



BOGNOR REGIS TOWN COUNCIL MODERN SLAVERY POLICY

Adopted by the Council on 7th November 2022

INTRODUCTION

Modern slavery in its wider sense is commonly accepted to include forced or bonded labour, human trafficking, child slavery, anything involving offences under the Protection of Children Act 1978 or the Sexual Offences Act 2003 and forced or early marriage.

Bognor Regis Town Council is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

This Modern Slavery Policy 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.

MODERN SLAVERY ACT 2015

The Modern Slavery Act 2015 consolidates various offences relating to human trafficking and slavery. In broad terms:

- 'slavery' is where ownership is exercised over a person or persons.
- 'servitude' involves coercion to oblige a person to provide services.
- 'forced and compulsory labour' is where a person works or provides services on a non-voluntary basis under the threat of a penalty.
- 'human trafficking' involves arranging or facilitating the travel of a person with a view to exploiting them.

The Council recognises its responsibilities as an employer and procurer of services. It acknowledges its duties as a Town Council to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015 and to act and work with other responder agencies under the Civil Contingencies Act 2004.

STANDARDS

Bognor Regis Town Council will meet the following standards and expects those with whom it does business with, 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.

ORGANISATIONAL STRUCTURE

Bognor Regis Town Council is a local authority of Arun District Council, which provides a wide range of statutory and discretionary services. Bognor Regis Town Council is made up of 16 Councillors and a staff team of 14. Underneath Full Council there are several Committees:

- Policy and Resources Committee
- Community Engagement and Environment Committee
- Planning and Licensing Committee
- Events, Promotion and Leisure Committee
- Allotments Sub-Committee
- Joint Consultative Sub-Committee (Staffing)

SUPPLY CHAINS

Bognor Regis Town Council is committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business. As a Council, our responsibility extends beyond supply chains and our links with third parties, as we have a corporate responsibility to safeguard the community.

The Council has a range of policies and processes which reflect our commitment to acting ethically and with integrity to prevent slavery and human trafficking in all of its operations.

POLICIES AND PLANS

Council policies are developed by Officers employed by Bognor Regis Town Council and are then approved by a Committee and then adopted by Full Council.

Protection of Children and Vulnerable Adult Policy – sets out how the Council will safeguard and promote the welfare of children, young persons and adults at risk who come into contact with its services and activities.

Whistleblowing Policy – The Council encourages employees to raise any concerns that they may have about any wrongdoing at any level within the business. Wrongdoing in this context means any breach of a legal obligation, risk to Health & Safety, a criminal offence being committed, a miscarriage of justice occurring or likely to occur, damage to the environment, or an attempt to conceal any of the above.

Officers' Code of Conduct – is the ethical framework that employees work to, which makes clear 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 and breaches are investigated.

Procurement Policy – Sets out the strategic aims and principles of procurement activity.

Equality Policy – sets out the Council's legal obligation under the Equality Act 2010 and the various ways the Council meets its duties.

Risk Assessments - organisational responsibility for human rights encompasses all services and departments. Modern slavery risk analysis would be provided by colleagues who are actively developing strategies and safeguards around this.

Due Diligence - in respect of suspected or known incidents of slavery or trafficking we would refer these to Sussex Police. We would expect any colleague who may witness or suspect any wrongdoing to report their concerns to their Line Manager.

TRAINING

Induction briefings on all relevant Town Council Policies, including equality and diversity and safeguarding, are provided to Councillors and employees.