

<b>Report Title</b>	Updated Modern Slavery Policy and Statement	
<b>Portfolio Holder</b>	Portfolio Holder for Policy Reform and Resources	
<b>Summary of report</b>	Demonstrate the Combined Authority's commitment to tackling modern slavery by adopting best practice; updating its internal Modern Slavery Policy and publishing an annual Modern Slavery and Human Trafficking Statement.	
<b>Is this report exempt?</b>	No	
<b>Is this a Key Decision?</b>	No	
<b>Is the report urgent?</b>	No	
<b>Is this decision to be exempt from call in?</b>	No	
<b>Local Authorities affected</b>	All Local Authorities	
<b>Impact and implications of this report</b>		
<b>Financial impact</b>	No	
<b>Delegation (s) sought</b>	None	
<b>Supporting the Corporate Plan</b>	A Fairer City Region	√
	A Stronger City Region	√
	A Cleaner City Region	x
	A Connected City Region	x
	A Vibrant City Region	x
<b>Climate Change Implications</b>	No	
<b>Equality and Diversity implications</b>	No	
<b>Social Value implications</b>	Yes - see paragraph 4.2	
<b>Human Resources implications</b>	No	
<b>Physical Assets implications</b>	No	
<b>Information Technology implications</b>	No	
<b>Legal implications</b>	Yes - see paragraph 4.3	
<b>Risk and Mitigation</b>	Yes - see paragraph 4.4	

<b>Privacy implications</b>	No
<b>Communication and consultation implications</b>	Yes - see paragraph 4.5
<b>Contact Officer(s)</b>	Yvonne Liu – Senior Solicitor, <a href="mailto:Yvonne.liu@liverpoolcityregion-ca.gov.uk">Yvonne.liu@liverpoolcityregion-ca.gov.uk</a>
<b>Appendices</b>	Yes – Appendix 1 - Draft Voluntary Modern Slavery and Human Trafficking Statement  Appendix 2 - Draft Modern Slavery Policy
<b>Background Documents</b>	No

# **Liverpool City Region Combined Authority**

**Friday, 15 March 2024**

## **Report of the Executive Director - Corporate Development and Delivery and the Portfolio Holder for Policy Reform and Resources**

### **UPDATED MODERN SLAVERY POLICY AND STATEMENT**

#### **1. PURPOSE OF REPORT**

- 1.1. To advise of progress made and ask the Combined Authority to agree the contents of the updated Modern Slavery Statement and Policy (appended to this report).
- 1.2. To request the Combined Authority to agree publication of the Modern Slavery Statement on the Combined Authority's websites (homepages) and on the Government National Database by April 2024.

#### **2. RECOMMENDATIONS**

- 2.1 It is recommended that the Liverpool City Region Combined Authority:
  - (a) agree the contents of the updated Modern Slavery Statement and Policy (attached as appendices 1 and 2); and
  - (b) agree to publication of the Modern Slavery Statement on the Combined Authority's websites (homepages) and on the Government National Database by April 2024.

#### **3. BACKGROUND**

- 2.2 Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. Modern slavery is an issue that happens everywhere and affects us all. It is happening here in the UK and in Liverpool City Region neighbourhoods. It is estimated more than 100,000 people are currently being forced to live in the UK as slaves.
- 2.3 The City Region is made up of many ethnicities and it attracts vast numbers arriving from Europe and beyond through our international airport, from ferries and cruise ships. As identified by the Merseyside Police & Crime Commissioner's Office ('PCC') at its Merseyside Modern Slavery Network Delivery Plan launch event in January 2024, Merseyside alone has high levels of deprivation and unemployment which could lead to an increased risk of exploitation. The PCC's Vision is to reduce people being exploited in Merseyside; to protect communities from Modern Slavery and Human Trafficking.
- 2.4 The Combined Authority is not immune to the risk of modern slavery, albeit a lower risk within the services it procures and the staff it recruits due to its existing internal policies and procedures, there are still potential risks that may arise in its supply

chains and services. To demonstrate the Combined Authority's commitment to tackling modern slavery and align with the PCC Vision, best practice should be adopted. The Combined Authority has therefore updated its internal procedures and policies and is in the process of scrutinising its supply chain, strengthening its procurement and grant funding agreements. It is working with partners and relevant external agencies to take positive action to reduce modern slavery.

- 2.5 The Modern Slavery Act 2015 (the 'Act') is the current legislation on modern slavery, consolidating offences relating to human trafficking and slavery, servitude and forced or compulsory labour. Section 54 (1) of the Act requires commercial organisations (who supply goods or services and have a minimum total turnover of £36 million per year) to prepare a slavery and human trafficking statement for each financial year. The statement should set out the steps they have taken to ensure that their business and supply chains are slavery free.
- 2.6 The requirement to publish a statement does not apply to public authorities. There were legislative plans (Prime Minister's Office legislative reform agenda May 2022) to extend the scope of section 54 Modern Slavery Act in a new Modern Slavery Bill (the 'Bill'), requiring public authorities to also publish an annual statement. It is unclear when the new Bill will become law. However, when enacted, certain other elements of the Bill will have a major impact on organisations and public authorities caught under the updated regime. There have been no developments since the 2022-23 Parliamentary Session. However, in November 2023, a Private Member's Bill was introduced to the House of Lords that requires both commercial organisations and public authorities to protect human rights and prevent environmental harms in supply chains.
- 2.7 Regardless of the legislative position, the Combined Authority will continue to work towards best practice in addressing modern slavery, given the devastating impact it has on victims and their families. It is thought that when the Bill is enacted, uploading and registering an organisation's modern slavery statement on the Government National Register will be mandatory (currently it is voluntary). It would therefore be prudent to progress with the proposed recommendations, as set out in this Report, with the new Bill in mind to demonstrate the Combined Authority's commitment to raising awareness and tackling modern slavery in its supply chains.
- 2.8 It is recommended that the Combined Authority approves, publishes and registers the appended modern slavery statement as a priority. The internal policy and proposed training will provide Combined Authority staff with guidance on how to identify any indications of modern slavery and how to appropriately report concerns.

## **4. IMPACT AND IMPLICATIONS**

### **4.1 Supporting the Corporate Plan**

Adopting a revised Modern Slavery Statement and Policy supports the Corporate Plan by creating a Fairer and Stronger City Region.

### **4.2 Social Value**

The updated Modern Slavery Statement and Policy supports the organisation's commitment to maximising social value by working in partnership with public sector

organisations and anchor institutions across the City Region.

Victims of modern slavery and human trafficking are men, women and children of all ages, ethnicities and nationalities. However, exploitation is normally more prevalent among the most vulnerable or within minority or socially excluded groups. For this reason, due to the nature of the Combined Authority, the work it does and what it stands for 'Creating a fairer, stronger, cleaner Liverpool City Region – where no one is left behind', it is in a position to make a difference.

Members of the Combined Authority's Legal Services and the Housing First Team met with external Police contacts from the Merseyside Police Modern Slavery Unit in December 2023, to discuss the advice given to Combined Authority staff on how to report incidents and also to discuss the regional issues Merseyside Police are facing. Staff members attended the Merseyside Police and Crime Commissioner's Modern Slavery Delivery Plan launch on 16th January 2024.

The action plan for 2024-2025 will include Combined Authority attendance at the Merseyside Police and Crime Commissioner's quarterly meetings where Network Members come together to share knowledge and best practice; and put effective interventions in place to protect potential victims across the City Region.

#### **4.3 Legal**

Legal Services will continue to advise the Combined Authority and will make the required changes to legal agreements (procurement and grant funding agreements) and processes to reflect best practice.

Existing internal policies such as the Whistleblowing Protocol and Safeguarding Protocol have been amended to specifically refer to modern slavery; directing staff to the right policy and appropriate reporting procedure.

On approval, Legal Services will oversee the updated modern slavery policy implementation and staff training in conjunction with the Safeguarding Lead.

#### **4.4 Risks and Mitigation**

Whilst the Act does not apply to public authorities, following best practice and taking a risk-based approach is important, and the Combined Authority should show it is committed to eliminating modern slavery in its supply chains. Not taking robust steps in addressing modern slavery will increase the risk of potential victims being exploited within Combined Authority supply chains or other Combined Authority endorsed activities. This approach needs to be balanced with continuing to ensure that the burdens in public procurement remain as low as possible, both for contracting bodies and for suppliers, especially small businesses and voluntary, community and social enterprise organisations.

In updating its procedures, the Combined Authority needs to ensure continuing compliance with public sector procurement rules and regulations. As per current Government Guidance on tackling modern slavery in Government Supply Chains (Procurement Policy Note 05/19), modern slavery risks can be found in contracts and suppliers of all sizes. However, in applying the Government Guidance, commercial teams must take action only where it is proportionate to the size of the

contract, and on existing contacts, the size of the supplier.

Failure by the Combined Authority to comply with its obligations under the procurement rules and regulations could result in legal challenge. The risk of legal challenge is being mitigated by ensuring that those with procurement responsibility will be trained in the latest Government Guidance and that advice is continued to being taken from Legal Services when updating procurement processes.

#### **4.5 Communication and Consultation**

Key aspects of the Modern Slavery Statement and Policy have been developed collaboratively by a cross-disciplinary officer group reporting to the Safeguarding Development Board. The incident reporting aspect has been consulted with Merseyside Police, including raising awareness around the Modern Slavery Helpline.

The updated Modern Slavery Policy will be communicated to all staff, to ensure they are alert to the signs of modern slavery and are aware of the free and confidential Modern Slavery Helpline.

If approved, the Combined Authority must publish its statement on all its websites with a prominent link to it on homepages.

### **5. CONCLUSION**

Modern slavery is a serious threat to organisations, communities, families and friends. Through the recommendations in this Report, the Combined Authority can further demonstrate its commitment to preventing and tackling the scourge of Modern Slavery in its City Region.

It is recommended that both documents are approved by the Combined Authority, endorsing its existing work on eliminating modern slavery from its services and supply chains.

LIZ DEAN  
Executive Director - Corporate  
Development and Delivery

MAYOR STEVE ROTHERAM Portfolio  
Holder for Policy Reform And Resources

#### **Appendices:**

Appendix 1 - Draft Voluntary Modern Slavery and Human Trafficking Statement  
Appendix 2 - Draft Modern Slavery Policy

#### **Background Papers:**

None