

South Derbyshire District Council Modern Slavery Transparency Statement 2025-26

Communities Team

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Version Control

Version	Description of version	Effective Date
1.0	Modern Slavery Transparency Statement 2018-19	October 2018
1.1	Modern Slavery Transparency Statement 2019-20	November 2020
1.2	Modern Slavery Transparency Statement 2025-26	August 2026

Approvals

Approved by	Date
F & M Committee	11 th October 2018
H & CS Committee	19 th November 2020
F & M Committee	26 th November 2020
Leadership Team	August 2026

Associated Documentation

Description of Documentation	
SDDC Modern Slavery Referral procedure	
Derby and Derbyshire Partnership Information Sharing Agreement for Modern Slavery and Human Trafficking	

1.0 Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. In its wider sense it is commonly accepted to include:

- sexual exploitation
- forced or bonded labour
- human trafficking
- criminal exploitation
- financial exploitation
- domestic servitude
- child slavery
- offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003
- forced or early marriage

This Statement constitutes South Derbyshire District Council's (The Council) actions to ensure there is no slavery or human trafficking in its own business or supply chains. This Statement is for the financial year ending March 2025-26 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As part of the public sector and a member of the Derby and Derbyshire Modern Slavery Partnership, the Council is committed to improving its practices to identify and combat this crime. The Council accepts its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor with other bodies; and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as required by section 52 of the Modern Slavery Act 2015.

The Council is committed to preventing and acting against identified slavery and human trafficking in its corporate activities, supply chains and the wider community, and ensuring these are free from slavery and human trafficking.

This Statement covers all activities of South Derbyshire District Council. The Statement covers employees of the Council, agency and casual workers and services delivered on behalf of the Council by third party organisations and the Council's supply chains.

2.0 Standards

The Council's vision for the next four years is to:

Work together to shape our environment, drive our economy and support our communities.

The Council has 7 values that describe how we work to achieve our vision: Our employees have developed these values to represent how services are delivered and the standard for how we interact and communicate to ensure that the needs of our customers are met. Our values are:

Working together: Working as a team to serve our residents.

Accountability: Taking ownership of the service that we deliver.

Respect: We value and listen to each other.

Fairness: Offering equal opportunities for all.

Being Responsive: We have a 'can do' attitude and respond to the needs of others quickly, positively and appropriately. Innovative:

Innovation: Looking for new solutions.

Excellence: Delivering our services to the highest possible standards. These values are embedded into everything we do.

The Council has responsibility for providing a wide range of statutory and discretionary services for its residents, businesses, visitors, and partners, either delivered directly or through external contractors or partners.

The Council procures goods, services and works in accordance with the Procurement Act 2023 and the Council's Contract Procedure Rules, as well as other associated procurement regulations and guidance where applicable. The Council seeks to deliver public value through procurement while ensuring that ethical, social and environmental considerations are appropriately embedded throughout the procurement lifecycle.

The Council will meet the following standards and also expects those with whom it does business, to meet these standards:

- 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 the services delivered
- To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously
- To take appropriate steps with relevant partner agencies to address actual instances of slavery and human trafficking

3.0 Policies and internal practices

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are key in meeting the requirements of the Modern Slavery Act.

3.1 Council Plan 2024-2028

The Council Plan is a key document that describes the Council's priorities, resources and how progress is monitored. The Plan also shows how the Council will work more closely with its

partners: police, parish councils, the voluntary sector, and the health services to ensure it maximises its resources to provide better joined-up services.

Within the Plan, one of the key aims under the Support our Community priority is to; '*Support the most vulnerable people in our communities*'.

For more information about the Council Plan 2024-2028 go to:

<https://www.southderbyshire.gov.uk/about-us/the-council-plan-2024-2028>

3.2 Safeguarding

The Council accepts its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults at risk. The Council has a Safeguarding Policy and provides training and information on its requirements to employees and Elected Members. The Council will also ensure that any volunteers, commissioned or contracted services are also aware of the Safeguarding Policy and their responsibilities within it. The Council also works within multi-agency partnerships to protect and safeguard people.

3.3 Employment Policies and Practices

The Council is committed to advancing equality, diversity and inclusion; eradicating unfair treatment and promoting good relations across and between all our communities.

The Council has employment policies and procedures that minimise the risk of any form of modern slavery existing within the organisation. These include disciplinary, grievance, harassment, Employee Code of Conduct, Whistleblowing procedures, as well as other policies that support fair treatment of employees including attendance management, performance capability, and recruitment, and selection.

Management guidance training and toolkits are also provided to ensure that policies are applied consistently and fairly.

3.4 Recruitment

The Council's recruitment and selection processes are transparent and reviewed regularly. They include robust procedures for screening new employees to ensure they can confirm their identities, work history, qualifications, and they are paid only into an appropriate, personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are required to supply evidence of their eligibility to live and work in the UK. References are also requested. Where the duties of the post require regular and unsupervised access to children or vulnerable adults a check is completed using the Disclosure and Barring Service, either at a standard or enhanced level. A new employee cannot commence their duties with the Council until all these checks have been completed.

3.5 Agency Workers

Where temporary labour is required, the Council typically accesses agency workers through framework providers or neutral vendor arrangements that have been procured in accordance with public procurement requirements. These arrangements incorporate appropriate checks and assurance mechanisms designed to promote compliance with employment legislation, ethical working practices and responsible labour sourcing. The Council seeks to work only with reputable

providers that share its commitment to fair treatment of workers and the prevention of modern slavery and labour exploitation.

3.6 Pay

The Council uses a job evaluation scheme, facilitated by an independent partner, to ensure that employees are paid fairly and equitably.

The Council employs people under different national terms and conditions of service dependent on their occupations. These national conditions of service provide consistency across employment groups in terms of pay, allowances and other employment conditions, as well as determining annual pay awards.

3.7 Employee Code of Conduct

The Code of Conduct makes clear the actions and behaviours expected of employees when representing the Council. The Council requires the highest professional standards of employee conduct and ethical behaviour and breaches are formally investigated. The Code also applies to contractors, agency staff, volunteers and those on student / work experience placements working on behalf of the Council.

3.8 Whistleblowing Procedure

The Council enables its employees, customers, and other business partners to report any concerns related to the direct activities or the supply chains of the Council. This Procedure provides a confidential and robust framework for employees and members of the public to raise any concerns and for them to be formally investigated where appropriate.

3.9 Procurement Contractors and Service Providers

The Council is committed to ensuring that its contractors adhere to the highest standards of ethics. The Council expects its providers and suppliers to have safeguarding policies, procedures, and training in place. As part of its procurement activity, the Council requires suppliers to confirm compliance with relevant legislation, including the Modern Slavery Act 2015. Where proportionate to the nature, value and risk of the procurement, suppliers may also be required to provide evidence of policies, procedures, training, supply chain controls and other measures implemented to identify and prevent modern slavery and human trafficking.

3.10 Receiving intelligence and initiating partner response

The Communities Team has the responsibility for managing incoming intelligence of suspected modern slavery cases relating to victims and offenders. The Communities Team will work with partners in the Derby and Derbyshire Modern Slavery Partnership (DDMSP) to investigate potential cases, pursue offenders and support victims, sharing intelligence where appropriate. The Communities Team will also take a lead role in raising awareness of modern slavery with South Derbyshire residents.

4.0 Working with Suppliers and Due Diligence

The nature of global supply chains for goods and services is increasingly complex. Modern Slavery can be found anywhere in the chain, but it tends to be much worse the further down the value chain, where there is little visibility and where the poorest and most vulnerable work.

Human rights due diligence is also a key concept in the United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs specify that due diligence processes should “include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed”.

South Derbyshire District Council spends in excess of £20 million each year on supplies and services from other organisations to help us to deliver our Council Plan and the services for our communities. Examples of things the council buys include waste collection services, energy, vehicles, building works, specialist consultancy support, tools and equipment and IT software.

During 2024-25, the Council brought its procurement function back in-house, strengthening commercial capability, enhancing oversight of procurement activity and supporting improved contract and supplier management across the organisation. This approach enables closer collaboration with service areas and stakeholders, ensuring procurement plays an active role in delivering the Council's priorities and objectives.

The Council's Procurement Strategy 2025-2028 sets out an ambitious vision for procurement as a strategic enabler of positive outcomes for the district. The strategy promotes the delivery of social value, environmental sustainability, responsible stewardship of public funds, support for local businesses and the voluntary and community sector, and the embedding of ethical procurement principles throughout the procurement lifecycle.

Ethical procurement is a cornerstone of the Council's approach. The Council is committed to promoting fair working practices, respecting human rights and taking appropriate, proportionate steps to identify, assess and mitigate the risks of modern slavery and human trafficking within its operations and supply chains. Through effective procurement planning, market engagement, supplier selection and ongoing contract management, the Council seeks to work in partnership with organisations that demonstrate a commitment to responsible business conduct and shared ethical values.

As part of its procurement and contract management activities, the Council expects suppliers, contractors and service providers to operate in accordance with relevant legislation, recognised standards and good practice relating to employment, human rights and ethical business behaviour. This includes compliance with the Modern Slavery Act 2015 and the implementation of appropriate measures to prevent modern slavery and human trafficking within their own organisations and wider supply chains. The Council seeks to foster open and constructive relationships with suppliers, encouraging transparency, accountability and continuous improvement in ethical sourcing and labour practices.

Recognising that modern slavery risks can vary across sectors and supply chains, the Council adopts a proportionate and risk-based approach to due diligence and assurance activities. The Council will continue to develop its procurement practices, systems and staff awareness to strengthen its ability to identify potential risks, support responsible procurement and ensure that public expenditure delivers not only value for money, but also wider social, economic and ethical benefits for the communities it serves.

The Council also requires its contractors and sub-contractors engaged in activities with children and vulnerable adults to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council's Safeguarding Policy

The Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of modern slavery are referred to the Police and the Communities Team Manager within the Communities Team, who is the Council's direct link to Derbyshire Constabulary and the Serious and Organised Crime Boards.

The Council works to ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain occupations such as car washes, care work and large numbers of adults in multiple occupancy domestic properties.

Any investigation and/or victim support in relation to modern slavery is conducted through the Derby and Derbyshire Modern Slavery Partnerships Multi Agency Tactical Response Agreement

5.0 Partnership Working

Through its local statutory Community Safety Partnership, the Council links in with the Derby and Derbyshire Modern Slavery Partnership. Bringing together public, private, and voluntary organisations to disrupt perpetrators and support victims of human trafficking and modern slavery in Derby and Derbyshire and further afield. The Council will strive for a community wherein awareness of all forms of human trafficking and modern slavery is commonplace and that across all sectors people work collectively to eradicate its existence. The Council works in partnership with a wide range of agencies to prevent abuse and neglect, to detect and report occurrences and to support victims. The Council is part of the Derbyshire Districts Safeguarding Group which is a subgroup of both the Derbyshire Safeguarding Children and Adults' Boards.

In October 2019, The Derby and Derbyshire Modern Slavery Partnership developed an Information Sharing Agreement for Modern Slavery and Human Trafficking to assist the multi-agency response to Human Trafficking. South Derbyshire District Council are one of the Partners to this agreement. A Copy of this Information Sharing Agreement can be found on the Councils Intranet site.

The Council has a duty to be part of the multi-agency response to the investigations into modern slavery and trafficking by providing assistance to victims (including facilitating and resourcing a place of safety) when they are taken to such a place during these investigations

6.0 Training and Awareness

The Council has a robust induction process and a mandatory training programme that all employees must complete, including separate courses on Safeguarding Awareness and Equality, Diversity and Inclusion. This enables employees, particularly in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

Derbyshire County Council provide Classroom and E-learning training on Modern Slavery which is accessible to all South Derbyshire District Council employees. Details of how to book onto classroom courses or to access the E-learning are available at

<https://derbyshire.learningpool.com/login/index.php>. All Members of the Council Safeguarding Group and appropriate front-line officers will be encouraged to attend this training.

The Council Modern Slavery Referral Procedure document is accessible to all staff via the Councils Intranet: This document will help staff understand:

- What modern slavery is
- The different types and what the signs of modern slavery are
- What can be done to flag potential concerns
- How to refer and support potential victims
- Who to speak to for support and guidance
- The National Referral Model and the Duty to Notify

Information on Modern Slavery and how to report concerns is also available to the public via the Council's Website: <https://www.southderbyshire.gov.uk/our-services/crime-and-community-safety/safeguarding>

The Council recognises that employees are required to complete training on modern slavery. This has a focus on customer-facing roles and consideration then given to prioritising staff responsible for supply chain management, and those who have a direct influence on the employment of staff or contractors and for procuring goods and services.

7.0 Equality, Diversity and Inclusion

The Council annually publishes its Corporate Equality, Diversity and Inclusion Report which demonstrates how it has played its part in helping to make society fairer by tackling discrimination and providing equality for all. This is supplemented by the annual Corporate Equality, Diversity and Inclusion Action Plan, which sets down priority projects for the coming year.

As a major employer and provider of services, the Council is committed to advancing equality of opportunity and providing fair access and treatment in employment and when delivering services as well as protecting and supporting the most vulnerable in the community. Equality and Safeguarding are embedded into everyday business. The Council requires all Elected Members, employees, partners, and contractors to treat everyone with dignity and respect and provide the best possible standards of service to all our customers.

To re-enforce this commitment, all employees and Elected Members receive training in equality, diversity and inclusion, as well as safeguarding. An internal group, which includes Elected Members and representatives from across all relevant service areas, monitor, promote and keep under review progress on the Equality, Diversity and Inclusion Action Plan and any emerging patterns/trends.

8.0 Review and Approval

The original Statement has been approved by the Council's Finance and Management Committee. The Statement will be reviewed annually:

- The Communities Team Manager within the Council, in conjunction with Human Resources, Procurement Lead, and Legal Services, monitors and updates the Statement in line with national guidelines and corporate priorities.
- Refreshed versions of the Council's Modern Slavery Statement are approved by the Leadership Team unless there are significant changes made within the statement.
- Ensuring that this Statement and resulting actions are embedded within the Council's Safeguarding Policies and Procedures and Strategic Plans.

As with all safeguarding concerns, all staff and Elected Members are required to log and share any cause for concerns in order that they can be investigated, and action taken as required. This can be done via the Council's Safeguarding Intranet hub:

[https://southderbyshiregovuk.sharepoint.com/sites/Connect_Hub/SitePages/Safeguarding_Hub/Safeguarding-Cause-for-Concern-Form-\(CFCF\).aspx](https://southderbyshiregovuk.sharepoint.com/sites/Connect_Hub/SitePages/Safeguarding_Hub/Safeguarding-Cause-for-Concern-Form-(CFCF).aspx)