

Hart District Council – Modern Slavery Transparency Statement

Introduction

This statement sets out Hart District Council's ('the Council') actions to understand all potential modern slavery risks related to its business and measures taken to ensure that there is no slavery or human trafficking in its own business, or in its supply chains.

The Council recognises its responsibility to notify the Secretary of State of suspected victims of human trafficking as introduced by Section 52 of the Modern Slavery Act 2015, as well as its general responsibility under safeguarding to take a strong approach to any allegations of modern slavery and human trafficking.

The Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. The Statement sets out practices already in place at the Council, and committed actions moving forward.

What is modern slavery?

Modern slavery encompasses human trafficking, slavery, servitude and forced labour and can include:

- sexual exploitation;
- labour exploitation;
- forced criminality;
- organ harvesting;
- domestic servitude;
- debt bondage.

Anyone can become a victim of modern slavery, with particularly vulnerable groups including:

- unaccompanied, internally displaced children;
- children accompanied by an adult who is not their relative or legal guardian;
- young girls and women;
- former victims of modern slavery or trafficking;
- homeless individuals.

Partnerships

The Council works in partnership with a wide number of agencies in order to combat modern slavery, including:

- North Hampshire Community Safety Partnership

- Hampshire Constabulary
- Hampshire and Isle of Wight Modern Slavery Partnership

The Hampshire and Isle of Wight Modern Slavery Partnership's main objectives include:

- To raise awareness of modern slavery
- To combat modern slavery by working in partnership
- To identify and support victims of modern slavery
- To pursue perpetrators of modern slavery

The full Partnership strategy is available on the website at www.modernslaverypartnership.org.uk/partnership.

The Hampshire and Isle of Wight Modern Slavery Partnership provides guidance, training and best practice to partners across the County, ensuring all organisations are equipped to tackle this issue.

At a local level, the Council's Community Safety team works with Hampshire Constabulary to identify and manage any victims or perpetrators of modern slavery. Hart Community Safety team operate under the Crime and Disorder Act 1998 and the duty to prevent crime and disorder, which includes modern slavery and trafficking. Monthly meetings are held to track individuals of note as well as resulting actions:

- for adults - the Hart & Rushmoor Vulnerabilities Operational Group (VOG) led by the Hart & Rushmoor Community Safety teams.
- for children – Hart & Rushmoor Op MET (Missing Exploited Trafficked) meeting led by Children's Services.

Policies

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

- **Safeguarding**
The Council is committed to safeguarding the welfare of children and vulnerable adults. The Council has a comprehensive Safeguarding Policy which all staff and councillors are expected to read and adhere to. The Council carries out Safeguarding training for all frontline staff biennially, has Safeguarding champions across departments and participates in multi-agency partnerships to protect and safeguard people.
- **Recruitment**
The Council vets all new employees ensuring they are able to confirm identity, qualifications and are eligible to work in the United Kingdom as well as following up references. The Council safeguards agency workers by ensuring

agencies used are reputable and have appropriate policies in place to safeguard workers.

- **Pay**
The Council operates a job evaluation scheme to ensure employees are paid fairly and equitably, taking into account The Equality Act 2010 and the National Joint Council for Local Government Services. The Council's pay and reward policy is based on fairness, affordability, consistency, flexibility, market rates and to encourage and reward achievement.
- **Employee Code of Conduct**
The Council's Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the Council. The Employee Code of Conduct promotes a high standard of conduct based around honesty, accountability and respect to maintain public confidence in services provided, with any breaches thoroughly investigated.
- **Whistleblowing**
The Whistleblowing policy forms part of the council's corporate governance arrangements to ensure that employees are confident in the reporting and investigation of malpractice including fraud, corruption, and unethical conduct.
- **Members Code of Conduct**
The Members Code of Conduct emphasises Members' responsibilities with regard to dealing with residents and all members of the community in a fair manner, putting the public interest first.

Supply Chains

It is a priority for the Council to ensure ethical trading, responsible sourcing and prevention of modern slavery and human trafficking throughout its supply chains.

The Council is committed to:

- full transparency of its supply chain;
- ensuring people who provide products and services used by the Council are treated fairly, and their fundamental human rights protected and respected;
- ensuring new suppliers understand the Council's requirements before commencing any work, and that existing suppliers comply with these requirements.

The Council procures goods and services from various suppliers which is governed by the Procurement Strategy and related Terms and Conditions.

The Council will carry out due diligence to ensure suppliers are aware of its expectation during any bid or tendering process, and again prior to new contracts being signed. The Council may request evidence of adequate Modern Slavery policies and procedures from any potential new suppliers, as well as existing ones. Prior to being engaged, all new suppliers will provide written confirmation of compliance with the Modern Slavery Act.

Suppliers may be requested to agree to the Council's Standard Safeguarding Contract Clauses.

If a current supplier is found to meet all statutory requirements but has policies that are lacking or could be improved, we may look to work in collaboration with them to improve these, or alternatively suggest an appropriate agency who can assist. Should the Council have serious concerns around a supplier's policies and the safety of those working for them, this should be immediately referred to the Council's Senior Management as well as the Contracts Manager and a suitable escalation process followed.

Any violations or safety concerns will be reported to the appropriate authorities including:

- Hampshire Constabulary - <https://www.hampshire.police.uk/>
- Hampshire County Council Children/Adults Services - <https://www.hants.gov.uk/socialcareandhealth>
- The Home Office - <https://www.gov.uk/government/collections/modern-slavery>
- Hampshire and Isle of Wight Modern Slavery Partnership - <http://www.modernslaverypartnership.org.uk/>
- Barnardos - <https://www.barnardos.org.uk/>
- Gangmasters and Labour Abuse Authority (GLAA) - <https://www.gla.gov.uk/report-issues/>

Training

All frontline Council staff are required to attend biennial Safeguarding Training, and all staff have access to Safeguarding Champions within the organisation for advice and assistance at any time. All staff are also encouraged to familiarise themselves with the Safeguarding Policy. Policies and the list of Safeguarding Champions can be accessed via SharePoint under Community Safety/Safeguarding.

Councillors are also encouraged to attend Safeguarding Training to assist them in carrying out their duties both within the Council, as well as when out working in the community for their constituents.

Review

This Transparency Statement was approved by the Cabinet of Hart District Council on **TBC** and will be reviewed annually by the Community Safety Manager.

Reporting of concerns

As a first responder, the Council will report all Modern Slavery concerns via the National Referral Mechanism for adults and to Children's Services for children.

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

[Contact Children's Services | Children and Families | Hampshire County Council \(hants.gov.uk\)](#)

Document Control		
Version	Amended by	Next update
1.0	Rachael Wilkinson	2022