EASTLEIGH BOROUGH COUNCIL

Modern Slavery Statement 2023/24

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 2023-26 gives a commitment to improve the quality of life for local residents'; we do this in part by providing services that meet the needs of residents and businesses.

Our values and guiding principles are set out in our 'Way we work' framework:

- We will keep our communities at the centre of what we do
- We will retain a supportive and collaborative culture
- We will think and do things differently to make necessary changes
- We will take pride in what we have achieved and where we succeed in the future.

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 2023/24 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.

What is modern slavery?

Modern slavery encompasses human trafficking, slavery, servitude and forced labour and can include:

- sexual exploitation;
- labour exploitation;
- forced criminality;
- organ harvesting;
- domestic servitude;
- debt bondage.

Anyone can become a victim of modern slavery, with particularly vulnerable groups including:

- unaccompanied, internally displaced children;
- children accompanied by an adult who is not their relative or legal guardian;
- young girls and women;
- former victims of modern slavery or trafficking.

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 are required to complete mandatory Modern Slavery training to raise awareness which covers a wide range of examples experienced 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 two 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 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.

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) and Mobile Home Sites 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.

Employee Code of Conduct

Our Employee Code of Conduct makes clear to employees the professional actions and ethical behaviours expected of them when working for, and representing the Council on official business. It promotes a high standard of conduct based around honesty, professionalism, conscientiousness, accountability and respect, with the aim of maintaining public confidence in services provided, with any breaches thoroughly investigated.

Councillors' Code of Conduct

The Councillors' Code of Conduct emphasises Councillors' responsibilities with regard to dealing with residents and all members of the community fairly and with respect and putting the public interest first.

Equality and Diversity

We are 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

We will ensure that 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.

As a Landlord (eastbrooke homes)

Our affordable housing service (the Council as Landlord) recognises that through day to day activities it may be in contact with vulnerable people and households at risk and are developing policies and procedures for this emerging workstream on safeguarding and appropriate support and assistance.

Accommodation

Section 188(1) of the Housing Act 1996 requires local housing authorities to secure accommodation for an individual if there is a reason to believe that the individual may be homeless, eligible for assistance and have a priority need.

If we believe an individual with recourse to public funds would be homeless as a result of being a victim of modern slavery, we will provide safe accommodation between referral to the National Referral Mechanism (NRM) and a Reasonable Grounds decision.

When assessing applications for homelessness assistance we will carefully consider the circumstances of an individual leaving accommodation where they have been exploited or are at risk of further exploitation.

Eastleigh Borough Council Supply Chains

In all our procurement activity, we aim 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. The Council has recently adopted a new Procurement Policy with an emphasis on balancing our social responsibility and commitment to protecting the environment through procuring responsibly and ethically.

To fulfil our obligations, new Standard Terms and Conditions 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 is required. This is a Standard Selection Questionnaire template provided by the Cabinet Office and 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.

We 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.

Should we have serious concerns around a supplier's policies and the safety of those working for them, this should be immediately referred to the Safeguarding Officer who will investigate and ensure appropriate action is taken.

Working in Partnership

The Council works in partnership with a wide number of agencies in order to combat modern slavery, including:

- Eastleigh (Community Safety) Partnership;
- Hampshire Constabulary;
- Hampshire and Isle of Wight Modern Slavery Partnership.

The Hampshire and Isle of Wight Modern Slavery Partnership's main objectives include:

- to raise awareness of modern slavery;
- to combat modern slavery by working in partnership;
- to identify and support victims of modern slavery; and
- to pursue perpetrators of modern slavery.

The Hampshire and Isle of Wight Modern Slavery Partnership provides guidance, training and best practice to partners across the county, ensuring all organisations are equipped to tackle this issue.

At a local level Eastleigh Borough Council work with Hampshire Constabulary to identify and manage any victims or perpetrators of modern slavery.

Reporting concerns

Staff, Councillors and Volunteers

All Modern Slavery concerns raised by Council staff, Councillors and volunteers will initially be reported via the Council's internal Safeguarding Report process. When applicable, the Safeguarding Officer may then decide to report to, or take advice from, the HPSIOW Modern Slavery Partnership or MASH, on to the National Referral Mechanism.

In England and Wales, public authorities specified in section 52 of the Modern Slavery Act 2015, have a statutory duty to notify the Home Office when they come across potential victims of modern slavery.

This duty is discharged by either referring a potential victim into the National Referral Mechanism (NRM) where they are a child or consenting adult, or by notifying the Home Office where an adult does not consent to enter the NRM. Both the referral and a notification can be made through the Modern Slavery Portal.

Statutory Guidance was published by the Home Office in October 2023 and a copy is available Gov.UK; Modern Slavery: Statutory Guidance for England and Wales (under section 49 of the Modern Slavery Act 2015)

Members of the Public

The advice to residents and communities if they are affected by slavery, or suspect someone is at risk, is to:

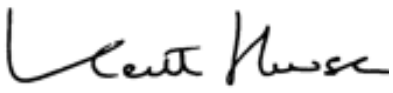
- call 999 if it is an emergency
- call 101 for non-emergencies
- call Crimestoppers anonymously on 0800 555 111
- call the Modern Slavery Helpline on 0800 012 1700
- report online via Modern Slavery Helpline

The Modern Slavery Victim Care Contract (MSVCC) is provided by The Salvation Army and provides specialist support for all survivors of Modern Slavery in England and Wales. This can include support obtaining confidential legal advice, health care, counselling, education, financial advice, and support in obtaining employment and housing. The Salvation Army referral helpline is open 24-hours a day, seven days a week, tel. 0800 808 3733 and advice can also be found on their website.

Actions going forward for 2024/25

Action	Responsible officer	Date
As part of the 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. *Update: The Procurement Policy states that the Council will particularly welcome suppliers that ensure that slavery and human trafficking is not taking place in any of their supply chains and in any part of their business*	Procurement and Insurance Officer	December 2023 Completed
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. *Update: The Procurement Policy includes as a buying standard the need to consider the risk of human trafficking and slavery in supply chains.*	Procurement and Insurance Officer (as part of emerging Procurement Policy)	December 2023 Completed
Consider reviewing large, long rolling contracts to determine whether any additional action is required.	Procurement and Insurance Officer	March 2025
Consider reviewing guidance to staff granting new leases to determine whether any additional action is required	Lead Asset Manager	December 2024
Review of the Council's Whistleblowing Policy	Head of HR/Service Director Governance and Support (Monitoring Officer)	Completed

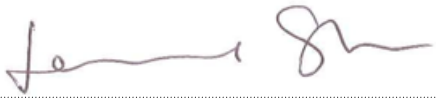
This Statement was approved by Eastleigh Borough Council:



15.07.2024

Signed
Councillor Keith House (Leader of the Council)

Date



15.07.2024

Signed
James Strachan (Chief Executive)

Date