

# Modern Slavery and Human Trafficking Transparency Statement

## Introduction

Modern slavery is a global problem and an international crime affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds can fall victim to human trafficking. Victims can be controlled by force, threats, coercion, abduction, fraud and deception.

Horsham District Council provides a wide range of services, alongside partners, to the local community. We are making a clear commitment to tackle modern slavery by signing up to this Modern Slavery and Human Trafficking Transparency Statement.

The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking does not exist within its supply chain or in any part of its own business. The term 'modern slavery' captures a whole range of exploitation which includes:

- **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children, in order to produce child abuse images or videos;
- **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties;
- **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars);
- **Bonded labour:** this includes descendant slavery when people give themselves into slavery as security against a loan or when they inherit a debt from a relative;
- **Criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker;
- **Human Trafficking:** this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job, or may be a child who is influenced to travel by an adult;
- **Other forms of exploitation:** including organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption.

## Our Responsibilities

The abuse of human rights in supply chains through modern slavery is gaining greater awareness. The Council has a responsibility to prevent slavery and human trafficking within our own supply chain and in any part of the organisation. It expects the same high standards from all of our contractors, suppliers and other business partners.

This Statement sets out the Council's actions and commitments to understand all potential modern slavery risks related to our activities and to put in place steps to combat and prevent acts of slavery and human trafficking within our business and supply chains. It applies to everyone working for the Council or on our behalf in any capacity. The Council's Senior Management Team has overall responsibility for ensuring this Statement complies with our legal and ethical obligations, and that all those under the Council's control comply with it.

The Council has signed up to the Modern Slavery Pledge and will adhere to its principles.

The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

## Our Policies

The Council has a commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The following policies and procedures are considered to be key in meeting the Council's requirements of the Modern Slavery Act 2015.

**Procurement Code** – 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. All tender exercises are conducted by the Council's procurement officer and in accordance with the Chartered Institute of Procurement and Supply Code of Ethics. The Council's Invitation to Tender document requires all bidders:

- i. to confirm that they (or any sub-contractor that they intend to use) have not been convicted of any offences including an offences under the Modern Slavery Act 2015;
- ii. to demonstrate how they tackle any modern slavery or human rights abuses in their business;
- iii. with a turnover of £36 million or more must submit a copy of their Modern Slavery Statement with their bid.

**Equality and Diversity Policy** – The Council is committed to inclusion and providing equality of opportunity in all its activities and to ensuring that discrimination does not occur at any level.

**Recruitment and Selection Policy** – The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures for the vetting of new employees and ensures they confirm their identities and qualifications. Right to Work checks are carried out to ensure that all individuals employed by the Council have the legal right to work in the United Kingdom. References are sought for all employees and relevant checks are carried

out, for example Disclosure and Barring Service checks where relevant to the position. The employees are paid directly into an appropriate, personal bank account.

**Pay and Reward Policy** – The Council operates transparent, consistent and equitable pay arrangements for its employees. All roles are subject to panel evaluation, jointly with unions, employees and managers. The policy sets out the key principles of the grading structure, progression, pay levels, and pay supplements.

**Whistleblowing Policy** – The Council encourages all its employees, contractors, consultants, partners, agency workers, volunteers and other stakeholders including Councillors who have concerns about any aspect of the Council's work to come forward and voice those concerns. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easier to disclose any information without fear of discrimination and repercussions.

**Grievance Policy** – The Council recognises that an effective grievance process is essential to ensuring all workers feel safe, valued and empowered to raise concerns. The Council's Grievance Policy provides a clear route for employees to raise any issues they may have with their manager or Designated Grievance Officer, and it explains the timeframes and the right to an accompanying companion.

**Safeguarding** – The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults who encounter its services and activities and to protect them from harm. The Council has a Safeguarding Policy that applies to all employees, agency workers, volunteers, Councillors and those that are commissioned or funded to deliver services and projects on behalf of the Council, who may come into contact with children and adults in the course of their work.

## **Duty to Notify**

The Council, as part of the public sector and as an employer, recognises that it has a duty to take a robust approach to modern slavery and human trafficking. The Council acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking under Sections 43, 52 and 54 of the Modern Slavery Act 2015. [Modern Slavery Act 2015](#) The Council expect the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Council include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Council expect that its suppliers will hold their own suppliers to the same high standards.

Guidance on the duty to notify is provided at: [Modern slavery: how to identify and support victims](#)

This requirement in respect of potential victims of Modern Slavery is set out in the council's safeguarding operating procedures and guidance where, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

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 08000 121 700
- Report online via the [Modern Slavery Helpline](#)

There are factsheets and a poster that explain what you need to do if you think someone has been a victim of Modern Slavery:

Modern Slavery - Duty to Notify Poster: [6.2286 HO LL Duty of notice poster 2 v2.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/6.2286_HO_LL_Duty_of_notice_poster_2_v2.pdf)

Modern Slavery – Duty to Notify Factsheet: [6.2286 HO LL factsheet duty to notify copy V3.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/6.2286_HO_LL_factsheet_duty_to_notify_copy_V3.pdf)

## **Due Diligence and Risk Assessment**

The Shared Procurement Service, who deal with most contracts worth £50,000 or more, take the lead on tackling modern slavery within our supply chains, and work in conjunction with stakeholder departments who may face the greatest risk of procuring goods, services or works associated with this crime. Staff are trained to ensure they are aware of the risks and issues and how to mitigate these in the procurement process.

The Council expects all suppliers regardless of size to actively work towards mitigating the risk of modern slavery within their organisations and its supply chain and may request evidence to demonstrate steps taken. In addition, the Shared Procurement Service has processes and due diligence mechanisms in place to ensure that modern slavery is tackled by its supply chain.

The Council aims to monitor the commitments which our suppliers have pledged, including the identification and management of risks in relation to modern slavery and human trafficking. This is done by:

- Increasing openness, transparency and efficiency in the management of supply chains
- Improving ability to identify strengths, weaknesses, opportunities and threats in supply chains
- Improving communications with suppliers
- Enhancing relationships with suppliers

## **Training**

Training on the risk faced by the Council from modern slavery in its supply chains, forms part of the safeguarding training for all staff who work for the Council, and regular refresher training will be provided as necessary.

All staff are encouraged to take part in any additional training offered by partner agencies which include modern slavery.

The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

Regular information and updates on modern slavery will be shared with Councillors, partners and the public alike through a range of media platforms.

## What the council has done

The Council has undertaken the following to meet its commitment to tackle modern slavery:

- Community Safety staff attend regular West Sussex Anti-Slavery Co-ordination Group meetings to share learning and guidance with other authorities and agencies.
- Mandatory online safeguarding training is provided for all staff.
- Face to face safeguarding training incorporating Modern Slavery issues was provided to the Council's safeguarding champions.
- Procurement have ensured that any supplier that wishes to tender for Council contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015.

## Our commitment for the next year

Following a review of the effectiveness of the steps we have already taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking.

1. We will disclose identified instances of modern slavery and continue to work with Police, Home Office, West Sussex County Council, Gangmasters and Labour Abuse Authority and other relevant authorities as appropriate where there are slavery concerns.
2. We will promote the online Modern Slavery training on our Learning portal and any additional Modern Slavery training provided through West Sussex County Council to all relevant staff.
3. We will continue to share learning and guidance provided through the West Sussex Anti-Slavery Co-ordination Group to relevant staff and partners and work with other statutory partners on any new anti-slavery initiatives.
4. We will ensure that modern slavery considerations are incorporated in any relevant new or updated Council policies.
5. We will continue to monitor our supply chains and report on any issues identified through non-compliance or insufficient information provided.
6. We will continue to ensure that any supplier that wishes to tender for the Council contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015, and will check in accordance with the Central Digital Platform under the Procurement Act 2023.
7. As part of our contract management processes, we will continue to undertake annual gathering and reviewing of Modern Slavery Statements for all suppliers with an annual turnover of £36m and over.
8. For all Above Threshold contracts (currently £214,905 inclusive of VAT) or contracts where we believe there are likely to be greater supply chain risks, we will continue to assess suppliers' recruitment policies and procedures to ensure that they are minimising the risk of modern slavery in their organisation.

9. The Shared Procurement Service will undertake an annual risk assessment of its supply chain to identify high risk areas and will continue to deliver training and guidance to contract managers to highlight the potential modern slavery risks.

## Declaration

This Statement is made under Section 54(1) of the Modern Slavery Act 2015 for the period 1 January 2026 to 31 December 2026. It is approved by the Council's Senior Leadership Team and Cabinet and will be subject to review on an annual basis.



Signed: .....

Cllr Anthony Frankland, Cabinet Member for  
Performance, Customer Service and Communications  
Horsham District Council



Signed: .....

Jane Eaton, Chief Executive  
Horsham District Council