

Modern Slavery and Human Trafficking Statement 2021-22

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 2022**. 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 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 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:
[Constitution – Gravesham Borough Council](#)
- 4.3 Details of the Council's management structure can be found at:
[Senior Staff Salaries and Organisation Structure – Gravesham Borough Council](#)

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 refers 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 established a dedicated Partnership for the Borough. The Partnership then developed a new 3-year Community Safety Strategy 2021-2024 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. The Partnership structure includes a multi-agency Gravesham Modern Slavery Working Group. Members of this Group 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 2021-22, sets out the steps the Council is taking to safeguard and protect the welfare of children, young people and adults at risk coming 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 for 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, 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 those using the whistleblowing policy

8. Work to address modern slavery and human trafficking during 2021-22

8.1. Continuing to deliver the Modern Slavery Strategy 2020-23

8.1.1 Gravesham is one of few Local Authority areas that have developed a dedicated Modern Slavery Strategy. This, together with the establishing of our multi-agency Modern Slavery Working Group, has been recognised as a good practice model in Kent and other areas are now looking to develop their own. The Strategy was launched in October 2020 and work has continued in 2021-22 towards achieving its objectives.

8.1.2 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:

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

8.2. Gravesham Modern Slavery Working Group

8.2.1 Gravesham Borough Council leads on the work of the Modern Slavery Working Group to oversee the delivery of the new Strategy and its underlying Action Plan and ensures that there is collaboration and 'joined-up' working between different services supporting victims (particularly between Council Departments). The Group is chaired by the Council Lead Safeguarding Officer. 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 as appropriate.

8.2.2 It is very encouraging that during 2021-22, the membership of the Group has grown and now includes representatives from:

- Gravesham Borough Council (Community Safety Unit, Housing Services)

- Kent Police
- Stop The Traffik
- Migrant Help
- Salvation Army
- Kent County Council Adult Safeguarding
- Kent County Council's Children's Social Care
- Citizen's Advice Bureau
- Department of Work and Pensions (DWP) (Job Centre Plus)
- Gangmasters and Labour Abuse Authority (GLAA)
- Medaille Trust
- Darenth Valley Hospital Safeguarding Lead
- Mountain Health Care – Sexual Abuse Referral Centre
- Kent and Medway NHS and Social Care Partnership Trust
- Porchlight
- Choices
- Rethink Mental Illness
- Kent Equality Cohesion Council

8.3. Directly supporting victims of modern slavery

8.3.1 During 2021-22, the Council has continued to diligently carry out its duties as a First Responder agency and 4 referrals through the National Referral Mechanism (NRM) were made by Council officers after these cases came to light because of information-sharing and partnership working between the agencies mentioned above. Victims were also supported with emergency temporary accommodation whilst they awaited the decision of the NRM process.

8.4 Partnership Day of Action

8.4.1 Following numerous reports from the public of Modern Slavery concerns, a Day of Action took place in January 2022 involving the GLAA, Kent Police, Gravesham Council's Community Safety Unit and Private Housing Team, Kent Fire and Rescue Service (KFRS), Kent Police Modern Slavery and Human Trafficking Unit, and DWP. KFRS had visited the site in question previously and spoke to the owners as the conditions on site were found to be very concerning. On this occasion, no evidence was found to suggest Modern Slavery was taking place, but the multi-agency visit emphasised to the owners that any future reports would equally be followed up and thoroughly investigated.

8.5. Engaging with survivors and better understanding the needs of victims

8.5.1 As part of developing local understanding of victims' direct experience of when they have engaged with services and identify ways in which responses can be improved, the Modern Slavery Working Group was privileged to welcome a survivor into one of the Group's meetings. They were able to share their experience of interacting with different agencies both during the time that they were enslaved and after the enslavement had come to an end. Key learning points were shared that services took away to improve practices within their separate organisations.

8.5.2 A better understanding of the wider determinants that can trap people in exploitative situations such as being in poverty or destitution with no access to public funds, fear of authorities or deportation etc. Appreciation of these factors has allowed the Working Group to act as a mechanism for raising these concerns at a higher level within their respective organisations when they arise. Direct engagement with victims this year brought to light the practical problem of a time gap between the survivor coming forward and support coming into effect. The Council's Senior Management Team agreed to bridge that gap by providing emergency accommodation for one or two nights to address the issue of survivors finding themselves street homeless whilst waiting for support services to become active.

8.6. Training Provision for Staff

8.6.1 During 2021-22, specialised Modern Slavery training was delivered to the Council's Safeguarding Champions by the Modern Slavery and Human Trafficking Prevent and Protect Officer from Kent Police. Mandatory Modern Slavery online training was also introduced for all Council officers.

8.7 Corporate Safeguarding Group

8.7.1 The Council has a Safeguarding Champions 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. Membership of the Group has been reviewed and updated to ensure there is a good level of representation.

8.5 Gravesham Vulnerability Panel

The Gravesham Vulnerability Panel is a multi-agency group that meets each month. 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 Serious Organised Crime Group

This further multi-agency, operational sub-group of the Gravesham Community Safety Partnership 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

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) 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
- iii) 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.

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

Signed by

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

**Stuart Bobby
Chief Executive**