North Herts Council

www.north-herts.gov.uk

Modern Slavery Transparency Statement 2025-2026

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. In line with best practice, and in compliance with Section 54 of the Modern Slavery Act 2015, this statement sets out the actions taken by the Council to understand, prevent and address modern slavery risks within its services and supply chains.

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.

North Hertfordshire District Council are a signatory to the Charter Against Modern Slavery and support the principles of the Modern Slavery Charter.

2. NHDC's organizational 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. Its medium spend contracts are those spent on Carelines Services and IT Services. Its low spend contracts are for Repair

works.

The supply chains for the Council's activities are considered as only operating within the United Kingdom and the country's risk of slavery and human trafficking is therefore relatively low. However, the Council remains vigilant and will take all steps available to manage the risks presented. To assist, a check list of the modern slavery identifiers within supply chains has been produced for dissemination within the Council's service areas to increase awareness of identifying modern slavery risks within supply chains. The checklistis in line with the Government's PPN 02/23 recommendations. This checklist will be applied at the procurement stage of new contracts so that modern slavery risks can be managed at the outset of a contract. For existing supplier contracts, contract managers will be able to use the risk identifiers to highlight specific areas of risk for that good or service and then be able to seek further information from suppliers on the processes they have in place for mitigating that risk.

For high risk, high value procurement, suppliers will additionally be invited to complete the Government's Modern Slavery Risk Assessment tool. This tool is designed to help public sector organisations work with their suppliers in understanding where the risk of modern slavery exists within their supply chains.

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 and Partnership. 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.

Specified public authorities have a duty to notify the Secretary of State of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. The 'duty to notify' provision is set out in Section 52 of the Modern Slavery Act 2015 and applies to local authorities in England and Wales which includes North Hertfordshire District Council. Guidance on the duty to notify is provided at: Modern slavery - GOV.UK (www.gov.uk)

If an infringement of the Modern Slavery Act is suspected, the following reporting options are available:

- Telephone 999 for emergencies
- Telephone 101 for non-emergencies (Request the Modern Slavery Unit)
- Suspicions/concerns contact the 24/7 charity, Modern Slavery Helpline: 0800 12 700; https://www.modernslaveryhelpline.org/

- If you would like to receive support for yourself in Hertfordshire, contact the local charity Beacon, which provides a free and impartial service, on 03000 115555 (option 3) or email info@hertfordshirebeacon.org

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: Safeguarding | North Herts Council (north-herts.gov.uk)

The Council has a wide range of policies and processes in place which support its commitment to preventing and tackling modern slavery throughout its operations. Associated and complimentary policies to enable our employees to better identify risks around exploitation such as modern slavery include:

- Equality & Diversity Policy
- Code of Conduct
- Whistleblowing Policy

5. What due diligence of suppliers is carried out?

For the appointment of new suppliers above the relevant threshold for services, the Council uses the Government Standard Supplier Selection Questionnaire for all appropriate procurements and requests confirmation that suppliers meet Modern Slavery Act 2015 requirements. This was recently updated in line with Central Government recommendations as per PPN 03/24: Standard Selection Questionnaire (SQ) - GOV.UK (www.gov.uk)

The Council will utilize the Government Modern Slavery Statement Registry which is a central system where suppliers can publish their Modern Slavery Statements. This will allow the Council to easily assess information in relation to suppliers' compliance with the Modern Slavery Act 2015. Find modern slavery statements - GOV.UK (modern-slavery-statement-registry.service.gov.uk)

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.

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.

6. Performance

The Council uses the following to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

- Investigating all allegations, complaints, whistleblowing reports received from employees, the public, or law enforcement agencies regarding modern slavery and human trafficking.
- At the outset of a procurement, where appropriate, Contract Managers will complete the Modern Slavery Identifiers checklist, which has appropriate actions based on a risk score. Contract Managers will be invited to complete the Government Modern Slavery Risk Assessment tool for high-risk contracts.

- All employees will be provided with mandatory Safeguarding training.

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 organization (including to elected Members). Going forward, all staff are required to undertake safeguarding training at a level relevant to their role. Introductory, basic, and advanced training is refreshed every three years. This training now includes modern slavery and human trafficking. Compliance with these training requirements is monitored by the Leadership Team and audited by the Hertfordshire Safeguarding Children Partnership and Hertfordshire Safeguarding Adults Board.

The Procurement Officer as part of their role is required to maintain current knowledge of the latest developments in tackling modern slavery through dialogue with Hertfordshire Modern Slavery Partnership and through their professional CIPS membership (including through the Chartered Institute of Procurement and Supply, Ethical Procurement and Supply e- learning which will be retaken every 12 months.

This statement will be reviewed on an annual basis. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the North Hertfordshire District Councils modern slavery and human trafficking statement.

The statement covers the following financial year:
1 April 2025 to 31 March 2026