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# Modern slavery and human trafficking statement 2023 to 2024

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## Introduction

We are pleased to present Blackpool Council's third annual published modern slavery and human trafficking statement, covering the period of 2023/24.

Over the past 12 months we have:

- **Supported the Lancashire Anti-Slavery Partnership.** We continue to support this Lancashire working group that shares best practice in disrupting modern day slavery/human trafficking (thereafter MDS/HT). Blackpool Transport assisted in getting a liveried double decker bus to raise awareness of MDS/HT
- **Continued to reinforce partnership working:** Key colleagues have come together as part of the Serious Organised Crime Working Group (known as 'Genga'). Referrals can be received by any agency around all forms of modern slavery and human trafficking. Cases are thoroughly reviewed on a monthly basis, and safeguarding plans implemented, along with conducting effective disruption, particularly in collaboration with police colleagues. Over the past 12 months we have vastly improved the partnership working with the Home Office immigration team, and regularly conduct disruption visits to business premises
- **Recently completed a council self-assessment** using the Local Government Association (LGA) council modern slavery maturity matrix. This matrix provided us with a framework to assess our current progress and plan future activity on modern slavery. It covers areas such as leadership, resources and capacity; identifying and supporting victims; disruption, prevention and mitigating the risk of modern slavery in our supply chains
- **Developed a new key performance indicator:** The number of individuals identified as potential victims of modern slavery, who have been referred to the national referral mechanism (NRM), has been adopted as a key performance indicator to demonstrate the council's dedication to transparency and disclosure. The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive appropriate support
- **Implemented a toolbox talk:** The recently developed modern slavery and human trafficking toolbox talk has been introduced for brief awareness raising on modern slavery and human trafficking. The training is intended to be shorter and less formal than the online training module, allowing for quicker and more regular delivery
- Several of the wholly owned companies have reported on the following actions in regard to modern slavery and human trafficking:
  - **Blackpool Coastal Housing (BCH):** have been providing virtual modern slavery awareness training to their staff through 'Hope for Justice'. The more positive together (MPT) team, emergency housing teams, housing services and HR have all attended. BCH believe frontline/customer facing services are the priority with the customer contact, so have committed to

ensuring that all staff attend the awareness training, including new starters in these areas

- **The Blackpool Housing Company:** have appointed one of their senior team to lead company activities with regard to modern slavery
- **Blackpool Transport:** have introduced a modern slavery policy of their own, led by one of their senior team
- **Blackpool Airports Operations Ltd** ensure that all corporate flights that are subject to National Aviation Security Policy (NASP) are screened at Blackpool airport. Security staff are fully aware of their obligations under Civil Aviation Authority (CAA) policy and are also aware of Border Force requirements applicable to NASP flights

This statement sets out the measures taken by the council to understand all potential modern slavery and human trafficking risks related to its business, and the steps put in place aimed at ensuring that there is none in our own business and supply chains. We regard modern slavery and human trafficking as such important challenges that this statement helps to address. This statement will be reviewed and updated as required. In the course of developing this statement, we have considered the potential links and impacts on people affected or vulnerable to these issues who share characteristics protected by the Equality Act. Evidence suggests that ethnic minorities are disproportionately affected. Where possible, we will use data and evidence on the links between these equality issues to inform and suggest future operational policy development.

The Modern Slavery Act 2015 consolidates slavery and trafficking offences, introduces tougher penalties and sentencing rules and provides more support for victims. Blackpool Council fully supports the implementation of the act. We stand firmly against any exploitation of people, and are committed to protecting the most vulnerable people in Blackpool.

## Definition

Modern slavery includes:

- **Forced labour-** Victims are forced to work against their will, often for very long hours for little or no pay in dire conditions under verbal or physical threats of violence
- **Debt bondage** – Victims are forced to work to pay off debts that realistically they never will be able to
- **Sexual exploitation** - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced under threat
- **Criminal exploitation** - Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will
- **Domestic servitude** - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy, often sleeping where they work

Human trafficking involves the recruitment, harbouring or transporting people into one of the above situations.

## Organisation structure and supply chains

Blackpool Council is a Lancashire unitary local authority, with a jurisdiction of approximately 35km<sup>2</sup> and a population of approximately 141,300. The council is comprised of 42 elected members (councillors). There are 2 councillors for each of the 21 wards, serving for a period of 4 years.

The council has two main priorities for the town:

- Priority one – Communities: Creating stronger communities and increasing resilience
- Priority two – Economy: Maximising growth and opportunity across Blackpool

Our vision for Blackpool is:

- Retaining our position as the UK's number one family resort, with a thriving economy that supports a happy and healthy community who are proud of this unique town.

## Supply chains and due diligence

Blackpool Council is responsible for providing a wide range of statutory and regulatory services for Blackpool's residents, businesses, visitors and partners. Our services are delivered both directly by the council and through external contractors. There are just under 1,000 live contracts held on the contract register and last year the council spent around £283million with third party organisations.

The council recognises its responsibility to prevent modern slavery and human trafficking within its supply chain. The council makes clear to our suppliers and potential, future suppliers that they are required to provide confirmation that they are compliant with the Modern Slavery Act 2015. They are also required to confirm their subcontractors and suppliers comply with the act.

Procurement professionals have critical influence over, and visibility of, supply chain decision-making, particularly in terms of the level

of due diligence that is done and the manner in which suppliers and their tenders are evaluated and assessed. A risk based approach, in line with guidance is adopted in respect of due diligence.

## Our approach

As part of local government, the council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to combating and preventing slavery and human trafficking in our corporate activities, and to ensuring our supply chains are free from slavery and human trafficking.

The council has approved and operates a number of policies and practices which either contribute to minimising the risk of slavery and human trafficking in our businesses and supply chains, or which help to establish an organisational culture which is aware of and acts on the issues involved:

Please note: In September 2023 the Pan Lancashire Children's Safeguarding Assurance Partnership (CSAP) ceased to exist and partnership arrangements for safeguarding children in Blackpool became the 'Blackpool Multi Agency Safeguarding Arrangements' or MASA.

- **MASA and local safeguarding adults board** both have multi-agency policies and procedures that include modern day slavery and human trafficking. These include descriptions of modern day slavery and human trafficking, outlines of the processes used to ensure the victims are supported and safeguarded and links to further information from other organisations. Safeguarding concerns about adults should be reported by calling 01253 477592 (in office hours) or 01253 477600 (out of office hours); and about children by calling 01253 477299 (24 hours).
- **Victim support/safeguarding:** Blackpool Council employs a 'public health approach' in relation to the safeguarding of vulnerable victims of modern slavery and human trafficking. A 'public health approach' focuses on the prevention of modern slavery and human trafficking, the protection of victims, and cooperation and collaboration between partners
- **Pan Lancashire Anti-Slavery Partnership, Modern Slavery Toolkit:** This includes detailed guidance on the process to follow where suspected victims have been identified
- **Community Safety Plan (2022-2025):** The community safety plan sets out the community safety partnership's priorities for the next three years. Serious organised crime, which is linked to modern day slavery, human trafficking, illicit trade and drug dealing has been identified as a key local priority. The serious organised crime working group, known as Genga, is actively engaged in addressing this priority. Sexual and criminal exploitation are also a priorities for the community safety partnership
- **Council plan:** The council plan sets out how we will develop organisational resilience through the support and development of the people we employ, growing their knowledge and skills. It also sets out values of accountability, compassion and fairness
- **Ethical principles:** These include specific principles around the promotion of social justice and reduction of poverty and inequality; upholding the dignity of all people; and promoting and supporting health and wellbeing
- **Supplier charter:** This document sets out what we expect suppliers to adhere to when bidding for and delivering contracts for goods, works and services. Our aim is to adopt and ensure ways of working in our supply chains which: respect fundamental international standards against criminal conduct (such as bribery, corruption and fraud) and human rights abuse (such as modern slavery), responding immediately where they are identified, and result in direct improvements to the working lives of people who contribute to our supply chains. Our purpose in doing this is to ensure our suppliers are delivering contracts responsibly, and we build trust with the public by promoting a culture of high ethical standards that deter or expose poor behaviour and practice.
- **Responsible procurement:** Responsible procurement plays an integral part of Blackpool Council's procurement process. The **Blackpool Council Procurement Strategy (2023 – 2027)** contains a commitment to ensure transparency, sustainability and equality are fully embedded into the council's processes and that local and national priorities are fully considered. Invitations to quote include a statement of corporate social responsibility which encourages contractors to adopt the principles of ethical procurement, including that employment is freely given; working conditions are safe; child labour is not used; living wages are paid; and there is no inhumane treatment
- **Living Wage:** On the 1 April 2013, Blackpool Council committed to paying all employees the National Living Wage. As an accredited employer to the Living Wage Foundation and in order to support the lowest paid workers in the council, the Real Living Wage supplement is applied for council employees whose total hourly rate is currently less than £11.44\* (\*under government plans, this figure may rise again in April 2025)
- **Equality and diversity:** The council's **Equality objectives** outline the council's commitment to integrating equality of opportunity and respect for diversity into all aspects of its activity. The objectives are:
  - **Services** – We will ensure all functions and services comply with our equality duty responsibilities, and we will monitor and inspect to ensure this
  - **Staff** – We will ensure that the workforce is representative of the community the council serves and equality and diversity is embedded in staff culture
  - **Decision making** – We will involve people from all backgrounds in decision making at every level
  - **Cohesion** - We will celebrate the growing diversity in Blackpool and increase respect and understanding for all
  - **Recruitment:** The council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account
  - **Speak out – Whistleblowing:** Blackpool Council is committed to the highest possible standards of openness, probity and

accountability. The council encourage its employees, contractors and partners who may have concerns about any aspect of the council's work to come forward and voice those concerns

When these policies are reviewed, the council will consider whether further measures to strengthen their direct impact on modern slavery and trafficking is necessary.

## Blackpool Council wholly owned companies

Blackpool Council wholly owns the following seven companies, which also provide services to a wide range of individuals who live and work in the town:

- Blackpool Airport Operations Limited ([www.blackpoolairport.com](http://www.blackpoolairport.com))
- Blackpool Waste Services Limited ([www.enveconw.co.uk](http://www.enveconw.co.uk))
- Blackpool Coastal Housing Limited ([www.bch.co.uk](http://www.bch.co.uk))
- Blackpool Transport Services Limited ([www.blackpooltransport.com](http://www.blackpooltransport.com))
- Blackpool Housing Company Limited ([www.myblackpoolhome.co.uk](http://www.myblackpoolhome.co.uk))
- Blackpool Operating Company Limited ([www.sandcastle-waterpark.co.uk](http://www.sandcastle-waterpark.co.uk))
- Blackpool Entertainment Company Limited ([www.wintergardensblackpool.co.uk](http://www.wintergardensblackpool.co.uk))

Although the council's wholly owned companies do not meet the requirement to have their own separate statement, they are covered under the council's statement. The council proactively engages with the wholly owned companies to advise them on the implications for their business, discuss activity and share training materials. We recognise that each of the council's wholly owned companies faces unique challenges in this area due to their diversity, and that each company has adapted its approach to address these challenges.

The wholly owned companies have the discretion to take actions such as:

- Ensuring procedures are in place to raise the alarm about potential safeguarding concerns around adults and children potentially in a modern slavery situation, should this arise and that staff are aware of these
- Conduct due diligence on suppliers and contractors to ensure that they are not involved in human trafficking or modern slavery, and that they also have their own statements or policies in place
- Identifying areas in operations where human trafficking and modern slavery may occur to understand the risks and take appropriate measures to mitigate risks
- Prepare their own statement or policy to further demonstrate their commitment to this cause

## Training and awareness

- **Modern slavery and human trafficking training e-learning iPool module:** The council has a programme of multi-agency training available for all relevant employees and members, including safeguarding awareness training and a modern slavery and human trafficking training e-learning iPool module. This 75 minute e-learning module has been developed to raise awareness of modern slavery and human trafficking, and to help staff recognise their role in identifying and reporting concerns. Training enables officers in community-facing and regulatory roles to look out for, identify and report incidents of abuse and neglect, including modern slavery and trafficking to the relevant agencies
- **Modern slavery and human trafficking toolbox talk:** The council has developed a toolbox talk (aimed at 'front-line' staff) specifically designed for brief awareness raising on modern slavery and human trafficking. The training is intended to be shorter and less formal than traditional online training modules, allowing for quicker and more regular delivery. The toolbox talk serves as a valuable tool to provide employees with essential information related to modern slavery and human trafficking

## Key performance indicators

Number of modern slavery and human trafficking iPool module completions:

- 229 people have completed our modern slavery iPool course
- 217 of those were Blackpool Council employees
- 8 were agency workers
- 4 from external agencies such as voluntary sector and residential care

As of summer 2024, 7.03% of employees have completed the module.

## Number of duty to notify (DTN) and national referral mechanism (NRM) referrals (latest data available to December 2023):

There have been **30** DTN referrals and NRM referrals recorded in the calendar year 2023 (Jan to December). 12 of those were for children under 18.

The NRM's have covered all exploitation types, sexual exploitation, domestic servitude, labour exploitation, and county lines.

(NB: National referral mechanism is the framework for identifying and referring potential victims of modern slavery, and ensuring they receive the appropriate support).

## Next steps for 2024/25

- A modern slavery risk assessment is currently being developed by the risk and resilience team in audit and risk services, and will be introduced before the end of 2024. This will then be subject to regular review and revision
- The organisational and workforce development team are revising the child sexual exploitation and criminal exploitation mandatory staff training modules. They will be adding in additional content on modern slavery. In future, all new staff will complete this revised module, thereby increasing knowledge and awareness of modern slavery, trafficking and awareness of the signs and issues surrounding it. This newly revised element should be available from early 2025
- Use the outcome of the LGA maturity matrix to implement improvements to policy and procedure. This will focus on areas we feel we can improve on – for example, in how we improve checks, awareness and verify appropriate action by our supply chain, and also how we build in positive modern slavery action into our contracting

## Review

We will review and update this statement on an annual basis. The 2023/24 statement will be approved and published in the autumn of 2025.

## Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement covers the full activities of Blackpool Council and its wholly owned companies and relates to the 2023/24 financial year. This statement has been approved by the chief executive of Blackpool Council on 30 September 2024.

Signed for and on behalf of Blackpool Council:

Neil Jack  
Chief executive

Councillor Lynn Williams  
Leader of the Council and Cabinet Member for Tourism, Arts and Culture

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