

**MODERN SLAVERY**  
**AND**  
**HUMAN TRAFFICKING STATEMENT**  
**2023-24**



## **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 every 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 2024**. 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:

[Document Complete Version of Constitution \(updated July 2024\) – Gravesham Borough Council](#)

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

[Senior Staff Salaries and Organisation Structure - Policies, strategies and open data – 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 2023-27** – The Corporate Plan focusses on 3 core objectives, each with its own portfolio of activities and initiatives but, importantly, which integrally support the other objectives for the benefit of our local community.

**#oneborough:** *a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy.*

**#onecommunity:** *an active, engaged, and culturally enriched population, built on the foundations of an affordable and quality local housing offer.*

**#onecouncil:** *a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.*

**Gravesham Community Safety Partnership's Community Safety Strategy 2024-28** – in March 2024, Gravesham's Community Safety Partnership (CSP) adopted a new 4-year Strategy that underpins multi-agency activity to prevent and reduce crime and anti-social behaviour. 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 has been fully reviewed and revised and 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**:

### **Safeguarding Pledge**

**As we are made aware, we will ensure that any children or adults at risk that access services organised and delivered by Gravesham Borough Council are protected, kept safe from harm and wherever possible, are provided with 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.**

**Where there is a conflict of agendas, the welfare of the child or adult at risk is paramount.**

**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 2023-24**

8.1. Gravesham is one of a few Local Authority areas to 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 e.g. Maidstone, have now adopted the same approach. The Working Group continues to meet on a bi-monthly basis with the aim of fulfilling the Strategy's objectives and as an operational group of the CSP, reports back on progress to quarterly CSP meetings.

### **8.2 Gravesham Modern Slavery Working Group**

8.2.1 Gravesham Borough Council leads on the work of the Modern Slavery Working Group to ensure that there is collaboration and 'joined-up' working between different services supporting victims, particularly between Council Departments but also across a range of agencies and organisations. The Group is chaired by the Council's Lead Safeguarding Officer.

8.2.2 It is very encouraging that during 2023-24, the membership of the Group has remained stable and includes representatives from:

- Gravesham Borough Council (Community Safety Unit, Housing Services, Rough Sleeping Initiative)
- Kent Police
- Stop The Traffik
- Migrant Help
- Salvation Army
- Kent County Council Serious Organised Crime Team
- 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
- Darent Valley Hospital Safeguarding Lead
- Mountain Healthcare
- NHS

- Porchlight
- Rethink Mental Illness
- Kent Equality Cohesion Council

### **8.3 Directly supporting victims of modern slavery**

8.3.1 During 2023-24, the Council continued to diligently carry out its duties as a First Responder agency and although only 1 referral through the National Referral Mechanism (NRM) was made by a Council officer, the Council's Safeguarding Officers and Community Safety Unit were able to support other agencies in their completion of NRM referrals. Victims have been supported with emergency temporary accommodation whilst they awaited the decision of the NRM process and rooms in the Civic Centre has been provided as a discreet, safe and secure environment for external agency colleagues needing to meet with victims.

### **8.4 Partnership Activity**

8.4.1 The following events and activities have been delivered in 2023-24:

- Information and signposting advice on modern slavery and human trafficking (MSHT) was made available to the public when a stall was staffed in Gravesend town centre to mark Anti-Slavery Day in October 2023;
- Messaging on domestic servitude featured as part of awareness-raising during the Domestic Abuse 16 Days of Action in November-December 2023;
- Kent Police colleagues delivered 5 training sessions to the Kent Fire & Rescue Service's Safeguarding Team and to branches of the Citizens' Advice Bureau in late 2023-24;
- An Active Bystander training programme is now delivered on a rolling basis provided by the Council's Community Safety Unit which also covers recognising the signs of MSHT and how to report and/or seek advice;
- A key voluntary sector partner of the Working Group, Stop The Traffik, has established an Analysis Hub which agencies can use to input anonymised data and experiences from within their local area which is assisting in building a better intelligence picture;
- In response to new legal responsibilities placed on CSPs to address serious violence, Gravesham CSP has developed a local Serious Violence Duty Strategy 2024-28 (which dovetails with the broader Community Safety Strategy) and which includes modern slavery related issues within its priorities and specifically criminal and sexual exploitation;
- A template and supporting documents to assist with the completing of an NRM referral have been developed by Citizens' Advice Bureau colleagues and shared with other members of the Modern Slavery Working Group;
- A NHS Service Awayday for staff working in the community e.g. health visitors, community midwives, was attended by approximately 150 people

and a training input was provided by Stop The Traffik. This was very well-received and also led to one individual being identified as a victim and engaging with Stop the Traffik directly;

- Work has continued with those who have a 'lived experience' of MSHT and during the year this has included the preparation of a series of posters which focus on helping victims themselves to recognise that they are being exploited and empowering and encouraging them to seek help;
- Joint work and media posts/messaging in March 2024 to raise awareness of labour exploitation in the care sector;
- Safeguarding and MSHT information was published in the Council's Newsletter for Licensed Premises to create a better rapport and raise awareness on the subject;
- Funded through monies obtained from the Home Office Safer Streets Initiative, Gravesham has established over 20 'Safe Spaces' in business and community premises, predominantly in the town centre. Each of these have received training and now stock information and advice to be able to signpost and support any vulnerable person who may visit a Safe Space and resources include support for those experiencing MSHT/exploitation.

## **8.7 Corporate Safeguarding Roles**

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 – there are now over 20 Safeguarding Champions across the Council.

8.7.2 The Council has also committed to making the Lead Safeguarding Officer post, based within the Community Safety Unit, a full-time and permanent position. In addition, the Council is also utilising external funding to meet the costs of a full-time Domestic Abuse and Safeguarding Officer post, also based in the Community Safety Unit, to ensure that there is resilience in dealing with safeguarding issues, including handling cases of actual or suspected MSHT, at all times.

## **8.5 Gravesham Vulnerability Panel**

The Gravesham Vulnerability Panel is a multi-agency operational group of the CSP that meets each month. Led by Gravesham Borough Council, it has a very broad membership with most public sector services represented. 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 and may include cases in which MSHT is a feature.



### **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. Several addresses in which MSHT was suspected have been investigated as part of the work of the CSP's Serious Organised Crime Panel. Welfare checks were conducted at those addresses and one investigation is still ongoing.

## **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 and refresher training
- 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 work to address MSHT to the Gravesham's CSP and the Crime and Disorder Scrutiny Committee at regular intervals and to any other Council Committee as appropriate.

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



**Councillor John Burden  
Leader of the Council and Champion for  
Safeguarding, Cyber, Older Persons'  
and Equalities**



**Stuart Bobby  
Chief Executive**