

## Broadland District Council

### Modern Slavery & Human Trafficking Statement 2025/26

#### Introduction

Broadland District Council is committed to preventing slavery and human trafficking (MSHT) in their corporate activities, and to ensuring supply chains are free from slavery and human trafficking.

This statement sets out our actions to comply with the Modern Slavery Act.

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery:

#### Sexual exploitation:

Includes sexual abuse, forced prostitution and the abuse of children to produce child abuse images or videos.

#### Domestic servitude:

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, hospitality, food packaging, agriculture, car washes and nail bars.

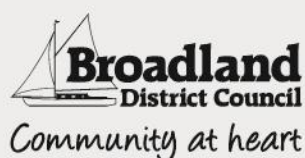
#### Bonded labour:

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:

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.

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#### Human Trafficking:

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

Section 52 of the Act imposes a duty on public authorities, including councils, to notify the Secretary of State of suspected victims of slavery or human trafficking. The Council is also a First Responder under the National Referral Mechanism which involves making referrals to secure the appropriate protection and support for victims.

Section 54 of the Act states that the employer's slavery MSHT statement might include information on:

- Its structure, business, and supply chains.
- Its policies in relation to MSHT.
- Its due diligence processes in relation to MSHT in its business and supply chains.
- The parts of its business and supply chains where there is a risk of MSHT taking place, and the steps that it has taken to assess and manage that risk.
- Its effectiveness in ensuring that MSHT is not taking place in its business or supply chains.
- The training about MSHT available to its staff.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to preventing slavery, exploitation and/or human trafficking, child slavery, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and forced or early marriage.

## *Policies and Plans*

The Council reviews its policies and procedures to ensure they remain compliant and fit for purpose. The following policies and procedures are considered key in meeting the Modern Slavery Act requirements:

### *Safer Norfolk Plan 2025 to 2028*

The plan contains a key priority which relates specifically to MSHT, but others are linked. This is, Priority Three: deliver a coordinated partnership response to modern slavery and criminal exploitation, including child criminal and child sexual exploitation.

### *Safeguarding*

The Council has a comprehensive safeguarding policy which all staff and Councillors are expected to read and work within. The Council works within multi-agency partnerships to protect and safeguard people.

### *Recruitment*

The Council has a robust and transparent recruitment and selection process that is reviewed regularly. These include procedures for vetting new employees, whether full-time, part-time, or contractors/consultants. The checks made ensure they can confirm their identities and qualifications and are paid directly into an appropriate personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

### *Pay*

The Council operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council became an accredited Living Wage Employer in 2024.

### *Employee Code of Conduct*

The Councils' Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour, and breaches are investigated.

### *Whistleblowing*

The Council encourages all its employees, customers, and other business partners to report any concerns related to the direct activities or the supply chains of the Councils.

The Councils' whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

#### *Councillors (Members)*

The Council expects all Members to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. The Monitoring Officer investigates breaches.

#### *Partnerships*

South Norfolk Council works in partnership with a wide range of agencies to prevent abuse and neglect, detect and report occurrences, and support victims. This includes Norfolk County Council and the Local Safeguarding Boards. The Council is represented at the Norfolk Anti-Slavery Network, Local Organised Crime Board and on the Serious Violence Duty Strategic and operational partnerships.

Staff work within these partnerships to share insight and coordinate action around issues, including MSHT.

#### *Due Diligence – Contractors and Service Providers*

The Council requires its contractors to have safeguarding policies, procedures, and training in place, and confirm compliance with the Act.

#### *Training*

The Council has a programme of mandatory training that all employees must complete. This enables officers in community facing roles to identify and know how to report suspected incidents of MSHT.

In addition, additional training is available via the Norfolk Against Slavery Network, and this is offered to staff, as well as extended to other key partners, community groups and third sector organisations.

#### *What the Councils have done*

The Council has undertaken the following towards meeting its commitment to tackle MSHT:

- Worked with Norfolk Police, Home Office, and local relevant partners where there has been concerns around MSHT.
- Incorporated modern slavery into our safeguarding training to all frontline staff.

- Arranged specific modern slavery training for all staff, covering what constitutes modern slavery, how to spot the signs and what action should be taken to report concerns or suspicions.
- Arranged specific training for frontline staff around county lines and exploitation.
- Designated a lead officer for MSHT within Community Safety.
- Designated a lead officer for MSHT within the Finance Team.

#### Our commitment for the next year

- We will disclose identified instances of modern slavery and continue to work with Norfolk Police, Home Office, Norfolk County Council, Gangmasters and Labour Abuse Authority and other relevant partners as appropriate, where there are slavery concerns.
- We will 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.
- We will continue to offer training to staff which supports their duties under the Modern Slavery Act.
- We will ensure that modern slavery considerations are incorporated in any relevant new or updated Council policies.
- We will continue to ensure that any significant supplier that wishes to tender for Council contracts, must provide evidence that they have met the requirements of the Modern Slavery Act 2015 to be able to bid. Any supplier who fails to evidence their compliance, shall be excluded from participating further in the tender process.
- We will include clauses in our standard contract terms that specify the suppliers' contractual obligations concerning modern slavery.

#### Declaration

This Statement is made under Section 54(1) of the Modern Slavery Act 2015 for the period April 2025 to March 2026. It is approved by the Councils' Leadership Team and signed by the Deputy Leader of the Council. This Statement will be subject to review on an annual basis.

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Signed:



Cllr Sue Holland  
Leader of Broadland District Council



Dated: 27/08/2025

Date of review: April 2026

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