



## **Modern Slavery Act 2015 - Transparency Statement**

**Updated 29 January 2026**

St Albans City and District Council wants to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we are undertaking to combat modern slavery in our organisation and supply chain.

### **Our policies on slavery and human trafficking**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

### **Due diligence processes for slavery and human trafficking**

We understand that the following areas give rise to the highest modern slavery risks:

1. Procurement supply chains.
2. Temporary workers - workers outsourced from an agency or hired based on high demand in periods of the year, for example, at Christmas, are at a higher risk of exploitation.

St Albans City and District Council's procurement processes:

- Encourage fair pay and working conditions in our supply chain;
- Ensure that there is no slavery or human trafficking in our own business, nor that of our supply chains.

Modern slavery includes:

- Forced labour, where victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence.
- Debt bondage, where victims are forced to work to pay off debts that realistically they never will be able to.
- Sexual exploitation, where victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced often under the threat of force, or another penalty.

- Criminal exploitation, where often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.
- Domestic servitude, where victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

### **St Albans City and District Council**

St Albans City and District Council expects our contractors, suppliers, partners and staff, to be aware of, and comply with the requirements of the Act.

The Council procures goods and services from various suppliers, and this is governed by our procurement strategy.

#### **The Council's procurement team:**

- Reviews the content of this Modern Slavery Act 2015 Transparency Statement each year and publishes it on the procurement pages of the Council's website.
- Manages risks associated with potential modern slavery as they relate to procurement, through our risk register.
- Ensures that all major tender processes require bidders to provide confirmation that they are compliant with the Act.
- Ensures that, before being added to the finance system, all new suppliers provide confirmation of compliance with the Act.
- Makes training and information available to staff, to inform and remind them of their responsibilities under the Act related to procurement and publicises the availability of this training to staff.

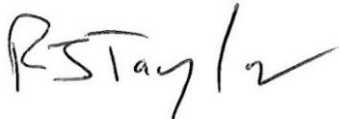
#### **Further steps**

This year we will continue to review our Procurement Procedures to identify and mitigate risk. We will put in place robust systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

This statement has been approved by the Council's Senior Leadership Team. It will be reviewed and updated annually by the Strategic Director for Business and Corporate Support as lead officer for Procurement.

Robin Taylor, Strategic Director for Business and Corporate Support



6 January 2026

## **Associated matters**

### **Safeguarding**

(This content is reviewed annually by the Chief Executive who leads the Strategy, Policy and Transformation Directorate in which this service sits)

The Council is part of the St Albans District Community Safety Partnership. The partners work together on safety and safeguarding related matters. This includes a collaborative approach to tackling the issue of modern slavery. More about what modern slavery includes can be found at:

<https://www.gov.uk/government/collections/modern-slavery>.

The lead for Safeguarding at the Council is the Principal Emergency Planning and Community Safety Officer.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the Council's responsibility as an employer, it acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015. The Council also notes its responsibility under the National Referral Mechanism as a 'First Responder'. The Council has a programme of mandatory training that all employees must complete. It enables officers in community-facing roles to identify and know how to report suspected incidents of abuse and neglect, including modern slavery and trafficking.

Training on safeguarding matters is available to councillors.

### **Recruitment and staffing**

(This content is reviewed annually by the Council's Strategic Director for Business and Corporate Support)

The Council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they 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.

The Council uses only reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

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 has paid the Living Wage or more to its employees since April 2015.

The Council's 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.

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

### **Councillors**

(This content is reviewed annually by the Council's Monitoring Officer)

The Council expects all Councillors to demonstrate the highest standards of conduct and behaviour. All Councillors are required to abide by a formal Code of Conduct. Complaints that Councillors have breached the Member Code of Conduct are considered by the Monitoring Officer. The ethical framework within the Council's Constitution sets out further details.

The Council requires all Councillors to record and declare personal and pecuniary interests.

### **Hertfordshire Modern Slavery Partnership**

Information about the [Hertfordshire Modern Slavery Partnership](#) can be found at the link provided.

Last reviewed: 29 January 2026