



Lewes District Council



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Accountable (Operational Lead):	Josie Grayson Head of People First
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Approved by:	Robert Cottrill, Chief Executive Stephen Holt, Leader of Eastbourne Borough Council Zoe Nicholson, Leader of Lewes District Council
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Introduction

GOV.UK defines Modern slavery as the “recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the [Modern Slavery Act 2015](#) and includes holding a person in a position of

slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.”

This statement sets out Eastbourne Borough Council's and Lewes District Council's (referred to as the councils 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 2025 to 31 March 2026.

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

The councils are 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.

Organisational structure and supply chains

The councils are a local authority based in Lewes District and Eastbourne Borough 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.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies and Risk Assessments:** The responsibility for policies and risk assessments is held by council officers.
- **Investigations/due diligence:** The councils expect 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 councils' expectations. We would request that our suppliers ensure the same of their own supply chains.

Relevant policies

The councils have 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.

- **Whistleblowing policy**
The councils 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.

- **Employee Code of Conduct**

The councils' Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the councils. The councils strive to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.

- **Recruitment Policy**

The councils directly recruit its employees and where agency workers are used, the councils 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 councils, through its policies and job evaluation scheme ensures that all employees are paid fairly and equitably.

- **Equality, Diversity & Inclusion Policy**

The councils are committed to providing a service and culture where equality and fairness is integral to everything we do. We believe that people with different backgrounds, skills, attitudes and experiences bring fresh ideas and perceptions that enrich our local community. 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.

- **Agency Workers Guidance**

This guidance sets out the procedure the councils follow to engage agency workers ensuring compliance with regulations.

- **Safeguarding Policy**

The councils actively work to ensure the safeguarding of all vulnerable people. As part of its safeguarding responsibility, the councils regularly undertake 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 councils' Nominated Senior Officer or Safeguarding Contacts or police and/or East Sussex Children's' and Adults' Services.

- **Health and Safety**

The councils have various policies which aim to promote high standards and good practices in relation to health, safety, and welfare. These policies and guidance are important to tackling modern slavery as victims of forced labour and modern slavery may be at increased risk of work-related injuries due to inadequate protective equipment and health and safety measures, including appropriate training. The councils recognise that while exploitation may not be present in the workplace, individuals could be controlled and exploited outside the working environment. Consequently, identifying poor physical and mental health in the workplace linked to a worker's personal life may uncover potential modern slavery practices.

- **Grievance Procedure**

This policy sets out the procedure the councils follow to handle grievances. Grievance mechanisms are important to tackle modern slavery as it involves an additional route by which employees can raise complaints or concerns.

- **Dignity at Work**

The purpose of this policy is to provide a safe, healthy and harmonious working environment for all staff and to ensure that everybody is aware that bullying and harassment will not be tolerated by the councils. This policy covers bullying and harassment of and by managers, employees, contractors, agency staff and anyone else engaged to work at the councils, whether by direct contact with the organisation or otherwise.

- **Due diligence of suppliers**

The councils expect 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 councils' expectations. We would request that our suppliers ensure the same of their own supply chains.

As part of the Council's commitment to identify and mitigate risks of modern slavery, we will:

- Robustly undertake thorough recruitment and selection processes for all employees;
- Providing training for staff to develop understanding of modern slavery and human trafficking
- Maintain and raise awareness of the Council's whistle-blowing and Safeguarding policies;

Training

The councils Safeguarding Policies can be accessed via the intranet. All staff are required to complete mandatory online learning training during the first month of employment this includes safeguarding children and vulnerable adults. Staff and councillors also have access to a Modern Slavery and Human Trafficking course.

Our modern slavery training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- what external help is available, for example through the Modern Slavery Helpline and Human Trafficking Foundation

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Eastbourne Borough Council's and Lewes District Council's modern slavery and human trafficking statement for the financial year ending 31st March 2026.

Signed:



Cllr Zoe Nicholson

Leader Lewes District Council

Signed:



Stephen Holt

Leader, Eastbourne Borough Council

Signed:

A handwritten signature in black ink, appearing to read 'Robert Cottrill', written in a cursive style with a large loop at the end.

Robert Cottrill

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

Date: 1 October 2025