning disabilities.

Modern slavery crimes take place in many different sectors and workplaces, including factories, fields, retail or service units, within private homes, and within criminal enterprises. The most common types of exploitation for those referred in the National Referral Mechanism in the last year were labour exploitation for adults, and criminal exploitation for children and young people. Some business types are especially vulnerable to modern slavery, particularly those with high volumes of low-skilled, transient workers, and those where labour costs are a significant portion of overall expenses. Industries like agriculture, food processing, construction, care work and hospitality are frequently identified as high risk, with car washes, nail bars and sex work specifically vulnerable to exploitation. In recent years, the care sector has also been identified as a sector where there is a high risk of labour exploitation.

Crimes of modern slavery have taken place all over the country. Intelligence suggests that includes within South Tyneside.

Key indicators of potential trafficking include:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

What to do if you encounter or suspect modern day slavery or trafficking?

In the first instance the point of contact for all modern slavery crimes should be the local police force. If you have information about a potential modern slavery crime that requires an immediate response (such as where victims are at risk) **dial 999**.

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline on **0800 0121 700**. Alternatively, you can make calls anonymously to Crimestoppers on **0800 555 111**.

If you have concerns or suspect that an adult is at risk of harm or abuse, you can contact Adult Social Care at:

- **0191 424 6000** (Monday to Thursday, 8.30am until 5pm and Friday 8:30am until 4:30pm)
- **0191 456 2093** (outside of the above office hours)

If you are a professional, you can also use the **Safeguarding Adult Referral Form** to share concerns about an adult

(<https://www.southtynesidesafeguardingapp.co.uk/resources/forms-leaflets-and-posters/#forms>).

If you have concerns or suspect that a child is at risk of harm or abuse, is being trafficked or enslaved, you can contact Children's Social Care at:

- **0191 424 5010** (Monday to Thursday, 8.30am until 5pm and Friday 8.30am until 4:30pm)
- **0191 456 2093** (outside of the above office hours)

If you are a professional, you can refer concerns about a child using the **Multi-Agency Referral Form** (<https://www.southtyneside.gov.uk/article/13756/Multi-Agency-Referral-Form>).