



North Hertfordshire District Council: Modern Slavery Progress Document

Introduction

Councils can play several different roles in relation to modern slavery, including identifying and referring potential victims, supporting victims, disrupting modern slavery and ensuring supply chains are free from modern slavery. As modern slavery intersects with many different departments and areas that councils are involved with, a number of different officers may come across it whilst going about their everyday duties. Such key departments include housing, finance (procurement), community safety, safeguarding, human resources, legal, environmental health (licensing, gambling, health and safety, waste. In fact, UK councils were the third highest category of referral organisation in 2018 for the National Referral Mechanism, referring 1,335 cases.

Since 2016, North Hertfordshire District Council has undertaken several actions to tackle modern slavery, including training staff, raising awareness of the issue. committing itself to working with the Hertfordshire Modern Slavery Partnership and tackling exploitation in its supply chains. Notable successes include producing a Modern Slavery & Human Trafficking Action Plan in 2018, engaging in relevant Partnership campaigns, organising the delivery of training sessions to all customer facing staff, producing a modern slavery page on the intranet and [Council website](#), including HTMS within compulsory safeguarding training for new starters, as well as signing up to the Modern Slavery Charter, resulting in the production of a Modern Slavery Transparency Statement.

However, there is still more work to be done, with a number of council policies not featuring any reference to modern slavery. Full details of North Hertfordshire District Council policies that potentially could be amended to include modern slavery are given below, along with relevant content in current policies.

General Recommendations

To support this process, it would be extremely beneficial for the Council to commit to the following to support the embedding of this issue within the Council's day-to-day activities:

1. Produce a Modern Slavery Strategy, which would set out the council's strategic approach to tackling modern slavery, acting as a reference point for officers and residents alike. e.g. [Enfield](#)
North Herts Progress: *NHDC adopted new safeguarding policies in October 2019. Modern slavery is referenced in the children and adult policy as one of the types of abuse affecting both children and adults.*
2. Produce an annual Modern Slavery Report, which would embed monitoring of this issue as a whole council and ensure that it remains at the top of the agenda. e.g. [Islington](#)
North Herts Progress: *The first annual modern slavery report will be submitted to the Executive (Cabinet) in July 2020. It was specifically triggered by the publication of the transparency statement and signing up to the charter, which requires reporting on progress. A modern-day slavery action plan was created in 2018, which has been updated and reported in the Council's Annual Safeguarding Report since 2018, which is submitted to the Overview and Scrutiny Committee annually.*
3. Appoint an internal Centralised Champion who can coordinate and bring together all the work being undertaken across the council + Department Champions, who can act as lead contacts, supporting their colleagues.
North Herts Progress: *Jeanette Thompson acts as the centralised safeguarding champion corporately and a series of Department Champions, referred to as 'Designated Safeguarding Officers' sit throughout the organisation taking on the role of supporting colleagues with safeguarding referrals, including MDS.*

4. Ensure modern slavery is embedded in safeguarding training to guarantee that all staff have a minimum knowledge on this subject area.

North Herts Progress: Modern slavery is incorporated into existing council safeguarding training at all levels, including first day information for new starters, corporate induction for new starters, e-learning for all staff and face to face basic and advanced training for those staff in customer facing roles.

5. Ensure all staff complete a modern slavery e-learning module to ensure that staff are effectively sighted on this issue. e.g. Stevenage

North Herts Progress: Modern slavery is incorporated into existing council safeguarding training at all levels, including first day information for new starters, corporate induction for new starters, **e-learning for all staff** and face to face basic and advanced training for those staff in customer facing roles.

6. Produce a whole council internal victim care pathway, which specifies the pathway for identification, report of and support to suspected and identified modern slavery victims. e.g. Stevenage and City of Bradford.

North Herts Progress: Internal procedures were created for the whole council in 2019, which guide staff on the reporting pathway for adults and children. These procedures include clear instructions on who to report concerns to internally and externally, as well as how to report modern slavery cases through the National Referral Mechanism.

7. Sign up to the Modern Slavery Charter and produce a Council Modern Slavery Transparency Statement e.g. Nottinghamshire County Council and Cardiff City Council.

North Herts Progress: A [Modern Day Slavery Transparency Statement](#) was produced in June 2019 and the Council approved signing up to the [Co-Operative Charter Against Modern Slavery](#) at a full Council meeting in July 2019.

Initial Steps taken by the Council

Since 2015, the annual safeguarding review by the Council Corporate Safeguarding Group included Child Sexual Exploitation, with actions undertaken from 2015-2017 on training for council staff and external stakeholders, serious case reviews, procedure audits and signposting of relevant resources and guidance. Following the creation of the Council modern slavery action plan in 2018, modern slavery has been included in the annual safeguarding review since then and progress on actions is reported to the Overview & Scrutiny Committee. Additional actions in 2018 included creating a MDS intranet page for all staff to access with all information on identifying and reporting modern slavery internally and to the National Referral Mechanism, introduction of an e-learning package for all staff to complete that have no customer contact and the delivery of several cross-departmental 1-hour briefings by the Operation Tropic between November 2018-January 2019. Completion of the safeguarding e-learning module, which includes HTMS, is now compulsory for all new starters. HTMS is also embedded within Level 1 and 2 Safeguarding Training.

The North Herts District Council Modern Slavery & Human Trafficking Action Plan features the following areas:*

1. Monitoring and Reporting
2. Policy and Process
3. Communications and Training
4. Partners
5. External Endorsement

*Instead of including the action plan within this document, sighted actions have been embedded within this document. In reviewing this document, a copy of the action plan should also be provided separately by relevant council officers.

1. Community Safety

Councils have a legal duty to reasonably prevent crime and disorder in their areas. Community safety officers may come across trafficking or modern slavery whilst working on issues around serious and organised crime, gangs, drug selling, and other crimes committed within their area – like cannabis cultivation, shoplifting and begging.

In the Protecting Vulnerable People section, the [NORTH HERTFORDSHIRE COMMUNITY SAFETY ACTION PLAN 2019/20](#) states that it will '[1. Support national and countywide campaigns that aim to raise awareness of issues including; child sexual exploitation, hate crime, domestic abuse, counter terrorism and modern slavery. All CSP partners](#)

to lead and support where appropriate campaigns through social media, exhibition stands and events April 2019-March 2020.'

Relevant to this strategic priority are the following provisions, although modern slavery victims do not feature as a separate action, which would be vital for ensuring a business as usual approach to tackling modern slavery:

- *4. To reduce the number of domestic abuse victims in North Herts [and] To respond effectively to reports of domestic abuse crime April 2019-March 2020.*
- *To reduce the number of scam victims in North Herts [and] To identify and support scam victims from becoming repeat victims April 2019-March 2020.*
- *To provide practical and technological support to victims and vulnerable people [and] To promote Herts Careline services to key vulnerable groups April 2019-March 2020.*

For North Herts District Council's community safety department to improve its approach to tackling modern slavery, it should:

- 1a) Linked to the centralised MDS & HT referrals log, include exploitation, modern slavery and National Referral Mechanism figures in its updated Community Strategy.
- 1b) Linked to the Council modern slavery action plan, include specific anti-modern slavery actions around identification and reporting of modern slavery victims within the Community Safety Plan. These actions should centre around the following, but this is by no means an exhaustive list:
 - How it plans to engage with the local community around modern slavery
 - How it plans to increase visibility of modern slavery.
 - How it plans to prevent modern slavery from taking place.
 - How it plans to increase identification and reporting of modern slavery in collaboration with other organisations
 - How it plans to increase identification and reporting of perpetrators of modern slavery.
 - How it plans to safeguard, and support suspected and identified modern slavery victims in collaboration with other organisations.
 - How it plans to ensure the CSP as a whole is fully trained on modern slavery issues.
- 1c) Include the modern slavery helpline within the contacts list of an updated community safety plan.
- 1d) Include the Hertfordshire Modern Slavery Partnership within its Community Safety Plan in terms of how it plans to work with the Partnership in practice.

2. Safeguarding and Housing

Councils may see people who are at risk of trafficking through the provision of homelessness services, or through inspections of houses in multiple occupation (HMOs) they might come across modern slavery victims living in substandard accommodation. Children's safeguarding services will deal with trafficked children or children who have been exploited, and adult safeguarding services may have a role in supporting adult victims with care and support needs. Depending on the age and needs of victims, councils have separate legal obligations to provide statutory support, outside of the National Referral Mechanism, to child and adult victims, in terms of social care support and housing. Understanding that councils play a significant role in this area, a housing workshop (directed at housing leads) was organised by the Hertfordshire Modern Slavery Partnership for all 10 districts in September 2019, which was attended by a North Herts representative from the housing department.

The following policies were reviewed to check for reference to modern slavery, exploitation or human trafficking:

- Safeguarding Adults Policy
- Safeguarding Children Policy
- [Housing Strategy 2019-2024](#)
- Modern Slavery & Human Trafficking Action Plan in 2018

North Hertfordshire District Council's Safeguarding Adults policy includes the following content on modern slavery, outlining definitions and possible indicators to support with identification of victims:

Modern slavery

Types of modern slavery

· Human trafficking

- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Possible indicators of modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

North Hertfordshire District Council's Safeguarding Children's policy includes the following content on modern slavery:

3.1.5 Modern Slavery

There are a number of different types of exploitation that victims of modern slavery may be subjected to, and victims may experience more than one type of exploitation at the same time. The most common forms of exploitation are:

- Sexual exploitation
- Labour exploitation
- Forced Criminality
- Organ Harvesting
- Domestic Servitude

Other forms of exploitation include:

- Forced Marriage
- Financial Exploitation

Victims of modern slavery have often been promised a better life or legitimate job before they are exploited, and by the time they find out the job doesn't exist they are already enslaved. Some victims might not see they have been exploited or feel that the life they are living is better than the one they might have lived at home. Others might be too scared to seek help due to fear, involvement in criminal activity, immigration status, or due to loyalty to the perpetrators.

The victims may have been given a prepared story by the traffickers/modern slavery facilitators to use when talking to the authorities. They may also be aggressive or hostile to the authorities or have difficulties in recalling what they've experienced as a result of trauma. They may be threatened with or have experienced violence, may be controlled through debt, or have been groomed. Perpetrators of modern slavery can be serious and organised crime groups, but may also be an individual close to the victim, such as family members, friends, individual employers or partners.

Reporting Procedures

In 2019, the Council produced two reporting procedure documents (adults and children) to assist all council staff with reporting modern slavery cases following identification:

- 1) **Procedure for Modern Day Slavery for a Child**
- 2) **Procedure for Modern Day Slavery for an Adult**

These procedures include clear instructions on who to report concerns to internally and externally, as well as how to report modern slavery cases through the National Referral Mechanism. The documents also feature individual flow charts and relevant links to resources and organisations. These procedures have been added Appendix A and B of this document.

In order to improve its approach to safeguarding modern slavery victims, North Herts District Council should:

- 2a) Update the Safeguarding Children's Policy with possible indicators of modern slavery for children, including citing of the grooming cycle.

- 2b) Update the adult safeguarding policy to include reference to the Council's legal responsibilities to modern slavery victims (see [HTF Adult Modern Slavery Protocol for Local Authorities](#) for further details).
- 2c) Add to existing procedure documents, clarifying on support procedures, for victims entered and also not entered in the NRM. Support procedures should include reference to how the Council will support suspected and identified modern slavery victims to access the following (see [HTF Survivor Care Standards](#) for further details):
 - Case work and advocacy
 - Accommodation
 - Legal advice
 - Health services
 - Psychological support and counselling
 - Returning home
 - National Referral Mechanism

Housing

Under Section 2 of the North Herts District Council Modern Slavery & Human Trafficking Action Plan 2019-2022, the following actions have been included around responsibilities of Housing Options and Housing Advice teams to potential and identified modern slavery victims. These provisions are outlined below:

- *2.5 The Housing Options and Housing Advice Teams provide potential victims of MDS with advice on their housing options (including homelessness services) and signpost to other specialist support agencies as appropriate.*
- *2.6 The Housing Options and Housing Advice Teams support the police and partners in Operation Tropic activities through the provision of an on-site housing options service (including homelessness advice), as required.*

However, the Council's [Housing Strategy 2019-2024](#), which is made up of its Homelessness and Rough Sleeping Strategy and Tenancy Strategy, makes no reference to modern slavery, human trafficking or exploitation. Yet, victims of modern slavery have very similar housing needs to domestic abuse victims, who are mentioned several times throughout the Strategy. Extracts from this strategy which should at the very least include reference to modern slavery are provided below:

3.13 Specialist, or supported, housing may also be required by people of all ages who have physical, mental health or learning difficulties or who have alcohol or substance misuse issues or who are fleeing domestic violence. Supported housing is also available to young people leaving care and setting up new tenancies. (pg. 17)

5.8 Poverty and financial pressures were also felt to contribute to family and relationship breakdown and domestic abuse which are also important reasons behind homelessness, as table 6 illustrates. (pg. 25)

5.28 Many households are still waiting until they reach crisis point before they approach the Council for assistance, meaning that it is often too late for prevention measures to be effective. The Council already works closely with relevant agencies to identify households at risk of homelessness and to provide early intervention in the form of accommodation and support plans for care leavers and young people and most recently, support to help victims of domestic abuse to remain safely in their homes.

In order for North Herts District Council's housing department to improve its approach to supporting modern slavery victims, it should:

- 2a) Establish joint working arrangements with housing associations, NRM support providers and homelessness charities for effective safeguarding and support to victims. e.g. *Westminster*
- 2b) Agree a specific safeguarding pathway for adult victims of modern slavery that are homeless. e.g. *Stevenage*
- 2c) Agree a housing protocol with the other 9 districts to ensure that a modern slavery victim is housed in a place of safety. e.g. *Hull*

- 2d) Reflect and agree on the most suitable form of accommodation for modern slavery victims to prevent re-trafficking.
- 2e) Establish suitable security measures to ensure that traffickers are not able to access safe houses.
- 2f) Ensure housing staff are suitably trained to identify and report modern slavery concerns within the remit of their role, including recording cases and signposting to relevant organisations.

3. Environmental Health and Licensing

Through day-to-day work with local businesses, a range of council regulatory services may be able to identify cases of modern slavery. In line with regulatory services like Trading Standards and the Fire and Rescue Service, relevant council services may encounter victims or perpetrators whilst inspecting premises such as nail bars and restaurants, regulating other businesses, such as gambling premises, taxis and private hire vehicles and/or in the inspections of houses in multiple occupation (HMOs). The Council of Europe Convention on Action against Trafficking in Human Beings, GRETA underlined 'the significant role of workplace inspections, including on health and safety, compliance with labour standards and revenue laws, in deterring instances of human trafficking for forced labour and identifying possible victims of MS.'

In addition, these services have several enforcement tools and powers of entry that may be helpful in targeting perpetrators modern slavery, alongside other types of rogue business. Licensing and environmental health departments have a responsibility to engage with licensed premises that can be unwitting or willing hosts to modern slavery: 1) Victims and their traffickers visiting such establishments can be identified by staff, 2) local business staff can be recruited through unscrupulous means and/or through an exploitative recruitment agency, leaving them trapped and/or indebted to a trafficker.

Understanding that councils play a significant role in this area, a licensing workshop (directed at staff working with taxi drivers) was organised by the Hertfordshire Modern Slavery Partnership for all 10 districts in January 2019, which was attended by a North Herts representative from the licensing department.

The following policies were reviewed to check for reference to modern slavery, exploitation or human trafficking:

- [Statement of Licensing Policy 2016-2021](#)
- [Hackney Carriage and Private Hire Licensing Policy 2018](#)

Statement of Licensing Policy 2016-2021

Reviewing North Hertfordshire District Council's [Statement of Licensing Policy 2016-2021](#), the Policy makes no reference to modern slavery and/or human trafficking. However, it does include the following provisions around Child Sexual Exploitation on pp.29-30:

E4.6 Safeguarding against Child Sexual Exploitation (CSE)

E4.6.1 Whilst the Council encourages a diverse and vibrant night-time economy and will not seek to limit access by children without appropriate reasons, it is acutely aware that licensed premises have the potential to expose children to the risk of child sexual exploitation.

E4.6.2 The Council acknowledges that CSE awareness does not just apply to children on licensed premises. Applicants should be equally aware of children in the proximity of the premises that may be waiting for, or seeking, older persons.

E4.6.3 Applicants are encouraged to ensure that suitable management controls are in place to safeguard children against the risk of CSE. Measures may include, but are not limited to:

- *awareness training for staff;*
- *regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable children;*
- *close monitoring of patrons as they leave the premises;*
- *recording and reporting concerns to the police.*

E4.6.4 The Council expects applicants to be aware of 'risk indicators' of CSE which include, but are not limited to:

- developing relationships between a child and an older person;*
- children in the company of a group of older persons;*
- children regularly attending premises and meeting with a number of different older persons, particularly where older persons are buying alcohol for children;*
- children outside of licensed premises developing relationships with older persons, particularly older persons buying alcohol for children;*
- children leaving the premises with older persons, particularly with a group of older persons;*
- children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons*

E4.6.5 Whilst the Council does not wish to create the impression that all contact between children and older persons is inappropriate and should be precluded from the night-time economy, it is strongly of the view that licence holders should be aware of the risks of CSE and should proactively manage their premises to minimise the risks.

E4.6.6 The Hertfordshire Safeguarding Children Board (HSCB) has a dual role in respect of preventing CSE within licensed premises. The HSCB is a responsible authority under the Act having been nominated by the Council to undertake this function in relation to the protection of children from harm objective. The HSCB also monitors compliance with the statutory requirements under section 11 of the Children Act 2004 to safeguard and promote the welfare of children. Applicants are encouraged to visit the HSCB website for advice www.hertssafeguarding.org.uk

E4.6.7 Of particular relevance to applicants is the Information Handbook for Licensed Premises available from the HSCB website. The Council expects applicants to read this handbook and ensure that the operating schedule identifies all management controls, particularly preventing CSE, appropriate for the promotion of the prevention of children from harm objective.

E4.6.8 The Council expects applicants to demonstrate the measures they will take to safeguard against CSE in the operating schedule.

E4.7 Conditions requiring the admission of children to premises cannot be attached to licences or certificates. Where no restriction or limitation is imposed, the issue of access will remain a matter of discretion of the individual licensee or club or holder of a temporary event notice.

E4.11 The Council expects applicants to fully set out the steps they propose to take to protect children from harm when preparing an operating schedule. Dependant on the nature of the proposed business model, there may be times when the presence of children in the premises would be inappropriate. The Council encourages applicants to undertake a self-assessment of their proposed business model in relation to the welfare of children and propose any appropriate restrictions as part of their operating schedule.

In order for North Hertfordshire District Council to improve its approach to tackling modern slavery, it should:

- 3a) Add 'Exploitation and Modern Slavery' as a separate section to an updated Statement of Licensing Policy, including a definition on what it is, cite relevant offences/legislation, outline the relevance to licensed premises and taxi drivers/operators, include a summary of key things that can be done to mitigate risk, signpost to relevant materials, outline the process of reporting that these entities should follow in suspected cases and the consequences if taxi drivers, taxi operators and/or licensed premises are found to be complicit in modern slavery . See modern slavery content added to [Hertsmere Borough Council's Statement of Licensing Policy](#) in 2018.
- 3b) As with CSE, relevant departments should seek to promote knowledge and understanding of modern slavery amongst those in the licensed trade, including signposting to relevant resources e.g. Agency Worker Welfare Questionnaire
- 3c) Add 'Exploitation and Modern Slavery' as a separate section to an updated **Environmental Health Enforcement Policies** and **Private Sector Housing Enforcement Policies**, including clear information on

what exploitation/modern slavery can look like in these scenarios, risks of outsourcing labour needs to a recruitment agency, and reporting procedures if modern slavery is potentially identified.

E.g. Food Service Industry: As an industry, which relies heavily on a low skilled and paid workforce and is lacking in regulation, exploitation is a high risk. It is common practice for such affected workers to be paid below minimum wage, working more than 72 hours a week, living in sub-standard, overcrowded accommodation with other workers, usually at or close to the place of work, with deductions from low salaries to pay for employer provided accommodation and food. Organised crime groups have also been known to collect foreign workers from abroad and transport them to food service businesses in the UK.

Hackney Carriage and Private Hire Licensing Policy 2018

In North Hertfordshire District Council's [Hackney Carriage and Private Hire Licensing Policy 2018](#), no reference is made to modern slavery and/or human trafficking. However, the following provisions have been included on prevention of child sexual exploitation, as well as safeguarding vulnerable adults and children on pp.22-23 of the policy:

3.10 Safeguarding Training

3.10.1 The Council acknowledges the importance of safeguarding training to all licensed drivers and operators, particularly with regard to the prevention of child sexual exploitation, but additionally regarding vulnerable adults and children.

3.10.2 The Council are part of a Herts & Beds Licensing Collaboration Group that is looking at the possibility of standardising safeguarding training across Hertfordshire. When an appropriate safeguarding training course is available, the Council will make it a mandatory requirement for all new drivers and operators prior to the grant of a licence. All existing drivers and operators will be given a period of time in which to attend the training; failure to do so will preclude a licence being renewed until such time as the training requirement has been fulfilled.

In order for North Hertfordshire District Council to improve its approach to tackling modern slavery, it should:

- **3a) Training**
 - Ensure that licensed premise owners attend basic safeguarding training, which includes modern slavery (Labour, Sexual, Criminal Exploitation + Domestic Servitude)
 - Compulsory safeguarding training for taxi drivers and taxi operators to include modern slavery (Labour, Sexual, Criminal Exploitation + Domestic Servitude)
- **3b) Resources**
 - Provide licensed premises and taxi operators/drivers with relevant materials and resources to ensure that local awareness is raised and that licensed premises can begin the journey to combat exploitation within their supply chains.
- **3c) Reporting**
 - Taxi operators should be able to demonstrate robust safeguarding referral pathways, which feature modern slavery.
 - Expand the Hackney Carriage and Private Hire Licensing Policy to include modern slavery as a whole, requiring all drivers to report any suspicion or concerns that any child, young person or adult is being transported for the purposes of exploitation, rather than just child sexual exploitation, including providing information on how that might manifest (signs and indicators) and reporting pathway (call Crime stoppers (anonymously) on 0800 555 111 or the Modern Slavery Helpline on 08000 121 700)
- 3d) Consider the inclusion of modern slavery within the following policies linked to responsibilities of council staff to identify and report concerns, as well as acknowledgement of high-risk venues and/or sectors for exploitation:
 - Gambling Policy
 - Food Law Enforcement Service Plan
 - Contaminated Land Strategy

- Health and Safety Service Plan
 - Recycling and waste policies
 - Drainage policies
 - Street cleaning and maintenance policies
- 3e) Add offences for modern slavery as a reason for refusal of a taxi driver application.
 - 3f) Consider establishing a North Herts equivalent of Hotel Watch e.g. *Oxfordshire*

4. Human Resources and Legal

Local businesses and councils, along with organised crime groups, are fortunate to be able to take advantage of a flexible labour market in the UK. Minimising the risk of modern slavery is about addressing the human rights risks to people – whether they are directly employed, agency workers, or are working in the supply chain of the council. At its core, human resources are about caring for people in their place of work and putting policies and systems in place to ensure that they are safe. These skills are needed more than ever in addressing the challenge of modern slavery. Human resources and legal departments play a key role in tackling modern slavery by raising awareness of the issue, providing training, and helping to ensure an aligned and consistent organisational response.

The following policies were reviewed, and none were found to include any reference to modern slavery, exploitation and human trafficking:

- [Anti-Fraud and Corruption Policy](#)
- Anti-Bribery Policy
- [Whistleblowing Policy 2019-2020](#)
- [Risk and Opportunities Management Strategy for 2017/20](#)
- Induction Policy & Procedure
- Recruitment and Selection Policy
- [Corporate Equality Policy 2017-2022](#)

However, Anti-Fraud and Corruption Policy and Whistleblowing Policy 2019-2020 do include the following content, which refer to areas that are also relevant to modern slavery. Specific sections have been extracted out of the Anti-Fraud and Corruption policy related to risk, recruitment and contractors, which are areas that modern slavery should be added to as required within cited council policies.

Whistleblowing Policy

The Policy states: *'The Council is committed to conducting its business with honesty and integrity, and we expect all those who work for the Council and Councillors to maintain high standards in accordance with their respective Codes of Conducts (or any service or goods contracts with them).'*

Anti-Fraud and Corruption Policy

The Policy states: *'North Hertfordshire District Council takes its duty to ensure proper stewardship of public money very seriously. The Council is, therefore, committed to the prevention, detection and investigation of all forms of fraud and corruption, whether these are attempted from within or outside the organisation.'*

Under Section 2, the Policy also states that: *The Council has formally assessed its exposure to potential fraud risks and has made appropriate entries in the Council's risk register. The Risk Management Group reviews the entries periodically to ensure that key fraud risks are being identified and effectively managed. Should existing controls be deemed inadequate, revised controls will be recommended for implementation.*

Under Section 3, the Policy states that: *The Council recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. Therefore written references are obtained prior to appointing staff, including those employed on a temporary or contract basis. This is also a requirement of the Council's Fidelity Guarantee insurance. Additionally, where appointment is dependent on the holding of specific qualifications, HR manages the process for ensuring that stated qualifications are verified and copies of certificates retained on the individual's personal file.*

Under Section 7, the Policy states that: *The terms of the Council's contracts require that contractors take all reasonable steps, in accordance with good industry practice, to prevent any fraudulent activity by the Staff, the Contractor (including its shareholders, members, directors) and/or any of the Contractor's suppliers, in connection with the receipt of monies from the Authority. The Contractor must notify the Council immediately if it has reason to suspect that any fraud has occurred, is occurring or is likely to occur.*

For North Herts District Council to improve its approach to tackling modern slavery in this area, it should:

- 4a) Review and update the following policies to include relevant modern slavery content:
 - [Anti-Fraud and Corruption Policy](#)
 - Anti-Bribery Policy
 - [Whistleblowing Policy 2019-2020](#)
 - [Risk and Opportunities Management Strategy for 2017/20](#)
 - Induction Policy & Procedure
 - Recruitment and Selection Policy
 - [Corporate Equality Policy 2017-2022](#)

Suggested amendments – some examples:

- **Recruitment and Selection Policy:** Include reference to modern slavery risks in recruitment of agency workers and how to mitigate those risks, including documents required and due diligence checks to be undertaken with staff and third-party labour providers.
- **Induction Policy and Procedure:** Completing a modern slavery training module should compulsory
- **Whistleblowing Policy:** Add a section outlining the procedure for reporting slavery and trafficking concerns clear and easy, as well as ensuring staff feel comfortable and safe to make a report. More specifically, it should include the following (see [here](#) for further details):
 - Introduction to the Modern Slavery Act and its importance to the Council
 - When to use the whistleblowing i.e. matter of public interest.
 - Procedure for responding to concerns raised i.e. to who, how the concern is dealt with and next steps once the concern is raised.
 - Importance of confidentiality e.g. if a concern is raised against a supplier.
 - Protecting the Whistle-blower i.e. any victimisation leading to disciplinary action.
- 4b) Review and update any other related policies to include relevant modern slavery content.
- 4c) Ensure that all relevant equalities impact assessments consider modern slavery victims, as they do with domestic violence victims.
- 4e) Add modern slavery to the Council risk register, which is reviewed annually by the Risk Management Group.

5. Finance (Procurement)

Business supply chains are often complex as services, along with products that are manufactured, packaged and distributed, usually form part of a process linking multiple suppliers in many countries, making it difficult to spot forced labour. Supply chains that are particularly at risk, include those that hire outsourced employees, recruit direct staff through a recruitment agency or third party, work with suppliers in high risk countries and/or use suppliers that outsource their employees. Understanding that councils play a significant role in this area, a procurement workshop was organised by the Hertfordshire Modern Slavery Partnership for all 10 districts in September 2018, which was attended by a North Herts representative from the procurement department.

Since then, North Hertfordshire District Council has approved a robust [Modern Day Slavery Transparency Statement](#) in June 2019, and agreed to adopt the [Co-Operative Charter Against Modern Slavery](#) at a full Council meeting in July 2019. The Corporate Procurement Group also established key performance indicators for implementation of the Modern Slavery Transparency Statement / Charter, which have been incorporated into the Annual Safeguarding Report 2019/20 for review. The contents of North Herts' Modern Slavery Transparency Statement 2019-2020, which is publicly available to download on the council website, are provided below:

Modern Slavery Transparency Statement 2019-2020

1. Introduction

The Council has a key role to play in tackling modern slavery, including identifying and supporting victims and working in partnership locally. The Council's role can be separated into four distinct areas:

1. identification and referral of victims;
2. supporting victims by safeguarding children and adults with care and support needs and providing housing/homelessness services;
3. community safety and disruption activities; and
4. ensuring the supply chains that the Council procures from are free from modern slavery.

Modern slavery intersects with many different areas that the Council is involved with and a number of different officers might come across it while going about their everyday activities. Key examples where officers might come across victims include housing and homelessness services, community protection work, licensing and customer services.

The procurement of services is an important part of the Council's expenditure. Understanding our supply chains and assessing the risk to those working in it requires commitment, support and collaboration. The Council is uniquely placed to be at the forefront of the fight against modern slavery hence the Council has voluntarily compiled this modern slavery Transparency Statement.

This statement sets out North Hertfordshire District Council's actions to understand the potential modern slavery risks related to its activities and to put steps in place to attempt to eliminate acts of modern slavery and human trafficking within its supply chain.

2. NHDC's organisational structure & supply chains

North Hertfordshire District Council is a local authority in the north-eastern part of Hertfordshire, in the East of England region. The activities the Council undertakes are wide ranging in order to fulfil its duties to its residents. Its highest spend contracts are for the Household Waste Services and Grounds Maintenance.

The supply chains for the Council's activities are considered as only operating within the United Kingdom and the risk of slavery and human trafficking is therefore considered low. While the risk of slavery and human trafficking is considered low, the Council remains vigilant and will take all steps available to manage the risks presented.

Going forward, over the next 12 months, the Council will undertake a supply chain mapping exercise that increases its knowledge and awareness of its supply base. It is important that the limited resource available for doing this is focussed on the areas that pose greatest risk and the mapping exercise will therefore consist of the following steps:

- 1) List suppliers by total spend
- 2) Categorise into spend areas by goods and/or services
- 3) Determine the modern slavery risk rating of Low; Medium or High from:
 - a. Location of production or service: does the country/area have a high prevalence of modern slavery or other labour rights violations?
 - b. Industry sector: does that industry or sector have a high prevalence of modern slavery or other labour rights violations?
 - c. Value and length of contract: the higher the value or longer the contract will give a higher risk.

3. Responsibility: who has responsibility for anti-slavery initiatives?

The Council believes that safeguarding is the responsibility of all employees, Members, volunteers and organisations delivering services on our behalf. Everybody has a duty to safeguard children and adults in our local communities.

Our Named Safeguarding Officer is our Service Director: Legal and Community. Designated Safeguarding Officers throughout the organisation support colleagues to respond and refer any concerns and a Corporate Safeguarding Group monitors current practice in relation to safeguarding and identifies key areas for development.

Responsibility for safeguarding sits with the Executive Member for Community Engagement. An annual report is also made to the Overview and Scrutiny Committee.

Each Service area is responsible for reviewing spend on their supplier contracts as part of their ongoing commissioning and budget setting process. As part of this process, whenever spend is reviewed, it is considered best practise to include consideration of modern slavery. Going forward the Council's Contract Procurement Group will produce a check list of the modern slavery identifiers within the supply chain and disseminate this within their service areas for increasing awareness of identifying and preventing modern slavery from within its supply chain.

4. Link to relevant policies

The Council's commitment to safeguarding children and adults at risk is outlined in our policies for safeguarding children and adults at risk that can be found on our website:

<https://www.north-herts.gov.uk/home/community/health-and-social-care/protecting-children-young-people-and-adults-risk>

5. What due diligence of suppliers is carried out?

For the appointment of new suppliers, the Council has adopted the Government Standard Supplier Selection Questionnaire, which is used in all appropriate procurements and requests confirmation that suppliers meet Modern Slavery Act 2015 requirements.

Any bidder who fails to evidence their compliance with the required legislation shall be excluded from participating further in the tender process. Incorporated within the Council's standard contract terms are clauses that specify the supplier's contractual obligation concerning Modern Slavery.

Currently there are no processes in place at the Council for reviewing existing supplier's compliance with the Modern Slavery Act 2015 requirements. The supply chain mapping exercise referred to in point 2 of this statement will however provide a useful knowledge base from which to identify the contracts at greatest risk from modern slavery and whose contract managers will be requested to carry out checks for the supplier's compliance to the Modern Slavery Act requirements. Any suppliers found not meeting the required standard will be asked to take action to improve; where this is not forthcoming the contract relationship will be terminated at the next opportunity, taking into account the contract terms and conditions. This exercise is planned to take place over the next 12 months.

6. Key performance indicators

The following KPIs will be monitored during 2019:

- The number of new contract awards and whether the Modern Slavery Act 2015 applied to the awarded organisation.*
- Numbers of staff that have completed modern slavery training, identified as mandatory for all staff.*

7. How we train NHDC staff on anti-slavery measures

In 2018/19, training on modern day slavery was identified as mandatory for all staff and briefings and e-learning was rolled out throughout the organisation. Going forward, all staff are required to undertake safeguarding training at a level relevant to their role. Basic, level one or level two training is refreshed every two or three years. This training now includes modern slavery and human trafficking. Compliance with these training requirements is monitored by the Senior Management Team and audited by the Hertfordshire Safeguarding Children Partnership and Hertfordshire Safeguarding Adults Board.

The Procurement Officer and Legal Commercial Team Manager have both attended the Hertfordshire Modern Slavery Procurement Workshop in September 2018.

Over the next 12 months the Procurement Officer will undertake the Chartered Institute of Procurement and Supply, Ethical Procurement and Supply e-learning (or equivalent) to achieve the recommended accreditation in this area.¹

¹ June 2019

In addition, the Lead Procurement Officer has put together the following guidance to support contract managers within North Herts District Council with identifying modern slavery risks in new and existing suppliers and how to address these risks. The guidance, which will be available on the council intranet is cited below:

NHDC Modern Slavery Identifiers

This guide has been issued for contract managers within North Herts District Council and is taken from the guidance issued by Central Government in its 'Tackling Modern Slavery in Government Supply Chains', full version available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf

Risk Identifiers

North Herts District Council is committed to preventing all forms of modern day slavery and human trafficking within its supply chains. In order to identify whether a risk of modern slavery exists in the supply chain for a good or service, the following modern slavery identifiers should be applied to the contract matter:

- 1) **Industry:** industries involved with raw materials and those which are labour intensive are considered high risk.

Industries characterised by this and considered high risk include:

- *Products from: Agriculture; Construction; Manufacturing and electronics; Garment/ textile production; Food processing; Mining; Logging; Fishing and fisheries.*
- *Services: Hospitality, Security services; Cleaning and catering; Logistics, including warehousing, transport; Healthcare; Social care; Mining; Logging; Fishing and fisheries.*

- 2) **Nature of the workforce:** high risk characteristics associated with the nature of the workforce include:

- *Reliance upon low-skilled or unskilled labour?*

Typically work that is low-paying and undervalued is often undertaken by vulnerable workers.

- *High numbers of temporary, seasonal, or agency workers?*

Worker vulnerability is heightened by employment uncertainty.

- *Dangerous or physically demanding work.*

May indicate vulnerable workers exposed to unethical conditions.

- *Isolation of workers?*

Due to working in rural locations, being home-based or in unmonitored and unregulated environments.

- 3) **Business / Supply chain model:** the typical structure of the business / supply chain model that can indicate a greater risk of modern slavery are:

- *Sub-contracting and complex supply chains posed a greater risk as the larger and more complex the supply chain, the harder it is for organisations to know about conditions for workers in their supply chains.*
- *Complex employment relationships with a reliance on agency, outsourced or subcontracted workers adds another layer of separation between employers and workers, leaving workers exposed to unethical practices.*
- *Purchasing that is predicated on a tight profit margin only can leave workers vulnerable to exploitative practices as the pressures to keep costs low are driven down the supply chain.*

Supplier location is a further characteristic that is often used as a risk identifier, with some countries outside the UK posing a greater risk of modern slavery, however due to the majority of the council's suppliers being based in the UK this has not been included in the above list. Should an overseas supplier bid for a contract then please consult with Procurement in this instance.

Addressing the risk

If a risk is found through one or more of the identifiers present in your contract, you should seek to address it in the contract specification by setting out your required standards and assess suppliers' compliance through a quality question under your evaluation criteria.

Example quality tender response questions:

- *Where subcontractors are used, bidders should be asked how the supply chain will be managed and monitored for modern slavery supply chain risks and their action plans for tackling cases as they rise.*
- *Bidders could be asked to provide information on their working/employment practices relating to the staff who will be assigned to perform the contract and to demonstrate their approach to tackling modern slavery abuses which might arise amongst their staff.*

- For labour intensive contracts such as cleaning and construction contracts, bidders could be asked to provide evidence of the recruitment methods used for staff delivering the contract.
- For construction, a high-risk category in the UK, there are also recognised standards for recruiting labourers, such as the BRE's Ethical Labour Sourcing Standard (ELS) and your specification could require such standards to be in place for the workforce.

(<https://www.bregroup.com/services/standards/ethical-labour-sourcing-standard/>)

You should carefully consider, and liaise with procurement on, the construction of the evaluation methodology. There must be sufficient incentive in the scoring methodology to encourage bidders to offer responsible supply chain management, and this can be achieved by allocating an appropriate weighting to this part of the evaluation criteria.

The following North Herts District Council policies were reviewed, and none were found to include any reference to modern slavery, exploitation and human trafficking:

- [Constitution \(Section 20\): Contract Procurement Rules](#)
- [Medium Term Financial Strategy 2019-2024](#)
- [Corporate Plan 2017/21](#)
- [Corporate Procurement Strategy 2013](#)

In order for North Hertfordshire District Council to improve its approach to tackling modern slavery in its supply chains, it should:

- 5a) Undertake an annual review of its Modern Slavery Transparency Statement, seeking to build on its progress in this area year-on-year.
- 5b) Undertake a deep dive analysis of council risk factors in consideration of supply of services as well as goods, relative to hot spot industries and source countries of concern e.g. do you have cleaners or outsourced care staff and how are you mitigating these risks practically?
- 5c) Facilitate or signpost suppliers to relevant training and resources.
- 5d) Review and update the following policies to include relevant modern slavery content in line with the Council's Modern Slavery Transparency Statement:
 - [Constitution \(Section 20\): Contract Procurement Rules](#)
 - [Medium Term Financial Strategy 2019-2024](#)
 - [Corporate Plan 2017/21](#)
 - [Corporate Procurement Strategy 2013](#)
- 5e) Review and update any other related policies to include relevant modern slavery content.

Concluding Remarks

North Herts District Council has made excellent progress towards increasing awareness of modern slavery amongst staff and the local residents/stakeholders through training sessions and engagement in relevant campaigns. Signing up to the national modern slavery charter, alongside producing a council modern slavery transparency statement and a modern slavery action plan, has also paved the way for the production of an annual report on modern slavery submitted to the Council Executive. As outlined in this document, the council's focus should centre on ensuring that modern slavery continues to be embedded within existing protocols and added to relevant policies, as well as consistent monitoring and evaluation of actions and data, to ensure a business as usual approach is adopted across the whole council in tackling this issue.

Appendix:

Appendix A – North Herts Council Reporting Procedure for Modern Day Slavery: Child Victims

Procedure for Modern Day Slavery for a child

If you are concerned that someone is a victim of Modern Day Slavery contact any NHDC Designated Safeguarding Officer (the list can be found on the intranet) or your line manager to discuss your concern. If none are available, make a referral using the contacts below. If there is an immediate threat to life or a crime is being committed, always call the Police on 999.



If a Designated Safeguarding Officer is available, agree the next steps and ensure a referral, if relevant, is made within 24 hours of noting your concern. If you decide not to make a referral, please complete a NHDC Safeguarding Child Incident form, stating Modern Day Slavery and send it to safeguarding@north-herts.gov.uk . This will ensure that if another officer reports concerns about a child, we have a full picture.



A CHILD UNDER 18

Complete the online National Referral Mechanism (NRM) form at <https://www.modernslavery.gov.uk/start>

If the child is in immediate danger call the Police on 999.



Complete the online Hertfordshire Child Protection referral form. Once completed create a PDF of the file. If the child is in immediate danger call the Police 999.

See ***(2)** below for information on how to complete the online form.



The DSO/Officer should be prepared for further involvement, potentially with other professionals.



Record of **All** referrals should be sent to the Safeguarding Inbox. safeguarding@north-herts.gov.uk

***(1) Online NRM Form**

To complete an online NRM form for children visit: <https://www.modernslavery.gov.uk/start>

The online form requires email validation. When you click on the above link, you will be asked to submit your work email address. You will then receive a link (to your email) which you will need to click on in order to complete the form.

Complete the form with as much detail as possible. Once you have completed and submitted the online form, you will be sent a further link to download a copy of your submission. Once the form has been received by the Home Office,

you will receive a case reference number by email that can be used should you need to contact the Home Office about the case. Please then send a copy of the form to the safeguarding inbox for our records.

Following submission of the on-line form, any additional information can be emailed to nationalreferralmechanism@homeoffice.gov.uk quoting the case reference number in the subject line. Please note that this email should only be used for additional information.

Please be aware that the online form automatically logs you out (without saving the details) after one hour for security reasons.

***(2) Online Child Protection Referral**

To complete an online child protection referral visit: <https://eservices.hertfordshire.gov.uk/my-account> and create an account if you don't already have one. Once set up, look top right corner and click 'Services' and under the letter C the child protection contact form can be found.

Complete the form with as much detail as possible as the form will not submit without all mandatory fields completed. The mandatory fields will highlight purple if not complete. Before you submit the form it will ask if you would like a PDF version created - this must be done and sent to the safeguarding inbox for our records.

Once the form has been submitted you will receive a unique reference number that can be used should you need to contact HCC about the case.

List of contacts: Ext.

List of current Designated Safeguarding Officers (DSO) – (available on intranet by searching Designated Safeguarding Officers)	
Hertfordshire County Council Referrals for child safeguarding	0300 123 4043
NHDC Monitoring Officer and Named Safeguarding Officer – Jeanette Thompson Jeanette.thompson@north-herts.gov.uk	4370
NHDC Corporate Human Resources Manager – Kerry Shorrocks Kerry.shorrocks@north-herts.gov.uk	4224
Queries regarding NHDC's safeguarding database, intranet pages, Designated Safeguarding Officer or safeguarding training. (Non-urgent queries) safeguarding@north-herts.gov.uk	4560/4367

Appendix B – North Herts Council Reporting Procedure for Modern Day Slavery: Adult Victims

Procedure for Modern Day Slavery for an Adult

If you are concerned that someone is a victim of Modern Day Slavery contact any NHDC Designated Safeguarding Officer (the list can be found on the intranet) or your line manager to discuss your concern. If none are available, make a referral using the contacts below.

If there is an immediate threat to life or a crime is being committed, always call the Police on 999.



If a Designated Safeguarding Officer is available, agree the next steps and ensure a referral, if relevant, is made within 24 hours of noting your concern.

If you decide not to make a referral, please complete a NHDC Safeguarding Adult Incident form, stating Modern Day Slavery and send it to safeguarding@north-herts.gov.uk. This will ensure that if another officer reports concerns about an adult, we have a full picture.

Please see below which avenue to follow depending on whether consent has been given:

Consent is given



AN ADULT

Complete the online National Referral Mechanism (NRM) form at <https://www.modernslavery.gov.uk/start>

See *(1) below for information on how to complete the online form

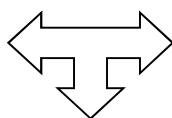
Consent Not Given



AN ADULT

If an adult does not provide consent, a Duty to Notify referral should be made using the same online form at <https://www.modernslavery.gov.uk/start>

See *(1) below for information on how to complete the online form



ADULTS AT RISK

Complete the online Adult referral form. Once completed, save the PDF. If the adult is in immediate danger call the Police 999.

See **(2) below for information on how to complete the online form.

ADULTS NEEDING MENTAL HEALTH SUPPORT

Complete the Single Point of Access (SPA) referral form and send to the email address at the bottom of the form.

If the adult is in immediate danger call the Police on 999.



The DSO/Officer should be prepared for further involvement, potentially with other professionals.



Record of All referrals should be sent to the Safeguarding Inbox.
safeguarding@north-herts.gov.uk

***(1) Online NRM Form**

To complete an online NRM form for adults visit: <https://www.modernslavery.gov.uk/start>

The online form requires email validation. When you click on the above link, you will be asked to submit your work email address. You will then receive a link (to your email) which you will need to click on in order to complete the form.

Complete the form with as much detail as possible. Once you have completed and submitted the online form, you will be sent a further link to download a copy of your submission. Once the form has been received by the Home Office, you will receive a case reference number by email that can be used should you need to contact the Home Office about the case. Please then send a copy of the form to the safeguarding inbox for our records.

Following submission of the on-line form, any additional information can be emailed to nationalreferralmechanism@homeoffice.gov.uk quoting the case reference number in the subject line. Please note that this email should only be used for additional information.

Please be aware that the online form automatically logs you out (without saving the details) after one hour for security reasons.

**** (2) Online adult referral form**

To complete an adult referral form visit: <https://hcsportal.hertfordshire.gov.uk> and create an account if you don't already have one.

Once you are registered and every time you log in, a verification code is emailed to you for security reasons.

To find the referral form, click on 'Safeguarding' which will direct you straight to the form.

Complete the form with as much detail as possible as the form will not submit without all mandatory fields completed. The mandatory fields all have asterisks next to them. Save the PDF version of the form and email a copy to safeguarding@north-herts.gov.uk for it to be stored securely. If you forget to save it, you can also access from your 'submitted forms' button at the top.

Once submitted you will hear back from social services letting you know how/if they are processing with the case.

List of contacts: **Ext.**

List of current Designated Safeguarding Officers (DSO) – (available on intranet by searching Designated Safeguarding Officers)	
Herts County Council referrals for adult safeguarding	0300 123 4042
Single Point of Access (SPA) referrals for adults needing mental health support	0300 777 0707
NHDC Monitoring Officer & Named Safeguarding Officer- Jeanette Thompson Jeanette.thompson@north-herts.gov.uk	4370
Corporate Human Resources Manager – Kerry Shorrocks Kerry.shorrocks@north-herts.gov.uk	4224
Queries regarding NHDC's safeguarding database, intranet pages, designated safeguarding officers or safeguarding training (non-urgent queries) safeguarding@north-herts.gov.uk	4560 4367

