

Oxford City Council Modern Slavery Statement

2021 - 2022

Contents

1. Introduction	1
2. Responsibility	2
3. Our City	2
4. Our Progress.....	3
5. Procurement, Contractors and Service Providers.....	3
6. Policies	4
7. Risk and Due Diligence	6
8. Partnership Working	6
9. Staff Training and Awareness	7
10. Next Steps	8
11. Declaration.....	9

1. Introduction

Oxford City Council is committed to eliminating and preventing acts of Modern Slavery and human trafficking within its business and supply chains, sub-contractors and partners.

The Council is committed to the implementation of the Modern Slavery Act 2015 which was designed to combat slavery and human trafficking. Modern Slavery is an umbrella term that encompasses offences relating to slavery, servitude, forced or compulsory labour and human trafficking. The most common forms of exploitation that victims are subjected to are:

- **Labour Exploitation:** Victims are made to work against their will, often working very long hours for little or no pay, in dire conditions under constant verbal or physical threats of violence to them or their families. It can happen in any industry such as agriculture, food processing and packaging, construction, car washes, nail bars, warehousing and logistics, hospitality and catering, manufacturing, cleaning and other service industries.
- **Sexual Exploitation:** victims are deceived, forced or coerced into forms of sexual activity for the benefit of someone else such as street prostitution, brothels (Inc. massage parlours and saunas) escort agencies, pole/lap dancing, web-cam work, phone sex lines and pornography.
- **Criminal Exploitation:** also known as forced criminality, victims are forced to carry out or participate in illegal, criminal activity through coercion or deception including county lines, cannabis cultivation, begging, pick-pocketing, shoplifting, theft, selling counterfeit goods and cuckooing (the taking over of a person's property).
- **Domestic Servitude:** victims are extremely difficult to identify because the work is performed in private residences as seemingly normal practice that is used as cover for the exploitation and control of someone for example, nannies, au-pairs or other domestic help.
- **Financial Exploitation:** happens when someone is deceived, coerced or pressurised into handing over money or property including benefit fraud, blackmail, scams, money laundering, taking loans out in victims name, opening of bank accounts in victims name but used by perpetrators or wages being paid directly into perpetrators account and debt bondage.

In accordance with Section 54 of the Modern Slavery Act 2015, Oxford City Council has produced the following statement in relation to the steps taken to identify, prevent and reduce Modern Slavery in all parts of its operations and supply chains.

The statement also outlines the Council's actions to understand and address all potential Modern Slavery risks and put in place steps that are aimed at ensuring this does not occur in our services.

2. Responsibility

The Council recognises our responsibility to take a robust and proactive approach to Modern Slavery and human trafficking and the key roles it plays in working collaboratively with our partners to tackle slavery in four key areas:

1. **Identification and referral of victims** – In addition to the Council’s responsibility as an employer, it acknowledges its Duty to Notify the Secretary of State of potential victims of slavery as set out in Section 52 of the Modern Slavery Act 2015.
2. **Supporting victims** – this can be through safeguarding children and adults with care and support needs or through housing/homelessness services. We take very seriously our responsibility to safeguard the most vulnerable in our society.
3. **Community safety services and disruption activities** – 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 area, which includes Modern Slavery and human trafficking. We work to disrupt and bring justice to the perpetrators of such crime across the city and build strong and resilient communities.
4. **The production of a Modern Slavery Statement** – covering the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or part of its own business.

The Council has further evidenced its commitment to responding to Modern Slavery by embedding the full time role of an Anti-Slavery Coordinator Oxfordshire to lead on this work.

3. Our City

Oxford City has a growing population and economy. The latest figures for the city are:

- Population: 162,100 (ONS 2021 Census)
- 44,945 students are enrolled for full-time studies in two universities
- The largest proportion of adults in full-time studies of any city in England and Wales
- The third highest ethnic minority population in south-east England
- 26% of residents were born outside of the United Kingdom

Our city has great areas of poverty, areas where Modern Slavery can take hold. Ten of Oxford’s 83 neighbourhood areas are among the 20% most deprived areas in England, experiencing multiple levels of deprivation and we are working with others to address this deprivation and inequality.

Oxford is also the tourism gateway to the rest of Oxfordshire. We attract approximately 7 million day time and staying visitors per year, generating an estimated £780 million of income for local Oxford businesses. In terms of overseas visitors to the UK, Oxford is the eighth most visited city for staying visits.

4. Our Progress

This statement explains the steps Oxford City have taken in 2021/2022 to identify, prevent and mitigate Modern Slavery in our operations and supply chains.

Some of the main achievements and progress during the last 12 months include:

- ✓ The appointment of a full time Anti-Slavery Coordinator for Oxfordshire to lead on Modern Slavery work.
- ✓ The publication of 'Researching the Extent and Nature of Modern Slavery in Oxford' report by Elmore Community Services who were commissioned by the Council to research and evaluate the prevalence of Modern Slavery in the city.
- ✓ Development of new guidance and referral pathways for frontline staff, including suppliers to ensure identification of victims, how to report concerns and the relevant processes to follow.
- ✓ Reviewed and updated our Modern Slavery Delivery Plan.
- ✓ Produced a new Self-Assessment Questionnaire for suppliers of contracts over Find a Tender Service (FTS) threshold.
- ✓ Fulfilling our duties as a designated First Responder Organisation under the National Referral Mechanism by training staff to identify and refer into the NRM.

5. Procurement, Contractors and Service Providers

Oxford City Council is a district council which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners.

We work closely with Oxfordshire County Council and nearby districts to achieve the aims set out in its Council Strategy 2020-2024 which can be found on our website.

Contract Managers assigned to a contract are responsible for managing relationships with suppliers and contract status during the length of a contract. The Procurement Team offers guidance and templates which can facilitate this process.

The Council's procurement activity is governed by the Council's Constitution and the Council's Procurement and Contract Procedure Rules give elected members and employees procedures to follow which ensure the Council's expected standards are met in terms of managing public money and assets.

The Council expects all suppliers of goods or services to the organisation who meet the requirements of the Modern Slavery Act 2015 to provide confirmation of their compliance to the Act and to have their own policies relating to working practices or Modern Slavery.

The Council seeks to develop long-term relationships with our suppliers based on the principles of fair, open and transparent dealings at all times. Our work with our suppliers reinforces our zero-tolerance ethos to Modern Slavery by requiring suppliers to adhere to and demonstrate compliance with our ethical standards by providing safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour.

The UK is a member of the WTO (World Trade Organisation) and the GPA (Agreement on Government Procurement) which means that Oxford City Council will abide by the principles of those organisations, to ensure open, fair and transparent conditions for procurement.

In April 2018 Oxford City Council created Oxford Direct Services (ODS) and Oxford City Housing Limited (OCHL) which are wholly owned by Oxford City Council. OCHL has adopted its own statement in line with the Council's practices. ODS Modern Slavery Statement can be found on its own website.

6. Policies

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. There are a number of policies and procedures already in place that are considered key in meeting the requirements of the Modern Slavery Act and which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations.

➤ **Safeguarding**

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults with needs for care and support. The Council has a comprehensive Safeguarding Children and Vulnerable Adults policy working within multi-agency partnerships to protect and safeguard people.

Safeguarding is embedded in the following Oxford City Council Strategies:

- Council Strategy 2020-2024
- Children and Young Peoples Strategy 2018-2022
- Community Safety Plan 2020-2021
- Housing and Homelessness Strategy 2018-2021

➤ **Confidential Reporting Code (Whistleblowing Policy)**

The Council engages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The council's Whistleblowing Procedure is designed to make it easy for employees to make disclosures, without fear of reprisal or victimisation.

➤ **Members' (Councillors) Code of Conduct and Ethical Framework**

The Members' Code of Conduct sets out the rules governing the behaviour of Councillors of Oxford City Council. Breaches of the Code are investigated by the Monitoring Officer.

➤ **Employees Codes of Conduct**

The Employee Code of Conduct is available on our website and makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing its supply chain, and any breaches are investigated.

➤ **Corporate Procurement Strategy**

The Council procures goods and services from various suppliers and this is governed by our procurement strategy. The Council's approach to ethical procurement is formalised in our Ethical and Sustainable Procurement Statement under Appendix 2 of the Corporate Procurement Strategy and requires its contractors to provide confirmation of compliance with the Modern Slavery Act 2015.

➤ **Recruitment**

The Council has robust procedures for vetting new employees, which ensure they are able to confirm their identities, eligibility to work in the UK, their qualifications and that they are paid directly into an appropriate, personal bank account.

➤ **Remuneration and Pay**

The Council's Pay Policy Statement is available on our website. The Council is an accredited Living Wage Employer and has paid the voluntary Oxford Living Wage (95% of the voluntary London Living Wage) or more to its employees since 2009. This is also the minimum rate paid to agency staff and we encourage other employers to pay the voluntary living wage.

➤ **Agency Workers**

The Council has a managed service contract in place for the provision of temporary agency staff and has verified the practices of the service provider. Where the need arises to source resources from alternative agencies, the practices of that agency will be verified before any workers are accepted from that agency.

7. Risk and Due Diligence

We are committed to undertaking due diligence at all stages of the procurement cycle for tenders that exceed the Find a Tender Service (FTS) threshold to mitigate the risk of Modern Slavery and human trafficking within these supply chains. These are managed by the Procurement team and ensures that Self-Certification is picked up in template documents along with noting the outcome on the Contract Register and highlighting to the Contract Manager what is expected of them.

These measures include:

- ✓ Maintaining a register of all of the Council's contracts
- ✓ Identification and management of risks in procurement will take place by carrying out risk assessments using our contract management framework to be explicit in our implementation of initiatives to tackle Modern Slavery
- ✓ Monitoring contracts over FTS threshold to seek reassurance that those who we contract with are compliant with the Modern Slavery Act and are combating Modern Slavery
- ✓ Work proactively with our suppliers and partners (including our wholly owned companies) to help understand our collective responsibilities
- ✓ Requesting any suppliers found to not be meeting the required standard to take action to improve
- ✓ Invoking sanctions against suppliers which fail to improve their performance in line with action plans or who fail to adhere to the Council's expectations of suppliers, including the termination of the business relationship
- ✓ Ensure that suppliers tendering for Find a Tender Service (FTS) contracts (which can include suppliers from Europe) comply with the requirements of the Modern Slavery Act 2015, as mandatory selection criteria.

8. Partnership Working

The Council works in partnership, at a strategic and operational level, with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims.

Oxford City Council's Head of Corporate Strategy has overall responsibility for safeguarding in Oxford City Council and oversees the Council's representation on the Oxfordshire Safeguarding Children's Board (OSCB), Oxfordshire Safeguarding Adults Board (OSAB) and the Safeguarding Board sub-groups. The Council is also represented at a strategic partnership level on the Health and Wellbeing Board, Health Improvement Board and Children's Trust.

- The Council chairs and administers the Sex Workers Intervention Panel (SWIP) which is a multi-agency panel with representatives from statutory and non-statutory agencies working in partnership as one team to reduce harm to and exploitation of sex workers.

- The Council is a member of a multi-agency group to protect vulnerable adults from cuckooing and homeless people from exploitation. The group has taken regular enforcement action working with Thames Valley Police to protect residents who have been cuckooed, often by County Lines gangs.
- The Council chairs the Oxford Community Safety Partnership the priorities of which include violence against women and girls, Modern Slavery, trafficking and child sexual exploitation.
- The Council is represented on the Oxfordshire Modern Slavery Strategic Group and co-chairs the Oxfordshire Anti-Slavery Network, which is a group of frontline organisations that share information and coordinate activities to address Modern Slavery.
- The Council's Community Safety Team works closely with the police to disrupt serious and organised crime groups in the city, including those involved in exploitation and slavery.

9. Staff Training and Awareness

Modern Slavery is identified under the Care Act 2014 as one of ten categories of abuse. It features in both OSCB and OSAB training which is available to all Council employees.

The level of training required has been identified for each post within the Council and employees must complete the appropriate level of training for their post. All posts require safeguarding training at awareness level as a minimum and all new employees must complete an awareness briefing as part of their induction or the higher level training where required.

The awareness briefing is aimed at all officers to enable them to identify abuse and to give them tools and knowledge to be able to report concerns. Online E-Learning Modern Slavery and Exploitation awareness training is available from the OSAB. Child Exploitation and National Referral Mechanism training is also available from the OSCB and OSAB to all council employees.

Our Procurement staff receive Modern Slavery awareness training through our E-Learning Module provided through the OSAB E-Learning module.

Information on the NRM and statutory Duty to Notify responsibilities is available on the Council's intranet Safeguarding page.

Induction material on equality and diversity and safeguarding is provided to all Councillors on election and safeguarding awareness briefings, which includes Modern Slavery and exploitation.

10. Next Steps

In addition to work that has already been undertaken, we will continue to build on our approach to make improvements to safeguard individuals and communities from Modern Slavery in Oxford.

Our plans for 2022/2023 include:

- Developing guidance for members of the public with our intended aim that people who live, work in or visit Oxford can understand what Modern Slavery is, recognise potential slavery in our City and know how and where to report their concerns.
- Create a multi-agency operational protocol to ensure a robust needs based approach to supporting victims and to disrupt activities of perpetrators of Modern Slavery.
- Continue to meet the requirements of our duty as a First Responder by developing guidance for all staff on the National Referral Mechanism, the process to follow and how to support victims through the process and running training sessions in conjunction with the guidance.
- Set up a central recording system to identify trends, threat, risk and harm and to understand and produce data on the prevalence of potential slavery and exploitation in Oxford.
- Create targeted Modern Slavery supply chain and contract management training for relevant staff, followed by a wider programme of Councillor and staff awareness raising, including the Council's wholly owned companies' staff.
- Incorporate within the Council's standard contract terms clauses as appropriate that specify the suppliers contractual obligations concerning Modern Slavery, including passing these responsibilities to subcontractors in the supply chain.
- Conduct audits on all of the Council's current contracts over FTS threshold on a regular basis.
- Develop an effective communication strategy to raise awareness of Modern Slavery internally within the local authority, with organisations within our supply chain and the wider community.
- Continue to work in partnership with a wider range of organisations to reduce the risk of Modern Slavery and support victims.

In order to measure effectiveness of the steps being taken, we will set up a task group to meet quarterly to monitor delivery, record progress and achievements and identify further areas for improvement.

11. Declaration

This statement is the Council's second statement, is made with reference to Section 54(1) of the Modern Slavery Act 2015 and constitutes Oxford City Council's Modern Slavery Statement relating to actions and activities during the financial year ending March 2022.

Through delegated powers, approval has been granted from the Cabinet for this statement to be approved by the Council's Head of Corporate Strategy and will be reviewed and updated annually.

This statement was agreed and approved by:

Mish Tullar, Head of Corporate Strategy

Signed: 

Date: 31st August 2022

To be reviewed: April 2023

Contact Officer: Nicola Bell, Anti-Slavery Coordinator Oxfordshire
nbell@oxford.gov.uk
01865 252406