

**NEW FOREST DISTRICT COUNCIL**  
**MODERN SLAVERY ACT 2015 SECTION 54 STATEMENT**

**Introduction**

In compliance with Section 54 of the Modern Slavery Act 2015, New Forest District Council (NFDC) 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.

**Organisational Structure**

NFDC is administratively responsible for matters such as planning, housing, recycling, waste and environment, benefits and council tax, business (business support & economic development). This statement covers direct employees, of which there are approximately 1,200 together with agency workers engaged through NFDC's managed service contract.

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

**What is modern slavery?**

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

- Sexual exploitation
- Labour exploitation
- Forced criminality
- Organ harvesting
- Domestic servitude
- Debt bondage

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

- Unaccompanied, internally displaced children
- Children accompanied by an adult who is not their relative or legal guardian
- Young girls and women
- Former victims of modern slavery of trafficking

**Partnerships**

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

- Safer New Forest Community Safety Partnership
- Hampshire Constabulary
- Hampshire and Isle of Wight Modern Slavery Partnership

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

- To raise awareness of modern slavery

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

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

## Our Policies

NFDC 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 key to meeting the requirements of the Modern Slavery Act 2015.

- **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 must adhere to. The Council carries out regular safeguarding training for all staff, has safeguarding leads and participates in multi-agency partnerships to protect and safeguard people.
- **Recruitment** – NFDC 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 eligible to work in the United Kingdom as well as following up references. DBS checks are carried out on all staff. The Council safeguards agency workers by ensuring agencies used are reputable and have appropriate policies in place to safeguard workers by following our Agency Framework Agreement and insuring compliance with IR35.
- **Pay** – The Council operates a job evaluation scheme to ensure all employees are paid fair and equitably, taking into account The Equality Act 2010. 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 and that actions of Council Officers are totally open to public scrutiny. The Employee Code of Conduct promotes a high standard of conduct based around honesty, impartiality, fairness, 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 all members of the community in a fair manner, putting public interest first.

## Reporting of Concerns

All Modern Slavery concerns raised by Council staff, councillors and volunteers will be reported via the National Referral Mechanism. Any violations or safety concerns will be reported to the appropriate authorities including:

- Hampshire Constabulary [www.hampshire.police.uk](http://www.hampshire.police.uk)

- Hampshire County Council Children/Adults Services  
[www.hants.gov.uk/socialcareandhealth](http://www.hants.gov.uk/socialcareandhealth)
- The Home Office [www.gov.uk/government/collections/modern-slavery](http://www.gov.uk/government/collections/modern-slavery)
- Hampshire and Isle of Wight Modern Slavery Partnership  
[www.modernslaverypartnership.org.uk](http://www.modernslaverypartnership.org.uk)
- Barnardos [www.barnardos.org.uk](http://www.barnardos.org.uk)

The advice to residents and communities if they are affected by slavery or suspect someone is at risk, is to:

- Call 999 if it is an emergency
- Call 101 for non-emergencies
- Call Crimestoppers anonymously on 0800 555 111
- Call the Modern Slavery helpline on 0800 012 1700
- Report online via the Modern Slavery Helpline website  
[www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)

### **Our Supply Chain**

The Council procures supplies, services and works from a wide range of suppliers in full compliance with the Public Contract Regulations 2015 and the Council's "Contract Standing Orders".

As part of the tendering process, potential suppliers must complete a self-declaration questionnaire which seeks confirmation and assurances of their compliance with the Modern Slavery Act 2015 and the nature of checks made on their own supply chain.

The Council's procurement process is designed to support the prevention of modern slavery and human trafficking throughout the supply chain by ensuring;

- People who provide products and services used by the Council are treated fairly and their fundamental human rights protected and respected
- New suppliers understand the Council's requirements before commencing any supply contracts and that existing suppliers comply with these requirements

Should Council officers 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 Supplier's Contract Manager and NFDC's Monitoring Officer.

Ongoing dynamic risk assessments are to be implemented through the engendering of 'professional curiosity' in all NFDC officers and staff and to be alert to risk scenarios, thus leading to the reporting of any concerns as above.

The assessment of NFDC's effectiveness in targeting and preventing slavery and human trafficking is to be gauged through monitoring of the key performance indicators of (i) complaints, (ii) training needs; and (iii) monitoring by Strategic Procurement Manager. In the last year there have been no complaints/concerns raised in relation to slavery or human trafficking. NFDC is committed to evolving its future training, subject to ongoing monitoring and requirements.

## **Training**

All Council staff are required to complete an e-learning package on safeguarding children and vulnerable adults which encompasses modern slavery as part of their induction into the Council with a refresh every three years.

Classroom based training is mandatory for visiting officers and members of staff from services that have significant contact (directly or indirectly) with children, young people or adults at risk. This training is refreshed every two years. Councillors are trained every two years following their election to the Council and midway through each four year term.

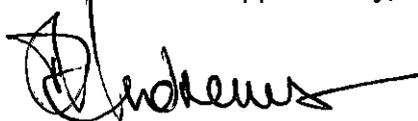
## **Review**

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 2020.

This statement was approved by;

A handwritten signature in black ink, appearing to read 'Diane Andrews', with a long horizontal stroke extending to the right.

Signatory, Diane Andrews, Portfolio for Community Affairs