

# **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

Policy Owner: Mike Hill  
Date of Adoption: 31 January 2024  
Next Review: 31 March 2027  
Version Number: 1

## **1. Policy statement**

1.1. Modern slavery and human trafficking are a crime and a violation of fundamental human rights. It is widely recognised as increasing in prevalence across the UK and a safeguarding concern for all communities. Modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Gedling Borough Council has a zero-tolerance approach to modern slavery.

1.2. Gedling Borough Council are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

1.3. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific clauses in our standard contract templates and tender documents to ensure we are contracting with organisations who are committed to complying with requirements under the anti-slavery and human trafficking laws, including but not limited to the Modern Slavery Act 2015.

1.4. This policy applies to all persons working for us or on our behalf in any capacity, including Members, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **2. Responsibility**

2.1. The Council's Members and Senior Management Team have overall corporate governance responsibility for ensuring this policy complies with our legal and ethical obligations. This policy document will be kept under review to ensure it complies with any legislative changes and remains fit for purpose.

2.2 It is the responsibility of the Head of Service responsible for procurement to ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking. Any high risks identified should be assessed in consultation with the officer responsible for safeguarding and a risk assessment prepared.

2.3 It is the responsibility of the Head of Service responsible for safeguarding to ensure that any risks or issues in relation to modern slavery and human trafficking identified outside of the supply chain are dealt with appropriately and in a timely fashion. This includes assisting officers in the preparation of risk assessments where activities are identified as high risk in relation to modern slavery and human trafficking, and also utilising the appropriate reporting methods where any issues of modern slavery or human trafficking are reported to the officer responsible for safeguarding.

2.4. The Council's Heads of Service have primary and day-to-day responsibility for implementing, monitoring the policy's use and effectiveness, dealing with any queries regarding it and auditing internal control systems and procedures, including effective contract management, to ensure they are effective in countering modern slavery.

2.5. All levels of management are responsible for ensuring that the staff reporting to them understand and comply with this policy and are given appropriate training on the issue of modern slavery in supply chains.

### **3. Training**

3.1 Staff have already been briefed on the impact of modern slavery and human trafficking both locally and nationally. Staff will receive further training in respect of this policy, how to identify the signs of human slavery and trafficking and how to escalate potential slavery or human trafficking issues to the relevant person within the Council.

3.2 Training on this policy, and on the risk the business and the community face from modern slavery in its supply chains, will also form part of the induction process for all individuals who commence employment with the Council.

3.3 The co-ordination of training and disseminating further information to staff in respect of modern slavery will be dealt with by the Council's Corporate Safeguarding Group.

### **4. Reporting**

4.1 If a member of staff identifies the signs of modern slavery or human trafficking they should report their concerns to their manager. The manager or Head of Service for the service area must report this to the officer responsible for safeguarding.

4.2 The officer responsible for safeguarding will ensure that the appropriate reporting mechanisms to external agencies are followed where appropriate, and will assist the reporting staff member in the preparation of any necessary referral documents.

### **5. Compliance with the policy**

5.1. All employees must be aware of, read, understand and comply with this policy.

5.2. The prevention, detection and reporting of modern slavery in any part of the Council's business or supply chains is the responsibility of all those working for the Council or under its control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. If an employee is unsure about whether a particular act or treatment of workers or working conditions constitutes any of the various forms of modern slavery, their concerns should be raised with their manager.

5.3. Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

5.4. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

5.5. Staff should note that where appropriate, the Council will give support and guidance to our suppliers to help them address abusive and exploitative work practices in their own business and supply chains.

5.6. The Council aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken and no one should suffer any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place. This includes dismissal, disciplinary action, threats or other unfavourable treatment.

## **6. Relevant Policies**

6.1 The Council operates the following policies which may also be relevant in relation to the identification of modern slavery risks:

- Safeguarding Policies (Children and Young People; Vulnerable Adults)
- Whistleblowing Policy
- Code of Conduct and Declaration of Interests
- Recruitment and Selection
- Anti-Money Laundering Policy
- Equality and Diversity Policy