

MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

2019-20

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1.0 Introduction

- 1.1 Dartford Borough Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.
- 1.2 This Modern Anti-slavery and Human Trafficking Statement sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business, and its supply chains.
- 1.3 This Modern Anti-slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020¹.

2.0 The Modern Slavery Act 2015

- 2.1 The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery. In broad terms:
 - '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 UK and have a global turnover above £36 million, to publish a slavery and human trafficking statement each financial year.
- 2.4 The Council engages in commercial activities by providing services (statutory and discretionary), and its annual turnover is greater than £36million. There is not currently a settled view as to whether or not local authorities have an obligation under section 54 of the Act but the Council has nonetheless determined to issue this Modern Anti-slavery and Human Trafficking Statement setting out the steps it has taken to ensure there is no slavery or human trafficking in its business or supply chains.

¹ The Council's first Modern Anti-slavery and Human Trafficking Statement was endorsed and approved by Cabinet on the 7 September 2017 [Min. No. 51 refers]. All previous versions of the Statement can be found on [Dartford Borough Council's website](#).

3.0 Standards

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

- 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 the 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;
- To take appropriate steps to address actual instances of slavery and human trafficking.

4.0 Organisational structure

4.1 Dartford Borough Council is a local authority situated in the county of Kent, which provides a wide range of statutory and discretionary services, delivered both directly by the Council and through external contractors. Services include, for example, rubbish collection, recycling, council tax collections, housing and planning applications.

4.2 The Council's **Structure and Services** set out how the Council is organised, including the management structure and the services delivered under each directorate.

4.3 The **Constitution** sets out how the Council operates, how decisions are made and the procedures that are followed to ensure that these are efficient, transparent and accountable to local people and the way in which the Council is organised to carry out its affairs.

5.0 Supply chains

5.1 In the procurement process, Dartford Borough Council would expect all suppliers of goods and services to comply with all applicable laws, statutes, regulations [and codes] from time to time in force [including [but not limited to] the Modern Slavery Act 2015, their own anti-slavery policy (where applicable) and this Modern Anti-slavery and Human Trafficking Statement. 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 businesses.

- 5.2 If the organisation is a relevant commercial organisation (as defined by Section 54 of the Act), and has an annual turnover of £36million or more, compliance with the reporting requirements to produce an annual Modern Anti-slavery and Human Trafficking Statement is checked. If the organisation is not a relevant commercial organisation and has an annual turnover below £36million, the organisation is expected to sign-up to abide by Dartford Borough Council's Modern Anti-slavery and Human Trafficking Statement.
- 5.3 The Council also requires its contractors and sub-contractors engaged in a 'regulated activity'² to 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](#).
- 5.4 In this current statement period, the Council will review and amend its procurement methods by adopting a risk-based approach to tackling modern slavery in its supply chains. This approach will involve identifying the risk of modern slavery to each individual contract and then, depending on the level of risk, will include particular relevant and proportionate requirements in each specification and project document, as well as additional clauses in contract terms and conditions.

6.0 Due diligence

- 6.1 Dartford Borough Council's due diligence approach to procurement requires suppliers of goods and services to:
- have completed an up to date and accurate due diligence questionnaire in respect of modern slavery;
 - warrant that neither the supplier nor any of its officers, employees or other persons associated to it:
 - has been convicted of any offence involving slavery and human trafficking;
 - has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- 6.2 Suppliers of good and services are also required to implement due diligence procedures for their own suppliers, subcontractors and other participants in their supply chains, to ensure that there is no slavery or human trafficking in their supply chains.

² As defined by the Safeguarding Vulnerable Groups Act 2006 (as amended)

7.0 Policies and Plans

7.1 Dartford Borough Council 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:

- **Corporate Plan** – contains a strategic aim to create a safer borough in which to live, work and socialise. Strategic objectives under this aim include using the Council's statutory functions to increase public safety in the borough; reduce anti-social behaviour; and increase public perception of the borough as a safe place.
- **The Dartford & Gravesham Community Safety Partnership's Community Safety Strategy** – contains a priority to protect people who are more vulnerable to harm, which includes potential victims of slavery and human trafficking. The strategy is closely aligned to the Kent Police Control Strategy that references 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 the borough and to ensure that colleagues with safeguarding and emergency planning responsibilities are well-placed to provide appropriate support to victims.
- **Safeguarding Policy** – sets out how the Council will safeguard and promote the welfare of children, young persons and adults at risk who come into contact with its services and activities. The policy covers how the Council should comply with the duty to notify the Secretary of State of suspected victims of slavery and human trafficking, and protect any children and adults at risk from harm through its safeguarding referral procedures.
- **Whistleblowing Policy** – encourages all its employees, councillors, co-optees, 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, or the supply chain. The policy is designed to make it easy to make disclosures without fear of discrimination and victimisation.
- **Employee Code of Conduct** – is the ethical framework that employees work to, which makes clear the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.
- **Recruitment Policy** – sets out robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up with DBS checks undertaken for relevant posts.

- **Corporate Procurement Strategy** – sets out the strategic aims and principles of procurement activity. This includes safeguarding requirements which are expanded in the procurement guide for managers.
- **Anti-Fraud and Corruption Strategy** – sets out the Council’s commitment towards the prevention of fraud and corruption (including bribery) from both internal and external sources.
- **Procurement Equality Standard** – aims to ensure that equality and diversity is embedded into the procurement processes.
- **Comprehensive Equality Policy** – as contained in the Council’s Equality & Diversity Document Framework, this policy sets out the Council’s legal obligations under the Equality Act 2010 and the various ways the Council meets its duties.

8.0 Training

- 8.1 **Employees and multi-agency partners** – Dartford Borough Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of all forms of abuse and neglect, including modern slavery and human trafficking. As at September 2019, nearly 90% of staff had completed the mandatory safeguarding awareness course under the current programme of training.
- 8.2 Specific modern slavery awareness training was last delivered to employees in March 2017. The training included:
- the basic principles of the Modern Slavery Act 2015 and the Council’s duties;
 - how employees can identify slavery and human trafficking and what to do if they have concerns;
 - what external help is available, for example through the modern slavery helpline.
- 8.3 In December 2018, multi-agency Serious Organised Crime Training was jointly facilitated by Dartford Borough Council, Gravesham Borough Council and Kent Police. The training aimed to raise awareness and provide an overview of Serious Organised Crime Groups, money laundering, modern slavery, gangs and county lines, and problem solving (SARA model).
- 8.4 In this current statement period, a new programme of modern slavery awareness e-learning training will be delivered to employees. The training will be mandatory for key employees whose role can potentially bring them into contact with victims of modern slavery, including; enforcement officers, housing officers, community safety officers, licensing officers, environmental health officers, and housing benefit visiting officers. Employees working in supply chain management, procurement and HR will also be required to undertake the training.

- 8.5 In addition to the training programme, all employees will be issued with a briefing summarising the key points of the e-learning training as well as promoting an organisation-wide sense of responsibility to prevent modern slavery in both the business and supply chains.
- 8.6 **Elected Members** – Induction briefings on equality and diversity and safeguarding are provided to Elected Members following local elections. Members last received these briefings following the Borough Ward and Parish elections in the summer of 2019.
- 8.7 **Taxi Drivers** – Dartford Borough Council's Taxi Licensing Policy contains a requirement for mandatory training modules concerning child sexual exploitation, the 'Prevent' element of counter terrorism and modern slavery for all new taxi drivers and those renewing their licences in order for them to be granted their respective licences to work in the Dartford borough.

9.0 Partnership working

- 9.1 **Community Safety** – Dartford Borough Council has a strong track record of working in partnership with other agencies to improve community safety. The Dartford and Gravesham Community Safety Partnership (CSP) is made up of statutory agencies brought together with a shared responsibility to tackle crime, disorder and anti-social behaviour. The Community Safety Unit is the operational arm of the CSP that deals with short-term operational issues on a daily basis and also looks strategically at medium and long-term projects connected with the priorities of the partnership.

Alongside the work of the CSP, the Council facilitates a multi-agency Dartford Vulnerability Forum (DVF) which aims to;

- develop a common understanding and accountability framework among local partners of the threats, vulnerabilities and risks relating to:
 - serious and organised crime
 - organised crime gangs (OCGs)
 - street gangs
 - child sexual exploitation
 - domestic abuse
 - mental health
 - counter terrorism – radicalisation (Prevent)
 - safeguarding
 - slavery and human trafficking
- provide and share information and intelligence on which to base local programmes and action plans that feed into the Community Safety Strategy;
- facilitate and support the mainstreaming of the DVF activity into day-to-day policing, local government and partnership work;
- understand and agree on a targeted and proportionate use of resources.

The DVF's work is informed by information and intelligence from a variety of sources, including Serious and Organised Crime Local Profiles produced by Kent Police.

Sitting under the DVF is the Dartford Vulnerability and Organised Crime Panel (DVOCP). This is a multi-agency panel consisting of practitioners that problem solve cases at an individual level. The DVOP has been established to assist Dartford's Community Safety Strategy in supporting vulnerable communities and individuals by tackling forms of anti-social behaviour and organised crime including gangs, child sexual exploitation and slavery and human trafficking.

- 9.2 **Safeguarding** – Dartford Borough Council works with a wide range of agencies to safeguard children, young people and adults at risk from abuse and neglect. This includes Kent County Council and the Local Safeguarding Boards.

The Council's Safeguarding Steering Group includes representation from Kent County Council Children's Social Work Services and Adult Social Services. The group monitors the Safeguarding Policy and any safeguarding referrals that are made by the Council, ensuring that it is taking its safeguarding responsibilities seriously and complying with legal requirements.

The Council is also represented on the Kent District Council Safeguarding Children Leads Group. This is a sub-group of the Safeguarding Children Multi-Agency Partnership (KSCMAP) that provides re-assurance that local safeguarding children issues are raised and addressed at a local level as well as enabling joint working opportunities and the sharing of best practice between districts.

10.0 Leadership and Scrutiny

- 10.1 Scrutiny committees play a vital role in challenging their councils to justify their actions, or lack of them, in order to drive forward improvement. In recognition of UK Anti-Slavery Day on the 18 October 2018, Dartford Borough Council's Scrutiny Committee examined whether the Council's performance in this policy area fulfilled the terms of this Statement, including whether there is any scope for more to be done in respect of its interactions with suppliers and partners³. This examination provided Members with assurance of the existing proactive measures being undertaken, as set out in the Statement at the time, whilst also providing input into considerations for the review and formulation of the next statement.

³ Scrutiny Committee meeting of the 20th November 2018 [Min. No. 27 refers]

11.0 Monitoring our effectiveness in combating slavery and human trafficking

11.1 Dartford Borough Council uses the following performance indicators to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

1. Number of suppliers evaluated using its supplier evaluation and due diligence measures;
2. Number of employees trained on safeguarding and modern slavery;
3. Number of cases reported under the Whistleblowing Policy and resulting action.

11.2 Under the previous statement, in 2018/19:

1. 143 suppliers were evaluated using supplier evaluation and due diligence measures across 14 projects/procurement opportunities. .
2. 120 employees received safeguarding awareness training.
3. 0 cases were reported under the Whistleblowing Policy concerning any circumstances that have given rise to an enhanced risk of modern slavery.

This Modern Anti-slavery and Human Trafficking Statement was approved by Dartford Borough Council's Management Team and endorsed by its Cabinet. It is reviewed, and updated as necessary, on an annual basis and approved for publication by Management Team.