

## **Sunderland City Council's Slavery and Human Trafficking Statement 2023-2024**

**To be Published November SEPTEMBER 2023**

### **1. The Modern Slavery Act 2015**

Section 54(1) of the Modern Slavery Act 2015 (the "Act") requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'.

The Act specifies two legal requirements for statements.

- Statements must be published on the organisation's UK website with a link in a prominent place on the UK homepage. The emphasis on visibility is intended to enhance reporting standards, encouraging companies to publicly demonstrate their commitment to addressing modern slavery.
- Statements should be approved by the board or directors (or equivalent management body) and signed by a director (or equivalent). This assigns ownership to senior level management and encourages their proactive involvement in tackling abusive practices in business operations.

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act").

### **2. Introduction**

Sunderland City Council (the Council) is committed to understanding and mitigating risks of slavery and human trafficking in its corporate activities and supply chains. This statement makes clear the Council's commitment to tackling modern slavery by setting out the Council's actions to understand all potential modern slavery risks related to its business and the steps it has taken to aim to ensure that there is no slavery or human trafficking in its own business and its supply chains.

This statement looks back over the previous year and so relates to actions and activities during the financial year 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Act.

### **3. Organisational Structure and Governance**

This statement covers direct employees of the Council (and its wholly owned companies) and services delivered on behalf of the Council by third party organisations, and in the supply chains.

## APPENDIX 1:

More information about the Council structure and governance is available in the [Council Constitution](#)<sup>1</sup>

Each annual statement is reviewed and approved by both Council Chief Officers and relevant Council Cabinet member prior to publication.

A statement will be issued annually, setting out relevant information in respect of the previous financial year and published at:

<https://www.sunderland.gov.uk/article/12178/Modern-slavery-and-trafficking>

### **4. Action Taken to ensure compliance with the Act:**

The Council provides a wide range of support and services. It has a zero-tolerance approach to any form of modern slavery and trafficking and is committed to acting ethically, with integrity and transparency in all service and business dealings and we expect our employees, supply chain, contractors, and all our partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

This statement includes information on relevant Council policies, procedures and plans that are considered key in ensuring compliance with the requirements of the Modern Slavery Act 2015.

Activity which has taken place within the Council (see sections 4.1 to 4.4):

#### **4.1 Review and Updating of the Council Modern Slavery Policy**

In 2018, the Council developed and implemented a corporate Modern Slavery Policy aimed at preventing opportunities for modern slavery to occur within the Council's services or supply chain; safeguarding those who may be at risk; and partnership working to disrupt modern slavery in all of its forms.

The policy applies to all individuals working for, or with, Sunderland City Council in any form, including our employees, supply chain, contractors and our partner agencies and was published on the Council's intranet (The Hub) for all staff to access along with promotion and communication to staff.

The Policy has been reviewed and updated during 2022- 2023.

#### **4.2 Community Safety and Safeguarding Responses**

The Safer Sunderland Partnership, of which the Council is a responsible authority, considered modern slavery within its annual partnership strategic intelligence assessment and Safer Sunderland delivery plan 2022-2023. The Modern Slavery Policy which details the operational procedures and offers guidance has been finalised and reviewed.

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<sup>1</sup> <https://www.sunderland.gov.uk/constitution>

### **4.3 Risk Assessments**

Risk assessments are undertaken by the relevant service area where there is deemed to be a risk of modern slavery or human trafficking, with the support of colleagues within HR and Procurement. Where the risk assessments identify a high risk, the assessment and additional actions proposed are signed off by the appropriate Director and retained centrally as part of the modern slavery risk analysis.

### **4.4 Service Delivery and Procurement and Supply Chains**

The biggest risk to the Council in not being compliant with the Modern Slavery Act is recognised to be through the procurement of goods and services. The Council's Procurement Strategy was updated to specifically refer to modern slavery and much activity in previous years has been focussed on eliminating the procurement risks as much as possible. Procurement staff receive mandatory training and protocols have been subject to regular review.

### **5. Future Action to be Taken.**

The Council will continue to train and raise awareness with staff and elected members so that they:

- understand that modern slavery is an issue in the UK.
- are aware of some of the high-risk areas.
- can spot the signs of modern slavery.
- be clear about what to do and where to report it if they see something of concern.
- think about how the choices people make about what to buy may impact modern slavery.

The Council will continue to work with police on a Northumbria-wide approach to operational procedures and guidance for staff that supports a multi-agency approach to supporting people who have been subject to slavery, trafficking, and exploitation.



Councillor Graeme Miller  
Leader of the Council