

## **Appendix 1**

Updates shown in Italics

### **Eastleigh Borough Council Modern Slavery Act 2015 Statement**

Eastleigh Borough Council is committed to reducing modern slavery and aims to reduce the impact on people in the borough.

Eastleigh Borough Council's Corporate Plan gives a commitment to lead and support the Borough and its communities: developing a strong and sustainable economy that supports improved standards of living for residents; promoting thriving and healthy communities; and maintaining an attractive and sustainable environment that residents value.

Pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 Eastleigh Borough Council will produce a slavery and human trafficking statement each financial year.

Our statement for 2019/2020 sets out what steps the Council has taken, and will be taking, to ensure that modern slavery is not occurring within the Council and inside our supply chains. It also addresses the partnership role that the Council has within the Borough.

#### **Within Eastleigh Borough Council**

Eastleigh Borough Council has a range of policies and processes which help to ensure that we are acting ethically and with integrity to prevent slavery and human trafficking.

#### **Recruitment and selection**

Eastleigh Borough Council's Recruitment and Selection policy and 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 checking that interview attendees are eligible to work in the UK and for requesting and following up applicant 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.

#### **Job Evaluation**

The Council is committed to ensuring that its pay strategy is (fair and) equitable, legally compliant, affordable, transparent and easily understood, committing to the Real Living Wage, enabling the organisation to attract, retain and develop a skilled and flexible workforce.

*The Council has a formal job evaluation framework which is based on the principles of joint ownership, openness and transparency, and equality.*

## **Whistleblowing**

The Council encourages staff, contractors and elected Members who have serious concerns about any aspect of the Council's activities, to come forward and voice those concerns.

Our 2019 Whistleblowing Policy has been prepared in consultation with staff and with the help of the independent charity, Public Concern at Work. It commits the Council to ensuring that whistle blowers will suffer no recrimination or victimisation as a result of raising a concern about malpractice.

## **Safeguarding**

Through our Safeguarding Policy, Eastleigh Borough Council is committed to safeguarding and promoting the welfare of children and adults at risk of harm and their families. We take our responsibilities seriously and expect all staff, partners and contractors to share this commitment. We ensure our procurement, Houses of Multiple Occupation (HMO) *licencing and inspections* and contracting policies and procedures adequately reflect our safeguarding responsibilities and that all incidents of poor practice, allegations and suspicions are reported, taken seriously and responded to swiftly and appropriately by the appropriate agency.

## **Equality and diversity**

Eastleigh Borough 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.

## **Policy Framework**

We will ensure, as part of their ongoing review, that key policies reference and address modern slavery issues where appropriate.

## **As a landlord**

All contracts for properties let by the Council include a clause that they can only be used as part of legal activities. The Council has in the past cancelled leases based on this cause and would consider doing so if there was a breach of the Modern Slavery Act.

## **Eastleigh Borough Council supply chains**

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

Suppliers to Eastleigh Borough 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.

## **Actions going forward for 2020/2021**

- Consideration of the inclusion of standard modern slavery and human trafficking terms and conditions into the Council's contracts. *New Standard Terms and Conditions have been drafted which include Modern Slavery and Human Trafficking Clauses.*
- As part of the revised terms and conditions the Council will require its larger contractors to undertake regular audits of their safeguarding policies, procedures and training, reporting the outcome to the Council.
- OJEU tender processes will be updated to require potential suppliers to confirm that they are meeting the requirements under the Modern Slavery Act 2015. *New Selection Questionnaire will be introduced for use in procurements above OJEU thresholds. This will use a Standard Selection Questionnaire template provided by Crown Commercial Service.*
- Guidance update for staff so that any supplier engaged by the Council is contracted to do so in line with the Authorities' Modern Slavery Statement and its, Safeguarding, Equality and Diversity, whistleblowing policies *A policy clause is being added to the new Standard Terms and Conditions – this will list policies that we expect any of our contractual partners to have.*
- Should the Council look to procure or import products or services from outside the UK which would pose an increased risk of slavery or human trafficking, we would give consideration of supply chains in order to account for potential risks. *Consideration will be given to asking providers to include a Risk Register as part of their submissions and give details of the wider supply chain*
- The Council may examine, as appropriate, suppliers' past records in respect of their treatment of staff and their conduct in relation to modern day slavery and human trafficking. *Within the Selection Questionnaire (SQ) that will be used for above OJEU tenders, there is a Grounds for Exclusion section where providers must self-declare whether they have any prior convictions of Modern Slavery or trafficking offences. The SQ cannot be amended so this must be deemed sufficient by the Crown Commercial Services For below OJEU thresholds we would need to consider how we could look at providers past records.*
- 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 for 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. *This will be covered within the Policy clause that is being added to the Standard T&C's.*
- Consider reviewing large long rolling contracts to determine whether any additional action is required.

*This Statement was approved by Eastleigh Borough Council on (Date).*

*Signed*

*Leader of the Council*

*Chief Executive*

*Dated*