



## **Basingstoke and Deane Borough Council Modern Slavery Act 2015 Section 54 Statement**

### **Introduction**

In compliance with Section 54 of the Modern Slavery Act 2015, Basingstoke and Deane Borough Council ('the council') sets out in this statement its 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 within the organisation, our supply chains or in its linked business activities.

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 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 – any age, race or gender. Modern slaves are sold like objects, forced to work for little or no pay, live in fear and squalor, have their freedom restricted and are at the mercy of their employers.

Home Office data during 2020 showed that the most common type of exploitation for both adults and minors was labour exploitation. Potential victims from the UK, Albania and Vietnam were the three most common nationalities to be referred in the National Referral Mechanism (NRM).

### **Organisational Structure and local area**

Basingstoke and Deane Borough Council is a tier two district authority made up of officers and fifty-four elected members. The council provides a broad range of statutory and non-statutory services to the Basingstoke and Deane community. The council aims to improve the local community's quality of life by providing excellent public services that represent excellent value for money based on residents' priorities which help to formulate the council plan and priorities. The borough of Basingstoke and Deane consists of an urban centre and large rural areas. Modern slavery can be more easily hidden in rural areas; therefore, the council needs to be particularly vigilant in identifying issues in these communities.

Some of the services the council provides include:

- Local planning and development control
- Street cleaning, household waste and recycling
- Administering council tax and housing benefit locally
- Providing a range of quality housing options, expert advice and specialist homelessness support
- Environmental health and safety
- Developing cohesive, stronger and safer communities
- Parking enforcement
- Licensing
- Promoting economic development and tourism in the area
- Providing parks and leisure facilities

The strategic leadership team carry out the day-to-day management of the council and its services. The senior leadership team is led by the Chief Executive. The council employs officers to give advice, implement its decisions and to manage the delivery of council services to the local community. Certain officers hold responsibility for statutory functions such as the roles of the monitoring officer and Section 151 officer.

A formal meeting of all councillors is called 'Council'. The council makes important decisions, including approving a number of key plans and strategies and setting the council's budget and council tax. It is responsible for the budget and policy as well as service areas that are not the responsibility of the Cabinet (the body responsible for day-to-day decisions).

The Cabinet (also known as the Executive) is the council's main, day-to-day decision-making body and normally meets once a month. Cabinet meetings are usually open to the public, except if personal or confidential matters are being discussed. The Leader of the Council is responsible for appointing other councillors to the Cabinet. Each Cabinet member is responsible for a particular area of council business, which is known as their portfolio.

Every year a long serving councillor is appointed Mayor of Basingstoke and Deane. The Mayor's term of office is one year and the Mayor changes in May. The Mayor is responsible, in a non-political way, for furthering the interests of the borough when an appropriate occasion arises and representing the council at events

## **Partnerships**

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

- Safer North Hampshire Community Safety Partnership;
- Hampshire Constabulary;
- Hampshire and Isle of Wight Modern Slavery Partnership;
- Hampshire safeguarding children partnership and adults board.

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

- To combat modern slavery by working in partnership;
- To raise awareness of modern slavery;

- 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](http://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.

## **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. It has a comprehensive Safeguarding Children and Adults Policy, which all staff and councillors are expected to read and adhere to. The council carries out regular safeguarding training for all staff, has safeguarding leads within departments and participates in multi-agency partnerships to protect and safeguard people.

### Recruitment

BDBC has a robust and transparent recruitment and selection process, which seeks to ensure that all new workers that are recruited into the council are subject to requisite checks. Our offer of employment is subject to ensuring that all new employees 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.

### Equality, Diversity and Inclusion in Employment

The council embed the principles of equality, diversity and inclusion in all aspects of employment including advertising vacancies, recruitment and selection, terms and conditions of employment, training and personal development and monitoring of reasons for ending employment.

### Pay

The Council operates a job evaluation scheme to ensure employees are paid fair and equitably, taking into account The Equality Act 2010 and the National Joint Council for Local Government Services. The Council's pay 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, professionalism, conscientiousness, 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.

### Fraud and corruption

The Council's fraud and corruption policy sets out the council's responsibilities for tackling fraud and corruption. The Council is committed to the elimination of fraud and corruption and to the promotion of high standards of integrity.

### Procurement

The Local Government Association (LGA) has created a 'living' National Procurement Strategy for Local Government in England 2018 (published July 2018).

## **Supply Chains**

In all our procurement activity, Basingstoke and Deane Borough Council aims to be consistent with the highest standards of integrity and ensure fairness in allocating contracts. Ethical trading, responsible sourcing and prevention of modern slavery and human trafficking throughout its supply chains are important criteria in the provision of goods and services procured.

The council is committed to:

- 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 Councils requirements before commencing any work, and that existing suppliers comply with these requirements.

The council procures goods, services and works from various suppliers which is governed by the Councils Contract Standing Orders and related Terms and Conditions. The council is also aligned to integrating the policies of the National Procurement Strategy for Local Government in England 2018.

The council requests evidence of Modern Slavery compliance on all tenders, and where applicable, will request evidence of suppliers having adequate Modern Slavery policies and procedures.

In addition to complying with the required statutory standards for safeguarding and modern slavery, the council may impose additional, specialist safeguarding clauses in contracts where it is deemed relevant. Suppliers may be requested to agree 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 Procurement team as well as the contract manager and a suitable escalation process followed.

As part of Government's efforts to tackling modern slavery in global supply chains, the Home Office's Modern Slavery Unit and Joint Security and Resilience Centre have produced an Modern Slavery in Public Sector Supply Chain e-learning course for public sector commercial staff on the practical steps they can take throughout the commercial lifecycle to identify and mitigate modern slavery risks. The council will be ensuring that all procurement staff have successfully completed the course as well as encouraging its wider completion by council officers.

### **Reporting suspicions of modern slavery**

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>

The council can also refer victims of Modern Slavery through the National Referral Mechanism (NRM) as it is a first responder.

The Home Office established the National Referral Mechanism (NRM) in 2009, which is the UK Government framework for identifying and reporting adult and child victims of human trafficking or modern slavery and ensuring they receive the appropriate support. Under the Modern Slavery Act 2015, specific designated organisations in England and Wales have a statutory Duty to Notify (DtN) the Home Office when they encounter a potential victim of modern slavery. These designated organisations are known as First Responders, which includes BDBC.

### **Training**

All council staff are encouraged to attend face to face Safeguarding Training and all staff are required to complete an annual e-learning package on safeguarding children and vulnerable adults. All staff are also encouraged to familiarise themselves with the Safeguarding Policy itself and discuss any concerns with Safeguarding leads. Policies and the list of Safeguarding leads can be accessed by the Council intranet, Sinbad.

Councillors are also encouraged to access the e-learning package and face to face 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.

Staff and councillors, in particular front-line teams which may come into contact with victims or perpetrators of modern slavery are encouraged to complete the Home Office approved Modern Slavery e-learning.

### **Risk Assessment**

As well as the moral obligation to act and the statutory requirements placed upon the Council in relation to supporting victims, there are a number of risks to the organisation that are associated with failure to prepare for and respond effectively to potential or actual Modern Slavery:

- Modern Slavery cases can be high-profile and attract considerable media interest. Cases where victims are improperly supported or should have been identified at an earlier point have the potential to cause significant reputational damage.
- Community tensions can increase in response to the identification of modern slavery, particularly where victims or perpetrators are associated with particular ethnic or religious groups.
- Newly identified victims of modern slavery may require immediate, unplanned-for accommodation and support which can bring unexpected cost pressures, particularly where a group of victims has been identified at once.
- Officers interacting with victims or encountering potential sites of modern slavery without proper training have the potential to unwittingly compromise evidence which could damage the chances of securing a prosecution against the perpetrators.
- The Modern Slavery Act 2015 requires that all large organisation with an annual turnover of more than £36m must undertake effective due diligence in procurement and report upon this in an annual transparency statement. There has been a significant increase in prosecutions for non-compliance in recent years, as well as organisations being 'named and shamed'.

Service risk registers will reflect risks associated with the Modern Slavery, where applicable, as well as the mitigations in place to reduce the risk.”

### **Actions moving forward**

Basingstoke and Deane Borough Council will carry out the following actions during the 2021/22 financial year to further strengthen the council's approach to Modern Slavery, to prevent slavery and human trafficking in our corporate activities and to ensure that the councils supply chains are free from slavery and human trafficking.

1. Corporate contract management guidance including suggested meeting agenda and minutes template shared with staff to raise awareness of modern slavery and trafficking through internal communications and training opportunities– to both Officers and Members;
2. Encourage members of staff to complete the Home Office Modern Slavery e-Learning course for increased awareness and understanding more about the NRM referral process;
3. Updated Safeguarding e-Learning training for all council officers to be produced during the 2020/21 year which will include a specific section on Modern Slavery;
4. Specifically including a section on Modern Slavery as part of face-to-face safeguarding training;
5. When a NRM is submitted, this will be reviewed by designated safeguarding officers and the referring officer to understand key learning from this action and better equip staff for any future referrals in the future;
6. Relevant officers to complete the Modern Slavery in public sector supply chain e-learning;

7. Share updates from the Hampshire Modern Slavery Partnership with staff and promote key messages via external communication channels to make residents and partner organisations aware of them.

### **Key Performance indicators (KPIs)**

Basingstoke and Deane Borough Council will use the following performance indicators to measure how effective it has been in ensuring that slavery and human trafficking is not taking place in any part of the council's business or supply chains:

1. Corporate contract management guidance shared with all staff who are responsible for awarding and managing contracts with external suppliers.
2. At least one update per annum to all staff and one update to all councillors through internal communication systems to raise awareness of modern slavery and trafficking, including encouragement to complete the Home Office e-learning.
3. External promotion carried out on Anti-Slavery Day to raise awareness of modern slavery and how to report issues.
4. Completion of mandatory internal safeguarding e-learning by a minimum of 95% of employees within the last 3 years.
5. Members of staff who have a frontline/public facing role to complete face to face internal safeguarding training. Target of a minimum of 75% of frontline officers completing face-to-face training within the last 3 years.
6. One safeguarding training session for members per year, which includes information on modern slavery and how to report concerns.
7. Monitor number of NRMs submitted by the Council and review any learning in ALL referrals. Any learning opportunities shared with relevant officers/teams.
8. Completion of Modern Slavery in public sector supply chain e-learning by 100% of procurement staff.
9. All staff who have responsibilities for purchasing lower value goods or contracts (where procurement involvement is not required) provided with information on how they can access the Modern Slavery in public sector supply chain e-learning and encouraged to complete.

In the last year (2020/21) there have been no complaints/concerns raised in relation to slavery or human trafficking in our supply chains.

### **Review**

We will continue to monitor and audit our policies and procedures to make amendments and update staff where necessary but, in any event, reviews will take place annually.

### **Approval for this statement**

This statement is made under Section 54 (1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2022. This statement was approved by:



Approved signatory at executive director level or above: Tom Payne, Interim Executive Director of Residents Services, Basingstoke and Deane Borough Council

Date: 18 October 2021