

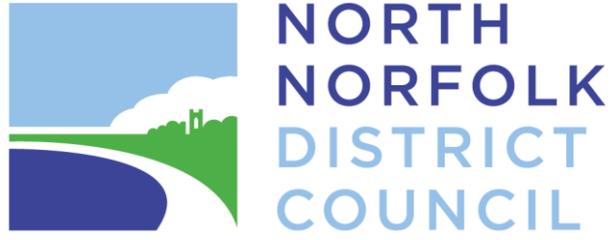
# North Norfolk District Council Modern Slavery & Human Trafficking Statement

26 February 2026

VERSION NUMBER	DATE
1.0	26/02/2026



**NORTH  
NORFOLK  
DISTRICT  
COUNCIL**



## Modern Slavery & Human Trafficking Statement

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## Foreword

As a Local Authority, we are committed to safeguarding vulnerable individuals and upholding human rights across our community. Modern slavery — including human trafficking, forced labour, domestic servitude, and criminal exploitation — is a serious crime and a grave violation of fundamental rights. We fully support the objectives of the Modern Slavery Act 2015 and are committed to playing our part in its prevention.

We recognise that risks of modern slavery can arise within public sector supply chains, commissioned services, and frontline delivery. Through our safeguarding responsibilities and procurement processes, we work to identify, assess, and mitigate these risks while promoting transparency and accountability.

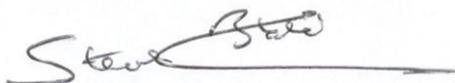
During this reporting period, we have continued to strengthen:

- Due diligence within commissioning and procurement
- Staff training and awareness, particularly for safeguarding and frontline teams
- Partnership working with law enforcement and safeguarding partners
- Clear reporting pathways for concerns relating to exploitation

Tackling modern slavery requires strong local leadership and effective multi-agency collaboration. We remain committed to continuous improvement in our approach and to ensuring that our policies, procedures, and partnerships reflect both our statutory duties and our moral responsibility to protect those at risk.

This statement has been reviewed and approved by senior leadership and demonstrates our ongoing commitment to preventing modern slavery in all its forms.

Signed

A handwritten signature in black ink, appearing to read 'Steve Blatch', with a long horizontal line extending to the right.

Name: Steve Blatch

Officer Role: Chief Executive

North Norfolk District Council

Cllr Name: Cllr Tim Adams

Member Role: Leader of the Council

North Norfolk District Council

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## Executive Summary

North Norfolk District Council is committed to preventing and addressing modern slavery and human trafficking in all its activities and supply chains. Modern slavery is a serious crime and violation of fundamental human rights. It can take the form of forced labour, bonded labour, human trafficking, domestic servitude, exploitation of children, or other forms of exploitation.

This statement sets out the steps the Council has taken, and will continue to take, to identify and mitigate the risk of modern slavery and human trafficking in its operations and in its supply chain, consistent with the requirements of the Modern Slavery Act 2015 and the statutory guidance.

Further information regarding modern slavery is published on the Government’s website.

[Access modern slavery details at www.gov.uk](http://www.gov.uk)

## Policy Statement

### ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAINS

North Norfolk District Council is a local authority providing a range of statutory and discretionary services for residents, businesses and visitors across the North Norfolk district. These services include housing, waste collection, planning and development control, environmental health, leisure and recreation, and community safety.

In delivering its services the Council engages directly, and via contracts, with third-party suppliers, contractors and service providers. The Council procures a wide variety of goods and services including (but not limited to) construction works, building maintenance, cleaning and facilities management, grounds maintenance, catering, supplies of goods, IT equipment and professional services.

Some of these supply chains involve goods and services sourced from national and international supply chains, and thus the Council recognises there is a risk, albeit limited, of modern slavery or human trafficking being present within them.

### RISK ASSESSMENT AND KEY RISK AREAS

The Council has assessed that, given the nature of its core functions, the risk of modern slavery occurring directly within the Council's own workforce is relatively low. Nevertheless, the risk is not zero, and vigilance is required. Moreover, higher risk is identified in those supply chains where:

- labour-intensive activities are outsourced (for example cleaning, grounds maintenance, building works)
- services involve vulnerable or migrant workers
- goods originate from countries or sectors with higher incidences of forced labour or human trafficking
- third-party contractors engage multiple tiers of sub-contracting without sufficient visibility or oversight

The Council has identified that the following areas should be subject to particular scrutiny:

- Facilities management and maintenance services (contracted cleaning, security, waste processing)
- Construction and refurbishment contracts
- Grounds maintenance and external landscaping services
- Supply of goods (for example textiles, uniforms, certain imported consumables)
- Catering and hospitality services

## **POLICIES IN PLACE**

To mitigate the risks identified, NNDC has put in place, or will ensure the following policies and procedures are embedded:

- A zero-tolerance policy on modern slavery and human trafficking in any part of the Council's business or supply chain.
- Procurement and contract management policies that require bidders and contractors to demonstrate adherence to labour standards, human rights and ethical supply chain practices.
- Safeguarding policies (children, adults, vulnerable people) that include the risk of exploitation and trafficking.
- Whistle-blowing and grievance procedures enabling staff and contractors to raise concerns confidentially and without fear of detriment.
- Recruitment and employment policies that ensure transparency, legal working status, appropriate pay, working hours and conditions for any workers engaged directly by the Council or via agency arrangements.
- Contract clauses that require suppliers and sub-contractors to comply with the Council's anti-slavery expectations, to warrant that slavery and trafficking is not taking place in their business or supply chains, and to permit audit or inspection where required.

## **DUE DILIGENCE AND MONITORING**

The Council applies due diligence processes during procurement and contracting, including:

- Pre-qualification evaluation of potential suppliers' policies, practices and track records in relation to labour standards and supply chain transparency.
- Including modern slavery and human trafficking risk as part of supplier/contractor risk assessment.
- Contract management reviews and site visits (where applicable) particularly for higher-risk contracts (for example outsourced cleaning or maintenance).
- Requiring supply chain transparency from key contractors (for example requiring them to identify any further subcontractors, and to confirm appropriate checks are in place).
- Periodic review of supplier performance, audit findings, and any incidents or emerging risk.
- Where a risk or actual instance of modern slavery is identified, the Council will require corrective action and may terminate contracts or remove suppliers who do not remediate expediently.

## **TRAINING AND AWARENESS**

NNDC recognises that awareness and understanding of modern slavery is critical for its workforce, contractors and partners. The Council has taken or will take the following measures:

- Provide training and awareness-raising for staff in procurement, contract management, and service delivery roles, to help them identify signs of modern slavery, know how to escalate concerns and understand their role in mitigating risk.
- Include modern slavery awareness in induction training for new staff and as part of ongoing refresher training.
- Encourage contractors and suppliers to ensure that their own workers are aware of modern slavery indicators and have access to mechanisms to report concerns.
- Communicate internally and externally the Council's zero-tolerance approach and expectations of suppliers in respect of modern slavery and human trafficking.

## **GOVERNANCE AND APPROVAL**

This statement has been approved by the Leader of the Council and the Senior Leadership Team of North Norfolk District Council. The Council will review this statement annually and publish it on its website, making it available to the public and supply chain partners.

## **FUTURE PRIORITIES**

For the next 12-24 months the Council will focus on:

- Enhancing supplier engagement: working proactively with key contractors to raise awareness of modern slavery risks in their supply chains and encouraging them to publish their own anti-slavery statements or disclosures.
- Embedding modern slavery risk into all relevant contract management and procurement processes, particularly for those high-risk categories identified above.
- Extending training and awareness-raising across the wider Council workforce, including operational staff who may encounter indicators of exploitation (for example environmental health, community safety, leisure staff).
- Strengthening the monitoring framework: identifying where audit or third-party assessment of supply chains may be appropriate and building internal capacity for reviewing modern slavery risk.
- Engaging with partner agencies, including the multi-agency safeguarding partnerships and national support networks, to ensure that victims of exploitation can be identified and supported, and that the Council plays its role in the wider community response to modern slavery.

## Document Information & Version Control

<b>Document Name</b>	Modern Slavery & Human Trafficking Statement
<b>Document Description</b>	Statement of commitment to the prevention and reporting of Modern Slavery and Human Trafficking within the Local Authority remit of First Responder
<b>Document Status</b>	Current
<b>Lead Officer</b>	Lucy Cubitt
<b>Sponsor</b>	Trudi Grant (Assistant Director - People Services)
<b>Produced by (service name)</b>	Corporate Services
<b>Relevant to the services listed or all NNDC</b>	All NNDC
<b>Approved by</b>	Corporate Leadership Team
<b>Approval date</b>	17/02/2026
<b>Type of document</b>	Policy
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<b>Review Interval</b>	Annual

<b>Next Review Date</b>	17/02/2027
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<b>Version</b>	<b>Originator</b>	<b>Description including reason for changes</b>	<b>Date</b>
0.01			