

# STRONGER together



Lewes District Council



Working in partnership with **Eastbourne Homes**

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<b>Responsible (Executive Lead):</b>	Becky Cooke Assistant Director for Human Resources and Transformation
<b>Accountable (Operational Lead):</b>	Helen Knight Head of Human Resources
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# Modern Slavery Statement 2024-25

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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 2024 to 31 March 2025.

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.

## Our organisation

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.

## Our 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.

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

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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 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.

- **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.

- **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.

- **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 councils' 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 HR policies and job evaluation scheme ensures that all employees are paid fairly and equitably.

- **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.

- **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.

- **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.

## **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 31<sup>st</sup> March 2025.

Signed:

Handwritten signature of Stephen Holt, consisting of a cursive name and the initials 'H.H.' to the right.

Stephen Holt, Leader of Eastbourne Borough Council

Signed:

Handwritten signature of Zoe Nicholson, a cursive name with a long horizontal stroke at the end.

Zoe Nicholson, Leader of Lewes District Council

Signed:

Handwritten signature of Robert Cottrill, a cursive name with a large loop at the end.

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

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