

Modern Slavery and Human Trafficking Statement

1. Introduction

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.

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.

This Statement relates specifically to activity carried out during the financial year ending 31 March 2021. 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.

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

2. The Modern Slavery Act 2015

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.

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.

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.

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

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

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.

The Council's Constitution and details of the Council's management can be found on in our [Transparency and Open Data directory](#).

5. Supply chains

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.

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

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 focuses 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.

Gravesham Community Safety Partnership's Community Safety Strategy

In late 2020, Gravesham withdrew from a joint Community Safety Partnership with Dartford Borough Council and has established a dedicated Partnership for the Borough. As a consequence of this, the Partnership has now produced a new 3-year Community Safety Strategy to focus on local needs. 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. A new Partnership structure has also been created and this now includes a multi-agency Gravesham Modern Slavery Working Group. Members of this Group will 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, revised and reviewed in 2020-21, 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 vetting procedures for new employees to confirm their identities and qualifications is obtained. To comply with the Asylum, Immigration and Nationality Act 2006, it's asked of prospective employees 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

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.

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. Action being taken

Developing our first Modern Slavery Strategy 2020-23

In October 2020, Gravesham Borough Council developed and launched its first dedicated Strategy to address modern slavery and human trafficking. The Strategy was launched to coincide with International Slavery Day on 18 October 2020 and was very well-publicised through local media (both print and online coverage). Contributions in one press article from Gravesham Borough Council, Kent Police and Porchlight (local homelessness charity) clearly demonstrated the commitment that local agencies have made to working together proactively to deal with this crime. This generated some very positive responses from the public. A further article on the new Strategy was also included in the winter edition of Your Borough magazine which is delivered to in excess of 45,000 households across Gravesham.

The Strategy is also a resource document; it explains the legislation that defines the offences of modern slavery and trafficking, details the National Referral Mechanism and contains material to help spot the signs of modern slavery. It also clearly identifies the Council's objectives and priorities in tackling the issue as follows:

- Priority 1: To raise awareness and understanding of modern slavery and its effects across Council departments and within our local communities
- Priority 2: To increase reporting of modern slavery by service providers and the public
- Priority 3: To ensure Council staff and Members have the right knowledge, skills and processes to act confidently
- Priority 4: To identify, support, protect and empower victims of modern slavery
- Priority 5: To assist in the identification, disruption and bringing to justice of offenders
- Priority 6: To have effective governance, processes and clear lines of responsibility

Creation of a Gravesham Modern Slavery Working Group

Gravesham Borough Council has led on the establishing of a multi-agency Modern Slavery Working Group to oversee the delivery of the new Strategy and developed an Action Plan to ensure that progress is routinely monitored. During the year, progress has been reported back to the Gravesham CSP, the Gravesham Serious Organised Crime Panel, the Council's Crime and Disorder Scrutiny Committee and the Council's Community and Leisure Cabinet Committee.

The Working Group is chaired by the Council's Lead Safeguarding Officer and the Vice-Chair is a colleague from Porchlight (local homelessness charity) The core membership of the Group is as follows (although other agencies and organisations are expected to join the Group as work develops:

- Gravesham Borough Council
- Kent Police
- Porchlight
- Choices
- Rethink Mental Illness
- Kent Equality Cohesion Council

Directly supporting victims of modern slavery

During 2020-21, the Council has developed its understanding of duties as a First Responder agency and as a consequence, 3 referrals through the National Referral Mechanism (NRM) were made by Council officers in respect of cases of labour exploitation. Victims were also supported with emergency temporary accommodation whilst they awaited the decision of the NRM process.

Training Provision for Staff

In March 2021, the Council's Procurement/Commissioning Officer attended a 2-day training course specifically tailored for commissioning staff. The training was delivered virtually due to Covid-19 by the Chartered Institute of Procurement and Supply and provided information on how to spot the potential signs of slavery, to understand and/or manage supply chains of any size and what to do if there is concern that slavery may be occurring within the supply chain.

Corporate Safeguarding Group

The Council has a Safeguarding Champions Group composed 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

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.

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.

9. Monitoring our effectiveness

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:

- Provide training to new staff and Members;
- 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;

- Report progress on the delivery of the Council's Modern Slavery Strategy to the Gravesham Community Safety Partnership, the Crime and Disorder Scrutiny Committee and the Community and Leisure Cabinet Committee at regular intervals and as appropriate.