

EAST HAMPSHIRE DISTRICT COUNCIL
MODERN SLAVERY ACT 2015 SECTION 54 STATEMENT

Introduction

In compliance with Section 54 of the Modern Slavery Act 2015, East Hampshire District Council (EHDC) sets out in this statement its 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 within the organisation, our supply chains or in its linked business activities.

Organisational Structure

East Hampshire District Council is responsible for services such as bin collections, collecting council tax, housing, planning applications, environmental health and more. This statement covers direct employees, of which there are approximately 301.

Everything that the council believes, thinks and does is about improving people's lives by providing excellent public services that represent great value for money and meets the needs of customers –the businesses and communities within the District.

The Council is 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 Statement sets out practices already in place at the Council and actions moving forward.

Partnerships

The Council works in partnership with a wide number of agencies in order to combat modern slavery, including:

- East Hampshire Community Safety Partnership
- Hampshire Constabulary
- Hampshire and Isle of Wight Modern Slavery Partnership

Our Policies

EHDC reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered key to meeting the requirements of the Modern Slavery Act 2015.

- **Safeguarding** – The Council is committed to safeguarding the welfare of children and vulnerable adults. It has a comprehensive Safeguarding Children and Vulnerable Adults policy which all staff and councillors must adhere to. The Council carries out regular safeguarding training for all staff, has safeguarding leads and participates in multi-agency partnerships to protect and safeguard members of the public.
- **Recruitment** – East Hampshire District Council's Recruitment Procedures are designed to recruit staff in a fair and consistent way that supports equality of opportunity. Our recruitment processes are open and robust with procedures for confirming identity, eligibility to work in the UK as well as requesting and following up references.

- 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.
- **Pay** – The Council operates a job evaluation scheme to ensure all employees are paid fair and equitably, considering The Equality Act 2010. The Council’s pay policy is based on fairness, affordability, consistency, flexibility, market rates and to encourage and reward achievement.
- **Equality**- The Council is committed to equality of opportunity in our approach to service delivery, employment and community leadership. We are also committed to identifying, understanding and eliminating all barriers that prevent access to services, information and employment by people with one or more protected characteristic.
- **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 and that actions of Council Officers are totally open to public scrutiny. The Employee Code of Conduct promotes a high standard of conduct based around honesty, impartiality, fairness, accountability and respect to maintain public confidence in services provided, with any breaches thoroughly investigated
- **Whistleblowing** – The Whistleblowing Policy forms part of the Council’s corporate governance arrangements to ensure that employees are confident in the reporting and investigation of malpractice including fraud, corruption and unethical conduct.
- **Members’ Code of Conduct** – The Members’ Code of Conduct emphasises Members’ responsibilities regarding dealing with all members of the community in a fair manner, putting public interest first.

Our Supply Chain

In all our procurement activity, East Hampshire District Council aims to be consistent with the highest standards of integrity and ensure fairness in allocating contracts. Equality, social responsibility and safety are important criteria in the provision of goods and services procured.

Suppliers to East Hampshire District Council must abide by all employment legislation, regulation and codified guidance. Where there are questions over the conduct of a supplier then these shall be investigated, and the appropriate action taken.

Specifically, key contractors must have safeguarding policies, procedures and training in place.

Training

All Council staff who have contact with members of the public are required to complete classroom based Basic Safeguarding Awareness training which encompasses modern slavery. This is undertaken within 6 months of new employees starting and is refreshed every three years.

Councillors received the same training as part of their induction and are refreshed every three years thereafter.

Actions moving forward

- The Council’s requirements regarding compliance with the Modern Slavery Act 2015 will be communicated clearly to new suppliers before commencing any supply contracts. This will also be communicated to existing suppliers.

- As part of the tendering process, potential suppliers will need to complete a self-declaration questionnaire which seeks confirmation that they have not had an offence under section 2 or section 4 of the Modern Slavery Act 2015.
- Inclusion of standard and consistent wording relating to modern slavery and human trafficking in the terms and conditions of all Council contracts for new suppliers, or when existing contracts are up for renewal.
- Based on having accepted the Council's Terms and Conditions, suppliers of goods and services will be assumed to have their own policy relating to working practices or 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.
- Provide a guidance update for staff, so that any supplier engaged by the Council is contracted to do so in line with the Council's Modern Slavery, Safeguarding, Equality, Whistleblowing policies and its Member and Officer codes of conduct.
- Raise awareness of modern slavery and trafficking through internal communications and training – to both Officers and Members

Key Performance indicators (KPIs)

East Hampshire District Council will use the following performance indicators 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 new suppliers confirming their adherence to the Modern Slavery Act 2015
2. Employees made aware of Modern Slavery Act 2015 and updated training provided to 75% of workforce.
3. Completion of mandatory Safeguarding Training, by all employees within last 3 years.
4. Number of cases reported and resulting action

In the last year there have been no complaints/concerns raised in relation to slavery or human trafficking in our supply chains. EHDC is committed to evolving its future training, subject to ongoing monitoring and requirements.

Review

We will continue to monitor and audit our policies and procedures to make amendments and update staff where necessary but, in any event, reviews will take place annually.

Approval for this statement

This statement is made under Section 54 (1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2022.

This statement was approved by:



Date: 23rd November 2022

Cllr Julie Butler, Deputy Leader of the Council, Portfolio Holder for Community Engagement