

---

# Modern slavery, human trafficking and safeguarding statement 2026/27

---



This document is produced by the Policy and Performance Team.

## Revisions

Date of review/revision	Reason	Author
22.12.2020	Annual refresher	Organisational development
3.2.2022	Annual refresher	Policy and Performance
2.1.2023	Annual refresher	Policy and Performance
2.3.2026	Annual refresher	Policy and Performance



**Elmbridge**  
Borough Council

## Contents

Modern slavery, human trafficking and safeguarding statement 2026/27 .....	1
Introduction .....	3
The Modern Slavery Act 2015.....	3
Organisational structure and supply chains .....	3
Countries of operation and supply.....	4
High risk activities .....	4
Responsibility .....	4
Relevant policies.....	5
Due diligence .....	6
KPIs .....	7
Training.....	7
Partnership working .....	8
Standards .....	9
Board approval .....	10
Appendix A Practical Guidance .....	11
What should I do if I suspect someone is being trafficked or the victim of slavery?.....	12

## Introduction

---

Elmbridge Borough Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

This statement sets out Elmbridge Borough Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2026 to 31 March 2027

As part of the Public Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **The Modern Slavery Act 2015**

Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:

- Sexual exploitation: This includes sexual abuse, forced prostitution and the abuse of children to produce child abuse images/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).
- Criminal exploitation: This can be understood as the exploitation of a person to commit a crime, such as pickpocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- Other forms of exploitation include organ removal, forced begging fraud, marriage and illegal adoption.

### **Organisation structure and supply chains**

The statement covers direct employees of Elmbridge Borough Council, agency workers; suppliers of goods, delivery of works and the services delivered on behalf of

---

## Modern slavery, human tracking and safeguarding statement 2026/27

---

the Council by third party organisations, and their supply chains. This statement also covers the Council's supply chain from end to end.

The Council engages in commercial activities by providing goods, work and services, statutory and discretionary, delivered directly by the Council and through external contractors; and its annual turnover is greater than £36 million.

The Council's Structure and Services is updated on the Council's website and can be found [here](#)

The Council's constitution can be found [here](#)

### Countries of operation and supply

Elmbridge Borough Council is a local authority based in Esher in the county of Surrey, United Kingdom:

- Elmbridge Borough Council is an organisation of 400 staff, 48 Councillors and hundreds of volunteers. With a gross annual expenditure of £100M we try to deliver quality public services, cost effectively, for all the residents of Elmbridge.
- As a Borough Council, Elmbridge is responsible for services such as waste and recycling, housing, planning, community support services, parks, community safety, playgrounds and green spaces. Underpinning all that we do in Elmbridge is the 'Council Plan' - our strategic planning document.

The Council remains vigilant and will take all steps available to manage the risks presented by modern slavery and human trafficking.

### High risk activities

The Council will conduct dynamic risk assessments of their activities in assessing whether particular activities are high risk in relation to slavery or human trafficking. Any concerns should be raised initially with the officer responsible for Safeguarding.

There have been no reported or identified high risk activities at the present time.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Council Management Board is responsible for reviewing this policy and the Head of Legal and Governance is responsible for keeping under review contract procedures when risks are identified in the supply chain. This policy will be reviewed on an annual basis or when legislation changes.

## Modern slavery, human tracking and safeguarding statement 2026/27

---

- **Risk assessments/investigations/due diligence:** It is the responsibility of the Head of Legal and Governance to ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking and explain their specific role.
- **Responsibility:** It is the responsibility of the Strategic Director – Place and Community to ensure any risks or issues identified outside of the supply chain are dealt with appropriately and in a timely fashion and in accordance with safeguarding procedures.
- **Learning and development:** Elmbridge Borough Council Policy and Performance team has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, including modern slavery and human trafficking

---

## Relevant policies

---

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Confidential reporting:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who may have concerns can raise the concerns through the mechanisms outlined in the [Confidential Reporting Policy](#) available on the Council's website
- **Employee code of conduct (2025):** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain
- **Legal Declaration:** The council's procurement legal declaration states that suppliers must comply with the Modern Slavery Act 2015. The organisation is committed to ensuring that its contractors adhere to the highest standards of ethics. Contractors are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with contractors to ensure that they and their supply chain adhere to the requirements of The Procurement Public Contracts directives, regulations,

## Modern slavery, human tracking and safeguarding statement 2026/27

---

policies and guidance. Violations will lead to the termination of the business relationship.

- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency
- **Safeguarding:** sets out how the Council will safeguard and promote the welfare of children, young persons and adults at risk who come into contact with its services and activities. The policy covers how the Council should comply with the duty to notify the Secretary of State of suspected victims of slavery and human trafficking
- **Elmbridge Community and Safety Partnership Plan 2026/27:** Contains a theme to protect vulnerable people from harm, including those who are affected by slavery and human trafficking. This includes a commitment to establish the nature and extent of slavery and human trafficking within the borough, and to work with emergency planning teams to make sure that support will be available for victims who may be rescued at short notice
- **Equality, Diversity and Inclusion Strategy:** sets out the Council's legal obligations under the Equality Act 2010 and the various ways the Council meets its duties.

---

## Due diligence

---

The organisation undertakes due diligence when entering contracts with suppliers where relevant, and contract managers will ensure adherence to the Key Performance Indicators contained in those contracts.

The organisation's due diligence and reviews may include some or all of the following:

- Mapping the supply chain broadly to assess products or geographical risks of modern slavery and human trafficking.
- Ensure contractors confirm their adherence to Modern Day Slavery Act 2015 and human trafficking risks by reviewing, on an ad hoc basis, aspects of the supply chain based on the supply chain mapping.
- Conducting risk-based audits through the Council's Internal Audit team and in accordance with risks that may be identified.
- Providing advice to contractors by hosting Supplier Events, providing procurement email address, telephone support and via the EBC external website
- Contractors are obliged to meet all Service Level Agreements (SLA). To confirm the SLA has been achieved a Key Performance Indicator (KPI) is *allocated to each SLA*. The KPI's are monitored as stated and where the KPI's fail to meet the minimum threshold staggered agreed actions are instigated.

## Modern slavery, human tracking and safeguarding statement 2026/27

---

- Procurement Legal Declaration puts the onus on contractors to inform the Council of any changes or breaches during the contract term.
- Contractors are required to sign Insurance Schedules confirming they hold the relevant insurance cover and will continue to for life of the contract.
- Where required the council requires contractors to complete self-declaration questionnaires (Part 1, 2 and 3)

The Council has standard questionnaires it publishes where appropriate, for example, Health and Safety & Equalities Qualification, Additional Selection Questions - General Data Protection Regulation and Financial Information Qualification (SF).

---

## Key Performance Indicators (KPIs)

---

Elmbridge Borough Council uses the following performance indicators in relevant contracts to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

1. All contractors considered for any opportunities confirming their adherence to Modern Day Slavery Act (2015)
2. Employees made aware of Modern-Day Slavery Act 2015 and training provided as identified
3. All employees completed mandatory Safeguarding Training
4. Number of cases reported on its confidential reporting system and resulting action.

---

## Training

---

Elmbridge Borough Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, including modern slavery and human trafficking.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages
-

## Modern slavery, human tracking and safeguarding statement 2026/27

---

below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.
- the organisation requires all staff within the organisation to complete training on modern slavery as a module within the organisation's wider Safeguarding human training programme.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to contractors and other business partners and contractors to implement anti-slavery policies;
- what steps the organisation should take if contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Induction briefings on equality and diversity and safeguarding respectively are provided to Members following local elections.

---

## Partnership working

---

Elmbridge Borough Council has a strong track record of working in partnership with other agencies to improve community safety. The Elmbridge Community and Safety Partnership (ECSP) is made up of statutory agencies brought together with a shared responsibility to tackle crime, disorder and anti-social behaviour. The Joint Action Group (JAG) and the Community Harm and Risk Management Meeting (CHARMM) are the operational arms of the ECSP that deals with short-term operational issues daily and also look strategically at medium and long-term projects connected with the priorities of the partnership

The ECSPs work is informed by information and intelligence from a variety of sources,

---

## Modern slavery, human tracking and safeguarding statement 2026/27

---

including Serious and Organised Crime Local Profiles produced by Surrey Police.

Elmbridge Borough Council works with a wide range of agencies to safeguard children, young people and adults at risk from abuse and neglect. This includes Surrey County Council and the Surrey Safeguarding Boards.

Where possible, Elmbridge will raise awareness of modern slavery and human trafficking to residents and businesses to encourage reporting.

---

## Standards

---

Elmbridge Borough Council will meet the following standards and expects those with whom it does business with, 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 to address actual instances of slavery and human trafficking.

## Board approval

---

This statement was approved by the Council's Chief Executive, and Leader of the Council who review and update it annually:

Adam Chalmers

Chief Executive, Elmbridge Borough Council

Councillor Mike Rollings

Leader of the Council

## Appendix A Practical Guidance

---

In the course of our employment with the Council, we may come across situations and people that cause us concern. This section seeks to give some practical guidance to assist with deciding if someone may have been trafficked or is the victim of modern slavery.

Victims are trafficked all over the world for little or no money – Including to and within the UK. They can be forced to work in the sex trade, domestic service, forced labour, criminal activity or have their organs removed to be sold. There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they cannot speak the language, have their travel and identity documents removed and are told that if they try to attempt an escape, they or their families will be harmed.

Key indicators of trafficking include:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

This list is not exhaustive. Remember, a person may display several of the trafficking indicators set out above, but they may not necessarily be a victim of trafficking. Often you will build up a picture of the person's circumstances which may indicate that

---

something is not quite right. **If you have a suspicion, report it.**

### **What should I do if I suspect someone is being trafficked or the victim of slavery?**

In the first instance the point of contact for all modern slavery crimes should be the local police force. If you have information about modern slavery crimes – those who are committing such crimes or where victims are at risk that requires an immediate response dial 999.

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline 08000 121 700.

For more information visit [www.unseenuk.org](http://www.unseenuk.org)

Alternatively, you can make calls anonymously to Crimestoppers on 0800 555 111

Stop the Traffik have a 24-hour hotline for victims to call or to report suspected trafficking. The number is 0800 783 2589.

The Multi-Agency Safeguarding Hub (MASH) responds to initial enquiries about children, young people and adults. **Monday to Friday from 9am to 5pm.**

If you have a concern about a child, young person or adult, please contact the Surrey MASH:

Phone: **0300 470 9100**

Email: [mash@surreycc.gov.uk](mailto:mash@surreycc.gov.uk)

[Learn more about the Surrey MASH](#)

**If you are concerned about the safety of a child, you can contact the Multi-Agency Safeguarding Hub on: 0300 470 9100 – Monday to Friday from 9am to 5pm.**

Outside of these hours, call on 01483 517898 to speak to the [emergency duty team](#). In an emergency where you are concerned for the child's immediate safety you should call [Surrey Police](#) on 999.

For wider concerns about adults please call The Salvation Army 24-hour confidential Referral Helpline on 0300 3038151 anytime of the day or night to refer a potential adult victim of trafficking or to receive advice.

For potential child victims of trafficking please call the MASH on 0300 500 8090 or the NSPCC Child Trafficking Advice Centre on 0808 800 5000.

---

**Modern slavery, human trafficking and safeguarding statement 2026/27**

---

Out of office hours, you can contact the Emergency Duty Team on 0300 456 4546  
Northern Ireland and Scotland:

Migrant Help - 07766 668781

Scotland: TARA - 0141 276 7724

Please be aware not all victims may want to be rescued and there may be instances where reporting a suspected trafficking case puts the potential victim at risk.