

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT - 2024/25

1. Introduction

- 1.1 Gedling Borough Council (GBC) is committed to preventing slavery and human trafficking in the delivery of its services and corporate activities. GBC 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.
- 1.2 This Modern Slavery and Human Trafficking Statement details the steps that GBC 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.
- 1.3 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.

2. The Modern Slavery Act 2015

- 2.1 The Modern Slavery Act 2015 (the Act) consolidates various offences relating to human trafficking and slavery. Offences relate to the following activities:
 - '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/borough 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 of more than £36 million, to publish a slavery and human trafficking statement each financial year.
- 2.4 GBC engages in commercial activities by providing services (both statutory and discretionary). The budget set for 2024/25 forecasted annual turnover to be £37.3* 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. GBC 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 GBC makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

*As per paragraph 6(b) of the calculation for the year 2024/25 in accordance with sections 31A, 31B and 34 to 36 of the Local Government Finance Act 1992 (Council 6 March 2024).

3. Standards

3.1 GBC 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 reasonably 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 GBC's attention and to take all reasonable steps to support and protect its victims.

4. Organisational Structure

4.1 GBC 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.

4.2 GBC's Constitution and details of the structure are available on its website www.gedling.gov.uk.

5. Supply Chains

5.1 As part of its procurement processes, GBC requires that 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.

5.2 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 'Safeguarding Children and Young People - Policy and Procedures' and 'Safeguarding Vulnerable Adults – Policy and Procedures' documents (being updated during 2025).

6. Policies and Plans

6.1 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:

6.1.1 **The Gedling Plan 2023-2027** – the Council adopted '*Place*' as a strategic priority and a key objective under this is '*Community Protection*' with an aim of '*reducing*

crime and the fear of crime so that residents feel safe and protected in their neighbourhoods'. In order to meet these objectives, GBC works both individually and with partner agencies to reduce crime and anti-social behaviour; uses statutory powers to improve public safety, for example, enforcement of licensing requirements; raises awareness of services available; and encourages victims to report incidents to access the support they need.

- 6.1.2 **Safeguarding Policies** – GBC's 'Safeguarding Children and Young People - Policy and Procedures' and 'Safeguarding Vulnerable Adults – Policy and Procedures' documents (being updated during 2025) set out the steps the Council is taking to safeguard and protect the welfare of children and young people at risk and vulnerable adults who meet or use its services and activities. These documents include the Council's responsibilities in respect of reporting suspected activity which may amount to modern slavery. The Council has a statutory duty to work in partnership with several agencies to identify, refer and respond to suspected abuse and to provide additional support.
- 6.1.3 **Whistleblowing Policy** – GBC encourages all its employees, Councillors, contractors, their agents and/or sub-contractors, consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of GBC. The Whistleblowing Policy is intended to make it easier to disclose information without fear of discrimination and victimisation.
- 6.1.4 **Code of Conduct** – GBC makes it clear to all its employees that there are expected standards of behaviour to which they must adhere to 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. All Councillors are expected to demonstrate the highest standards of conduct and behaviour and are required to abide by the formal Code of Conduct.
- 6.1.5 **Declaration of Interests** – GBC expects all Councillors to record and declare disclosable pecuniary and non-pecuniary interests. Employees are also required to declare certain interests in respect of GBC's business.
- 6.1.6 **Recruitment and Selection** – GBC works to legislative requirements and adopts 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.
- 6.1.7 **Agency Workers** – GBC use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- 6.1.8 **Anti-Money Laundering Policy** – This sets out GBC's commitment to the prevention, detection and reporting of money laundering.
- 6.1.9 **Equality, Diversity and Inclusion Policies** – GBC has an Equality, Diversity and Inclusion Policy 2024-2027 and Action Plan in place that aims to provide services and opportunities without barriers to Councillors, employees, service users and Gedling citizens and also references our own internal Equality Policy (Employment). This is a

declaration of the Council's commitment to making equality, diversity and inclusion an integral part of the Council's business as usual. It includes a commitment to use our influence and purchasing power to help make equality a reality for all, and to take action to eradicate discrimination and inequality when delivering services, when employing others to deliver services on our behalf, and when providing funding to others to provide services. The document sets out how we will meet our public sector equality duty under the Equality Act 2010.

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

6.1.11 **Procurement Strategy** - The Council's Procurement Strategy 2025-2027 sets out how the Council will continue to drive forward the key objectives of delivering economic, social and environmental benefits to the borough through procurement. It includes ethical standards as a core principle for procurement and acknowledges the important role that procurement plays in sourcing in a manner that ensures ethical standards are met, minimises the risk of social exploitation and rewards good employment practices. Our ethical procurement objectives will ensure the well-being and protection of workforces throughout the supply chain, and that people are treated with respect and their rights are protected.

7. **Due Diligence**

7.1 GBC'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 and to certify their compliance with the Modern Slavery Act 2015.

7.2 As part of GBC's commitment to identify and mitigate risk, all service areas 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.

8. **Training**

8.1 GBC has made efforts to ensure that initiatives to raise awareness of slavery and human trafficking, and services available to assist victims have been prioritised.

8.2 It has given an undertaking to provide Safeguarding, Domestic Violence and Modern Slavery awareness training to employees periodically.

8.3 The Council requires all new Councillors and employees to complete induction training, which includes mandatory safeguarding training.

9. **Targeted Activity**

9.1 GBC 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 and the Community Safety Partnership. The Council's Public Protection team work with colleagues to deliver activities locally, both in respect of responding to issues reported daily and creating and co-ordinating medium and longer-term projects that aim to reduce crime and improve public safety by gathering intelligence on disruptive activity where appropriate.

- 9.2 GBC 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.
- 9.3 GBC has a Corporate Safeguarding Group (being refocussed in 2025) which raises awareness of corporate safeguarding responsibilities and reviews all safeguarding referrals to ensure that cases of modern day slavery are identified and the appropriate referrals are made. The Group provides advice and guidance to all appropriate staff on the signs and indicators of where modern-day slavery may be present. The Council is also undertaking a programme of reviews / updates to all relevant policies to ensure compliance with the Modern Slavery Act 2015.
- 9.4 Nottingham City Council operate a Slavery Exploitation Team (SET) which has been commissioned by Gedling and the six other District/Borough Councils to take referrals where there are concerns about exploitation and works with partners to support victims and reduce harm. The team's focus has been to develop a structure through which professionals can refer known or suspected victims of exploitation, slavery or trafficking and share situations where suspicious activity has been highlighted. Central to the team's responsibilities is the co-ordination and chairing of the monthly SERAC (Slavery Exploitation Risk Assessment Conference) meetings. The team receives and reviews all referrals to the SERAC, in addition to dealing with queries raised by colleagues and external partners. SET seeks to establish the wider background to cases and works with partners to identify action plans.

10. Monitoring our Effectiveness

- 10.1 GBC regularly reviews and monitors 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:
- i) Tasking the Corporate Safeguarding Group (being refocussed in 2025) 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;
 - ii) Recording the number of employees provided with training on modern slavery and human trafficking;
 - iii) Carrying out a periodic 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;
 - iv) Carrying out internal audits on safeguarding through our auditors (BDO);
 - v) Undertaking periodic self-assessment audits on safeguarding and promoting the welfare of children under Section 11 of the Children Act 2004;

- vi) Completing the annual self-assurance checklist (Partner Assurance Tool) return for adult safeguarding as part of the Nottinghamshire Safeguarding Adults Board.

10.2 This Statement together with the action plan will be reviewed annually to monitor their effectiveness.

Signed: Mike Hill, Chief Executive

Date: 27 May 2025