

STRONGER together



Lewes District Council



Working in partnership with Eastbourne Homes

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Modern Slavery Statement 2020-21

Introduction

This statement sets out Eastbourne Borough Council's and Lewes District Council's (referred to as the council from herein) stand on all potential modern slavery risks related to its business and to put in place steps aimed at ensuring 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 2020 to 31 March 2021.

As part of the public sector, the council recognises it has a responsibility to take a robust approach to slavery and human trafficking.

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

Our organisation

The council is a local authority providing a wide range of local government services including council tax, housing benefits, homelessness, planning applications, bins and recycling, parking permits and car parks and seafront services. These services are delivered both directly and through external contractors, with a large and diverse supply chain.

Our Policies

The council has a range of policies and processes which reflect the commitment to acting ethically and with integrity to prevent slavery and human trafficking in their operations.

The following policies and procedures are considered key to meeting the requirements of the Modern Slavery Act 2015.

- **Procurement Strategy**

The Procurement Strategy was developed with the key objectives of delivering economic, social and environmental benefits to the community through procurement. The strategy identifies the role played by procurement in minimising the risk of social exploitation within the supply chain by ensuring the councils' ethical standards are met. The councils' ethical procurement objectives are to ensure that people in the supply chain are treated with respect and have rights with regards to employment, including rights to freely choose employment, freedom of association and equal opportunities for all.

- **Due diligence of suppliers**

The council expects all suppliers of goods or services to have their own policy relating to working practices of modern slavery, or for evidence to be available to ensure their standards are in accordance with the council's expectations. We would request that our suppliers ensure the same of their own supply chains.

- **Employee Code of Conduct**

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.

- **Equality & Diversity Policy**

The council is committed to making equality and diversity an integral part of the business as usual. This includes a commitment to use our influence and purchasing power to help make equality a reality for all, and to take action to eradicate discrimination and inequality when delivering services, when empowering others to deliver services on our behalf and when providing funding to others to provide services.

- **Recruitment Policy**

The council directly recruits its employees and where agency workers are used, the council will verify the practices of the agency before accepting workers from that agency.

The council's recruitment processes are transparent and reviewed regularly. This includes robust procedures for the vetting of new employees and ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account.

- **Pay**

The council through its HR policies ensures that all employees are paid fairly and equitably.

- **Whistleblowing Policy**

The council encourage all its workers, volunteers and elected councillors 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 councils' whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear or retaliation. Anyone who has concerns can raise these via either their manager, director or other designated officers.

- **Safeguarding Policy**

The council actively works to ensure the safeguarding of all vulnerable people. As part of its safeguarding responsibility, the council regularly undertakes safeguarding training for colleagues across the authority, to help identify any signs of potential safeguarding incidents and the relevant referral pathways. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to the council's Nominated Senior Officer or Safeguarding Contacts or police and/or East Sussex Children's' and Adults' Services.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Eastbourne Borough Council and Lewes District Council's modern slavery and human trafficking statement for the financial year ending 31st March 2021.

Signed:



David Tutt, Leader of Eastbourne Borough Council

Signed:



James MacCleary, Leader of Lewes District Council

Signed:



Robert Cottrill, Chief Executive of Eastbourne Borough Council and Lewes District Council