

East Sussex County Council

Modern Slavery Statement for the financial year 2023/2024

Introduction

This statement outlines key steps East Sussex County Council have taken during the 2023 to 2024 financial year to mitigate modern slavery risks within our operations and supply chains. This is pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 which requires certain organisations to publish an annual modern slavery statement.

As a public sector body, East Sussex County Council recognises that we have a duty to ensure that public money is spent responsibly and our activities and those working on behalf of the authority are conducted in an ethical, responsible and sustainable manner.

East Sussex County Council have four overarching priority outcomes we plan to achieve by 2026:

- driving sustainable economic growth
- keeping vulnerable people safe
- helping people help themselves; and
- making best use of resources now and for the future.

Our [Council Plan 2023/2024](#) sets our ambitions and what we plan to achieve by 2026 for our priority outcomes.

At a time when local government is facing significant challenges and uncertainties, we remain dedicated to progressing our understanding of modern slavery and implementing appropriate measures to tackle it. Due to the widespread and multifaceted nature of this issue, it is crucial that people working for and behalf of the Council be involved in efforts to combat exploitative practices. The Council fully acknowledges the complexity and challenges involved in tackling modern slavery. This issue requires appropriate resources to understand, implement and monitor the effectiveness of various approaches. Despite the daunting nature of this problem – a heinous crime affecting 50 million people worldwide and over 100,000 in the UK, one thing is certain: We have a duty to take action. Our approach to combatting this problem is focused on securing sustained long-term efforts and we are committed to taking action to safeguard the most vulnerable members of our society.

In our previous modern slavery statements, we expressed a commitment to doing more to address risks within our operations and supply chains and outlined how we are working to progress understanding of the problem, looking more closely at our own spending to understand potential risks, and putting measures in place to strengthen our response. In the last financial year, we have continued to work on building and strengthening the foundation of our anti-slavery efforts.

This statement includes information on:

- our organisation structure and supply chains
- policies in relation to modern slavery
- risk assessment
- due diligence measures
- how we measure our performance, and
- training available to our staff

Additionally, as the Modern Slavery Act 2015 encourages public scrutiny of modern slavery statements, we have included information for reporting cases of suspected or actual cases of modern slavery.

Due to the complex and ubiquitous nature of modern slavery, there are different people, teams and local partnerships working to address it and related concerns such as issues around vulnerability and safeguarding. Consequently, it is challenging to document all activities including training, support and correspondence. Therefore, this statement may not fully reflect all actions taken by the authority, but it provides insight into key activities.

This statement relates to the steps taken by the Council during the financial year 1 April 2023 to 31 March 2024.

Our organisation structure and supply chains

East Sussex County Council provides a range of services to over 500,000 residents in East Sussex, including providing social care to children and the elderly, maintaining roads and providing libraries and waste management services. The Council employs approximately 5,000 staff corporately.

Our Corporate Management Team provides strategic direction to the whole council which is organised into the following directorates:

- Adult Social Care and Health
- Governance Services
- Children's Services
- Business Services
- Communities, Economy and Transport

As detailed in our previous statement, East Sussex County Council has partnered with Surrey County Council and Brighton & Hove City Council to establish Orbis Procurement – our shared service partnership working together to deliver lean procurement support, shared learning to achieve excellent outcomes, and shared resource for the delivery of achieving value for money for our residents. Collectively, we comprise of one of the largest public procurement spends in local government, with an expenditure circa £2 billion a year with external suppliers across the three local authorities. As we deliver a significant amount of our projects annually via our Orbis Procurement service, its contribution to our anti-slavery in supply chain activities is vital. Accordingly, this work is driven by our Orbis Procurement service for the benefit of the three authorities.

For each of the authorities where services are not procured directly by Council departments, we procure them via our Orbis Procurement service. This statement reports on activities related to these services. Further work will be required to map services procured outside our partnership and directly by Council departments. These services are often significantly lower in value and spend and are governed by the Council's Procurement and Contract Standing Orders. As noted in our previous statements, it is anticipated that such work would require longer-term assessments in collaboration with other teams working across the Council. Focusing on services procured via our Orbis Procurement partnership allows us to ensure adequate prioritisation of modern slavery risks and allocation of shared resources to respond to these risks.

Beyond work undertaken in our Orbis Procurement service to mitigate modern slavery risks in our supply chains, the Councils also have people and teams across the authorities working on addressing related concerns such as issues connected to abuse, vulnerability, safeguarding, and community and partnership.

During the 2023 to 2024 financial year the Council spent approximately **£523 million** with **1,937** suppliers.

Education, health & social care	£325 million
Assets and infrastructure	£145 million
Corporate & Business	£53 million

Policies in relation to slavery and human trafficking

East Sussex County Council recognises the importance of policies to communicate our commitments and expectations of our staff, suppliers, and those who we do business with, to effectively address modern slavery. We also recognise that modern slavery sits on the extreme end of the labour exploitation continuum. Therefore, we have several policies, procedures, and codes of conduct with respect to abuse, fair labour and employment conditions that work to prevent and respond to a range of issues, including modern slavery, in our operations and supply chains. This includes whistleblowing, recruitment, health and safety, and grievance policies. Details of these policies and their relevance to modern slavery can be found in the Annex.

During the 2022/2023 financial year, our Orbis Procurement service conducted a review of our Supplier Code of Conduct to assess whether it is fit for purpose in addressing modern slavery and other ethical and sustainable issues within our supply chains. The Code of Conduct outlines the Council's expectations of suppliers with regards to ethical conduct when bidding for and delivering contracts. Following a review of the current Code and consultation with procurement officers across the three authorities in 2022/2023, we identified the need to refresh the Code to ensure that it adequately communicates our expectations of suppliers and that procurement and contract management officers are aware of the Code and how to utilise it in their respective roles. During the 2023/2024 financial year, we redrafted the Code which underscores our responsibility to ensuring that our activities do not cause, contribute, or are linked to adverse human rights impacts such as modern slavery and our commitment to engaging collaboratively and proportionally with our suppliers to deliver greater ethical and sustainable value from our relationship. We also carried out a consultation with procurement officers to understand support needed with implementing it. Our Orbis Procurement team is in the process of preparing for publication of the Code and producing guidance for staff on its implementation.

Risk assessment

As a public sector body, we recognise the risk of modern slavery facing our vulnerable people and service-users in our community as well as workers in the supply chains supporting our activities. We also acknowledge that modern slavery is an issue that is prevalent in the UK. While we have an ambition to work with local supply chains, the

risk of slavery still exists as the unfortunate reality is that no supply chain is entirely free of modern slavery or unethical labour practices. Modern slavery can take place at any stage of a supply chain, from the extraction of raw materials to the delivery and use of a final product while people delivering and receiving services can be subjected to exploitative practices by preparators internal and/or external to an organisation.

To aid our understanding of risks and inform our due diligence approach, we regularly consult and communicate up-to-date information on high-risk goods and services within the UK and beyond. Regarding modern slavery concerns in services we provide and the communities we serve, we recognise vulnerable service-users including children, young people, and vulnerable adults. Within our supply chains, we recognise risks in our third party spend in high-risk areas such as adults social care, construction and facilities management but acknowledge that the Council's potential exposure to modern slavery issues is likely much greater due to the extent and nature of our activities. Identifying potential areas in our supply chain at higher risk such as these, helps us to prioritise our anti-slavery efforts.

As a local authority, we expect the type of risks we are likely to encounter to remain consistent and unlikely to vary significantly.

Due diligence

This section of our statement reports on activities aimed at understanding and managing risks within our operations and supply chains. The Council recognises the breadth, impact and reach of our activities as a local authority. We exist to serve the public interest and are accountable to the residents of our communities. Consequently, tackling modern slavery in our operations also means taking action to support efforts to eradicate modern slavery within our locality.

Our operations and communities

The Council have numerous legal responsibilities to protect and safeguard vulnerable adults, children and young people. Under the Care Act 2014 we have a duty to safeguard adults with care and support needs. We also have a duty under child protection legislation, notably the Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017 to safeguard children and young people in need in our local area. East Sussex County Council is also first responder organisation. This means we have a responsibility to refer potential victims into the National Referral Mechanism (NRM). This is the government's framework for identifying and supporting potential victims of modern slavery. Under section 52 of the Modern Slavery Act 2015, we have a statutory duty to notify the Home Office of potential victims of modern

slavery that we come across. Adults who give their consent and child victims can be referred into the NRM. Where a potential adult victim has not consented to a referral, the Council still have a duty to notify (DtN) the Home Office to support intelligence gathering.

In 2023, 17,004 potential victims of modern slavery were referred to the Home Office.¹

Of these, East Sussex County Council referred 29 victims into the NRM. Twenty-four were children (aged 17 and under), and five were adults. Three DtN referrals were also made.

According to the NRM statistics, 2023 saw the highest number of potential victims claiming exploitation as children nationwide since it was introduced in 2009. The rise in the number of victims is said to be attributed to the increase in county lines – a term used to describe organised criminal gangs and networks transporting and selling illegal drugs from one area to another within the UK using mobile phones to facilitate their dealings. Often children and vulnerable adults are exploited and taken advantage of to support these activities such as being forced to store and conceal illegal drugs.

East Sussex County Council and Brighton & Hove City Council are taking part in a national pilot to develop approaches on decision-making concerning children who have been identified as victims of modern slavery and exploitation.

The NRM pilot operates on threshold decision to examine all available evidence to assess whether there are grounds to believe that someone is a victim of modern slavery. The pilot started in February 2023, and the decision-making panel was devolved to East Sussex. This means that local children are considered by the local decision-making panel and decisions are made much quicker. Since the decision-making panel was set up in East Sussex, the panel have made decisions on about 60 children and the majority of these decisions have been ratified by the Home Office.

Children who have a positive decision from the NRM panel are supported by a social worker for a period of at least 3 months from the Child Exploitation Team, often longer. Their parents and guardians are also offered support from experienced keyworkers who are knowledgeable about contextual and community risks to children.

¹ [Modern Slavery: NRM and DtN statistics, end of year summary 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2023)

With regards to adult safeguarding, Section 42 of the Care Act requires local authorities to make enquires, or ask others to do so, if they believe an adult with care and support needs is at risk of abuse or neglect in their area and to find out what, if any, action may be needed to protect them. The Care Act 2014 includes modern slavery as a type of abuse, as well as being a serious crime, therefore, managing cases of modern slavery is closely linked to safeguarding adults procedures. A section 42 duty is triggered when three requirements of the Care Act have been met. This is when an adult: has care and support needs, is experiencing or is at risk of abuse or neglect and as a result of those care and support needs is unable to protect themselves from the risk or experience of abuse or neglect.

During the 2023/2024 financial year, 10 safeguarding cases reported as a modern slavery concern progressed to a section 42 safeguarding enquiry.² Various types of abuse were reported including psychological abuse, financial abuse, and physical abuse. The alleged harm occurred in a range of settings such as in a person's own home.

The process of a statutory enquiry under section 42 of the Care Act typically involves understanding what happened, considering the wishes of the adult involved, assessing their needs for protection and support, taking immediate actions to protect them, developing a protection plan, liaising with authorities such as the police where a crime is suspected so appropriate action can be taken regarding an alleged perpetrator, and identifying others who may be at risk.

Further information on the safeguarding enquiry process is available at:
<https://www.eastsussexsab.org.uk/>

Our supply chains

Regarding due diligence undertaken to tackle modern slavery in our third party spend, the Council have taken several actions through our Orbis Procurement partnership. We view compliance with the law, particular Section 54 of the Modern Slavery Act 2015³, as the minimum expectation and are working towards more stringent due diligence measures.

² This figure only reflects the cases that have been enquired upon and is not indicative of all safeguarding concerns received by the Local Authority.

³ Section 54 of the Modern Slavery Act 2015 requires certain organisations to publish a modern slavery statement each year outlining the steps taken to address modern slavery in their operations and supply chains.

Key work undertaken within the partnership in the 2023/2024 financial year include:

- Keeping abreast of new research, data, and guidance published by different organisations to inform and strengthen our approaches.⁴
- As part of standard tendering process, requiring organisations within the threshold of Section 54 of the Modern Slavery Act 2015 to confirm their compliance with the annual reporting requirements.
- Advising teams to require suppliers bidding for contracts involving high-risk works or services to produce a modern slavery statement or similar document (where not legally required to) and include information on the six suggested reporting areas⁵ included in the legislation to level the playing field.⁶
- Encouraging teams to consider procurements where tendering activity and wording could be strengthened, such as emphasising risks within specifications and introducing quality questions to understand suppliers' commitments and capabilities to managing modern slavery risks.
- Reviewing current high-risk contracts to understand if and how modern slavery considerations were embedded within tendering and contract activity and identify ways to improve in similar future projects, including re-procurements and extensions and consider opportunities to further engagement with current suppliers and their supply chain partners to mitigate risks.
- Consulted with key operational staff such as procurement, commissioners and contract managers within services across the partnership to understand how these roles need to work in tandem to ensure that modern slavery risks are

⁴ Notably statutory guidance including PPN02/23, the Global Slavery Index, the Modern Slavery Policy & Evidence Centre, the Local Government Association and anti-slavery charities such as Unseen who manages the national modern slavery helpline.

⁵ The organisation's structure, business and its supply chains; Its policies in relation to slavery and human trafficking; Its due diligence processes in relation to slavery and human trafficking in its business and supply chains; The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk; Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators; The training about slavery and human trafficking available to its staff.

⁶ Existing research on modern slavery statements have reported inconsistency in the quality and content of statements produced by organisations with some only complying with the minimum requirements of the legislation.

taken seriously and considerations adequately embedded throughout a contract's lifecycle.

- Considered ways to strengthen engagement with suppliers, including monitoring supplier's anti-slavery efforts. This included delivering workshop and risk briefings to increase providers' understanding of issues facing their sector, and trialling use of supplier assessments, such as central government's Modern Slavery Assessment Tool (MSAT).
- Delivered practical training sessions to key supply chain management teams on embedding modern slavery considerations in service delivery.
- Finalised draft of the Orbis Supplier Code of Conduct which communicates the Councils' expectations of providers with regards to behaving ethically and responsibly.
- Strengthening modern slavery wording in contract documentation, such as including an offence under the Modern Slavery Act 2015 as a prohibited act in all Orbis Public Law service contract templates.

The work undertaken above was driven by the Council's Senior Policy Lead on Modern Slavery, based in the Orbis Procurement team. While lessons were drawn from each authority in our partnership, we are working towards consistency across the partnership to strengthen collective efforts in tackling modern slavery and we hope to build on this year on year.

Key performance indicators to measure effectiveness of steps being taken

Our general approach to tackling modern slavery, particularly within our supply chains, is heavily informed by existing research, best practices, and statutory guidance. Research on modern slavery statements often report that one of the areas organisations tend not to report on are indicators to measure effectiveness of anti-slavery efforts. The Council therefore recognises this as an area for improvement and is working to strengthen how we measure our overall approach. As aforementioned, a challenge the Council faces with tracking actions to tackle modern slavery and consequently their effectiveness, is the number of activities and correspondence undertaken in this area by different people, teams and services across the authority, particularly those that handle concerns such as safeguarding whose work captures modern slavery issues alongside others.

The indicators below have been drawn from and inspired by external guidance and demonstrate what our organisation believes is feasible for us to monitor at this stage in our journey to managing modern slavery risks. These indicators support our anti-slavery efforts by i) helping us to understand potential risks ii) ensure that we are taking action iii) understand the effectiveness of our approach and iv) identify areas that require improvement. We will monitor and report on our indicators on an annual basis in our modern slavery statements.

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
Potential cases of modern slavery	Reports of potential cases of modern slavery can be made through various channels within the local authority and the process for addressing different types of concerns may differ. As a result, the number of cases that have been reported in this statement may	Identifying cases not only ensures that potential victims have access to necessary support, but also gives us insight into the risks we may encounter	Number of reports made through the following channels: • Our whistleblowing helpline • Adult safeguarding enquires • NRM (end of year summary statistics)	Whistleblowing: 0 Adult Safeguarding (s42 enquiry): 10 NRM 2023: 29 referrals & 6 DtN

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
	not reflect all potential cases or concerns received by the local authority.	as an authority, vulnerabilities within our community, operations, and supply chains, and our overall response to these challenges.		
Training of key supply chain management staff	Despite the availability of Council-wide training on our e-learning platform, the authority recognises the importance of providing regular and targeted training for our staff. However, it can be challenging to require this type of training due to the large number of staff members who have various roles and responsibilities. Additionally, staff may have access to training (both internal and external) provided by their teams or services. As a result, the training reported may not accurately reflect all staff	Targeted training ensures that staff responsible for key aspects of service delivery are equipped with the necessary knowledge and skills to address modern slavery within their specific roles.	Number of training delivered to staff and attendance	<u>Commissioners & contract managers</u> Number of sessions: 1 Number of attendees: 27 <u>Procurement team</u> Number of sessions: 2 Number of attendees: Session 1 (46), Session 2 (45)

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
	members who have accessed modern slavery training.			
Monitoring implementation of supplier code of conduct	A limitation with monitoring the implementation of supplier code of conduct is the lack of capacity to assess how it is used in all relevant procurements and contracts.	To ensure Code is being used in tendering activity.	Project sampling across the partnership	Too early to report on
Review active high-risk projects to understand how modern slavery considerations were embedded	Due to capacity limitations, it is not feasible to review all current projects that are potentially high-risk for modern slavery practices.	To leverage insights from current contracts to inform our handling of future high-risk projects and our overall approach to managing risks in procurement and contract management activity.	Project sampling across the partnership	During the 2023/2024 financial year, 29 projects across the Orbis Partnership with a total contract value of approximately £5 billion were reviewed by Orbis Senior Policy Lead on Modern Slavery.
Identification of projects across the partnership that may be at high-risk	This assessment is not a confirmation of risk or the appropriate approach needed to respond. In most cases,	To understand Orbis partner authorities' exposure to	Number of projects across the partnership that have been flagged as potentially high-risk by procurement officers.	At the time of drafting this statement, there are 231 projects in total that have been flagged. ⁷

⁷ As projects are at various stages of the tendering process, this figure represents the total number of projects presently in our project management system rather than by financial year.

What we are measuring	Challenges/limitations	Why we are measuring it	How we are measuring it	2023/2024
for modern slavery practices.	projects may require further assessment, taking into account various factors such as the complexity of the procurement, the route to market, nature and characteristics of potential risks, and opportunities and challenges to managing these. Additionally, some projects may experience delays or changes before the procurement process begins and anti-slavery measures may need to be considered at a later stage. Further there is also a risk that some projects may go unflagged. Procurement officers regular receive reminders to flag projects.	potential modern slavery risks and opportunities to manage these.		

The indicators above reflect what the Council believe is currently feasible for our organisation to monitor our approaches to combat modern slavery practices. Despite the Council's own challenges of capturing and monitoring all anti-slavery activities undertaken across the authority, the Council remains dedicated to strengthening our anti-slavery efforts, raising awareness of the problem of

modern slavery throughout our organisation and supply chains, reporting on the areas we have adequate visibility of, and developing firm measures that continuously advance and improve over time.

Training on modern slavery available to staff

The Council understands the importance of ensuring that people within our organisation have the relevant knowledge to support wider anti-slavery efforts. As mentioned previously, the complexity of modern slavery and the nature of our activities as a local authority means that we are likely to face a variety of risks. We also acknowledged the challenge of documenting all work undertaken Council-wide to manage these risks. To overcome this, we rely on our greatest asset: our people. It is important that our staff understand the problem of slavery and can address it in their respective roles. Therefore, the Council provides several courses for staff on modern slavery.

- Modern Slavery and Human Trafficking
 - This is a 40-minute e-learning course designed to raise awareness of modern slavery and human trafficking and offer guidance to staff on recognising their role in identifying and reporting concerns. It provides information on areas such as understanding modern slavery and its various forms, the scale of slavery in the UK, vulnerabilities that lead to victimisation, spotting signs of potential victims, and information on referring potential victims into the NRM.
- Introduction to Modern Slavery in Supply Chains
 - This is a 60-minute e-learning course designed by the Council's Senior Policy Lead on Modern Slavery in the procurement service to help staff in supply chain management roles understand the unique issue of modern slavery in supply chains. It includes information on key findings of the Global Slavery Index 2022 in relation to forced labour in supply chains, the current legislative landscape, the International Labour Organization's Indicators of Forced Labour, high-risk sectors for forced labour, examples of cases within the UK and public sector responsibility for addressing modern slavery risks within our supply chains. This training was developed to ensure consistency in training received for staff working across Orbis Procurement partnership as well as others in operational roles.
- Adult Social Care training

- The Council also facilitates a multi -agency modern slavery awareness workshop for Adult Social Care (ASC) staff and professionals that support ASC. During the 2023/2024 financial year, Council staff delivered three 3-hour sessions throughout the year. These sessions provided information on the prevalence of modern slavery, different types of modern slavery practices, guidance on spotting the signs and indicators of exploitation and considered relevant legislation and legal responsibilities. All professionals are requested to complete the Council's modern slavery eLearning course before attending.

Like other anti-slavery efforts, due to the lack of a centralised reporting or material database, it is challenging to document all training, work and correspondence undertaken relating to modern slavery. Beyond training that is available Council-wide,, different staff and teams within the Council deliver and circulate local training and guidance (including from external sources) on modern slavery while broader discussions and meetings involving different staff can address this issue. For instance, in the procurement team, new joiners are required to complete the Introduction to Modern Slavery in Supply Chains E-learning course as part of the induction process while existing staff are encouraged to take it as a refresher prior to more practical sessions being delivered.

In addition to the Council-wide training available above, during the 2023/2024 financial year, a 90-minute session on modern slavery was delivered to commissioners and contract managers and two 1-hour sessions to procurement staff. These sessions were delivered by the Council's Senior Policy Lead on Modern Slavery in the procurement team and offered guidance on embedding modern slavery considerations throughout service delivery including discussion on determining risk, drafting tender and contract wording, and engaging with suppliers, including guidance for officers conducting site visits. The training highlighted the importance of staff in doing their part within their respective roles to support the Council's wider anti-slavery commitments.

Reporting concerns of modern slavery

For further information on modern slavery and how to spot the signs that someone may be a victim, please see: [Unseen](#) and [GLAA](#).

Reports of suspected or actual cases of modern slavery can be made via the following channels.

Non-emergency concerns: call the Modern Slavery Helpline – 08000 121 700 or local police on 101 (ask for their Modern Slavery Team)

Emergency, immediate danger, or threat to life situation: call 999

East Sussex County Council Whistleblowing: [Whistleblowing, fraud and corruption – strategy and policy documents | East Sussex County Council](#)

Concerns for an adult with care needs - Adult Social Care and Health: 0345 608 0191

Concerns for a child with care needs - Single Point of Advice: 0132 346 4222

Approval of statement

This statement has been approved by the Corporate Management Team on 14 August 2024. It will be reviewed and updated on an annual basis.

Becky Shaw, Chief Executive.



Date: 14 August 2024

Nick Bennett, Deputy Leader/Lead Member for Resources and Climate Change.



Date: 15 August 2024

Annex – Organisation policies

Policy	Relevance to tackling modern slavery
Council Constitution	East Sussex County Council's Constitution sets out the political decision-making arrangements used by the Council. It explains the responsibilities of the Council, the Members, and staff. The "Procurement and Contracts Standing Order" in the Constitution sets out how the Council authorises and manages spending and contracts with other organisations. This ensures that prior to any significant expenditure there is proper consideration of the need first of whether to buy at all and service the need internally, or if external expenditure is required that it is made in a fair, open and transparent way. The Order covers issues pertinent to the anti-slavery agenda such as ensuring that supply chain partners operate fair and ethical working practices when purchasing goods, works and services.
Whistleblowing Policy	This policy provides a clear framework which is intended to give people the confidence to raise workplace concerns without fear of reprisal or victimisation. This policy applies to all Council employees. In addition, the policy applies to Members, all contractors and their staff working for the Council e.g., agency staff, consultants, and builders; also, providers of works, services, and supplies, including the Council's external contractors and those providing services under a contract with the Council in their own premises. This policy is important for individuals wanting to raise concerns about modern slavery and/or related issues.
Code of Conduct and Conflict of Interest Policy	This Code sets out the minimum standards of conduct that employees will be expected to observe when carrying out their duties. This includes encouraging and expecting employees, through agreed procedures and without fear of recrimination, to raise workplace concerns about risk, malpractice, or wrongdoing. Employees are expected to conduct themselves at all times (inside and outside of work) in a manner which will maintain public confidence in both their integrity and the services provided by the Council. This is relevant to the anti-slavery agenda as the Code expects employees to behave ethically and maintain high standards of personal conduct and be aware of and act in accordance with the Council's values and behaviours.

Policy	Relevance to tackling modern slavery
Health and Safety	The Council has various policies which aim to promote high standards and good practices in relation to health, safety, and welfare. This includes policies on: Personal Protective Equipment; Health and Safety; Stress Management and Risk Assessment; and Occupational Health and Wellbeing. These policies 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. Our Stress Management policy is also relevant to modern slavery as the Council recognises that while exploitation may not be present in the workplace, individuals could be controlled and exploited outside of 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.
Working Time Policy Statement	The Council recognises that excessive overtime beyond permitted national legal limits can contribute to forced labour practices when coupled with forms of threat. The Working Time Policy Statement aims to ensure that managers know the legal limits on working hours and the minimum breaks required at work and between days of work. This policy explains the Working Time Regulations 1998, which places legal limits to working hours for most workers and provides a legal entitlement to rest breaks. This Policy applies to all "workers" (as defined in the Regulations) and the definition includes all contracted employees and temporary and casual workers engaged by the Council. Agency workers are covered by the Regulations but in most cases the agency will be the employer and will therefore retain responsibility for ensuring compliance with the Regulations. However, managers using agency workers are expected to ensure that the limits to working time and rest break requirements are applied to these workers when they are working for the Council.
Recruitment	The Council recognises the importance of recruitment processes in identifying and responding to potential modern slavery cases. We have several recruitment policies in place that are relevant to the anti-slavery agenda. In addition to policies such as the promoting diversity and equality of opportunity in employment (see below) we have a Recruitment and Selection Policy which sets out the procedure for recruiting and selecting staff at the Council. The policy is designed to ensure the recruitment and selection process is fair, open, and transparent and promotes equal opportunities to all groups throughout the local community. We also maintain a pre-employment checks policy, which provides information on checks that should be carried out to verify recruitment decisions.

Policy	Relevance to tackling modern slavery
	The policy also provides guidance on the use of agency staff. The Council aims to fill all vacant posts with directly employed staff. However, where required the Council has an appointed managed service provider for temporary agency workers. The Council's Human Resources team support hiring managers in the recruitment process, including handling issues about the service provider and safeguarding alerts involving an agency worker. The Council also has several policies on Disclosure and Barring Service (DBS) checks, which enable checks to be used for assessing the suitability of candidates in relevant roles. The policies provide guidance on the effective use of the DBS Disclosure process to safeguard the children and adults who access our services. Agency workers, contractors, sub-contractors, and volunteers are assessed against the same criteria as those working directly for the Council if a DBS is required. The Council recognises that victims of modern slavery can be exploited in legitimate jobs with legal terms of employment but exploited by others unrelated to the Council. Therefore, the above policies are important to ensure that potential victims and vulnerabilities are identified during the resource and recruitment process, including the use of temporary workers employed via an agency. Additionally, the policies are relevant to the anti-slavery agenda as they cover aspects of work where vulnerable people accessing our services could be taken advantage of and exploited.
Grievances, Workplace Conflict and Mediation	We have several policies and procedures on grievance, workplace conflict and mediation. This includes: Grievance and Workplace Conflict Policy: This policy sets out the Council's approach to handling grievances, including its expectations that complainants are not discriminated against or victimised for having brought a complaint, and ensuring that confidentiality is maintained at all times, including after any procedures have concluded. Promoting Diversity and Equality of Opportunity in Employment: This policy ensures equal access to opportunities in employment and promotes diversity in our workforce. Dignity at Work: This document provides guidance on ensuring that colleagues are treated with respect and dignity in the working environment. Grievance mechanisms are important to tackle modern slavery as it involves an additional route by which employees can raise complaints or concerns. The Council also recognises that certain vulnerable, marginalised, and underrepresented groups are at a higher risk of poor labour and employment practices and therefore the above policies ensure that every member,

Policy	Relevance to tackling modern slavery
	manager, and employee have a duty to be aware of equality issues in their daily activities.
Domestic Abuse	This policy sets out the principles and standards that the Council will apply in supporting employees who have experienced, or are experiencing, domestic abuse and where there are concerns that an employee may be the perpetrator of domestic abuse. This includes types of abuses such as psychological, physical, sexual, financial, and emotional. The principles and standards apply to all employees, agency workers, contractors and their staff whilst working for, or on behalf of, the Council. While this policy focuses specifically on domestic and sexual abuse, it is important for tackling modern slavery as cases may share similar indicators of abuse.
Trade Unions	East Sussex County Council has agreements with unions to provide facilities to help them to represent members at all levels. Relevant policies include: Trade Union Facilities Policy: This policy sets out the principles to underpin good working relationships between the Council and recognised trade unions by affording the trade unions the necessary time and appropriate access to facilities to discharge their duties. Employee Relations Policy: This policy sets out areas of responsibility regarding employee relations. It also sets out the Council's position on trade union recognition, collective bargaining, and joint consultation, as well as disputes, discipline, and grievance. The Council recognises that trade union representation in the workplace can help reduce the risk of modern slavery by representing the interest of workers, ensuring fair working practices, supporting workers in negotiating their terms and conditions, and the resolving of grievances.
Sussex Safeguarding Adults Policy and Procedures	The Policy sets out the approach taken to adult safeguarding across Sussex. The Procedures explain how agencies and individuals should work together to put the Sussex Safeguarding Adults Policy into practice. They have been updated in accordance with the Care Act 2014 and the Care and Support Statutory Guidance, and should be read in conjunction with these. This policy and procedures provide an overarching framework to ensure a proportionate, timely and professional approach is taken, and that adult safeguarding is co-ordinated across all relevant agencies and organisations. This is essential for the prevention of harm and abuse.
Sussex Child Protection & Safeguarding Procedures	Brighton and Hove, East Sussex and West Sussex Local Safeguarding Partners have commissioned the policies and procedures in this manual, which reflects a significant consensus about best practice across the three areas, and all those agencies in Sussex that contribute to the prevention, detection and investigation of abuse or neglect, risk management of offenders and the support and treatment of those affected. The development

Policy	Relevance to tackling modern slavery
	of the procedures manual is one of the core functions of the safeguarding partners in their role to coordinate local work to safeguard and promote the welfare of children. The procedures encourage close working between agencies to facilitate early intervention in a supportive way to meet the needs of children and their families.