

Tunbridge Wells Borough Council

# Modern Slavery and Human Trafficking Statement

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2028-2027

Date: January 2025

Review Date: January 2027



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# 1. Introduction

- 1.1 Tunbridge Wells Borough Council is committed to preventing slavery and human trafficking in the delivery of its services and corporate activities. The Council recognises that slavery and human trafficking remain a hidden blight on our society and that the Council has a responsibility to be vigilant in spotting associated risks and to strive to ensure that its supply chains are free from slavery and human trafficking at any level.
- 1.2 This Modern Slavery and Human Trafficking Statement details the steps the Council has taken to understand potential modern slavery risks related to its business and the measures adopted with the aim of ensuring that these offences are not committed through the delivery of services or via supply chains.

## 2. The Modern Slavery Act 2015

- 2.1 The [Modern Slavery Act 2015](#) consolidates various offences relating to slavery and human trafficking. Broadly speaking this means that:
  - ‘Slavery’ is where ownership is exercised over a person.
  - ‘Servitude’ involves coercion to oblige a person to provide services.
  - ‘Forced and compulsory labour’ is where a person works or provides services on a non-voluntary basis under the threat of a penalty.
  - ‘Human trafficking’ involves arranging or facilitating the travel of a person with a view to exploiting them.
- 2.2 Section 52 of the Act imposes a duty on public authorities, including district councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.
- 2.3 Section 54 of the Act imposes a legal duty on commercial organisations who met the stated threshold that supply goods and/or services from or to the United Kingdom to publish a slavery and human trafficking statement each financial year.
- 2.4 Section 5 of the Local Government Association ‘[Council Guide to Tackling Modern Slavery](#)’ outlines the role of a local authority in tackling modern slavery, with work cutting across a range of different services and activities. The areas of responsibility are as follows:
  - Identification and referral of victims.
  - Supporting victims, potentially through safeguarding children or adults with care and support needs and through

- housing/homelessness services.
  - Community safety and disruption.
  - Ensuring that the supply chains councils procure from are free from modern slavery.
- 2.2 Tunbridge Wells Borough Council engages in commercial activities by providing services (some of which are statutory and others that are discretionary) and its annual turnover is greater than the stated level. Whilst the Modern Slavery Act does not state that Local Authorities specifically are included within the grouping of organisations legally required to publish a statement, the Council has chosen to do so as a matter of good practice. The Council is keen to raise awareness of slavery and human trafficking and as a large-scale local employer and provider of services, it is seen as imperative that the Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

### 3. Responsibilities

- 3.1 Tunbridge Wells Borough Council will meet the following standards and expects those with whom it does business, to meet them:
- To support every individual's human right to live free from abuse, servitude, and inhumane treatment.
  - To promote ethical business and operational practices in corporate activity and services delivered.
  - To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains.
  - To take reports of witnessed, suspected, or disclosed concerns of slavery and human trafficking seriously and to ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated.
  - To take appropriate action to address actual instances of slavery and human trafficking brought to the Council's attention and to take all reasonable steps to support and protect its victims.

### 4. Organisational structure

- 4.1 Tunbridge Wells Borough Council is a Local Authority situated in the county of Kent. The Council provides a wide range of statutory and discretionary services delivered either directly by the Council itself, through

partnership working with other agencies and through commissioned work with external contractors.

- 4.2 The Council's Constitution can be found on our [Council constitution webpage](#).
- 4.3 Details of the Council's structure and governance can be found on our [Council structure webpage](#).

## 5. Supply chains

- 5.1 As part of its procurement processes, Tunbridge Wells Borough Council expects that all suppliers of works, goods and services comply with all applicable laws, statutes, regulations, and codes including the Modern Slavery Act 2015.
- 5.2 The Council requires its contractors and subcontractors engaged in 'regulated activity' for children and adults at risk to have safeguarding policies, procedures, and training in place and to comply with the reporting procedures in the Council's Safeguarding Policy.
- 5.3 The Council will follow best practice guidance developed by the Government Commercial Function and Home Office and have adopted a risk-based approach to tackle modern slavery in supply chains.

The three key areas of activity are:

- a) Identify and manage risks in new procurements:
  - Review and amend general procurement guidance, processes, and any related documentation.
  - Design new procurements to take account of modern slavery risks.
  - Review and amend contract management processes and any related documentation.
- b) Assess existing contracts:
  - Carry out a high-level risk assessment.
  - Invite suppliers to complete the Modern Slavery Assessment Tool if appropriate.
  - Apply strengthened contract management to manage risks, working with suppliers to progressively improve.
- c) Taking action when victims of modern slavery are identified:
  - Work openly and proactively with suppliers to resolve issues and change working practices.
  - Consider terminating the contract only as a last resort.

## 6. Policies and Plans in relation to Modern Slavery

- 6.1 Tunbridge Wells Borough Council has a range of policies and plans that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:
- 6.2 **Tunbridge Wells Community Safety Partnership's Strategic Assessment and Rolling Action Plan** – The Partnership has a strategic assessment in place. The key strands of work contained within are geared towards protecting vulnerable people from harm, including potential victims of slavery and human trafficking. Partner agencies have been and will continue to work together to help identify and establish the nature and extent of slavery and human trafficking across our area and to ensure that colleagues with safeguarding and community safety responsibilities are well placed to provide appropriate support to victims.
- 6.3 **Safeguarding Policy** – Safeguarding is the term used to protect children, young people, and adults at risk from all forms of abuse, neglect, exploitation, domestic abuse, radicalisation, forced marriage and human trafficking/modern slavery. Safeguarding is everyone's responsibility.

We are committed to working in partnership with several agencies to safeguard the welfare of children and vulnerable adults at risk from all forms of abuse, neglect, or exploitation. How we deliver our safeguarding role and ensure safeguarding is embedded across all our service areas is set out in our [Safeguarding Policy](#).

Our Safeguarding Policy provides information and advice for staff on how to refer, or notify, suspected victims of modern slavery or trafficking through the National Referral Mechanism or Duty to Notify.

- 6.4 **Whistleblowing Policy** – The Council encourages all its employees, councillors, contractors, their agents and/or subcontractors, consultants, suppliers, and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council.
- 6.5 **Employee Code of Conduct** – The Council makes clear to all its employees that there are expected standards of behaviour to which they must adhere when they are representing and acting on behalf of the Council. Employee conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken.
- 6.6 **Recruitment Policy** – This sets out procedures followed to vet new employees to ensure that confirmation of their identities and qualifications is obtained. To comply with the Asylum, Immigration and Nationality Act 2006, prospective employees are asked to supply evidence of their eligibility to work in the United Kingdom. References are sought and followed up for all employees and relevant checks e.g. Disclosure and Barring Service (DBS) checks are carried out where relevant to the position.
- 6.7 **Corporate Procurement Strategy** – This sets out the strategic aims and principles

of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from third-party and in-house providers.

6.8 **Equality, Diversity, and Inclusion Policy** – The Council is committed to people having the opportunity to reach their potential and access services that meet their needs. We want our Borough to be a place where people feel valued, included and respected in their communities. We will support diversity within our workplace and treat each other with dignity and respect. The Equality Act 2010 places legal responsibilities on public authorities under the Public Sector Equality Duty to ensure TWBC services.

- Remove or reduce disadvantages for people with protected characteristics.
- Meet the needs of people with protected characteristics.
- Encourage people with protected characteristics to participate in public life.

6.9 Under this policy, the Council will also:

- Demonstrate that we have considered any vulnerability identified within the Act when deciding to proceed to legal action.
- Have concluded that legal action is needed because of the anti-social behaviour (ASB) on either the health of the victim and/or perpetrator.
- Ensure that the proposed legal action is a proportionate response to the ASB.

## 7. Due Diligence

6.1 Tunbridge Wells Borough Council's approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, subcontractors, and other participants in their supply chain where their annual turnover exceeds £36 million.

6.2 As part of the Council's commitment to identify and mitigate risk, Council departments work together and alongside partner agencies to:

- Identify and assess potential risk areas in its business affairs.
- Mitigate the risk of slavery and human trafficking through robust checks and balances.
- Monitor and review any potential risk areas identified.
- Protect whistleblowers.

## 8. Ensuring employees, partner agency colleagues and Council Members are well-informed

8.1 Specific projects and initiatives are regularly undertaken, including days of action with Community Safety Partnership colleagues focussing on identifying areas of concern in regard to Modern Slavery and Human Trafficking and trying to establish any new trends of concerns in the community.

- 8.2 **Tunbridge Wells Vulnerability Board** - This multi-agency meeting takes place on a monthly basis. Jointly led by Kent Police and Tunbridge Wells Borough Council, it has a broad membership and its key purpose is to be a multi-agency practitioners' group that enables and encourages partnership working to protect vulnerable people from crime and anti-social behaviour in the borough of Tunbridge Wells. It provides a framework for partners from a variety of agencies and organisations to ensure that services are offered that are aimed at prevention and intervention towards victims and, where necessary, perpetrators. Referrals of individuals can be made by any of the agencies attending the meeting.
- 8.3 **Tunbridge Wells Borough Council Safeguarding Champions Meetings**- The Council has a group of voluntarily Safeguarding Champions representing different service areas. The purpose of the Safeguarding Champions is to support the Council's Safeguarding Agenda to promote the welfare of children and adults at risk, and to ensure that all employees recognise and understand their responsibility to report any signs of abuse and neglect and how to do this.
- They help to promote awareness of good safeguarding practices in the service areas or departments of the Safeguarding Champions and disseminate information concerning safeguarding to support colleagues in developing their understanding of safeguarding.
- 8.4 **Community Safety Unit** – Holds a bi-weekly (Mon and Fri) multi-agency meeting chaired and administered by the Council's Community Safety Team. Attendees are signed up to the Kent and Medway Information Sharing Agreement. The meeting is for agencies to raise and discuss any local concerns and areas of potential crime and anti-social behaviour. Actions are allocated to the appropriate agency in attendance.
- 8.5 **District Contextual Safeguarding Meeting (DCSM)** – This is a monthly meeting chaired by Kent County Council to discuss and risk assess any places and spaces where children and young people may experience harm and/or any children and young people who are at risk of harm. This meeting is for youth service providers, social workers, Kent Police, and other relevant parties.

## 9. Key Performance Indicators measuring effectiveness

- 9.1 Tunbridge Wells Borough Council will use the following steps to regularly review and monitor the measures being implemented to address modern slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:
- i) Ensure and log Council representation at all multi-agency meetings for sharing of information and intelligence.
  - ii) To regularly review the Government's position statement on modern slavery and human trafficking and update the Council's statement accordingly.



## 10. Training and Awareness

- 10.1 Tunbridge Wells Borough Council's Community Safety Unit (CSU) has carried out activity to raise awareness of modern slavery and human trafficking and of services available to assist victims. We have achieved this by working with Kent Police to share their knowledge with partners.
- 10.2 The Safeguarding policy (Appendix 6) has as recommended training - Modern Slavery & Exploitation training for current and new staff with a refresher every 3 years.
- 10.3 National Referral Mechanism Training will be provided for key individuals identified due to their job role.
- 10.4 All Tunbridge Wells Borough Council employees who have contact with children, young people or adults at risk, and employees responsible for the manage front line staff or have a strategic role where safeguarding knowledge for the Council is require, are required to undertake level 2 children and adult Safeguarding training every 3 years.

## 11. Statement Review

- 11.1 This statement will be reviewed every year. It will be amended, if necessary, to consider new legal requirements, non-statutory guidance from central government and implementation of relevant industry standards.

**This Statement has been approved by:**



**Councillor Ben Chapelard, Leader of the Council**

**Date: 28 January 2025**



**William Benson, Chief Executive**

**Date: 28 January 2025**