Appendix 1

BROXTOWE BOROUGH COUNCIL
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024-25

1. Introduction

1.1 Broxtowe Borough Council (the 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, that it has a responsibility to be alert to the risks and to strive to ensure that its supply chains are free from slavery and human trafficking.

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 to put in place measures that ensure these offences are not committed in its own business or its supply chains.

1.3 This Statement relates to activity carried out during the financial year ending 31 March 2025. The Council will be reviewing the Statement on an annual basis and a new updated Statement, acknowledging any further actions that may have been taken, will be published in each subsequent year and uploaded to the Home Office's portal.

2. The Modern Slavery Act 2015

2.1 The Modern Slavery Act 2015 (the Act) consolidates various offences relating to human trafficking and slavery. Broadly speaking:

- '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, which supply goods and/or services from or to the UK and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.

2.4 The Council engages in commercial activities by providing services (some of which are statutory and some discretionary) and its annual turnover is greater than

the specified £36 million. Whilst the Act does not state that local authorities are among the 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. Standards

3.1 The Council will meet the following standards and also 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 place in any of its business or supply chains;
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and 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 The Council is a second tier local authority situated in the County of Nottinghamshire. The Council provides a wide range of statutory and discretionary services delivered both directly by itself, through partnership working with other agencies and commissioned work by external contractors.

4.2 The Council's Constitution and details of the organisational and political structures are available on the Council's website;
https://www.broxtowe.gov.uk/about-the-council/councillors-committees/council-constitution/
Political Structure (broxtowe.gov.uk)
Search (broxtowe.gov.uk)

5. Supply chains

5.1 As part of its procurement processes, the Council will require that all suppliers of goods and services comply with all applicable laws, statutes, regulations and codes including the Modern Slavery Act 2015. Suppliers will also be expected to publish a Slavery and Human Trafficking Statement (where required by law). Contract terms and conditions will set out the requirements of suppliers and sub-

contractors in relation to ensuring there is no slavery or human trafficking in their businesses.

5.2 The Council will also require its suppliers and sub-contractors 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 Adult and Children's Safeguarding Policies.

6. Policies and Plans

Broxtowe Borough Council has a range of policies and plans in place that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

6.1 **Council's Corporate Plan 2024 - 2029** – a key corporate priority is that "Broxtowe will be a safe place for everyone."

To achieve this outcome, the Council is working, individually and with partner agencies, to reduce crime and anti-social behaviour; using statutory powers to improve public safety, for example, enforcement of licensing requirements; raising awareness of services available; and encouraging victims to report incidents to access the support they need.

The Corporate Plan 2024 - 2029 is available on the Council's website;
https://www.broxtowe.gov.uk/about-the-council/strategies-plans-policies/corporate-plan/

6.2 **Safeguarding Policies** – The Council's Safeguarding Adults and Safeguarding Children policies set out the steps the Council is taking to safeguard and protect the welfare of children and adults at risk who come into contact with its services and activities. The policies include the Council's responsibilities in respect of modern slavery and human trafficking and its legal obligation to notify the Home Office of suspected victims of these offences. The Council recognises that Nottinghamshire County Council is the lead agency in the Borough with regard to the protection of children and adults at risk. However, Broxtowe Borough Council has a statutory duty to work in partnership with these agencies to identify, refer and respond to suspected abuse and to provide additional support. These policies were refreshed in June 2025.

The Adult and Children's Safeguarding Policies are available on the website;
https://www.broxtowe.gov.uk/for-you/crime-safety-emergencies/safeguarding/

In addition to the Council's own Adult and Childrens Safeguarding Policies the Council also subscribes, in partnership with all other Nottinghamshire District councils, to the online safeguarding policy platform TriEx. TriEx ensures all national policy and guidance changes are captured in this ever changing sector.

6.3 **Whistleblowing Policy** – The Council encourages all its employees, Members, 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. The Whistleblowing Policy is intended to make it easier to disclose information without fear of discrimination and victimisation. This Policy was refreshed in 2019.

The Whistleblowing Policy is available on the Intranet.

6.4 **Code of Conduct** – The Council makes clear to all its employees and Members that there are expected standards of behaviour to which they must adhere when they are representing and acting on behalf of the Council. Employee and Member conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken. The Employee Code of Conduct was refreshed in 2020 and the Member Code of Conduct refreshed in 2023.

The Member Code of Conduct is available on the website;
https://www.broxtowe.gov.uk/Search?q=code+of+conduct

The Employee Code of Conduct is available on the intranet.

6.5 **Recruitment and Selection Procedures 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 Immigration, Asylum and Nationality Act 2006, prospective employees are asked to supply evidence of their eligibility to work in the United Kingdom following the guidance https://www.gov.uk/prove-right-to-work. The Council has a formal procedure for employing UK and Non UK Nationals which is available on the intranet.

References are sought and followed up for all external employees and Police vetting is carried out where relevant to the post. The Communities Team are all Police vetted. However, there are no posts at the Borough Council which fit the criteria for Disclosure and Barring Service (DBS) checks. These are carried out for colleagues who take students on off site visits for safeguarding purposes. Liberty Leisure carry out their own checks.

The Recruitment and Selection Procedures are available on the intranet.

6.6 **Money Laundering Prevention Policy** – This sets out the Council's commitment to the prevention, detection and reporting of money laundering. This Policy was refreshed in 2019**.**

The Money Laundering Prevention Policy is available on the intranet.

6.7 **Procurement and Commissioning Strategy 2019 - 2024** – This Strategy 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 suppliers. This Strategy was refreshed in 2019.

The Procurement and Commissioning Strategy is available on the website;
https://www.broxtowe.gov.uk/for-business/procurement-contract-opportunities/

6.8 **Equality and Diversity Policy** – This policy provides a framework for the Council's approach to the wide ranging equality and diversity agenda.
The Council annually refreshes its equality and diversity objectives, sets out its annual activity in progressing the Equality duty and reports on an action plan to carry forward the work. The latest report in 2023 can be found at this link https://democracy.broxtowe.gov.uk/documents/s26770/3.1%20Appendix%201%20Equalities%20Annual%20Report%202022-3%20revised.pdf

7. Due Diligence

7.1 The 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, sub-contractors and other participants in their supply chain. For organisations with a turnover below £36 million, suppliers will be asked to confirm their acceptance of this Modern Slavery and Human Trafficking Statement. The Procurement Team are also working to establish a protocol for establishing Modern Slavery and Human Trafficking checks as part of the new contract management framework.

7.2 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;
- Identify and report individuals and properties of concern;
- Protect whistle blowers.

8. Training

8.1 The Council has made considerable efforts to ensure that initiatives to raise awareness of slavery and human trafficking, and services available to assist victims have been prioritised. The Council provides training for its employees and the online e-learning system contains mandatory modules of Modern Slavery as well as Serious Organised Crime. The purpose of the training has been to enable employees to better identify and know how to report, suspected or disclosed incidents, including situations involving slavery and trafficking.

9. Targeted activity

9.1 The Council has a strong history of working in partnership with other local authorities, both at county and district level, partner agencies, local charities and community groups. Within Nottinghamshire it was recently agreed to expand the modern slavery team which is hosted by Nottingham City Council to provide more capacity for the team to work within the county area including south

Nottinghamshire. Broxtowe agreed to contribute £16,390 in the 2024/25 and £17,763 in 2025/26 financial years towards the costs of the team. The Council is also an active member of Nottinghamshire's Serious Organised Crime Board and Serious Organised Crime Management Group. The Council's Communities Team delivers activity locally both in respect of responding to issues reported on a daily basis and creating and coordinating medium and longer-term projects that aim to reduce crime and improve public safety, gathering intelligence and disrupting activity where appropriate.

9.2 In support of its corporate objectives, the Communities Team facilitates and leads the Broxtowe Complex Cases Panel. This has a very broad membership including the Exploitation Officer for South Nottinghamshire and its key priority is to ensure that all agencies are working together to share intelligence, help identify adults at risk and agree actions that can be taken to provide tailored support. Where this panel identifies potential abuse or slavery, the necessary enforcement agencies are informed and referrals made to local and national support agencies.

9.3 Safeguarding reports may also flag exploitation and where the Safeguarding Lead identifies potential abuse or slavery, the necessary enforcement agencies are informed and referrals made to local and national support agencies.

In 2023 Sections of the Modern Slavery Act 2015 were amended so that assistance and support are only provided when there are reasonable grounds to believe that someone is, rather than may be a victim of modern slavery.

9.4 The Communities Team also coordinates and manages the Broxtowe Neighbourhood Safeguarding and Disruption (NSD) meetings which manage young people involved in or at risk of exploitation and County Lines and refer young people into the Child Criminal Exploitation Panel (CCEP) meetings and the National Referral Mechanism (NRM).

10. Monitoring our effectiveness

10.1 The Council will use the following steps to regularly review and monitor the measures being implemented to address slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:

i) Record the number of employees provided with training on modern slavery and human trafficking;

ii) Carry out periodic reviews to identify any deficiencies within our policies and practices and take appropriate action to rectify these to strengthen our ability to address slavery and human trafficking;

ii) Carry out periodic internal audits to ensure compliance with the policy.

iii) Undertake a self-assessment using the Local Government Association's modern slavery maturity matrix, and identify further actions to improve the Council's approach.