



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY



METROMAYOR
LIVERPOOL CITY REGION

MODERN SLAVERY POLICY

**[*FOR ALL CA STAFF – TO BE UPLOADED ON POLICY REVIEW SYSTEM AS
MANDATORY READING]**

[TO REFLECT MODERN SLAVERY STATEMENT*]

March 2024



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Document Control

Document Owner	Modern Slavery Working Task and Finish Group
Document Version	V1
Approved By	[Liverpool City Region Combined Authority]
Approval Date	[15 th March 2024?]
Created Date	December 2023
Reviewed Date	N/A
Material Changes Made	N/A
Date of Next Review	December 2024

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This document should be read in conjunction with the Modern Slavery Statement published on the Liverpool City Region Combined Authority's and Merseytravel's website [hyperlink if ready before Policy approval].

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This Policy is published by Liverpool City Region Combined Authority, Merseytravel and its subsidiary companies (the '**Organisation**'). This Policy and associated published Modern Slavery statements on the Organisation's webpages are made pursuant to section 54(1) of the Modern Slavery Act 2015 (the '**Act**') and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

This Policy will be reviewed and updated on an annual basis by the Executive Director Corporate Development and Delivery. In the case of any significant changes, the Policy will be presented for approval to the Safeguarding Development Group. However, as a minimum, the Policy will be presented for re-approval every five years or earlier, if there is a fundamental change in relevant legislation and the Organisation's obligations.

1. Purpose

1.1 The purpose of this Policy is to:

- set out its responsibilities, and of those working for and on its behalf, in observing and upholding its position on modern slavery and human trafficking; and
- provide information to those working for and on its behalf on how to identify and report concerns regarding modern slavery and human trafficking.

- 1.2 This Policy applies to all persons working for us or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and organisation partners.
- 1.3 This Policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Statement

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 2.2 Fairness and Social Justice are at the core of the Organisation's mission, hence the commitment to tackling the injustice of modern slavery. The Organisation also acknowledges its duty to ensure that taxpayers' money is not inadvertently funding criminal activity and the misery it creates, and to protect vulnerable workers both in the UK and elsewhere. The Organisation recognises that modern slavery is a regional issue and whilst this Policy focuses on internal procedures, its action plan intends to have a public facing element. The Organisation is currently looking at what the Organisation can do to support modern slavery incidents within its region and how it can help eliminate slavery and human trafficking within its regions. Recent work includes meeting with our existing contacts within the Police to discuss the modern slavery risk within its homelessness and Housing First Service.
- 2.3 The Organisation has a zero-tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all its relationships. At the time of writing, we are implementing and enforcing effective systems and controls to ensure modern slavery risk are identified and reduce the risk of it taking place in its own business or in its supply chains by adopting new processes and procedures, in both procurement and supply management.
- 2.4 The Organisation expects the same high standards from all of its contractors, suppliers and other business partners and, as part of its procurement processes, it is aiming to update its standard contracts (and grant fund agreements) with specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children, and it expects its suppliers to hold their own suppliers to the same high standards.
- 2.5 The current legal and regulatory requirements do not apply to public bodies. There were legislative plans (Prime Minister's Office legislative reform agenda May 2022) to extend the scope of section 54 of the Act in a new Modern

Slavery Bill to include local authorities (and combined authorities) with a budget threshold of £36 million or more. If and when that will happen is still unclear.

- 2.6 In order to show its commitment to tackling this horrific crime, the Organisation is embracing the underlying principles of the Act. This Policy sets out the work it will be carrying out to improve its practices to combat and prevent slavery, and human trafficking in its corporate activities with the overall aim of ensuring its supply chains are free from slavery and human trafficking.
- 2.7 The consequences of the Organisation or any of its partners breaching the Act would be very serious and cause reputational damage to the Organisation as a whole. The Organisation has therefore voluntarily decided to publish a Modern Statement and register on the Government's Modern Slavery Statement Registry accessible here: [Find modern slavery statements - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://find.modernslaverystatements.gov.uk).
- 2.8 The procedures contained within this Policy are designed to provide practical guidance to Organisation's employees concerned about modern slavery, including the actions to take in the event an individual is in danger.
- 2.9 The Organisation encourages all employees to report any concerns about modern slavery in the Organisation.
- 2.10 The scale and scope of services provided by the Organisation is such that it is not wholly immune to the risk of Modern Slavery in its supply chains and in the Organisations services. In particular, the Organisation has identified that there are modern slavery risks in its homelessness and housing projects. The Organisation has previously worked with Merseyside Police in response to incidents on how to combat crime in these key areas and it is engaging with Merseyside Police further to discuss how the Organisation can raise awareness, collaborate and support any Police initiatives.
- 2.12 The Organisation will fully support the Police and other external agencies in any investigations regarding slavery and human trafficking.
- 2.13 The Combined Authority has in place a Confidential Reporting (Whistleblowing) Policy to enable staff should a member of staff wish to confidentially report any modern slavery concerns which relate to any suspected unethical employment practices.

3. Scope

- 3.1 This Policy applies to all Members of the Combined Authority, all employees including temporary and agency staff, and all those acting on behalf of the Organisation, such as consultants.



- 3.2 Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Legal Officer and Monitoring Officer.

4. Roles and Responsibilities

- 4.1 The Safeguarding Lead and LCRCRA's internal Modern Slavery Working Task and Finish Group ('**Working Group**'). Working Group are responsible for deploying this Policy across the Organisation, monitoring its implementation, and taking appropriate action in the event of a modern slavery concern being raised. The Safeguarding Lead can be contacted as follows:

Private and Confidential

Safeguarding Lead
Liverpool City Region Combined Authority
Seventh Floor
1 Mann Island
Liverpool L3 1BP
Telephone: **[to be inserted]**

- 4.2 In the event of the absence of the Safeguarding Lead, the Designated Safeguarding Lead can be contacted at the above address or by telephone on : **[to be inserted]**.
- 4.3 The Executive Leadership Team is responsible for demonstrating leadership in developing and establishing an organisational culture in relation to modern slavery and human trafficking. Directors, Assistant Directors/Heads of Service are responsible for assessing the risk of modern slavery within their services and maintaining effective systems of internal control to minimise this risk, in accordance with the Policy.
- 4.4 Every member of staff has a responsibility to be aware of the risk of modern slavery and to apply the procedures detailed in this Policy in order to prevent, deter and detect it. All members of staff will be required to read this Policy and any revised versions on implementation. All members of staff must ensure that they have read, understood and comply with this Policy.
- 4.5 In addition, all employees will complete Level 1 mandatory safeguarding training. The training includes modern slavery as a category of abuse employees need to be aware of and prevent as part of their induction training and as part of refresher courses throughout their career with the Organisation. The Working Group has also recommended that employees involved in procurement decisions and procedures, undergo enhanced Government recommended training for tackling modern slavery in public sector supply chains, to help public sector commercial staff identify and mitigate modern slavery risks in their procurements. The Organisation will invite Merseyside Police to offer additional training for its Housing First and Homelessness Programme Team, to include specific training for its team of Locality Managers.



Practitioners and other support workers who regularly engage with service users and vulnerable persons within our region.

- 4.6 The prevention, detection and reporting of modern slavery in any part of our services or supply chains is the responsibility of all those working for the Organisation or under its control. An employee is required to avoid any activity that might lead to, or suggest, a breach of this Policy.

5. Implications

5.1 What is Modern Slavery?

5.1.1 Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can occur in various forms. These include slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty and their treatment as property by another, in order to exploit them for personal or commercial gain. Exploitation can take the form of sex work, domestic servitude, forced labour, criminal activity or organ removal.

5.1.2 There is no typical victim and some victims do not understand they have been exploited, that it is illegal, and that they are entitled to help and support. Victims are often trafficked to a foreign country where they are unable to speak the language, have their travel and identity documents removed, and are told that if they try to escape, they or their families will be harmed.

5.2 The Organisation is increasing its dialogue with the Police to gain a better understanding of the issue of cuckooing in its Housing First and homelessness programmes. The Organisation is aware of previous cuckooing incidents happening in its Housing First programme and has identified that its temporary housing it provides could still be a target for future incidents.

- 5.3 There are different types of cuckooing:
- using a property to grow, deal, store or take drugs;
 - using a property for sex work;
 - using a property to store weapons;
 - taking over a property as a place for someone to live;
 - taking over a property to financially abuse a tenant.

The most common form of cuckooing, is a person's home being taken over to distribute drugs, the person's property being taken as a place to live and the property being taken over to financially abuse the tenant.

Cuckooing often begins when the vulnerable adult is befriended by those that want to take over the property. The vulnerable adult may be offered something, this could be a relationship, friendship, drugs and/ or alcohol, money or clothing. Gradually the 'benefits' will reduce and may eventually come to an end, and more and more people will come and go from the address. The gang members / drug dealers may threaten the adult at risk verbally or physically if they try to put a



stop to their criminal activity. They will also discourage family / friends and support workers from visiting the vulnerable adult's address.

Housing First service users maybe a target for cuckooing because users are often known for being vulnerable and having multiple support needs by others in the community and are therefore targeted when they have their new tenancy. The Organisation works with adult social care, Police and the housing associations to support the service user and stop the cuckooing as soon as the Housing First Team have any concerns.

- 5.2 As a public organisation with a budget in excess of [**£435 million, and responsible for funds in excess of £1 billion* to be fact checked again and updated before publication*], the Organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. It is committed to acting ethically, transparently and with integrity in all its business dealings and relationships, and to implementing and enforcing effective systems and controls to counter the threat of modern slavery within its supply chains.

6. Supply Chains

- 6.1 The Combined Authority spends over [*£504 million a year with 1710 suppliers. Over 95% is spent with UK based companies to be fact checked again and updated before publication*]. Nonetheless it recognises that its supply chains spread across the world, and that parts are almost inevitably engaged in modern slavery. Although its resources to monitor and manage its supply chains are limited, and whilst we will therefore require its suppliers to be vigilant, we will not flinch from scrutinising those areas of activity likely to present the highest risk of modern slavery. These sectors include housing, homelessness, leisure and hospitality, construction, agriculture, catering, cleaning, clothing and manufacturing.
- 6.2 This year, the Organisation's focus will be looking at its tender, procurement and grant application processes. Starting with the tendering process, the Organisation will require that potential direct suppliers are aware of its commitment to tackle modern slavery and human trafficking, and that they also understand their obligations as a supplier or contractor prior to entering into a contract with the Organisation.
- 6.3 The Organisation already undertakes due diligence when considering taking on new supplier. This year the Working Group are prioritising implementing a Supplier Code of Conduct or 'Supplier Specification' with a minimum set of behaviours expecting from all its direct suppliers, bringing together the Organisation's social values and other work on external ESG accreditation. In addition, we are updating our due diligence procedures and intend for confirmed suppliers to answer a separate monitoring questionnaire, specifically addressing modern slavery and asking the supplier to confirm that it has not been convicted of a modern slavery offence in the past 5 years.

- 6.4 The Organisation will also review its existing high risk suppliers on an annual basis through its contract management arrangements and seek to embed the new Supplier Code of Conduct or other required standards in existing relationships, updating contracts with an incorporated Supplier Code of Conduct on renewals of contract where possible. The due diligence and reviews will include:
- Mapping the supply chain to identify high risk of modern slavery based on country, sector, high spend and strategically critical factors;
 - Evaluating the modern slavery and human trafficking risks of each new supplier;
 - Conducting supplier assessments to create a risk profile focusing on the financial stability and also covering insurance and compliance with various employment practises;
 - Taking steps to improve sub-standard supplier practises, including the provision of advice to suppliers and requiring them to implement action plans;
 - Participating in collaborative initiatives focused on human rights and socially responsible procurement policies in general and modern slavery and human trafficking in particular;
 - Invoking sanctions in respect of suppliers who fail to meet its expectations or to improve their performance in line with an action plan, which includes a provision to terminate the business relationship;
 - Internal accountability for work to identify, prevent and mitigate modern slavery will be via the ELT.
- 6.5 The Organisation's existing Anti-Money Laundering Protocol sets out the due diligence procedures for transactional activities. Compliance will ensure that the Organisation is working with legitimate businesses and partners.

7. Action Plan

- 7.1 Over the course of 2024, the Organisation will:
- Appoint a political lead for modern slavery;
 - Map its supply chains to identify high risks of modern slavery based on country, sector, high spend and strategically critical factors;
 - Review and update tender documentation (to include its existing Tender Questionnaire) to ensure modern slavery and human trafficking issues are fully

addressed, including clauses to ensure contractors with a turnover in excess of £36m pa have a Modern Slavery Statement;

- Develop appropriate key performance indicators (KPIs) for future reporting on modern slavery to measure progress and benchmark against this year's actions;
- Provide suitable training and awareness to staff, and include modern slavery as part of induction for new starters;
- Participate in existing Combined Authority partnerships focused on Serious Organised Crime, which includes modern slavery;
- Develop an annual communications plan in relation to its work on modern slavery, for both internal and external communications;
- Become a member of the Merseyside's Police & Crime Commissioner Modern Slavery Network which brings together partners from across civic society to examine modern slavery in the City Region and to promote best practise in identification, prevention and mitigation; and put effective interventions in place to protect potential victims across the City Region;
- Convene relevant constituent authority officers to exchange intelligence and best practice in relation to modern slavery in the Organisation;
- Within 12 months review and present an updated version of the published Modern Slavery Statement.

8. Reporting Concerns

8.1 If an employee suspects modern slavery or human trafficking

- 8.1.1 If an employee suspects workers are being subjected to modern slavery or they receive an anonymous tip-off, they should involve law enforcement agencies:
- In the UK, if someone is in immediate danger, report it to the Police by dialling 999.
 - If you are concerned about a potential victim, or suspicious about a situation that is potentially exploitative, you can call the Modern Slavery Helpline on 08000 121 700, or call the Gangmasters and Labour Abuse Authority on 0800 432 0804 or submit a report online.
- 8.1.2 In cases of suspected child labour exploitation in the UK, Local Authority Children's Services and the Police by dialling 999 should be notified immediately.



- 8.1.3 Once an incident of modern slavery has been identified and the victim has been safeguarded, the employee should inform your immediate line manager (if appropriate to do so) and inform the Safeguarding Lead immediately (see section 4.1 for contact details). An employee is reminded that the Organisation has a confidential Whistleblowing Protocol should you wish to report any organisational wrongdoing via that route. The Organisation encourage raising concerns about any issue or suspicion of modern slavery in any parts of its Organisation or supply chains of any supplier tier at the earliest possible stage.
- 8.1.4 If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the employee's line manager or through the confidential modern slavery helpline.
- 8.15 Please remember that in cases where modern slavery is discovered, informing the wrong person, tip offs or terminating a relationship immediately can leave victims even more vulnerable and at risk. Please consult the Organisation's Legal Team should a manager or an employee need further any advice.
- 8.16 An employee or their manager should also immediately report to the Chief Legal Officer and Monitoring Officer any complaints or concerns received from a member of the public in relation to possible criminal activity being carried out by someone who is a supplier or client of any of the Organisation.
- 8.17 In making the report, it is helpful to include as much detail as possible, such as:
- Full details of the people involved (including itself, if relevant);
 - Full details of the nature of their/its involvement;
 - The suspected form of modern slavery involved;
 - The dates of such activities;
 - Whether the activity has happened, are ongoing or are imminent;
 - Where they took place;
 - How they were undertaken;
 - What, exactly, are the grounds for suspicion;
 - If your concern has been reported elsewhere e.g., the Police or to the Modern Slavery Helpline.
 - Who else is aware of your concerns.
- 8.18 Once a concern has been reported the matter to the Chief Legal Officer and Monitoring Officer, any directions given to the reporting individual MUST be followed. The reporting individual must NOT make any further enquiries into the matter itself unless otherwise required by the Chief Legal Officer and Monitoring Officer or investigating law enforcement body.
- 8.19 In the unlikely event that legal professional privilege may apply, the lawyer relying on legal professional privilege must liaise with the Chief Legal Officer and Monitoring Officer to decide whether the matter should be reported to law enforcement bodies. It is worthy of note that legal professional privilege only

applies to information a lawyer receives for the purposes of providing advice, or in relation to litigation (or potential litigation). The likelihood therefore of a lawyer in the Organisation obtaining information related to suspected modern slavery in privileged circumstances is negligible.

- 8.20 The Organisation aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Organisation or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

9. Record Keeping

- 9.1 Each service area should keep a record of every due diligence record for a period of five years beginning from the date a business relationship ends or the date a transaction is completed. Details of any relevant transactions carried out for the same period must also be retained. Records showing for example funds received/paid and their purpose must be available for audit and any subsequent investigation or inspection by the relevant supervising body. In practice, each service area should have established procedures to maintain records of any dealings with new and existing customers.
- 9.2 The Safeguarding Lead will keep a record of all reports of suspected modern slavery made to them and of any action taken. The precise nature of these records is not set down in law but should be capable of providing an audit trail during any subsequent investigation.
- 9.3 Personal information collected should be treated in accordance with the data protection regime and subject to appropriate safeguards and held securely.

10. Declaration

This modern slavery and human trafficking policy and published modern slavery statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Organisation's modern slavery and human trafficking statement for the financial year ending [31 March 2025]. It was approved by [Highest level of authority]