

# Modern anti-slavery and human trafficking statement

1 April 2019 to 31 March 2020

01732 227000  
[information@sevenoaks.gov.uk](mailto:information@sevenoaks.gov.uk)

## **1.0 Introduction**

- 1.1** Sevenoaks District 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 2019 to 31 March 2020.

## **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.

### **3.0 Standards**

**3.1** Sevenoaks District 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** Sevenoaks District 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.

**4.2** The [Council's Structure](#)

**4.3** The [Council's Constitution](#)

### **5.0 Supply chains**

**5.1** In the procurement process, Sevenoaks District 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 subcontractors in relation to ensuring there is no slavery or human trafficking in their businesses.

**5.2** The Council also requires its contractors and sub-contractors engaged in a 'regulated activity'<sup>1</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.

---

<sup>1</sup> As defined by the Safeguarding Vulnerable Groups Act 2006 (as amended)

## 6.0 Policies and Plans

6.1 Sevenoaks District Council has a range of policies and plans in place which reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations:

- **Council Plan** – contains a strategic aim to create a safer District 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 District; reduce anti-social behaviour; and increase public perception of the District as a safe place.
- **The Sevenoaks District Community Safety Partnership's Strategy & Action Plan** – contains a priority to protect vulnerable people from harm, including those who are affected by slavery and human trafficking. This includes a commitment to establish the nature and extent of slavery and human trafficking within the District, and to work with emergency planning teams to make sure that support will be available for victims who may be rescued at short notice.
- **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.
- **Whistleblowing Policy** – 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.
- **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.

- **Procurement Equality Standard** – aims to ensure that equality and diversity is embedded into the procurement processes.
- **Comprehensive Equality Policy** – sets out the Council’s legal obligations under the Equality Act 2010 and the various ways the Council meets its duties.

## 7.0 Due diligence

7.1 Sevenoaks District Council’s due diligence approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to modern slavery for their own suppliers, subcontractors and other participants in their supply chains where their annual turn-over exceeds £36million. Where turn-over is less than £36million, suppliers are required to comply with this Modern Anti-slavery and Human Trafficking Statement.

## 8.0 Training

8.1 Sevenoaks District 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 abuse and neglect, including modern slavery and human trafficking.

8.2 Induction briefings on equality and diversity and safeguarding are provided to Members following local elections.

8.3 Within the last 12 months the Council has provided modern slavery awareness training to staff and partner agencies which included:

- the basic principles of the Modern Slavery Act 2015 and the Council’s duties;
- how employees can identify slavery and human trafficking and what to do if they have concerns;
- what external help is available, for example through the modern slavery helpline.

## 9.0 Partnership working

9.1 **Community Safety** – Sevenoaks District Council has a strong track record of working in partnership with other agencies to improve community safety. The Sevenoaks Community Safety Partnership (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.

Alongside the work of the CSP, the Council facilitates a multi-agency Sevenoaks Community MARAC (Multi-Agency Risk Assessment Conference)

which aims to;

- develop a common understanding and accountability framework among local partners of the threats, vulnerabilities and risks relating to:
  - serious and organised crime
  - organised crime gangs (OCGs)
  - street gangs
  - child sexual exploitation
  - domestic abuse
  - mental health
  - counter terrorism – radicalisation (Prevent)
  - safeguarding
  - slavery and human trafficking
  - substance misuse
  - anti-social behaviour and crime
  - repeat and vulnerable victims
  - repeat and persistent offenders
- provide and share information and intelligence on which to base local programmes and action plans that feed into the Community Safety Strategy;
- understand and agree on a targeted and proportionate use of resources.

The MARACs work is informed by information and intelligence from a variety of sources, including Serious and Organised Crime Local Profiles produced by Kent Police.

**9.2 Safeguarding** – Sevenoaks District 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 meets every 2 months and the group monitors the Safeguarding Policy and to ensure that it is taking its safeguarding responsibilities seriously and complying with legal requirements.

## **10.0 Our effectiveness in combating slavery and human trafficking**

**10.1** Sevenoaks District 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; Number of employees trained on code of conduct, human rights and modern slavery;
2. Number of cases reported on its whistleblowing system and resulting action.

This Modern Anti-slavery and Human Trafficking Statement will be reviewed and updated as necessary, on an annual basis.