

Appendix 1

Chichester District Council

Anti-slavery and human trafficking statement April 2021/22

1. Policy statement : Introduction

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Chichester District Council (referred to as the Council from herein) have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.
- 1.3 The Council, as part of the public sector and as an employer recognises that it has a duty to take a robust approach to modern slavery and human trafficking. The Council acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking under Sections 43, 52 and 54 of the Modern Slavery Act 2015. The Council expect the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Council include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Council expect that its suppliers will hold their own suppliers to the same high standards.
- 1.4 The Council has signed up to the Modern Slavery Pledge and will adhere to it's principles.
- 1.5 This statement sets out the Council's actions to understand all potential modern slavery risks related to its activities and to put in place steps to combat and prevent acts of slavery and human trafficking within its business and in its supply chains. It applies to all persons working for the Council or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.6 This statement does not form part of any employee's contract of employment and we may amend it at any time.

2. Policies and Plans

- 2.1 The Council has a range of policies and processes which reflect the commitment to acting ethically and with integrity to prevent modern slavery and human trafficking in its operations. The following policies and procedures are considered to be key in meeting the Council's requirements of the Modern Slavery Act 2015.
- 2.2 Procurement Strategy – This strategy sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from suppliers. All tender exercises are conducted by the Council's procurement officer and in accordance with the Chartered Institute of Procurement and Supply Code of Ethics. The Council's Invitation to Tender document requires all bidders:
- i. to confirm that they (or any sub-contractor that they intend to use) have not been convicted of any offences including an offences under the Modern Slavery Act 2015;
 - ii. to demonstrate how they tackle any modern slavery or human rights abuses in their business;
 - iii. with a turnover of £36 million or more must submit a copy of their Modern Slavery Statement with their bid.
- 2.3 Due diligence of suppliers – The council expects all suppliers of goods or services to have their own policy relating to working practices of modern slavery, or for evidence to be available to ensure their standards are in accordance with the council's expectations. We would request that our suppliers ensure the same of their own supply chains. The Council will regularly review their supply chains and check compliance where possible.
- 2.4 Code of Conduct for Employees – The Council makes clear to all its employees that there are expected standard of actions and behaviours to which they must adhere when representing the council. Any conduct and behaviours that does not meet these standards will be investigated and appropriate action taken.
- 2.5 Equality & Diversity Policy – The Council is committed to increasing inclusion and providing equality of opportunity in all its activities and to ensuring that discrimination does not occur at any level.
- 2.6 Recruitment and Selection Policy – The Council's recruitment processes are transparent and reviewed regularly. This includes robust procedures in place for the vetting of new employees and ensures they are able to confirm their identities and qualifications, references are sought for all employees and relevant checks are carried out, for example

Disclosure and Barring Service checks are carried out where relevant to the position. The employees are paid directly into an appropriate, personal bank account.

- 2.7 Pay and Reward Policy – The Council is committed to operating transparent, consistent and equitable pay arrangements for its employees. The policy sets out the key principles for establishing pay levels, the basis for determining salaries, pay progression and pay supplements.
- 2.8 Whistleblowing Policy – The Council encourages all its employees, volunteers, Councillors, contractors, agents, consultants, suppliers and service providers who have concerns about any aspect of the Council’s work to come forward and voice those concerns. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easier to disclose any information without fear of discrimination and repercussions.
- 2.9 Safeguarding – The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults who come into contact with its services and activities and to protect them from harm. The Council has a comprehensive policy which all staff and councillors are expected to read and work within.

3. Responsibility for the Policy

- 3.1 The Council’s compliance officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under the Council’s control comply with it.
- 3.2 The compliance officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. Compliance with the policy

- 4.1 The Council’s employees, volunteers, councillors, contractors, agents, consultants, suppliers and service providers must ensure that they read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of the Council’s business or supply chains is the responsibility of all those working for the Council or

under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 4.3 The Council encourages all staff, to raise concerns about any issue or suspicion of modern slavery in any parts of the Council's business or supply chains of any supplier tier at the earliest possible stage to the Divisional Manager for Communities and Wellbeing who is the modern slavery Single Point Of Contact.
- 4.4 If an employee or other staff of the Council believe or suspect a breach of this policy has occurred or that it may occur they must notify their manager or report it in accordance with the Council's Whistleblowing Policy as soon as possible.
- 4.5 If an employee or other staff of the Council are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Council's supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 4.6 The Council aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Council is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our its business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the [compliance officer] immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Council's Grievance Procedure, which can be found on the Council's intranet.

5. Communication and awareness of this policy

- 5.1 Training on this policy, and on the risk faced by the Council from modern slavery in its supply chains, forms part of the safeguarding training for all staff who work for the Council, and regular training will be provided as necessary.
- 5.2 Frontline staff who may witness the signs of modern slavery receive more bespoke training around exploitation to include modern slavery and all staff are encouraged to take part in any additional training offered by partner agencies which include modern slavery.
- 5.3 The Council's commitment to addressing the issue of modern slavery in its business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

5.4 Regular information and updates on modern slavery will be shared with Councillors, partners and the public alike through a range of media platforms.

6. Breaches of this policy

6.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 The Council may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

7. Approval

7.1 This statement is made under section 54(1) of the Modern Slavery Act 2015 for the financial year ending [31st March 2022].

7.2 This statement is approved by the Council's [Senior Leadership Team], and will be subject to review on an annual basis.

Signed: