North East Lincolnshire Council (NELC) Modern Slavery Statement

Statement 2024 - 2025

North East Lincolnshire Council (NELC) is committed to improving its practices to combat slavery and human trafficking. The local authority is committed to implementing and enforcing effective systems and controls to minimise the risk of modern slavery taking place anywhere within its business activities, its supply chains or through its collaborative partners.

This statement comprises the modern slavery statement for NELC for the financial year ending 31 March 2023 in accordance with Section 54, Part 6 of the Modern Slavery Act 2015.

The Modern Slavery Act 2015 has introduced changes in UK law focused on increasing transparency in employment practices, to ensure these are free from modern slavery (that is, slavery, servitude, forced and compulsory labour, human trafficking and exploitation).

NELC provides the following statement to offer assurance of their commitment and efforts to prevent modern slavery and human trafficking practices. We recognise the responsibility to take a robust approach to modern slavery and human trafficking and are committed to the prevention within all corporate activities.

About North East Lincolnshire

NEL is a unitary authority situated on the south bank of the Humber estuary with an area spanning 192 square kilometres across a range of communities within Grimsby, Cleethorpes, Immingham and 22 surrounding villages. The town centres of the more densely populated areas of Grimsby and Cleethorpes are only three miles apart with Immingham approximately eight miles from Grimsby. North East Lincolnshire's neighbours are the authority of North Lincolnshire and Lincolnshire's districts of East and West Lindsey.

The Office for National Statistics (ONS) Census 2021 data, confirms that North East Lincolnshire's population is around 157,000 with the average (median) age of North East residents of 43 years. The number of residents aged between 65 and 74 years is also increasing with consequently a lower percentage of working age people. The census also indicates that 92.6% of the population are of British origin.

Part 1: Definition of Offences

1.1 Modern Day Slavery, Servitude, Forced or compulsory labour: A person commits an offence if -

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude.

- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

1.2 Human Trafficking: A person commits an offence if -

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.

- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

1.3 Exploitation: A person is exploited if one or more of the following issues are identified in relation to the victim –

- Slavery, servitude, forced or compulsory labour.

- Sexual exploitation

- Removal of organs

- Securing services by force, threats and deception

- Securing services from children, young people and vulnerable persons.

Part 2: Organisational Structure

2.1 As a statutory body, NELC is responsible for many services for the people of NEL including the commissioning and provision of health and care services for adults and children.

Please click on the link below for more information
Council Plan – Our vision and aims | NELC (nelincs.gov.uk)

With our partners, NELC has adopted an Outcomes Framework that states five key outcomes that underpin the priorities, these include all people in North East Lincolnshire enjoy good health and wellbeing and all people in North East Lincolnshire live in a safe environment.

Please click on the link below for more information:

https://www.nelincs.gov.uk/assets/uploads/2022/03/NEL-Outcomes-Framework-2022.pdf

2.2 NELC recognises safeguarding as a high priority. In order to achieve this we ensure there are arrangements in place to provide strong leadership, vision and direction for safeguarding. We ensure we have clear accessible policies and procedures in line with relevant legislation, statutory guidance and best practice.

2.3 There is a clear line of accountability for safeguarding. We ensure that we have appropriate services that safeguard children in line with section 11 of the Children Act (2004), and adults in line with The Care Act (2014), The Mental Capacity Act (2005), and The Modern Slavery Act (2015).

NELC has a lead officer for modern slavery to drive work locally. There is a modern slavery multi agency group that meets quarterly. This group is responsible for raising awareness and working alongside partners to ensure that front line officers are able to identify key signs and take appropriate action.

NELC work closely with Humberside Police, The GLAA and The Humber Modern Slavery Partnership where there are single points of contact for advice and assistance with suspected cases of modern slavery.

2.4 Applications and inquiries under Part 7 of The Housing Act 1996 - Section 188(1) of the 1996 Act requires housing authorities to secure that accommodation is available for an applicant if they have reason to believe that the applicant may be homeless, eligible for assistance and have a priority need. If housing authorities believe an individual may be vulnerable as a result of being a victim of modern slavery, following a referral to the NRM, housing authorities should ensure that interim accommodation is available while they are waiting for an initial Reasonable Grounds decision and/or while the housing authority carries out its enquiries.

2.5 To enable robust safeguarding of those considered vulnerable because of modern slavery, a sub-regional housing protocol is in use. This gives East Riding, North and North East Lincolnshire and Hull City Councils the opportunity to accommodate victims safely in a neighbouring authority to safeguard against re-exploitation.

Part 3: Policies and Arrangements

3.1 Our recruitment processes are highly mature and robust requiring operational practice that adheres to safe recruitment principles. This includes strict requirements in respect of identity checks and all prospective employees are required to provide evidence of their eligibility to work in the UK as compliance with UK legislation as well

as criminal records/ DBS checks. This safe recruitment principle is supported by our Recruitment and Selection policy.

3.2 NELC has rigorous P&C policies and processes along with high standards for employees to minimise the risk of any form of modern slavery existing within the organisation. Our policies and procedures in place for all significant employment related matters including disciplinary, grievance, Bullying and Harassment at Work, performance, capability and attendance management provides an additional platform for our employees to raise concerns on poor working practices. Information on the relevant policies can be found here.

3.3 Our organisation is fully compliant with UK Legislation and have a set of policies and procedures to guarantee that every colleague is treated with respect and dignity irrespective of their gender, race, religion, ethnicity, age, sexual orientation, country of origin, disability, or any other protected characteristics. Colleagues are employed based on their capacity to carry out their role and duties, and not based on their personal characteristics or beliefs. We strongly support a working environment that values the rights of individuals to be treated with dignity and respect which is supported by our Dignity at Work Policy

3.4 As an Disability confident employer, we are dedicated to establishing and maintaining a courteous, non-discriminatory work environment for our colleagues. As such, NELC is committed to making the most of the talents disabled people can bring to the workplace.

3.5 We have a zero-tolerance for any threat of physical or sexual violence, harassment or intimidation against employees. Our policies are well-defined and conveyed to all staff which can be found here.

3.6 NELC is committed in promoting equality and our vision is to become a commissioning, enabling, and facilitating organisation, focused on creating the right conditions for individuals, communities and businesses to prosper. Further details can be found at NELC equalities policy statement.

Part 4: The Due Diligence processes in relation to Modern Slavery and human trafficking in its Business and Supply Chains

4.1 Where possible we build long standing relationships with our Providers and make clear our expectations of business behaviour.

4.2 With regards to national or international supply chains; we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place.

Part 5: The parts of its business and supply chains, where there is a risk of Modern Slavery and Human Trafficking taking place, and the steps it has taken to assess and manage that risk

5.1 NELC is committed to preventing and tackling modern slavery in all its forms. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational safeguarding process and in conjunction with partner agencies; such as the Local Authority and Police. We are member of the Humber Modern Slavery Partnership (HMSP) so are part of a robust multi-agency partnership which can support in dealing with concerns and offer wrap-around care for potential victims.

5.2 We use the mandatory government Standard Selection Questionnaire for all above threshold procurements, to verify relevant commercial organisations are compliant with the Modern Slavery Act 2015.

5.3 For below threshold procurements we apply a proportionate approach to checking compliance with the Modern Slavery Act 2015. If there is a high or medium level of risk of Modern Slavery taking place in the specific market then we undertake checks to ensure bidders comply with the Modern Slavery Act 2015.

5.4 Where proportionate to do so we apply tender response questions relating to modern slavery.

5.5 We seek a link to a relevant commercial organisations modern slavery statement and any corresponding policies as part of the Standard Selection Questionnaire to check the steps they take are appropriate. Issues are flagged with NELCs Community Safety Team.

5.6 We have standard terms and conditions that goods, services and work providers are expected to self-assess against to ensure they are compliant. NELC require providers to comply with relevant legislation.

5.7 We have training available on modern slavery to ensure staff are aware of their roles and responsibilities in identifying and preventing Modern Slavery.

5.8 We will continue to raise awareness of the Modern Slavery Act 2015 internally and where proportionate we will request providers to set out evidence of their plans and arrangements to prevent slavery in their activities and supply chain as part of the procurement process.

Part 6: Training about modern slavery and human trafficking for staff

6.1 Modern Slavery training is available to all staff on the internal Learn NEL platform. Currently the course is not mandatory or essential training but this is being explored. The training is promoted via line managers, team meetings and through internal newsletters.

Face to face modern slavery training is delivered to identified officers within adult social care and children's social care to ensure that signs are spotted early and steps taken to safeguard individuals.

Staff members within procurement are encouraged to complete the Local Government Association Modern slavery in public sector supply chain e learning course. Modern slavery in supply chains | Local Government Association

Modern slavery posters are displayed within NELC buildings to raise awareness and advise of how and where to report.

There are a number of modern slavery champions within NELC who are able to assist in raising awareness and disseminate information to team members as required or appropriate.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's modern slavery and human trafficking statement for the current financial year.

Signed: Spencer Hunt



Assistant Director and Modern Slavery Lead

Date: 25th April 2024

Signed:



Portfolio holder for Safer and Stronger Communities

NEXT REVIEW: March 2025