

Eastleigh Borough Council Modern Slavery Act 2020/21 Statement

Eastleigh Borough Council is committed to eradicating modern slavery and aims to eliminate 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 2020/2021 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 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 Council 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 equitable, legally compliant, affordable, transparent and easily understood, committing to the Real Living Wage through recognised accreditation as a Living Wage Employer, 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, transparency and equality.

Training

Staff and Councillors are required to complete mandatory Modern Slavery training to raise awareness which covers a wide range of examples experience in today's society such as child trafficking, debt bondage, forced labour, sexual exploitation, domestic servitude and criminal exploitation. This training is pivotal in educating staff and assisting with the Council's mission to eradicate modern slavery. To ensure this momentum and awareness is maintained, staff are required to complete modern slavery refresher training every 2 years.

Whistleblowing

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

The 2019 Whistleblowing Policy has been prepared in consultation with staff and with the help of the independent charity, Protect. It commits the Council to ensuring that whistle blowers will suffer no recrimination or victimisation as a result of raising a concern about malpractice. The Policy is reviewed every two years and is therefore due to be reviewed during 2021.

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. The Council carries out regular safeguarding training for all staff, has designated safeguarding lead officers and participates in multi-agency partnerships to protect and safeguard members of the public.

We ensure our procurement, 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. We ensure our licensing and inspections procedures for Houses of Multiple Occupation (HMO) are robust and we continue to foster close lines of communication with partner agencies, undertaking joint working where appropriate in our response to suspicions or concerns that arise or are reported.

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 characteristics.

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 clause and would consider doing so if there was a breach of the Modern Slavery Act.

Eastleigh Borough Council Supply Chains

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

To fulfil our obligations, new Standard Terms and Conditions have been drafted which include Modern Slavery and Human Trafficking Clauses. These are published

on the Council's website. Based on having accepted the Council's Terms and Conditions, suppliers of goods, services and works will comply with the Council's Policy or have their own policy relating to working practices for modern slavery. On occasions the Council may ask suppliers to provide copies of their policy or details of working practices.

For above threshold opportunities, a Selection Questionnaire will be required. This is a Standard Selection Questionnaire template provided by Crown Commercial Service. Within the Selection Questionnaire (SQ), there is a Grounds for Exclusion section where providers must self-declare whether they have any prior convictions for Modern Slavery or trafficking offences.

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. Where there are questions over the conduct of a supplier then these shall be investigated, and the appropriate action taken.

Actions going forward for 2021/22

Action	Responsible officer	Date
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.	Procurement Officer	December 2021
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 will be added to the new Standard Terms and Conditions – this will list policies that we expect any of our contractual partners to have.	Procurement Officer	December 2021
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.	Procurement Officer (as part of emerging Procurement Policy)	December 2021
Consider reviewing large, long rolling contracts to determine whether any additional action is required.	Procurement Officer	March 2022
Consider reviewing guidance to staff granting new leases to determine whether any additional action is required	Lead Asset Manager	March 2022
Review of the Council's Whistleblowing Policy	Head of HR	March 2022

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

Signed:

Leader of the Council

Chief Executive

Dated