



## **Hertsmere Borough Council**

### **Modern Slavery Transparency Statement 2021/2022**

#### **Introduction**

At Hertsmere Borough Council, we see our responsibility to tackle modern slavery as two-fold. We are committed to reporting on our business practices and supply chain and acting as a first responder whilst raising awareness of the issue more broadly in line with the requirements set out in the Modern Slavery Act 2015 (MSA 2015). This transparency statement will cover both aspects.

In October 2020, Hertsmere Borough Council signed up to the Co-operative Party [Charter Against Modern Slavery](#), which aims to establish ethical labour sourcing practices in our supply chain and create robust recruitment practices. Our commitment to the Charter has informed the work set out within this statement.

In accordance with [Section 54 of the MSA 2015](#), this statement will detail what steps we are taking to proactively work towards ensuring that slavery and human trafficking are not taking place in our supply chain or any part of our business operations.

This statement covers direct employees of the Council, agency workers engaged through the Council's temporary agency contract and services delivered on behalf of the Council by third party organisations and in the Council's supply chains. This statement refers to actions and activities during the financial year 2021/2022.

#### **Structure, Business, Supply Chains**

Hertsmere Borough Council is a local authority and is accountable to the public through elected members. The Managing Director of the Council, Sajida Bijle, has ultimate responsibility for activities covered by this statement and has signed the statement accordingly. Councillor Morris Bright has countersigned as Leader of the Council. While the Managing Director has ultimate responsibility, we have a cross-functional team made up of representatives from finance, community safety and human resources who are required to take responsibility for relevant anti-slavery policies and processes that have been set up within our business and also with our suppliers and business partners.

Hertsmere Borough Council is responsible for providing services including benefits, car parking, community safety, elections, environmental health, housing needs, leisure and parks, licensing, planning, street cleaning and kerbside waste and recycling collections.

We have supply chains and outsource some of our services. We are aware of our tier 1 suppliers and are undergoing a process to map them according to their risk.

The Council engages with other organisations to share knowledge and learn from experiences. These organisations include unions, the Hertfordshire Modern Slavery Partnership, charities and other local authorities.

### **Policies:**

We have policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in all of our operations. These policies are accessible via the staff intranet or on our website.

- [Whistleblowing Policy](#) - We encourage all customers and staff to report any concerns related to the direct activities of the organisation, or those in our supply chain. This includes any circumstances that may increase the risk of slavery or human trafficking. Reporting can be anonymous. Whistleblowing with Confidence is an e-learning module available to all Hertsmere Borough Council staff via the Learning Zone.
  
- **Recruitment Policy** – New workers are thoroughly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines. All employees are given a written contract of employment and assistance will be provided, where required, to ensure that the contract can be clearly understood by the new employee. No employees pay any direct or indirect fees to obtain work (including fees for the recruitment, travel, visas or administrative fees) to the council and we communicate our expectations of this to any third-party agencies used. The HR and payroll database is monitored quarterly for addresses of employees - a number of people listing the same address may indicate high shared occupancy (often a factor for those being exploited) and the Safeguarding Officer will be alerted of this. As part of the employee induction, information is provided to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. If, through the recruitment process, it is suspected someone is being exploited, the Council will provide the employee with appropriate support. We recognise that there are increased Modern Slavery risks associated with using any third-party labour recruiter. Agencies are engaged via our procurement process and we have due diligence in place to ensure that their

processes are reviewed and they are taking necessary steps to prevent exploitation.

During the tender process we ask for confirmation that the organisation has thoroughly investigated its labour practices and those of its direct suppliers, to ensure there is no slavery or forced labour used anywhere in this organisation or by any of the direct suppliers to this organisation.

We also ask that the organisation has put in place all necessary processes, procedures, investigations and compliance systems to ensure that this situation will continue to be the case at all times. Supporting evidence is required at award if the organisation is successful and we will continue to check this in the contract management process on a regular basis.

We require the recruitment agencies we appoint to follow the annual reporting requirements contained within section 54 of the Modern Slavery Act 2015. We verify all of the agencies within our framework as part of the procurement process. Officers are required to source agency staff through the framework unless there is a failure to provide suitable candidates.

- **Safeguarding children and Vulnerable Adults Policy** – Our safeguarding policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, including identifying and reporting trafficking or modern slavery cases.

### **Risk Assessing Suppliers**

Our focus for 2021/2022 will be to review the Council's Supply Chain in terms of identifying any potential risks of Modern Slavery or Human Trafficking. If a service/area is higher risk, this does not mean we have evidence of non-compliant activity in our supply chain, it indicates where greater attention and focus will be placed in monitoring supplier relationships; Initial investigation has shown that higher risk areas of Modern Slavery or Human Trafficking can occur with:

- Estates Goods and Services
- Grounds Maintenance
- IT equipment
- Construction
- Uniforms
- Office Supplies
- Temporary Staff
- Waste and Recycling

The following areas are deemed lower risk:

- Professional Services (e.g. Professional External Advisory Services in relation to Legal and construction, Marketing, Finance and Health & Safety issues)
- Consultancy services – e.g. construction and planning

## **Due Diligence of Suppliers**

We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain. We will work with partners to develop our understanding of the risks of modern slavery occurring and to review the supply chain to identify areas of vulnerability and risk.

A questionnaire will be circulated to contracted suppliers to help assess:

- Their organisation's understanding of what Modern Slavery and Human Trafficking is.
- What process and procedure is already in place to mitigate the risks of Modern Slavery and Human Trafficking.

We will ask suppliers to substantiate their comments with evidence.

This communication will demonstrate our commitment to raising awareness of Modern Slavery amongst the partners we work with. We expect our business partners to adhere to principles and values that are consistent with our own standards.

## **Modern Slavery Charter**

Hertsmere Borough Council signed up to the Co-operative Party Charter Against Modern Slavery in October 2020, which aims to establish ethical labour sourcing practices in our supply chain and establish robust recruitment practices.

The Charter against Modern Slavery commits the council to:

1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.

7. Review its contractual spending regularly to identify any potential issues with modern slavery.
8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
9. Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
10. Report publicly on the implementation of this policy annually.

### **Training and Awareness Raising (Spotting the Signs and Reporting)**

We are committed to raising awareness of Modern Slavery amongst all employees, councillors and partners including how Modern Slavery presents and what the statutory reporting duties are.

In January 2021 Hertsmere appointed a dedicated Safeguarding and Modern Slavery Lead Officer. The responsibilities of this role include:

- Putting in place measures to safeguard children, young people and adults at risk of violence, abuse or slavery.
- Identifying safeguarding and modern slavery training requirements and refresher training for all roles within the council
- Ensuring that Hertsmere is compliant in its statutory duty to report to the National Referral Mechanism (NRM).

To ensure a high level of understanding of the risks of modern slavery and human trafficking in Hertsmere and the council's business operation and supply chains as well as local businesses, we provide training to our staff.

Hertsmere delivers an online/e-learning training package for all staff to ensure staff are able to:

- assess the risk of modern slavery and human trafficking in relation to various aspects of the business, including resources and support available
- identify the signs of slavery and human trafficking
- know what initial steps should be taken if slavery or human trafficking is suspected
- escalate potential slavery or human trafficking issues to the relevant parties within Hertsmere Borough Council
- know what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and Stronger Together.

In addition to this, staff who are most likely to submit an NRM referral have completed the Home Officer First Responder E-Learning Module and relevant staff

attend a County Lines Safeguarding course.

The next priorities will be to organise staff training on how staff can support and engage with victims, this will include victim-centred interviewing techniques and emotional support. We are currently liaising with training providers who can facilitate this.

We will also develop some further training and guidance for staff with regards to contract management and use regular periodic internal corporate communications to maintain staff awareness on Modern Slavery.

### **Collaborative Working**

Hertsmere's Community Safety function shares intelligence and participates in joint investigations with Hertfordshire Constabulary and other partners regarding issues of community safety. Multi Agency meetings such as the Multi-Agency Risk Reduction Group, Joint Action Group and Regional Action Group are scheduled regularly and serve to share information, intelligence and best practice between agencies in accordance with established protocols.

In addition to this, under the umbrella of the Hertfordshire Modern Slavery Partnership (HMSP), Hertsmere works in collaboration with more than 100 local agencies and charities from across the county to tackle modern slavery and human trafficking in all its forms. The key focus of the partnership is to share information and proactively work together to increase identification and support of victims and disruption of perpetrators.

The HMSP have introduced the HSAB Adult and HSCP Child Victim Pathways which act as a step-by-step process for when an adult or a child presents to the service and the necessary steps that should be taken to support the potential victim. As a local authority, Hertsmere is one of a number of agencies who have a responsibility as a designated First Responder organisation (see [Section 52 of the MSA 2015](#)) to refer adults and children to the Home Office to receive appropriate support if concerns of Modern Slavery have been identified.

Between April 2017 and December 2020, 311 referrals have been made to the NRM and 256 modern slavery offences have been recorded in Hertfordshire.

### **Promoting and Communicating Modern Slavery Issues**

It is imperative that Hertsmere residents know what Modern Slavery and Human Trafficking is, not only to help abolish it but also to help victims to identify that they have been exploited and allow them to get the support they need. Work to raise public awareness of Modern Slavery and the development of promotional materials, posters and flyers are in the planning stages and will continue. The public can call The Modern Slavery and Exploitation Helpline to get help, report a suspicion or seek advice on 08000 121 700 or go to the website <https://www.modernslaveryhelpline.org>

The Hertfordshire Safeguarding Adults Board are due to circulate guidance for addressing cuckooing cases by June 2021. Hertsmere Borough Council's Community Safety team will be adopting this guidance to create a multi-agency process for dealing

with these cases effectively and with consistency. We also intend to raise awareness of cuckooing with local housing associations within the borough.

Our Community Safety team are also working in conjunction with St Giles Trust to facilitate and deliver training on “Understanding Group Offending, Criminal Exploitation and Violence” to local Primary and Secondary schools. Some of the learning outcomes of this course include: Understanding how young people may be recruited into exploitative networks, understanding the unique identifiers of young people at risk and building engagement tools and strategies to help young people make better informed decisions. This training is due to take place in June 2021.

### **Next Steps and Annual Review**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2022.

For the first time, this statement will be registered on the [UK Government portal](#) this year and will be updated annually following review at the policy group meeting in July 2021.



**Sajida Bijle**  
**Managing Director**  
**May 2021**



**Councillor Morris Bright MBE**  
**Leader of the Council**  
**May 2021**

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<sup>1</sup> The National Referral Mechanism is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

