



Modern Slavery and Human Trafficking Statement

2022-2023

Date: March 2022

Review Date: March 2023

1. Introduction

- 1.1 Ashford Borough Council 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 and that the Authority has a responsibility to be vigilant in spotting associated risks and to strive to ensure that its supply chains are free from slavery and human trafficking at any level.
- 1.2 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 the measures adopted with the aim of ensuring that these offences are not committed through the delivery of services or via supply chains.

2. The Modern Slavery Act 2015

- 2.1 The Modern Slavery Act consolidates various offences relating to slavery and human trafficking. 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.
- 2.2 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 United Kingdom and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.
- 2.4 Ashford Borough Council engages in commercial activities by providing services (some of which are statutory and others that are discretionary) and its annual turnover is greater than the specified £36 million. Whilst the Modern Slavery Act does not state that Local Authorities specifically are included within the grouping of organisations legally required to publish a statement, the Council has chosen 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 Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

3. Responsibilities

- 3.1 Ashford Borough Council will meet the following standards and 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;

- To promote ethical business and operational practices in corporate activity and 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 and to ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated;
- To 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.

4. Organisational structure

4.1 Ashford Borough Council is a Local Authority situated in the county of Kent. The Council provides a wide range of statutory and discretionary services delivered either directly by the Council itself, through partnership working with other agencies and through commissioned work with external contractors.

4.2 The Council's Constitution can be found at:

<https://ashford.moderngov.co.uk/ecSDDisplay.aspx?NAME=SD256&ID=256&RPID=2070469>

4.3 Details of the Council's structure and governance can be found at:

<https://www.ashford.gov.uk/transparency/our-staff/>

5. Supply chains

5.1 As part of its procurement processes, Ashford Borough Council expects 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 have their own anti-slavery policy and to publish their own Slavery and Human Trafficking Statement (where applicable). 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 business. Suppliers are also expected to advise workers of their right to join a trade union (where applicable).

5.2 The Council requires its contractors and subcontractors engaged in 'regulated activity' for 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.

5.3 The Council will follow best practice guidance developed by the Government Commercial Function and Home Office, and have adopted a risk-based approach to tackle modern slavery in supply chains.

The four key areas of activity are:

- a) Identify and manage risks in new procurements
 - Review and amend general procurement guidance, processes and any related documentation
 - Design new procurements to take account of modern slavery risks

- Review and amend contract management processes and any related documentation
- b) Assess existing contracts
- Carry out a high level risk assessment
 - Conduct supply chain mapping
 - Invite suppliers to complete the Modern Slavery Assessment Tool if appropriate
 - Apply strengthened contract management to manage risks, working with suppliers to progressively improve
- c) Taking action when victims of modern slavery are identified
- Work openly and proactively with suppliers to resolve issues and change working practices
 - Consider terminating the contract only as a last resort
- d) Training
- Raise awareness of modern slavery and human rights abuses amongst staff and deliver/make available appropriate training

6. Policies and Plans in relation to Modern Slavery

- 6.1 Ashford Borough Council has a range of policies and plans that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:
- 6.2 **The Council's Corporate Plan** – three main themes run through the 2022 Plan: Green Pioneer, Caring Ashford and Targeted Growth. The multi-agency approach to plans is embedded throughout with a specific emphasis on Caring Ashford and keeping residents protected from modern slavery and human trafficking. Early intervention and education to raise awareness with our young people and ensuring local services incorporate provisions to address needs are acknowledged in a key outcome that communities feel safe and secure with easy access to locally-led services designed with communities to meet their needs.
- 6.3 **Ashford Community Safety Partnership's Community Safety Strategy** – the Partnership has a three-year Strategy in place. The Key strands of work contained within the Strategy are geared towards protecting vulnerable people from harm, including potential victims of slavery and human trafficking. The Strategy is also 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 our area and to ensure that colleagues with safeguarding and emergency planning responsibilities are well placed to provide appropriate support to victims.
- 6.4 **Safeguarding Policy** – Safeguarding is the term used to protect children, young people and adults at risk from all forms of abuse, neglect, exploitation, domestic abuse, radicalisation, forced marriage and human trafficking/modern slavery. Safeguarding is everyone's responsibility.

We are committed to working in partnership with a number of agencies to safeguard the welfare of children and vulnerable adults at risk from all forms of

abuse, neglect or exploitation. How we deliver our safeguarding role and ensure safeguarding is embedded across all our service areas is set out in our [safeguarding-policy-2021-22.pdf \(ashford.gov.uk\)](#).

The Council recognises the influence people in the Borough have in their respective roles and have acknowledged this by way of a statement managing concerns around people in positions of trust (PiPoT).

- 6.5 **Whistleblowing Policy** – the Council 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.
- 6.6 **Employee Code of Conduct** – the Council 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 behalf of the Council. Employee conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken.
- 6.7 **Recruitment Policy** – this sets out procedures followed to vet new employees to ensure that confirmation of their identities and qualifications is obtained. To comply with the Asylum, Immigration 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 e.g. Disclosure and Barring Service (DBS) checks are carried out where relevant to the position.
- 6.8 **Corporate Procurement Strategy** – this sets 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 third-party and in-house providers.
- 6.9 **Equality Policy** – The Council is committed to promoting equality of opportunities in its services. The Equality Act 2010 provides a framework to ensure ABC services are not provided in a discriminatory manner by having due regard to eliminating discrimination, harassment, and victimisation, advancing equality of opportunity and fostering good relations.
- 6.10 Under this policy, the Council will also:
- Demonstrate that we have considered any vulnerability identified within the Act when deciding to proceed to legal action;
 - Have concluded that legal action is needed due to the effect of the ASB on either the health of the victim and/or perpetrator;
 - Ensure that the proposed legal action is a proportionate response to the ASB.

7. **Due Diligence**

- 7.1 Ashford Borough Council's approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, subcontractors and other participants in their supply chain where their annual turnover exceeds £36 million.
- 7.2 As part of the Council's commitment to identify and mitigate risk, Council departments work together and alongside partner agencies to:

- Identify and assess potential risk areas in its business affairs;
- Mitigate the risk of slavery and human trafficking through robust checks and balances;
- Monitor and review any potential risk areas identified;
- Protect whistleblowers.

8. Ensuring employees, partner agency colleagues and Council Members are well-informed

8.1 Specific projects and initiatives to include planned days of action with Community Safety Partnership colleagues focussing on identifying areas of concern in regard to Modern Slavery and Human Trafficking and trying to establish any new trends of concerns in the community.

8.1.1 Ashford Community Safety Unit Vulnerability Meeting

This multi-agency meeting (known as the Vulnerability Meeting) takes place on a monthly basis. Jointly led by Kent Police and Ashford Borough Council, it has a broad membership and its key purpose is to ensure that all agencies are working together to share intelligence, help identify vulnerable adults and agree actions that can be taken to provide tailored support. Referrals of individuals can be made by any of the agencies attending the meeting. We are also committed to the District and Contextual Safeguarding meeting which focusses on younger people in the district.

8.1.2 Ashford Serious Organised Crime Group

This second multi-agency group also meets on a monthly basis to share intelligence in respect of individuals who may be part of serious and organised crime networks with the aim of disrupting their offending, bringing them to justice and supporting victims. The Group will consider referrals where there is concern that slavery or human trafficking is part of the criminal activity. This is an effective approach and resultant work has led to referrals being made through the National Referral Mechanism (NRM) and using the Modern Slavery Notification process. We have engaged with Operation Clean Sweep which highlighted certain areas of concern and proactively engaged with businesses in the Borough to highlight any potential victims.

8.1.3 Corporate Safeguarding Group

The Council has a Lead Officer Safeguarding Group, comprised of officers from relevant Council departments that have specific safeguarding duties. Any cases of suspected modern slavery and/or human trafficking are referred to this Group in order that appropriate action can be taken drawing upon the expertise of the different officers involved and to act as swiftly as possible to protect the suspected victims from further potential harm.

9. Key Performance Indicators measuring effectiveness

9.1 Ashford Borough Council will use the following steps to regularly review and monitor the measures being implemented to address modern slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:

- i) Ensure and log Council representation at all multi-agency meetings for sharing of information and intelligence;
- ii) To review regularly the Government's position statement on modern slavery and human trafficking and update the Council's statement accordingly;
- iii) Continue to assess the impact of the Safer Streets 3 funding and where this initiative may be rolled out into wider areas of the Borough to incorporate modern slavery and human trafficking.

10. Training and Awareness

- 10.1 Ashford Borough Council's Community Safety Unit (CSU) has carried out activity to raise awareness of modern slavery and human trafficking and of services available to assist victims. We have achieved this by working with Kent Police to share their knowledge with partners.
- 10.2 As part of increasing awareness of modern slavery and human trafficking, in the December 2020 edition of our Ashford For You magazine we published an article to highlight awareness and how to report incidents if seen.
- 10.3 Ashford Borough Council has a programme of induction and ongoing mandatory training that all employees must complete. Training includes safeguarding awareness as well as a modern slavery and human trafficking module. This enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

11. Statement Review

- 11.1 This statement will be reviewed every year. It will be amended, if necessary, to take into account new legal requirements, non-statutory guidance from central government and implementation of relevant industry standards.

This Statement has been approved by:



Councillor Clarkson, Leader Date: 21 March 2022



Tracey Kerly, Chief Executive Date: 21 March 2022