



# **Modern Slavery & Human Trafficking Policy Statement**

**2021/2022**

## **1. Policy statement**

- 1.1. Modern slavery and human trafficking are crimes and a violation of fundamental human rights. It is widely recognised as increasing in prevalence across the UK and a safeguarding concern for all communities. Modern slavery can take various forms, such as slavery, domestic 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. Ashfield District Council has a zero-tolerance approach to modern slavery and is committed to acting to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. Ashfield District Council is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
  - 1.2.1. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. This policy applies to all persons working for us or on our 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.

## **2. Responsibility for the policy**

- 2.1. The Council's Members and Corporate Leadership Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- 2.2. The Council's Service Managers have primary and day-to-day responsibility for implementing, monitoring its use and effectiveness, dealing with any queries regarding it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. All levels of management are responsible for ensuring that those reporting to them understand and comply with this policy and are given appropriate training on the issue of modern slavery in supply chains.

## **3. Compliance with the policy**

- 3.1. All employees must be aware of, read, understand and comply with this policy.

- 3.2. 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. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. If an employee is unsure about whether a particular act or treatment of workers or working conditions constitutes any of the various forms of modern slavery, the concerns should be raised with their manager.
- 3.3. Employees must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5. Employees should note that where appropriate, the Council will give support and guidance to our suppliers to help them address abusive and exploitative work practices in their own business and supply chains.
- 3.6. The Council aims 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 and no one should suffer any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place. This includes dismissal, disciplinary action, threats or other unfavourable treatment.

#### **4. Communication and awareness of this policy**

- 4.1. Training on this policy, and on the risk the businesses and the community face from modern slavery in its supply chains, is available and will form part of the induction process for all individuals who work for the Council, and regular refresher training and awareness will be provided as necessary.
- 4.2. The Council's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of the business.

#### **5. Breaches of this policy**

- 5.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2. The Council may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.