

**MODERN SLAVERY  
AND  
HUMAN TRAFFICKING STATEMENT  
2019-20**

**Gravesham**  
Borough Council



## **1. Introduction**

- 1.1 Gravesham Borough Council is committed to preventing slavery and human trafficking in the delivery of its services and corporate activities. The Council recognises that slavery and human trafficking remain a hidden blight on our society and that the Authority has a responsibility to be vigilant in spotting associated risks and to strive to ensure that its supply chains are free from slavery and human trafficking at any level.
- 1.2 This Modern Slavery and Human Trafficking Statement details the steps the Council has taken to understand potential modern slavery risks related to its business and the measures adopted with the aim of ensuring that these offences are not committed through the delivery of services or via supply chains.
- 1.3 This Statement relates specifically to activity carried out during the financial year ending 31 March 2020. The Council will be reviewing the Statement on an annual basis and a new, updated Statement, acknowledging any further actions that may have been taken, will be published early in each new financial year.

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

- 2.1 The Modern Slavery Act consolidates various offences relating to slavery and human trafficking. Broadly speaking this means that:
  - 'slavery' is where ownership is exercised over a person;
  - 'servitude' involves coercion to oblige a person to provide services;
  - 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty;
  - 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.
- 2.2 Section 52 of the Act imposes a duty on public authorities, including District Councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.
- 2.3 Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the United Kingdom and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.
- 2.4 Gravesham Borough Council engages in commercial activities by providing services (some of which are statutory and others which are discretionary) and its annual turnover is greater than the specified £36 million. Whilst the Modern Slavery Act does not state that Local Authorities specifically are included within the grouping of organisations legally required to publish a statement, the Council has chosen to do so as a matter of good practice. The Council is keen to raise awareness of slavery and human trafficking and as a large-scale local employer and provider of services, it is seen as imperative that the Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

### **3. Standards**

3.1 Gravesham Borough Council will meet the following standards and also expects those with whom it does business, to meet them:

- To support every individual's human right to live free from abuse, servitude and inhumane treatment;
- To promote ethical business and operational practices in corporate activity and services delivered;
- To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains;
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and to ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated;
- To take appropriate action to address actual instances of slavery and human trafficking brought to the Council's attention and to take all reasonable steps to support and protect its victims.

### **4. Organisational structure**

4.1 Gravesham Borough Council is a Local Authority situated in the county of Kent. The Council provides a wide range of statutory and discretionary services delivered both directly by the Council itself, through partnership working with other agencies and through commissioned work with external contractors.

4.2 The Council's Constitution can be found at:

<https://www.gravesham.gov.uk/home/about-the-council/policies-strategies-open-data/transparency-and-open-data/constitution>

4.3 Details of the Council's structure and governance can be found at:

<http://democracy.gravesham.gov.uk/ecSDDisplay.aspx?NAME=Annex%20%20-%20Management%20Structure&ID=1897&RPID=10043546>

### **5. Supply chains**

5.1 As part of its procurement processes, Gravesham Borough Council expects that all suppliers of goods and services comply with all applicable laws, statutes, regulations and codes including the Modern Slavery Act 2015. Suppliers are also expected to have their own anti-slavery policy and to publish their own Slavery and Human Trafficking Statement (where applicable). Contract terms and conditions set out the requirements of contractors and subcontractors in relation to ensuring there is no slavery or human trafficking in their business.

5.2 The Council also requires its contractors and subcontractors engaged in 'regulated activity' for children and adults at risk to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council's Safeguarding Policy.

## 6. Policies and Plans

- 6.1 Gravesham Borough Council has a range of policies and plans that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

**Council's Corporate Plan 2019-23** – this includes a clear corporate priority focussing on 'People' with firm objectives to improve community safety by preventing, detecting and reducing crime and anti-social behaviour. It also focusses on the commitment to working with Kent Police and partner agencies in achieving these objectives and specifically makes reference to the importance of safeguarding people from harm.

**Dartford and Gravesham Community Safety Partnership's Community Safety Strategy** – the Partnership produced a new three-year Strategy that came into effect in April 2019 that has continued to be delivered. Key strands of work contained within the Strategy are geared towards protecting vulnerable people from harm, including potential victims of slavery and human trafficking. The Strategy is also closely aligned to the Kent Police Control Strategy that identifies modern slavery and human trafficking as a priority. Partner agencies have been and will continue to work together to help identify and establish the nature and extent of slavery and human trafficking across our area and to ensure that colleagues with safeguarding and emergency planning responsibilities are well-placed to provide appropriate support to victims.

**Safeguarding Policy** – this policy sets out the steps the Council is taking to safeguard and protect the welfare of children, young people and adults at risk who come into contact with its services and activities. The policy includes the Council's responsibilities in respect of modern slavery and human trafficking and its legal obligation to notify the Home Office of suspected victims of these offences. The Council recognises that Kent County Council (Specialist Children's Services and Adult Social Services) and Kent Police are the lead agencies in the Borough with regard to the protection of children and vulnerable adults. However, Gravesham Borough Council has a statutory duty to work in partnership with these agencies to identify, refer and respond to suspected abuse and to provide additional support.

In respect of this statutory responsibility, the Council has established the following **Safeguarding Pledge**:

*'As we are made aware, we will ensure that any children or vulnerable adults that access services organised and delivered by Gravesham Borough Council are protected, kept safe from harm and wherever possible, have the support they need to make the choices they want. We believe that safeguarding is everybody's responsibility and we will work with all residents, partner agencies, contractors and volunteers to fulfil this pledge'.*

**Whistleblowing Policy** – the Council encourages all its employees, Councillors, contractors, their agents and/or subcontractors, consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council. This policy is intended to make it easier to disclose information without fear of discrimination and victimisation. All

Council employees are regularly provided with a copy of the policy and asked to confirm that they have read and understood it.

**Employee Code of Conduct** – the Council makes clear to all its employees that there are expected standards of behaviour to which they must adhere when they are representing and acting on behalf of the Council. Employee conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken.

**Recruitment Policy** – this sets out procedures followed to vet new employees to ensure that confirmation of their identities and qualifications is obtained. To comply with the Asylum, Immigration and Nationality Act 2006, prospective employees are asked to supply evidence of their eligibility to work in the United Kingdom. References are sought and followed up for all employees and relevant checks e.g. Disclosure and Barring Service (DBS) checks are carried out where relevant to the position.

**Corporate Procurement Strategy** – this sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from third-party and in-house providers.

**Equality Policy** – this policy sets out the Council's procedures to ensure that it fulfils its obligations under the Equality Act 2010.

## **7. Due Diligence**

7.1 Gravesham Borough Council's approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, subcontractors and other participants in their supply chain where their annual turnover exceeds £36 million. For organisations with a turnover below this sum, suppliers will be asked to confirm their acceptance of this Modern Slavery and Human Trafficking Statement.

7.2 As part of the Council's commitment to identify and mitigate risk, Council departments work together and alongside partner agencies to:

- Identify and assess potential risk areas in its business affairs;
- Mitigate the risk of slavery and human trafficking through robust checks and balances;
- Monitor and review any potential risk areas identified;
- Protect whistleblowers.

## **8. Building capacity – work undertaken during 2019-20**

### **8.1 Ensuring employees, partner agency colleagues and Council Members are well-informed**

#### **8.1.1 Training delivered by national charity, Stop the Traffik**

Gravesham Borough Council's Community Safety Unit (CSU) funded and arranged the delivery of training sessions in July 2019 for key Council frontline staff as well as representatives of partner agencies, local charities and faith groups (particularly those working directly with homeless people and individuals who are rough

sleeping) and several newly elected Councillors. This training covered: an explanation of what constitutes modern slavery and human trafficking, relevant legislation, different types of exploitation and case studies, how to make referrals to through the National Referral Mechanism, how and when to complete a Modern Slavery Notification and considerations of current practice and best practice.

#### 8.1.2 Corporate Safeguarding Group

The Council has a Safeguarding Group comprised of officers from relevant Council departments that have specific safeguarding duties. Any cases of suspected modern slavery and/or human trafficking are referred to this Group in order that appropriate action can be taken drawing upon the expertise of the different officers involved and to act as swiftly as possible to protect the suspected victims from further potential harm.

### 8.2 **Specific projects and initiatives**

#### 8.2.1 Listen to Our Voices Conference 2019

An annual conference has been held as part of a multi-agency project entitled Altogether Safer – Reducing Violence Against Women and Girls (VAWG) in North Kent. The project has been led by Gravesham Borough Council but in close collaboration with Choices (Domestic Abuse Services), Kent Equality Cohesion Council, Kent Police, Dartford Borough Council and Rethink Mental Illness. It has been funded by the Home Office VAWG Transformation Fund. The annual conference is targeted at local women and girls from a BAME background to raise awareness, help remove stigma and break down cultural barriers that may prevent victims of violence and exploitation from seeking help.

The most recent conference was held in September 2019 and approximately 300 women and girls of all ages attended - approximately 95% of them being from a BAME background and the vast majority being from the Indian Sub-Continent. Presentations and discussions took place on the issue of Modern Slavery and Human Trafficking to raise awareness of these crimes and to develop an understanding of the kinds of behaviours resulting in domestic servitude and sexual and/or labour exploitation. Other potentially linked topics covered included forced marriage and honour-based violence.

Interpreters and translators were used throughout the event to enable the full participation of those who wanted to contribute to the debate but who did not speak English. Feedback on every occasion that the conference has been held as part of the Altogether Safer project has been very positive and clearly demonstrated the need for it to continue to take place following the end of the Home Office funded period. Consequently, Gravesham Borough Council's Community Safety Unit will fund the event in 2020 which will take place in November. This will provide another opportunity to continue to promote the debate and raise awareness of modern slavery and human trafficking.

#### 8.2.2 Gravesham Vulnerability Panel

This multi-agency meeting takes place on a monthly basis. Jointly led by Kent Police and Gravesham Borough Council, it has a broad membership and its key purpose is to ensure that all agencies are working together to share intelligence, help identify vulnerable adults and agree actions that can be taken to provide

tailored support. Referrals of individuals can be made by any of the agencies attending the meeting.

### 8.2.3 Gravesham Organised Crime Group

This second multi-agency group meets on a bi-monthly basis to share intelligence in respect of individuals who may be part of serious and organised crime networks with the aim of disrupting their offending, bringing them to justice and supporting victims. The Group will consider referrals where there is concern that slavery or human trafficking is part of the organised criminal activity. This is an effective approach and resultant work has led to referrals being made through the NRM and using the Modern Slavery Notification process.

### 8.2.4 Cross-Borough Working

Plans to explore collaborative working between Community Safety Units in Gravesham, Dartford, Swale and Medway and Kent Police have inevitably had to be deferred due to COVID-19. However, this work will continue to be developed in 2020-21 alongside the completion of a new Gravesham Tackling Modern Slavery Action Plan.

## 9. **Monitoring our effectiveness**

9.1 Gravesham Borough Council will use the following steps to regularly review and monitor the measures being implemented to address slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:

- i) Keep records of training delivered and provide training to new staff and Members;
- ii) Carry out an annual review to identify any deficiencies within our policies and practices and take appropriate action to rectify these to strengthen our ability to address slavery and human trafficking.

**This Statement has been approved by the Council's Cabinet and Senior Management.**



**Councillor John Burden  
Leader of the Council and Champion for  
Safeguarding**



**Stuart Bobby  
Chief Executive**