

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

EHDC 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 276.

Everything that EHDC 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.

EHDC 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 EHDC and actions moving forward.

Partnerships

EHDC 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
- Hampshire Safeguarding Adult's Board

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 – EHDC is committed to safeguarding the welfare of children and adults at risk of harm. It has a comprehensive Safeguarding Children and Adults at risk policy, which all staff and councillors must adhere to. EHDC 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 – EHDC'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 – EHDC operates a job evaluation scheme to ensure all employees are paid fair and equitably, considering The Equality Act 2010. EHDC’s pay policy is based on fairness, affordability, consistency, flexibility, market rates and to encourage and reward achievement.

Equality- EHDC 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 – EHDC’s Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing EHDC and that actions of employees 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, EHDC 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 EHDC 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 EHDC staff who have contact with members of the public are required to complete virtual 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 receive the same training as part of their induction and this training is also refreshed every three years thereafter.

Actions moving forward

- EHDC'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 EHDC contracts for new suppliers, or when existing contracts are up for renewal.
- Based on having accepted the EHDC'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 EHDC'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 EHDC's Modern Slavery statement, the Safeguarding Policy, Equality, Diversity and Inclusion policy, the Whistleblowing Policy 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)

EHDC 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:

- All new suppliers confirming their adherence to the Modern Slavery Act 2015.
- Employees made aware of the Modern Slavery Act 2015 and updated Safeguarding Training to include reference to this and to this statement.
- Completion of mandatory Safeguarding Training, by all employees within last 3 years.

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 2025.

This statement was approved by:

Signatory, 

Date: 31/03/2025

Cllr Adeel Shah

Portfolio Holder for Community Development and Engagement