

# MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

## 2020-21

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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 2020 to 31 March 2021<sup>1</sup>.

## **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.

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<sup>1</sup> 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 sub-contractors 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 and 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'<sup>2</sup> 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 the previous statement period, the Council reviewed and amended its procurement methods and adopted a risk-based approach to tackling modern slavery in its supply chains. This approach involves 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.

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<sup>2</sup> 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.
- **Community Safety Strategy** – key strands of work contained within the Community Safety Strategy are focused towards protecting vulnerable people from harm, including 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 and Procedure** – 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.
- **Counter-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 2020, 79% of staff had completed the mandatory safeguarding awareness course under the current programme of training.
- 8.2 In December 2019, all employees were issued with a training briefing summarising:
- what modern slavery is;
  - the types of modern slavery;
  - who may be particularly vulnerable to modern slavery;
  - who may be perpetrators of modern slavery;
  - the signs that may indicate someone is a victim of modern slavery;
  - Dartford Borough Council's role in tackling modern slavery;
  - how to access training and more information and advice on modern slavery.
- 8.3 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.
- 8.4 **Elected Members** – Induction briefings on equality and diversity and safeguarding are provided to Elected Members following local elections.
- 8.5 **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 Community Safety Partnerships (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.

The CSU facilitates a range of joint-working arrangements, as follows:

- **Daily Briefings** – enables multi-agency partners, including the Police, Kent Fire and Rescue Service, Community Wardens and other Council departments to raise issues of concern of crime, disorder and anti-social behaviour on a daily case-by-case basis.
- **Dartford Vulnerability and Contextual Safeguarding Panel** - addresses forms of anti-social behaviour, whilst supporting referring agencies by taking a multi-agency response to support those that are vulnerable. In respect of contextual safeguarding, the panel provides a multi-agency response to the risks associated to adolescents in extra-familial settings.

The CSU until recently facilitated the Dartford Vulnerability and Organised Crime Panel. The 'vulnerability' element of this panel has now been transferred to the work of the Dartford Vulnerability and Contextual Safeguarding Panel. The 'organised crime' element of this panel is now co-ordinated by Kent Police to which the CSU is a proactive participant to this partnership.

- 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 Addressing modern slavery risks during the Coronavirus (Covid-19) pandemic**

10.1 During the pandemic, it is essential Dartford Borough Council continues its activities to identify and address risks of modern slavery in its business and supply chains. As well as focusing on the health and safety of its employees, the Council also needs to consider how fluctuations in demand and changes in its operating model may lead to new or increased risk of labour exploitations.

10.2 **Health and safety of the workforce** – The Council has carried out a **Risk Assessment for Covid-19 Workplace Arrangements**, which identifies Covid-19 related risk and appropriate measures to control the risk. The assessment includes how:

- employees will be supported to work from home;
- employees who are required to work at the Civic Centre have a safe environment and are able to maintain social distancing and hygiene practices, including when using common areas and meeting rooms;
- contact will be minimised with visitors to the Civic Centre;
- the number of unnecessary visits by Members, contractors and external visitors to the workplace will be minimised;
- employees visiting other sites maintain social distancing and hygiene practices, including from contact within work vehicles;
- other organisations working in the building adhere to social distancing and hygiene practices;
- the workplace will be kept clean to prevent transmission.

Temporary Changes to HR Policies and Procedures have been put in place to help prevent the spread of Covid-19 and safeguard the welfare of employees during the pandemic. This includes temporary changes regarding sickness absence, remote working, flexible working, annual leave, and travel and childcare arrangements. The Council is also mindful that employees are still able to access grievance procedures and will consider how these procedures are carried out fairly during the pandemic.

10.3 **Awareness raising** – Modern slavery is a harmful and hidden crime and its victims may be especially isolated and hidden from view during the pandemic. The Council has promoted national and Kent-wide campaigns, both internally and externally, in order to raise awareness of the risks of different types of abuse and the support available for victims – including for modern slavery.

## **11.0 Modern Slavery Strategy**

11.1 This Modern Anti-Slavery and Human Trafficking Statement primarily sets out Dartford Borough 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. The statement also explains the ongoing work carried out in a broader borough-wide context, to involve other key organisations in the co-ordination of jointly identifying and tackling the threats, vulnerabilities and risk of various crimes, including modern slavery.

11.2. Growing awareness and identification of modern slavery can only contribute towards reaching more victims of these crimes and it will help to bring the offenders to justice. The Council is committed to building on the approach to raise awareness; to work collaboratively across the board; and to develop its knowledge and understanding of this issue further. This is why the Council will develop a Modern Slavery Strategy in the next statement period of 2021-22. The strategy will focus on the strategic priorities and outcomes that will form the basis of an action plan to specifically address modern slavery and trafficking in the Dartford borough.

## **12.0 Monitoring our effectiveness in combating slavery and human trafficking**

12.1 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.

12.2 Under the previous statement, in 2019-20:

1. 72 suppliers were evaluated using supplier evaluation and due diligence measures across 16 projects/procurement opportunities.
2. 206 employees were up to date with their training on safeguarding.
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.**