**MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT - 2020/21**

1. **Introduction**
	1. Gedling Borough Council (GBC) 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, that it has a responsibility to be alert to the risks and to strive to ensure that its supply chains are free from slavery and human trafficking.
	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 to put in place measures to ensure that these offences are not committed in its own business or its supply chains.
	3. This Statement relates to all activities carried out by GBC. It will be reviewed on an annual basis and a new updated Statement, acknowledging any further actions that may have been taken, will be published in the summer in each subsequent year.

# The Modern Slavery Act 2015

* 1. The Modern Slavery Act 2015 (the Act) consolidates various offences relating to human trafficking and slavery. 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. Section 52 of the Act imposes a duty on public authorities, including district/borough councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.
	3. Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the UK and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.
	4. GBC engages in commercial activities by providing services (both statutory and discretionary). The budget set for 2020/21 forecasted annual turnover to be £36.3 million. Whilst the Act does not state that local authorities specifically are included in those organisations legally required to publish a statement, GBC has elected 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 Authority makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

# Standards

* 1. The 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;
		+ Promote ethical business and operational practices in corporate activity and services delivered;
		+ Take appropriate steps to ensure, as far as is reasonable possible, that slavery and human trafficking is not taking part in any of its business or supply chains;
		+ Take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated;
		+ 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.

# Organisational Structure

* 1. The Council is a second tier local authority situated in the county of Nottinghamshire, providing a wide range of statutory and discretionary services delivered both directly by itself, and through partnership working with other agencies and commissioned work with external contractors.
	2. The Council’s Constitution and details of the structure are available on its website www.gedling.gov.uk.

# Supply Chains

* 1. As part of its procurement processes, GBC requires 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 publish a Slavery and Human Trafficking Statement (where applicable). Contract terms and conditions set out the requirements of suppliers and sub-contractors in relation to ensuring there is no slavery or human trafficking in their businesses.
	2. GBC also requires its suppliers and sub-contractors engaged in ‘regulated activity’ involving children and young adults at risk to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council’s Child Protection Policy.

# Policies and Plans

* 1. GBC has a range of policies and plans in place that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:
		1. **The Gedling Plan 2020-2023** – the Council has adopted a strategic priority *Cohesive, Diverse and Safe Communities* and a key objective under this is to *Reduce Anti-social Behaviour, Crime and the Fear of Crime*. In order to meet these objectives, GBC is working, individually and with partner agencies, to reduce crime and anti- social behaviour; using statutory powers to improve public safety, for example, enforcement of licensing requirements; raising awareness of services available; and encouraging victims to report incidents to access the support they need.
		2. **Safeguarding Policies** – The Council’s Child Protection Policy sets out the steps the Authority is taking to safeguard and protect the welfare of children and young adults at risk who come into contact with or use its services and activities. This Policy includes the Council’s responsibilities in respect of reporting suspected activity around modern slavery and human trafficking. We have a statutory duty to work in partnership with a number of agencies to identify, refer and respond to suspected abuse and to provide additional support.
		3. **Whistleblowing Policy** – GBC 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. The Whistleblowing Policy is intended to make it easier to disclose information without fear of discrimination and victimisation.
		4. **Code of Conduct** – GBC 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 its behalf. Employee conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken.
		5. **Recruitment and Selection** – We work to legislative requirements and adopt industry-standard good practices to vet new employees to ensure confirmation of identities and qualifications. To comply with the Immigration, Asylum 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, for example Disclosure and Barring Service (DBS) checks, are carried out where relevant to the position.
		6. **Anti-Money Laundering Policy** – This sets out the Council’s commitment to the prevention, detection and reporting of money laundering.
		7. **Commissioning and Procurement Policies** – These policies set 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 suppliers.

GBC is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Council works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

* + 1. **Dignity at Work** – Our Equality (Employment) Policy provides a framework for the Council’s approach to the wide ranging equality and diversity agenda and sets out the standards we expect to achieve.

# Due Diligence

* 1. The Council’s approach to commissioning and procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, sub-contractors and other participants in their supply chain. For organisations with a turnover below £36 million, suppliers will be asked to confirm their acceptance of this Modern Slavery and Human Trafficking Statement.
	2. As part of the Council’s commitment to identify and mitigate risk, all business units work together and alongside partner agencies to:
		+ Identify and assess potential risk areas in their business affairs;
		+ Mitigate the risk of slavery and human trafficking through robust checks and balances;
		+ Monitor and review any potential risk areas identified;
		+ Protect whistle blowers.

# Training

* 1. The Council has made efforts to ensure that initiatives to raise awareness of slavery and human trafficking, and services available to assist victims have been prioritised.
	2. We have given an undertaking to provide Safeguarding, Domestic Violence and Modern Slavery awareness training to staff periodically.

# Targeted Activity

* 1. The Council has a strong history of working in partnership with other local authorities, both at county and district/borough level, partner agencies, local charities and community groups including Nottinghamshire’s Serious Organised Crime Group. The Council’s Public Protection team will reinvigorate its approach to the delivery of activities locally, both in respect of responding to issues reported on a daily basis and creating and coordinating medium and longer-term projects, that aim to reduce crime and improve public safety by gathering intelligence on disruptive activity where appropriate.
	2. The Council also attends and supports the MARAC (Multi Agency Risk Assessment Conference) which is a meeting where information is shared on the highest risk domestic abuse cases between representatives of local police, probation, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs) and other specialists from the statutory and voluntary sectors. Where these groups identify potential abuse or slavery, the necessary enforcement agencies are informed and referrals are made to local and national support agencies.
	3. The Council will look to establish a Corporate Safeguarding Group which will raise awareness of corporate safeguarding responsibilities and will review all safeguarding referrals to ensure that cases of modern day slavery are identified and the appropriate referrals are made. The Group will provide advice and guidance to all appropriate staff on the signs and indicators of where modern day slavery may be present. It will also review and update all relevant policies to ensure compliance with the Modern Slavery Act 2015.

# Monitoring our Effectiveness

* 1. The Council will 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 by:
1. Tasking the Corporate Safeguarding Group to develop/implement an action plan aligned (where appropriate) to delivery of objectives included within the Gedling Plan as well as normal day to day council activities;
2. Recording the number of employees provided with training on modern slavery and human trafficking;
3. Carrying out an annual review to identify any deficiencies within our policies and practices and taking appropriate action to rectify these to strengthen our ability to address slavery and human trafficking;
4. Carrying out periodic internal audits to ensure compliance within these policies.
	1. This Statement together with the action plan will be reviewed annually to monitor their effectiveness.

Signed ……………………………………….. Date …………………

Mike Hill, Chief Executive