

Councillor guide to tackling modern slavery

Foreword

In 2017, the Local Government Association (LGA) published comprehensive guidance¹ for councils on tackling slavery. This document has been widely used by both councillors and officers to help them understand patterns and forms of modern day slavery and local government's responsibilities for addressing the issue. Since then, we have also developed a document with case studies of councils' work on modern slavery, and are developing a short guide on modern slavery and car washes.

We have developed this short follow up document specifically to support you as a local councillor in thinking about the individual role you can play to help tackle modern slavery. Broadly, there are two aspects to this; firstly, increasing awareness and knowledge across your council and locally, thereby helping to incorporate modern slavery within the council's work; and secondly, scrutinising the work of the council and its partners on modern day slavery, and holding them to account.

Awareness of modern day slavery and the number of reported victims has increased at a time when the pressures on council services that are key to disrupting slavery and supporting victims – from regulatory and community safety services, to housing and social care – have also been rising. There is no doubt that these pressures can make it harder for councils to proactively take the action they would wish to if resources were no object. But modern slavery is a heinous crime which, although often hidden, blights communities up and down the country. Whatever the challenges, we have a moral responsibility to ensure that we are taking all the steps we can to try to eradicate it.

As has been seen with many other issues, the personal initiative and commitment of individual members in driving the agenda can make a huge difference to ensuring that tackling modern slavery is a council priority. This document provides suggestions of the steps that councillors can take to do this, alongside examples of existing good practice. I hope you find it useful.



Councillor Simon Blackburn
Chair, LGA Safer Stronger Communities Board

¹ www.local.gov.uk/modern-slavery-council-guide

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Overview of the council role

The Local Government Association (LGA) document 'Tackling modern slavery: a council guide' set out four key areas of responsibility for councils in relation to modern slavery. While these are unlikely to change significantly, modern day slavery is a rapidly developing policy area, with various reform programmes and reviews currently taking place which may in future impact how councils undertake and deliver these responsibilities.

Disrupting modern slavery

Councils have an important role to play in disrupting, and sometimes discovering, modern slavery in their area. They are under a legal duty to do all they can to reasonably prevent crime and disorder in their areas, including modern slavery, and will be members of various partnerships which seek to tackle it. Through their day-to-day work with local businesses, a range of council regulatory services may be able to identify cases of modern slavery; these services also have a number of enforcement tools and powers of entry that can be helpful in targeting perpetrators of modern slavery alongside other types of rogue business.

Identifying and referring victims

Possible victims of modern slavery and human trafficking could be identified by a number of frontline council staff, including children's and adults services, housing teams, or those working different regulatory and environmental roles, community safety and general customer contact. Officers working in all of these services may encounter slavery in the course of their day-to-day work, and given the breadth of their work and contact, councils can therefore effectively act as an eyes and ears in terms of identifying anything untoward in their local area.

When a suspected victim has been identified, the Modern Slavery Act (the Act) designates councils as 'first responders', organisations with a legal requirement to refer suspected victims of modern slavery to the Home Office. This can be done in two ways. The national referral mechanism² (NRM) is the main formal process for recording the number of suspected victims, and the route to securing the available support for victims that want to access it (not all suspected victims consent to enter the NRM process). The second route is through the MS1 form, which should be used if the suspected victim does not consent to the NRM and/or if there isn't sufficient information attained. Other first responder organisations able to make referrals alongside councils include the police, borders and immigration authorities and non-governmental organisations (NGOs) working in this area.

² www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales

Supporting victims

Councils may have a role to provide support to victims of modern day slavery. For children, modern slavery and human trafficking is a form of child abuse and safeguarding issue, meaning councils have clear duties to support and protect child victims and normal child protection procedures should be followed.

For adults, the picture is a little more complex. Victims who agree to go through the NRM process and are formally recognised as victims receive a period of support and accommodation under a central victim care contract the Government has with The Salvation Army³ (support is delivered locally by a range of different organisations). However, prior to and after exiting the NRM they may be eligible for housing or adult social care support, subject to meeting eligibility thresholds.

Ensuring supply chains are free from modern slavery

Under Section 54 of the Act, commercial entities with an annual turnover of £36 million or more are required to produce annual transparency statements outlining the steps they have taken to ensure their supply chains are free from modern slavery. Councils and other public authorities are not currently subject to this requirement, but more than 100 councils have shown ethical leadership by voluntarily producing statements. The LGA which has produced its own statement, encourages councils to produce a statement, not least as it is expected that in due course the Act will be amended to bring public authorities within scope of the requirements.

Local government has the opportunity to use its extensive buying power to help mitigate the risks of slavery occurring in its supply chains by adopting new processes

and procedures, in both procurement and supplier/contract management. Many councils have already adopted a risk-based approach, identifying high and medium risk contracts to ensure resources are focused on areas where they will have the greatest impact, and working with them throughout the different contractual stages. The LGA website includes a number of tools and examples for councils to draw on in developing a transparency in supply chains statement: www.local.gov.uk/topics/community-safety/modern-slavery/supply-chains

A key point to recognise is that these varied responsibilities cut across a range of council services. Even a short list of current high profile modern slavery issues where councils may be focusing demonstrates the wide number of services that potentially become involved in the issue, but there are many others:

- **County lines.** County lines drugs trafficking is a form of child criminal exploitation and treated as modern slavery, accounting for a very significant proportion of the NRM referrals made by councils in recent years.
- **Hand car washes.** This is a sector that has been recognised as having high levels of labour market abuses, including slavery. Council planning, environmental health (health and safety) and trading standards teams may have an enforcement role in relation to individual hand car washes, and may also be asked to work in partnership with enforcement agencies on joint operations.
- **Nail bars.** Nail bars are also recognised to be a high risk sector in terms of labour exploitation, and another area where environmental health may have a regulatory/disrupting role to play.
- **Private sector housing regulation and enforcement.** There is an intrinsic link between slavery and housing; not all rogue housing will involve slavery, but virtually all cases of slavery will involve some form of substandard housing. Cases of slavery have been discovered when councils have investigated noise complaints or reports

3 www.salvationarmy.org.uk/supporting-adult-victims

of 'beds in sheds'; therefore regulation of private rented sector housing, including licensing schemes, can and has been used effectively to disrupt slavery.

Other areas which have received less publicity but which are areas where councils may be able to help identify and disrupt modern slavery, or make responsible procurement choices, include:

- **Licensed premises and food hygiene.**

Labour exploitation has been known to occur in licensed premises or restaurants, or be linked to hotels, meaning that licensing and environmental health teams have a role to play in being aware of modern slavery and able to appropriately refer any concerns they have.

- **Waste services, particularly non permitted/illegal waste, such as waste sites working outside of their permits, or illegal dumping of large scale waste.**

Victims of modern slavery have been known to be employed at low or no wages in these places. While councils do not themselves issue permits in this sector, they may be able to link into the work of other enforcement agencies including the Environment Agency, or offer alternative enforcement sanctions to disrupt sites and prevent slavery.

- **Care and cleaning industries.** Councils can consider the risks of exploitation occurring in two sectors where they may be involved in commissioning themselves – care services and cleaning. Nottinghamshire County Council has undertaken work to look at the risks of labour exploitation in the care sector, and what measures can be taken to try to prevent this.

An overarching role which councils can play, sitting above these specific responsibilities, is increasing public awareness of modern day slavery. An enforcement led approach may disrupt slavery, but eradicating it requires a community led response in which individuals and businesses understand and recognise slavery and make ethical decisions about where to shop and what to buy, choosing products and services that do not involve modern day slavery. The role of awareness raising is something in which councillors themselves can take the lead on.

How councillors can help tackle modern slavery

Councillors can help support local efforts to tackle modern slavery in four broad areas:

- increasing and sharing knowledge of modern slavery
- supporting increased awareness and engagement with the issue
- identifying how modern slavery fits in with their specific role and networks
- holding their council and relevant statutory/non-statutory stakeholders in their networks to account over the issue.

Increasing and sharing knowledge of modern slavery

An important first step for councillors in tackling modern slavery is to find out more about the issue and understand what activity is taking place locally.

There is a range of comprehensive guidance documents⁴ and training materials⁵ already available, including the LGA's guide to tackling modern slavery, and there may be opportunities to attend awareness training on the issue. The LGA has previously run a number of modern slavery conferences, and there are several organisations which can provide training on the issue.

General modern slavery awareness training	Organisation	Website
	Hope for Justice	www.hopeforjustice.org/professionals
	Unseen	www.unseenuk.org/modern-slavery-training?gclid=EALalQobChMI-
	Hestia	www.hestia.org/news/hestias-modern-slavery-training
	Snowdrop Project	https://snowdropproject.co.uk/casework-befriending/training-and-consultancy
	Stop the Traffik	www.stophetraffik.org/what-we-do/bespoke-training
Procurement training	Ethical Trading Initiative	www.ethicaltrade.org/training
	Chartered Institute of Procurement and Supply	www.cips.org/en-gb/knowledge/procurement-topics-and-skills/sustainability/modern-slavery1
	Anti-Slavery International	www.antislavery.org/what-we-do/work-supply-chains

4 www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page

5 <https://iasctoolkit.nottingham.ac.uk/uk-training-library/>

Councillors should seek to understand what is already happening locally to address slavery, including identifying:

- relevant partnerships and whether there is a dedicated modern slavery partnership
- which charities and non-government organisations working with victims are present locally
- whether the local police have a dedicated modern slavery unit
- what neighbouring councils and regions are doing on the issue.

Councillors can also seek to network with and visit other councillors across the country to bring back learning to their areas.

Once the local modern slavery landscape has been mapped out, it may be possible to identify opportunities to engage with local partnerships or police units by attending meetings or events, or requesting feedback on local operations.

As well as local officers, who can explain the local modern slavery landscape, councillors may find Nottingham University's anti-slavery partnerships toolkit a useful source of information: <https://iasctoolkit.nottingham.ac.uk> This includes:

- a map of partnerships
- reports and guidance assessing the types and scale of modern slavery
- a library of free training materials.

The Gangmasters and Labour Abuse Authority feature a number of information leaflets and posters on their website. These are in a number of different languages and can be downloaded and printed off free of charge: www.gla.gov.uk

Supporting increased awareness and engagement with the issue

Councillors can use their role and influence to raise awareness of slavery across their networks and increase engagement with the issue:

- within the council
- externally, with relevant agencies and networks
- and among local residents.

Information about modern slavery and local activity should be shared with all councillors, and officers, if there has been limited activity to date. As has been seen up and down the country, tackling modern slavery is a cross party issue and a council's efforts will be strengthened when councillors work across party lines. Within the council, member interest can help increase engagement and activity on the issue – members can use some of the tools set out in the final section of document to help drive this.

Externally, councillors can increase awareness and engagement through their networks and contacts with various groups.

Other bodies or networks	Awareness raising
Other statutory agencies	Councillors can play an important role by liaising between different statutory agencies, each of which will have their own strategies focusing on different issues. Councillors may be able to wield more influence and open more doors than officers to help achieve buy in.
Police and crime commissioner (PCC)	The PCC has an integral role in tackling modern slavery. Alongside officer links to the force, the link between councillors and the PCC can play an important role.
Local partnerships	Members can help to raise awareness of modern slavery across key partnerships and bodies, such as the CSP, HWB, safeguarding boards, etc.
Business networks	<p>Councillors can use their links with the local business community – including individual businesses and business networks – to raise awareness of modern slavery, including the importance of being able to spot modern slavery and eradicating it from supply chains. A number of local partnerships and councils have developed specific materials targeted at businesses:</p> <ul style="list-style-type: none"> • Hertfordshire procurement guidance: www.stopexploitationherts.org.uk/businesses/businesses.aspx • Cornwall concerned card: www.local.gov.uk/sites/default/files/documents/A6%20Concern%20Card%20pr2.pdf
Local voluntary and community sector, faith groups	<p>Councillors will have contacts with the local voluntary and community sector and can help to increase awareness of the issue and what to look out for.</p> <p>Faith groups and leaders have played an active role in trying to raise awareness and tackle modern slavery, so councillors can consider trying to work collaboratively with local groups.</p>
Human trafficking and modern slavery (HTMS) non-governmental organisations sector	<p>The HTMS NGO sector comprises a number of national organisations (such as the Human Trafficking Foundation, Stop the Traffik, Unseen, etc), as well as organisations with a more localised footprint involved in supporting victims. A directory of these organisations is available on the modern slavery helpline website: www.modernslaveryhelpline.org/directory</p> <p>Councillors can engage with these networks to find out more about the issue and link them into their local areas.</p>

Beyond specific networks, councillors can play an instrumental role in general awareness raising among local residents. This may focus on helping people to:

- understand that modern slavery is an issue in the UK
- be aware of some of the high risk areas
- spot the signs of modern slavery
- be clear about what to do and where to report it if they see something of concern
- think about how the choices people make about what to buy may impact modern slavery.

There are a number of materials that councillors can signpost their colleagues and networks to, including:

- video case studies and materials produced by the Gangmasters and Labour Abuse Authority (GLAA): www.glaa.gov.uk/publications/resources/glaa-videos
- Break the Chain, a short film about modern slavery produced by students from Oaklands College in Hertfordshire: www.youtube.com/watch?v=2vpbT5Lx_Mg
- the modern slavery helpline and related publicity materials: www.modernslaveryhelpline.org
- the safe car wash app developed by the Clewer Initiative to help consumers identify and flag concerns about hand car washes, a high risk sector: www.theclewerinitiative.org/safe-car-wash-app

A number of councillors have either attended or helped to arrange local events and conferences designed to raise awareness of modern slavery and develop local partnerships.

In 2018, councillors from **Cheshire West and Chester Council** worked with Chester Cathedral to organise an event for local businesses to raise awareness of modern slavery and how businesses can play a role in tackling it. The event was chaired by the Bishop of Chester, and the council drew on the contacts of the economic development team to help reach a number of businesses and organisations.

In 2017, **Hertfordshire County Council**, police, and police and crime commissioner worked with the anti-slavery charity Shiva Foundation to host a daylong event on modern slavery. This brought together national anti-trafficking experts in an effort to encourage local activity to prevent and address modern slavery and led to the creation of the Hertfordshire Modern Slavery Partnership.

www.shivafoundation.org.uk/wp-content/uploads/2019/02/HMSP-Guidance-to-Businesses1.pdf

Councillors in the **London Borough of Croydon** have been closely involved in the annual conference on modern slavery hosted by the council. The event aims to help develop a Croydon understanding about the scale and depth of modern slavery locally, as well as providing a forum for sharing experience across different sectors, and has been attended by senior councillors from different political groups.

<https://croydonlcsb.org.uk/2018/09/modern-slavery-conference-16th-october>

Identifying how modern slavery fits within councillor roles and networks

As set out above, modern slavery cuts across a number of council services areas, including licensing, environmental health and trading standards, housing, community safety, customer contact and social services.

Councillors with specific portfolios can consider how modern slavery links to this and how the relevant services areas could be working on modern slavery. Similarly, there is scope for councillors to consider how the committees that they are members of could consider modern slavery, or for them to raise it as a discussion point in committee meetings.

Modern slavery addition to the Statement of Licensing Policy (Hertsmere Borough Council)

Policy reviews are an opportunity to include modern slavery within existing frameworks and policies. Councillor Meenal Sachdev has played an integral role in raising awareness of HTMS across Hertsmere Council. As a member of the licensing committee, Councillor Sachdev saw an opportunity to include information on modern slavery within Hertsmere Borough Council's Statement of Licensing Policy, which was under review. She got in touch with the appropriate staff

member and a modern slavery section was added following approval by the rest of the committee and then full council. Through this type of commitment, licensing officers can be trained to not only raise awareness within licensed premises, but also better identify possible cases when visiting such premises.

Page 21 of the statement now says:

Modern slavery

Modern slavery is a crime. The UK Modern Slavery Act 2015 includes the following under the offence of modern slavery:

- slavery, where ownership is exercised over a person
- servitude, where a person is obliged to provide services imposed by coercion
- forced or compulsory labour, which involves work extracted under the menace of penalty and for which the person has not offered himself voluntarily
- human trafficking, which involves the movement of people by means such as force fraud, coercion or deception with the aim of exploiting them.

In the UK, estimates go as high as 136,000 when quantifying the number of hidden victims living in conditions of slavery. In the European hospitality sector, which includes bars and restaurants, a recent study found 110,000 victims of exploitation annually. Government agencies in the UK have specifically identified hospitality as a high-risk area for modern slavery.

Licensed premises might be unwitting hosts to modern slavery in two ways:

1. Victims and their traffickers visiting the establishment. Sexual exploitation and forced criminality would be the most common forms identified in this way.
2. Staff being recruited through unscrupulous means, leaving them trapped and/or indebted to a trafficker.

Identification and reporting

Staff at licensed premises can have the power to identify and report any exploitation they encounter. A licence holder may ensure awareness of modern slavery by:

- identifying any risks at the premises and working with relevant business partners and suppliers (ie recruitment agencies) to mitigate such risk
- actively informing those working on the premises of their rights and how they can confidentially seek help or advice on modern slavery if required
- provide regular training to all staff on the indicators of modern slavery and how to report concerns
- establishing strong relationships with local police and victims service providers, such as the national Modern Slavery Helpline (0800 0121 700), in advance of any incident.

Reporting protocols

Having clear and straightforward protocols for when an incident is discovered is crucial to ensure that victims get appropriate support. Where employees identify a potential victim, they can follow a specific internal procedure in order to protect the safety of that individual.

The procedure should 1) not be overly complex, 2) should involve senior level staff and 3) should account for when reporting should go immediately to the police (ie if certain indicators are met, if the potential victim is in immediate danger, if the potential victim is a child).

The Modern Slavery Helpline (0800 0121 700) can provide support to anyone who has a suspicion and would like some guidance on next steps, 24 hours a day.

Useful resources

Blueprint training www.shivafoundation.org.uk/blueprint/training

Indicator list www.shivafoundation.org.uk/blueprint-docs/18_SF_SSB_Sec05_Indicator-List.pdf

Example policies www.shivafoundation.org.uk/blueprint/policies-and-practices

Scrutiny and accountability

Councillors can use the full range of democratic tools available to them – such as scrutiny reviews, council motions, holding debates and asking questions at council meetings – to ensure that the council and its partners are accountable for their activity on modern slavery. These can enable councillors to assess and benchmark the council's work on the issue, as well as helping to drive the agenda locally by securing commitments for further activity.

In drilling down into local work on modern slavery, councillors might want to focus on a number of contributory factors that support work on modern slavery.

Theme	Key issues	Possible questions to ask
Knowledge and training	<p>Whether members and officers are aware of modern slavery as an issue and any locally specific issues or risks.</p> <p>Whether training on modern slavery is available for officers and members.</p>	<ul style="list-style-type: none"> • Has the organisation taken steps to ensure that staff are trained in modern slavery awareness? • Has training been provided for councillors? • Is the organisation able to evidence that staff understand what human trafficking and modern slavery is? • Does the organisation understand its obligations to potential and identified victims as outlined by the Modern Slavery Act 2015, relevant safeguarding legislation, the EU anti-trafficking directive and the European Convention on human rights?
Strategic approach	<p>The strategies the council has in place to drive its work on modern slavery.</p>	<ul style="list-style-type: none"> • Does the council have an individual or joint strategy for tackling modern slavery? • Does the organisational strategic plan for safeguarding adults/children include modern slavery? • Has the council undertaken a joint strategic needs assessment in relation to modern slavery?
Council structures and processes	<p>How the council coordinates modern slavery work across a diverse range of services.</p> <p>How the council fulfils its first responder obligations to submit NRM referrals.</p>	<ul style="list-style-type: none"> • Is the organisation able to evidence that staff know how to identify modern slavery and refer it to the appropriate channels? • Does the council have a modern slavery designated lead to act as a point of reference and provide specialist advice across the council? • Is there a system in place to collect and collate information regarding identification and reporting or potential victims? • Does the organisation have written guidance, referral pathways and procedures for handling cases of potential and identified victims? • Is the organisation able to confirm the number of potential victims identified by staff at any point of time, or the number of council NRM referrals?

Partnership working	<p>The local partnership structures which may include modern slavery within their remit.</p> <p>How the council engages in local modern slavery partnership structures and how effective are they.</p>	<ul style="list-style-type: none"> • Which officers and services are actively engaged in local partnership structures and how is information from them shared appropriately across the different departments working to tackle modern slavery? • What measures are in place to strengthen joint working and assess the impact of these structures?
Supporting victims	<p>Whether the council has been involved in supporting any victims of modern slavery, and has procedures in place for doing so.</p>	<ul style="list-style-type: none"> • Does the organisation have written guidance, referral pathways and procedures for handling cases of potential and identified victims? • If applicable, does the organisation keep a record of identified victims of HTMS that it supports? • Is there evidence that the needs of potential and/or identified victims of HTMS are being met? • Is regular learning and development needs analysis around HTMS being undertaken in relation to safeguarding adults and children?
Procurement	<p>Whether the council has taken steps to eradicate modern slavery from its supply chains.</p>	<ul style="list-style-type: none"> • Has the council developed a transparency in supply chains statement? • Have council procurement staff been trained on modern slavery risk in supply chains and how to mitigate it? • Has the council got modern slavery contract clauses embedded in its own contracts? • Does the council actively seek assurances from suppliers that there aren't instances of modern slavery further down their own supply chains or with sub-contractors? • Has the council undertaken a risk assessment of its supply chains? • Is the council making use of the available tools, such as the Transparency in Supply Chains report and the free, online Modern Slavery Assessment Tool (MSAT) supported by government? (a link to MSAT is available on the LGA website)
Awareness raising	<p>Whether and how the council is seeking to increase local public understanding of the issue of modern slavery and the need to tackle it.</p>	<ul style="list-style-type: none"> • Has the council developed or utilised existing awareness raising materials for local businesses and residents? • Has the council developed or utilised existing materials to signpost potential victims?

In December 2016, **Basingstoke and Deane Council** considered and unanimously approved a motion committing the council to various actions to tackle modern slavery:

1. That the UK Government is committed to leading international efforts to defeat modern slavery.
2. That slavery takes many different forms (forced labour, human trafficking, servitude, slavery) and may be present in a range of sectors (sex industry, service and hospitality industry, farming, etc).
3. That little is known about scale of the problem in Basingstoke and Deane.

Council commits to:

1. Working towards the eradication of human trafficking and slavery in Basingstoke and Deane.
2. Raise awareness of modern slavery amongst all employees, councillors and partners, how it presents and what they need to do should they come across it.
3. Ensure a multi-agency approach to this issue, to become a partner of the Hampshire and Isle of Wight Modern Slavery Partnership and to engage with and support the work of the partnership.
4. Implement the Transparency in Supply Chain provisions of the Modern Slavery Act to prevent modern slavery from occurring in its own supply chain.

The issue was referred to the Community, Environment and Partnerships committee, and a follow up report to the committee was subsequently prepared by the portfolio holder for community safety: <https://democracy.basingstoke.gov.uk/documents/s9188/Report.pdf>

At its full council meeting in November 2018, **Gloucestershire County Council** unanimously approved a motion adopting the Co-operative Party Charter against modern slavery, which aims to stamp out modern slavery from council supply chains:

This council notes that:

- Modern slavery is one of the great evils of our time and it's happening under our noses. In nail bars, car washes, farms, factories and restaurants, it is estimated that tens of thousands of people in the UK could be victims.

This council also notes that:

- Collectively, local authorities in England spend more than £40 billion per year procuring goods and services. From car washes to cleaning and construction, councils do business with hundreds of different suppliers. Many of those firms will have contractors and suppliers of their own.
- The Co-operative Party's Charter against modern slavery goes further than existing law and guidance, committing councils to proactively vetting their own supply chain to ensure no instances of modern slavery are taking place.

This council therefore resolves to:

- Adopt the principles of the Co-operative Party's Charter against Modern Slavery.

The council will:

1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.

3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
7. Review its contractual spending regularly to identify any potential issues with modern slavery.
8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
9. Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
10. Report publicly on the implementation of this policy annually Modern Slavery Charter.

<http://glostext.gloucestershire.gov.uk/mgAi.aspx?ID=22172>

As part of its mandatory scrutiny of crime and disorder, **Hertfordshire County Council** established a modern slavery and human trafficking topic group to examine the effectiveness of the Crime and Disorder Partnership in responding to and preventing modern slavery and human trafficking. The review was intended to provide assurance that partners are working collaboratively to identify and prevent modern slavery, and focused on three overarching issues:

- How does the partnership identify modern slavery and what action is taken for victims and offenders once it has been identified?
- What is the partnership doing to prevent modern slavery taking place without moving it on to another neighbouring district or county?
- How does the partnership share information on suspected modern slavery and react collaboratively?

Ahead of the review's evidence hearings, the scrutiny group undertook a site visit to Operation Tropic, the Hertfordshire Constabulary modern slavery unit, to see its work first-hand. A subsequent day long evidence session heard from the Hertfordshire Police and Crime Commissioner (PCC) David Lloyd and the manager of the National Modern Slavery Helpline. The hearing also heard evidence from representatives of the Hertfordshire Modern Slavery Partnership, including Hertfordshire County Council's adults and children's services and its trading standards team, Hertfordshire Constabulary's Operation Tropic lead, the Office of the PCC, Hertfordshire Fire and Rescue Service, Councillor Meenal Sachdev and the Community Safety Officer at Hertsmere Borough Council, representing the Hertfordshire district councils, and the Partnership Coordinator, Shiva Foundation.

The topic group found that the partnership had already had a positive impact, with a large number of partners working together. It made five recommendations for developing this work further by:

- The partnership working with all the Hertfordshire councils to increase the support for identified victims and prevent instances of HTMS, including by identifying and sharing effective practice to develop a consistent countywide approach.
- The partnership working with all Hertfordshire councils to include HTMS in the Equality Impact Assessment template, so that the impact on this vulnerable group is considered at the point of procurement or contract review.
- The partnership prioritising work with partner agencies to provide greater support to victims within the first few days of identification, including swifter relocation to places of safety.
- HTMS forming part of the quarterly safeguarding meeting with the leader of Hertfordshire County Council, who can subsequently feedback to Hertfordshire MPs.
- The partnership increasing the amount of awareness raising work it does with schools and small businesses.

These recommendations are due to be progressed over the course of 2019.

<https://democracy.hertfordshire.gov.uk/ieListDocuments.aspx?MIId=1320>

Acknowledgments

We are grateful to Cllr Meenal Sachdev, Hertsmere Borough Council and Kate Rolle, Shiva Foundation for their contributions to developing this guide.



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REF 22.47