



Subject:	Modern Slavery Act 2015: Updated Modern Slavery Statement and Corporate Action Plan
Date:	24th November, 2023
Reporting Officer:	Nora Largey, Interim City Solicitor / Director of Legal and Civic Services and David Sales, Director Neighbourhood Services
Contact Officer:	Sarah Williams, Governance & Compliance Manager

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.	
Insert number <input type="checkbox"/>	
<ol style="list-style-type: none">1. Information relating to any individual2. Information likely to reveal the identity of an individual3. Information relating to the financial or business affairs of any particular person (including the council holding that information)4. Information in connection with any labour relations matter5. Information in relation to which a claim to legal professional privilege could be maintained6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction7. Information on any action in relation to the prevention, investigation or prosecution of crime	
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Sometime in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.1	The purpose of this report is to provide the Committee with the updated annual Modern Slavery Transparency in Supply Chains Statement to meet the obligations of the Modern Slavery Act, 2015 and an update on the related corporate action plan.
2.0	Recommendation
2.1	<p>The Committee is asked to:</p> <ol style="list-style-type: none"> i. note the updated annual Modern Slavery Transparency in Supply Chains Statement (the “Transparency Statement”); ii. approve the addition of the Transparency Statement to the UK Government’s online registry; and iii. note the progress made on the action plan
3.0	Main Report
3.1	<p>Background</p> <p>The Modern Slavery Act 2015 (the “Act”) aims to address slavery and trafficking by enhancing support and protection for victims, giving law enforcement the tools needed to target today’s slave drivers and ensuring perpetrators can be severely punished. It also includes a provision in Section 54 to encourage organisations to ensure their supply chains are slavery-free, known as the Transparency in Supply Chains arrangements (“TISC”).</p>
3.2	<p>Key Issues</p> <p>The Council has voluntarily published an annual Transparency Statement on its website since 2015. This sets out what the Council has done to ensure there is no modern slavery in its supply chains or any part of its business.</p> <p>This year, the annual Transparency Statement has been reviewed by Commercial and Procurement Services, the Council’s Safeguarding Officer, the Council’s Registrar for Births, Deaths, Marriages and Civil Partnerships and the Equality and Diversity Officer and has been refreshed to reflect current guidance on its content. An updated version for 2022-23 is set out in Appendix 1 which, following Council ratification, will be published on the Council’s website.</p>
3.3	<p><u>Recent changes to the Transparency Statement Requirements</u></p> <p>The TISC provisions currently apply to commercial organisations, however, in recent years both the UK Government and the Northern Ireland Department of Justice have reviewed and consulted on these provisions and their potential application to the public sector:</p> <ul style="list-style-type: none"> • In July 2018, the Home Secretary undertook an independent review of the Act and made recommendations, one of which was to strengthen Section 54 by extending the requirement to publish Modern Slavery Statements to government and the public sector.

	<ul style="list-style-type: none">• In July 2019, the UK Government launched a consultation on measures to strengthen the TISC arrangements and published its proposals on how it planned to take this work forward. Many of the proposed changes will require legislative change which has not happened to date. The proposed changes would see a strengthening of the TISC arrangements for commercial businesses, and would, for the first time, extend them so they apply to the public sector.• In January 2022, the Northern Ireland Department of Justice (“DOJ”) published its report, summary of responses and next steps in response to its consultation on TISC. It found that overall, there is widespread support for the strengthening of TISC arrangements.
3.4	<p><u>Approach to Modern Slavery in Northern Ireland</u></p> <p>In October 2022, the DOJ launched a public consultation on a new three-year draft Modern Slavery and Human Trafficking Strategy.</p> <p>The DOJ noted in its consultation that the UK Government plan to make additional changes to the TISC provisions in the Act. The additional changes include:</p> <ol style="list-style-type: none">1. Reporting on specific topics;2. Publishing the MS statement on a public registry;3. Setting a deadline for submitting a statement annually;4. Extending the requirement to publish a statement to public sector organisations with a turnover of over £36million; and5. The introduction of financial penalties for those that do not publish a slavery statement. <p>The public consultation closed in January 2023. The DOJ Modern Slavery and Human Trafficking Unit has advised that a report has been drafted and is awaiting sign off.</p>
3.5	<p>It should be noted that the Legislative Consent of the Northern Ireland Assembly will be required to extend any UK Government changes to Northern Ireland.</p> <p>Alongside the consultation, the DOJ published a progress report on the commitments laid out in the 2021-22 Modern Slavery and Human Trafficking Strategy for Northern Ireland. The Progress Report states in part that the DOJ “will engage further with public sector procurement leads once the additional measures to strengthen TISC are progressed in legislation and will become mandatory for all businesses with an annual turnover of over £36million.”</p>

3.6	<p>In March 2021, the UK Government launched an online modern slavery statement registry. Since its launch, over 7,000 statements have been submitted covering over 23,350 organisations on a voluntary basis.</p> <p>Members asked to approve the addition of the Belfast City Council Transparency Statement to this registry.</p>
3.7	<p><u>Action Plan</u></p> <p>In October 2021, the Council approved an action plan to tackle modern slavery to be taken forward by various departments. This was based on guidance from NILGA. An updated version is attached at Appendix 2.</p> <p>Members should note that the suggested action of developing a Council protocol for reporting suspicions of Modern Slavery has been removed because Government guidance states that suspicions should be reported either to the police or to the Modern Slavery Helpline.</p> <p>Members should also note that an initial awareness session for relevant Belfast City Council managers on recognising Modern Slavery and Human Trafficking was held on 17 November 2022 by the Department of Justice.</p>
3.8	<p><u>Reporting</u></p> <p>The Governance and Compliance Manager co-ordinates an annual report on progress to be brought to CMT and the Strategic Policy and Resources Committee.</p>
3.9	<p><u>Financial and Resource Implications</u></p> <p>The implementation of the action plan will involve staff from City and Neighbourhood Services, Legal Services, Governance & Compliance Services, Commercial and Procurement Services, Corporate HR and Marketing and Corporate Communications.</p>
3.10	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>Any equality, good relations or rural needs implications will be identified using the council's usual screening process.</p>
4.0	<p>Documents Attached</p>
	<p>Appendix 1: Draft Modern Slavery Act Transparency Statement 2022 - 23</p> <p>Appendix 2: Modern Slavery Action Plan</p>