



## Modern Slavery Statement

Version number: 1.0  
Date: May 2024

## Tracking

**Policy title: Modern Slavery Statement**

**Head of Service sign off: Head of People & OD**

**SLT sign off:**

**Committee approval: Not required**

**Review due date: 1 May 2025**

**Service owner: People and Organisational Development**

## Revision History

Version No.	Revision Date	Revisor	Previous Version	Description of Revision
1	1 May 2024	Head of People and OD	0	Creation of the Modern Slavery Statement

## Document Approvals

Each revision requires the following approvals:

- Non-administrative updates: Strategic Leadership Team
- Administrative updates: Director of Corporate Services

## Impact Assessment and Consideration

Assessment Type	Required / Not Required	Date Completed	Impact Assessments and Considerations Comment	Completed By
Finance	Not Required			
Legal	Not Required			
Equality Impact Assessment	Not Required			
Counter-fraud	Not Required			
Health and safety	Not Required			
Data Protection Impact Assessment	Not Required			
Climate Change	Not Required			

## Four Year Plan

Applicable [Four Year Plan](#) theme(s): Safe and Well, Smart and Connected, Effective Council.

## **1. Epsom & Ewell Borough Council's Commitment**

- 1.1. The Council is committed to ensuring the prevention of modern slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.
- 1.2. This statement sets out the Council's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement related to actions and activities during the financial year 1 April 2024 to 31 March 2025.
- 1.3. As part of the Public Sector, the Council recognises its responsibility to take a robust approach to slavery and human trafficking. In addition to our responsibility as an employer, we acknowledge our duty to notify the Secretary of State of suspected victims of modern slavery or human trafficking as introduced by Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.
- 1.4. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Policy and Corporate Resources, Finance and Human Resources departments taking responsibility for overall compliance.

## **2. The Modern Slavery Act 2015**

- 2.1. Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:
  - Sexual exploitation: this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
  - Domestic servitude: this involves victims being forced to work in usually private households, performing domestic chores and childcare duties.
  - Forced labour: this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars).
  - Criminal exploitation: this can be understood as exploitation of a person to commit a crime, such as pickpocketing, shoplifting, cannabis cultivation, drug trafficking, and other similar activities that are subject to penalties and imply financial gain for the trafficker.

## **3. Organisational structure and supply chains**

- 3.1. This statement applies to direct employees of Epsom & Ewell Borough Council, Council, agency workers; suppliers of goods, delivery of works and the services delivered on behalf of the Council by third party organisations. This statement also covers the Council's supply chain from end to end.
- 3.2. The Council's Structure and Services can be found here.

- 3.3. The Council's constitution can be found [here](#).
- 3.4. Epsom & Ewell Borough Council is a local authority based in the County of Surrey, United Kingdom.
- 3.5. The Council is an organisation of 280 staff and 35 Councillors. With a gross annual expenditure of £48.4million the Council deliver quality public services, cost effectively, for the residents of Epsom and Ewell.
- 3.6. As a Borough Council, Epsom & Ewell is responsible for services such as waste and recycling, housing, planning, community support services, parks, community safety, playground, and green spaces. Underpinning all that we do is 'Our Vision' and 'Four Year Plan' – our strategic planning document.
- 3.7. The Council remains vigilant and will take all steps available to manage the risks presented by modern slavery and human trafficking.

## 4. Relevant Policies

- 4.1. The Council operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
- 4.2. **Whistleblowing Policy:** The Council encourages all its staff, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear or retaliation.
- 4.3. **Employee code of conduct:** The Council's code of conduct makes clear to employees the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour in all its activities.
- 4.4. **Recruitment and Selection:** The Council's policies, procedures, governance, and legal arrangements are robust, ensuring that proper checks and due diligence are applied in employment procedures to ensure compliance with this legislation. 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.
- 4.5. **Safeguarding:** The Council is committed to, and endeavours to, meet its obligations towards the safeguarding of children and adults at risk. Whilst the Council does not currently undertake any regulated activity as defined by the Safeguarding Vulnerable Groups Act 2006, it does interact with such, and therefore an outcome of the Safeguarding Policy and associated training is to provide staff, trustees, and volunteers with the overarching principles that guide our approach and interactions.

## 5. Due Diligence

- 5.1. Epsom & Ewell Borough Council's due diligence approach to procurement includes contractors of goods, services, or works to implement due diligence procedures in relation to modern slavery for their own contractors, subcontractors, and other participants in their supply chains where their annual turn-over exceeds £36million. Where turn-over is less than £36million, contractors are required to comply with this Modern Slavery Statement.
- 5.2. The Council undertakes due diligence when entering into contracts with suppliers, and contract manager's to ensure adherence to the Key Performance Indicators and the Councils Contract Standing Orders. The Council's due diligence and reviews include:
  - Mapping the supply chain broadly to assess products or geographical risks of modern slavery and human trafficking.
  - Ensure contractors confirm their adherence to Modern Slavery Act 2015 and human trafficking risks by reviewing, on an ad hoc basis, aspects of the supply chains based on the supply chain mapping.
  - Conducting risk-based audits through the Councils Internal Audit team and in accordance with risks that may be identified.
  - Providing advice to contractors by hosting Supplier Events, providing procurement email address, telephone support via the EEBC external website.
  - Contractors are obliged to meet all Service Level Agreements (SLA). To confirm the SLA has been achieved, a Key Performance Indicator (KPI) is allocated to each SLA. The KPI's are monitored as stated and where the KPI's fail to meet the minimum threshold staggered agreed actions are instigated.
  - Procurement Legal Declaration puts the onus on contractors to inform the Council of any changes or breaches during the contract term.
  - Contractors are required to sign Insurance Schedules confirming they hold the relevant insurance cover and will continue to for the life of the contract.
  - Where required the Council requires contractors to complete self-declaration questionnaires.

## 6. Risk Assessment

- 6.1. As part of the risk identification and mitigation process, the Council will:
  - Identify and assess potential risk areas.
  - Mitigate the risk of slavery and human trafficking occurring through supply chain management.
  - Monitor potential risk areas in the Council and supply chains.
  - Ensure staff are aware of the key indicators or potential modern slavery.

## **7. Key Performance Indicators (KPIs)**

- 7.1. Epsom & Ewell Borough Council uses the following performance indicators to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:
- All contractors considered for any opportunities confirming their adherence to Modern Day Slavery Act (2015)
  - Employees made aware of the Modern-Day Slavery Act 2015 and training provided as identified.
  - All employees completed mandatory Safeguarding Training.
  - Number of cases reported on its whistleblowing system resulting in action.

## **8. Training**

- 8.1. Epsom & Ewell Council has a programme of mandatory safeguarding training for employees that enables them to identify and know how to report suspected or disclosed incidents of abuse and neglect, including modern slavery and human trafficking.

## **9. Standards**

- 9.1. Epsom & Ewell Borough Council will meet the following standards and expects those with whom it does business, to meet these standards:
- To support every individual's human right to live free from abuse, servitude, and inhumane treatment.
  - To promote ethical business and operational practices in corporate activity and the services delivered.
  - To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains.
  - To take reports of witnessed, suspected, or disclosed concerns of slavery and human trafficking seriously.
  - To take appropriate steps to address actual instances of slavery and human trafficking.

## **10. Approval**

- 10.1. This statement has been approved by Epsom & Ewell Borough Council's Strategic Leadership Team. It will be reviewed and updated on an annual basis.

## **11. Reporting**

- 11.1. All modern slavery concerns raised by council staff, councillors and volunteers will be reported via the whistleblowing policy.
- 11.2. Residents and communities should report suspected modern slavery concerns in the Council or with any of its supply chains on 01372 732000. Hard of hearing can SMS on 07950 080 202.
- 11.3. 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 website [File a report \(modernslaveryhelpline.org\)](https://modernslaveryhelpline.org)