

East Sussex County Council 2025/2026 Modern Slavery Statement

Modern Slavery Statement for the financial year ending 2025/2026

Introduction

East Sussex County Council remains committed to ensuring 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.

Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 requires certain organisations to publish an annual modern slavery statement outlining the actions taken each year to tackle modern slavery risks within their operations and supply chains. While not required by the transparency provision to publish a statement, East Sussex County Council recognises the important role the public sector must play in helping to address this critical issue and has voluntarily chosen to report on our activities. This is the Council's 2025/2026 statement. The structure and content of the statement remain the same as our previous statement, with sections updated to reflect key activities undertaken during the 2025/2026 financial year.

Modern slavery is a heinous crime, with an estimated 50 million victims worldwide and over 100,000 here in the UK. As a local authority, we recognise that we have several roles to play to help address this problem. This includes safeguarding vulnerable adults and children from exploitation and harm, identifying potential victims in our role as first responders, and working to implement measures that protect workers in our operations and supply chains from modern slavery and other unethical labour practices.

[East Sussex County Council's 2025/2026 Council Plan](#) outlines the Council's ambition to achieve our four priority outcomes by 2028: driving sustainable economic growth; keeping vulnerable people safe; helping people help themselves; and making best use of resources now and for the future. We aim for East Sussex to be a county that is an attractive place to live, work and do business. We want East Sussex businesses to have the assistance they need to thrive and grow sustainably, including creating quality jobs, and goods and services for our communities. We want our people and residents to feel safe and have access to support and services to achieve their full potential – whether that be education, training, employment, and health and social care to meet their needs.

Our 2025/2026 modern slavery statement provides an update on all six areas recommended by Section 54 of the Modern Slavery Act 2015:

- 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

The Council recognises the important role the public can play in shining a light on modern slavery practices. As Section 54 of the Modern Slavery Act 2015 encourages public scrutiny of modern slavery statements, we have included information for reporting cases of suspected or actual cases to the relevant authorities.

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 with certain sections of the document updated as necessary.

This statement has been updated to reflect the authority's current approach and activities undertaken in the 2025/2026 financial year. It relates to key steps taken by the Council between 1 April 2025 and 31 March 2026.

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
- Children's Services
- Business Services
- Communities, Economy and Transport
- Governance Services

At the time of drafting this statement, East Sussex County Council have a shared procurement service with Surrey County Council and Brighton & Hove City Council. However, in early 2026, following a review of the service through respective governance routes, all three Councils have agreed to move towards a sovereign operating model, enabling services to better support their individual strategic priorities.

The measures outlined in this statement to address modern slavery risk, particularly those within our supply chain, were carried out through the inter authority agreement. Despite this agreement coming to an end, the Council remains committed to tackling this issue and will continue to build on work undertaken and lessons learned during the partnership.

Beyond work undertaken in our procurement service to mitigate modern slavery risks in our supply chains, the Council also has 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 2025 to 2026 financial year the Council spent approximately **£672m** with **3,440** suppliers.

Education, health & social care	£457m
Assets and infrastructure	£154m
Corporate & Business	£61m

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 key policies and their relevance to modern slavery can be found in the Annex.

Risk assessment

As a public sector body, we recognise the risk of modern slavery facing 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 exploitation 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 perpetrators 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.

Risk assessment of exploitative labour practices is embedded in our day-to-day procurement activity and is carried out on a project-by-project basis. This is primarily a desk-based exercise and led by our Senior Policy Lead on Modern Slavery in our Procurement's Policy Team, supported by the Strategic Procurement Team. The frequency of these assessments ensures that due diligence is applied consistently across high-risk categories and in new procurements where risks may be less familiar. We consider risks to workers involved in delivering the core service, and over the past financial year have started taking action to understand and address risks affecting workers further down the supply chain, such as those carrying out cleaning, repair, and maintenance roles to support the delivery of core services.

Our approach to risk assessment draws on a broad range of sources and considers risks across the spectrum of labour exploitation, recognising that the lines between unethical labour practices and modern slavery can often be blurred, with poor labour practices risk escalating to labour exploitation if not addressed.

To support our risk assessment, we draw on a range of sources. Key sources include, but are not limited to:

- Statutory guidance – Such as Procurement Policy Note 009: Tackling Modern Slavery in Government Supply Chains, which provides direction for commercial and procurement professionals
- Research publications – including UK and international research on modern slavery and global resources such as the Global Slavery Index
- Industry reports – which progress our understanding of sector-specific risks, trends, and issues.
- Parliamentary reports: including findings and recommendations from parliamentary inquiries and committees.
- Non-Governmental Organisation reports: which provide valuable frontline perspectives and evidence on exploitation risks.

Given the large number of procurements delivered, risk assessment helps us to identify projects to prioritise for due diligence. When assessing risks there are numerous characteristics that are taken into consideration such as the industry type, nature of the workforce, and business and supply chain model. The highest risk areas include construction, adult social care, facilities management, cleaning and waste management. Common risk factors in these sectors include complex supply chains, extensive subcontracting, reliance on agency labour, and the vulnerability of low-paid or marginalised workers.

In our risk assessment we also give consideration not only to our exposure to modern slavery, but opportunities to manage those risks. To fully understand project specific risks, close engagement is often required between the Senior Policy Lead on Modern Slavery, service stakeholders (such as commissioners and contract managers), and procurement officers.

Due to the activities and services we undertake and deliver as a local authority, we expect the type of risks we are likely to encounter to remain consistent and unlikely to vary significantly, however, incorporating risk assessment into our day-to-day procurement processes ensures that we are able to capture projects with new or emerging risks.

Due Diligence

This section of our statement reports on activities aimed at understanding and managing risks within our **operations and communities** and our **supply chains**.

Our operations and communities

The Council has 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 a 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 has a duty to notify (DtN) the Home Office to support intelligence gathering.

In 2025, 23,411 potential victims of modern slavery were referred to the [Home Office](#).

Of these, East Sussex County Council referred 25 potential victims into the NRM. Of the 25 potential victims, 22 were children (aged 17 and under). Two DtN referrals were also made.

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 2025 to 2026 financial year, 14 safeguarding cases reported as a modern slavery concern progressed to a section 42 safeguarding enquiry. This figure only reflects the cases that have been enquired upon and is not indicative of all safeguarding concerns received by the local authority.

Our supply chains

As the authority delivers hundreds of projects annually, we rely on a range of risk management “pinpoints” and internal systems to identify and address risks in our procurement activity. We continued to maintain our efforts to combat slavery in our supply chains and in the last financial year have focused on strengthening our approach to managing risks in our tendering activity. Key due diligence work undertaken during 2025-2026 included:

- **Project resourcing:** The Procurement service’s Policy Team reviews requests made by Procurement Partners and Strategic Procurement Managers for resources (such as a Procurement Specialist) to support projects. This review is undertaken on a weekly basis to identify projects that may need input from the Senior Policy Lead on Modern Slavery. When a project is flagged, an automated email is sent to the project lead instructing them to engage with the policy lead. This process ensures that the policy lead is engaged once formal procurement activity begins.
- **Procurement forward plan:** The Procurement Data and Analytics team provide the Senior Policy Lead on Modern Slavery with a weekly updated report of projects, including those that have been recently added to our project management system.

Projects have several filters applied, such as limiting to those that are Active or Pending and due to mobilise within the next 24 months. The policy lead uses this forward plan to track progress of projects and engagement with procurement leads to ensure management of modern slavery and unethical labour risks where required.

- **Collaboration and engagement:** Our Senior Policy Lead on Modern Slavery has regular meetings with members of the Strategic Procurement Team to discuss project scopes and potential risks. As projects can be at different stages, they engage regularly to ensure the policy lead is kept updated on projects as they progress. Procurement officers also connect the policy lead with other key stakeholders such as consultants, commissioning teams, and framework managers to discuss risks and due diligence measures.
- **Procurement activity:** Where a project is recognised as high-risk and there is an opportunity for risk management, the Senior Policy Lead on Modern Slavery is on hand to embed appropriate due diligence requirements in tendering activity. This includes supporting market engagement (such as communicating risks and expectations to the market), establishing specification requirements, drafting technical questions and reviewing award criteria, and advising on contract terms and conditions (which are reviewed and signed off by the legal team). The policy lead also supports the evaluation and moderation of modern slavery questions as the subject matter expert. Where a framework is being used for a high-risk project, the policy lead reviews existing framework materials, including terms and conditions, to understand what considerations around modern slavery were built into it and explores ways to strengthen these in call offs.
- **Procurement reporting:** Modern slavery is included in our procurement report to ensure that it is part of our documentation and decision making. Procurement officers are responsible for completing the report and documenting engagement with the policy lead and any modern slavery requirements and actions taken in the procurement.
- **Training:** Regular training continues to be delivered to the procurement service to keep them up to date on approaches to managing modern slavery risks (see next section on training).
- **Preparing for new regulations:** The Council has taken several measures to prepare for the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 and associated guidance that entered into force May 17, 2026. This included: attending webinars delivered by the Department of Health and Social Care and NHS on implementing the regulations; issuing comms to procurement staff via our internal intranet to raise awareness of the regulations; and reviewing existing systems and internal guidance for procurement to support implementation
- **Additional procurement checks:** In addition to the above, other checks typically undertaken within the procurement service for projects at risk of modern slavery and unethical labour practices include: reviewing past activity and checking procurement materials to understand what actions, if any, were taken to manage risks; assessing sector and supply chain risks and the market's response (e.g. reviewing Modern Slavery Statements); considering the urgency and contract length of projects to determine what is feasible to implement during tendering and the contract lifecycle; and confirming route to market and appropriate actions to manage risks – for example, if using a framework, engage with the framework manager to identify opportunities to strengthen requirements in call offs/mini competition.

- **Reporting:** Published a modern slavery statement outlining activities undertaken to tackle modern slavery during the 2024 to 2025 financial year on our website and on the Government's modern slavery registry.

Training

The Council continue to have the following training available to all staff on our e-learning platform.

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 in procurement 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 2025/2026 financial year, Council staff delivered two 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.

Additionally, one Community of Practice reflective session for Single Point of Contacts (SPOC) was facilitated, which is for ASC staff who are their nominated SPOCs within their operational teams. This provided an opportunity for the SPOCs to meet, share their learning experiences, and discuss relevant topics.

In addition to the training available above, during the 2025-2026 financial year, two knowledge-share training sessions, lasting between 1 hour and 1.5 hours, were delivered by Procurement's Policy Team, including the Senior Policy Lead on Modern Slavery, to the service. These sessions focused on the National Procurement Policy Statement (NPPS) which sets out central government's strategic priorities for public procurement and how contracting authorities can support their delivery. The NPPS requires all contracting authorities to *have regard* to these priorities when exercising their functions relating to procurement and where it is relevant to the subject matter of the contract and it is proportionate to do so. Having regard means that contracting authorities must consider whether the procurement can contribute to achieving one or more of the policy objectives stated in the NPPS in a manner that is appropriate, proportionate and relevant and take

steps to address this where it can. The NPPS requires the Council to consider issues such as fair working conditions and ensure that suppliers are committed to safe and healthy working conditions and actively working to tackle modern slavery and human rights violations and comply with employment law and other legal obligations. The first session delivered to the Procurement service aimed to raise awareness on the NPPS, its importance, and how to have regard to its priorities when undertaking a procurement. The second session explored the priorities in greater depth and outlined the Policy Team's approach to ensuring that these and the Council's own priorities are reflected in our service offer and procurement activity. This included: a brief refresher on modern slavery; a reminder of what we are trying to achieve in relation to modern slavery risk management; the factors that influence and shape this work; how projects are prioritised for modern slavery due diligence; and examples of how modern slavery considerations have been embedded.

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	2025/2026
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 not reflect all potential cases or concerns received by the local authority.	Identifying cases not only ensures that potential victims have access to necessary support, but also gives us insight into the risks we may encounter as an authority, vulnerabilities within our community, operations, and supply chains, and our overall response to these challenges.	Number of reports made through the following channels: • Our whistleblowing helpline • Adult safeguarding enquires • NRM (end of year summary 2023 statistics)	Whistleblowing: 0 Adult Safeguarding (s42 enquiry): 14 NRM: 25 referrals & 2 DtN
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	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>Procurement</u> Number of sessions: 2 Number of attendees: Session 1: 50 Session 2: 44

	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 members who have accessed modern slavery training.			
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 high-risk of modern slavery practices and engagement with suppliers.	To leverage insights from active procurements and 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 2025/2026 financial year, 18 active projects across the Orbis Partnership with a total contract value of approximately £296m were reviewed by our Senior Policy Lead on Modern Slavery

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](#)

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)

For concerns about your working conditions and your rights, and abuse or exploitation at work: contact the [Fair Work Agency](#)

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 5 August 2026. It will be reviewed and updated on an annual basis.



Becky Shaw, Chief Executive. Date: 17 August 2026



Cllr Stephen Chapman, Lead Member for Resources and Climate Change.
Date: 17 August 2026

Annex – Organisational 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 Orders" 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 Standing 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. It also includes a specific section on modern slavery which requires Council officers to have regard to the risk of unethical labour practices in the supply chains of goods, services and works that being procured.
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.
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 procedures are important to tackle modern slavery as victims are at increased risk of work-related injuries and ill health 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 <u>such as the:</u> 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. We also maintain a pre-employment checks policy, which provides information on checks that should be carried out to verify recruitment decisions.

	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 and Workplace Conflict Policy	We have several policies and procedures on grievance and workplace conflict. 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. 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, manager, and employee have a duty to be aware of in their daily activities.
Domestic Abuse	This policy sets out how the Council will support 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 coercive or controlling behaviour, psychological and/or emotional abuse, physical or sexual violence and abuse, violent or threatening behaviour, economic abuse, harassment and stalking, and online or digital abuse. Managers are expected to apply the general principles of the policy to agency workers and contractors employed by the Council. While this policy focuses specifically on domestic 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 of the procedure's 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.
Supplier Code of Conduct	The Council believes that its supply chain plays a vital role in making a positive contribution to its communities and society. Procuring in an ethical, fair, responsible and sustainable way which allows us to work with successful bidders to align with our policy objectives is a priority. The Council's Supplier Code of Conduct embeds these policy objectives and provides a detailed expectation of our supply chain. We expect our suppliers and their supply chains to follow three key principles which focus on people, and public service. These principles are underpinned by an overarching expectation for suppliers to conduct their business responsibly, maintaining high standards of integrity and professionalism in their business dealings.