

## **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 the 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: <sup>Appendix A</sup>
  - 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 practice 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 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 supplier's 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 CIPS Ethical Procurement and Supply e-learning to achieve the recommended CIPS accreditation in this area.

NORTH HERTFORDSHIRE  
DISTRICT COUNCIL

