

# Brighton & Hove City Council

## Policy & Resources Committee

## Agenda Item 21

**Subject:** Brighton & Hove City Council 2021/2022 Modern Slavery Statement

**Date of meeting:** 7 July 2022

**Report of:** Executive Director Governance People & Resources

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**Ward(s) affected:** All

**For general release**

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### **1. Purpose of the report and policy context**

- 1.1 The purpose of this report is to seek Policy & Resources Committee's approval of Brighton & Hove City Council's draft 2021/2022 Modern Slavery Statement.
- 1.2 The Modern Slavery Statement is an annual statement outlining actions that have been taken in the previous financial year to address modern slavery within their operations and supply chains.

### **2. Recommendations**

- 2.1 That Committee approves the Modern Slavery Statement (see Appendix 1)

### **3. Context and background information**

- 3.1 Modern slavery is an umbrella term used to describe situations of exploitation where people are exploited for financial gain. It refers to situations that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power and vulnerability. It encompasses practices such as slavery, forced labour or compulsory labour, debt bondage, human trafficking, domestic servitude, and sexual exploitation.
- 3.2 The key legislation in the UK on this issue is the Modern Slavery Act which was introduced in 2015. Section 54 of the legislation requires commercial organisations with an annual turnover of £36 million or more to report publicly on their efforts to address modern slavery in their operations and supply

chains. To comply with the legislation organisations meeting the threshold are legally required to publish a slavery and human trafficking statement for each financial year outlining the steps taken (or not taken) by the organisation to address modern slavery during this year. Statements must be approved at the highest level of an organisation, signed by the most senior member of the organisation, and published on their website with a link in a prominent place on their homepage.

- 3.3 Following an independent review and public consultation of the legislation, the government announced plans to make changes to the legislation. One of these changes is the extension of Section 54 obligations to public bodies with a budget of £36 million or more, including local authorities in England and Wales. While extending Section 54 will require legislative changes, in March 2022 the Home Office acknowledged in a letter to public sector bodies that this change will be introduced as soon as parliamentary time allows and encouraged organisations to in any case produce a statement for the 21/22 financial year by 30 September 2022.
- 3.4 The statement should focus specifically on supply chains and business operations and must “describe the steps your organisation has taken during the financial year to deal with modern slavery risks in your supply chains and your own business.” Currently, Home Office statutory guidance recommends that statements include information on the following areas: Organisation structure and supply chains; Policies in relation to slavery and human trafficking; Due diligence processes; Risk assessment and management; Key performance indicators to measure effectiveness of steps being taken; and Training on modern slavery and trafficking. The government announced plans to also mandate these requirements in the future.
- 3.5 Surrey County Council, East Sussex County Council and Brighton & Hove City Council have agreed that the responsibility for implementing approaches to responding to modern slavery in their operations and supply chains will rest with Orbis Procurement – a shared partnership service between the three authorities. The authorities jointly funded the role of the Senior Policy Lead on Modern Slavery to support this work. This is Brighton & Hove City Council’s first Modern Slavery Statement and has been drafted by the Senior Policy Lead with input from representatives of different services across the authority.
- 3.6 Brighton & Hove City Council has made several commitments to addressing modern slavery in its supply chain. For instance, In 2018, the Council joined the Co-operative Party Charter Against Modern Slavery. The Charter commits Councils across England and Scotland to proactively vet their own supply chain to ensure no instances of modern slavery are taking place. This includes committing to take actions such as reviewing contractual spending to identify potential modern slavery risks, train procurement teams, and engaging with suppliers. In 2020, the Council also signed a joint pledge on modern slavery coordinated by the Sussex Anti-Slavery Network. This pledge commits the Council to work proactively with local and national actors to take actions such demonstrating strong local leadership for anti-slavery initiatives and removing slave-based labour from our supply chains.

3.7 Consequently, as this is the Council's first statement, it demonstrates how we have started responding to modern slavery risks in our operations and supply chains and some of our planned actions. The Government's statutory guidance acknowledges that "Organisations will need to build on what they are doing year on year. Their first statements may show how they are starting to act on the issue and their planned actions to investigate or collaborate with others to effect change." The Senior Policy Lead on Modern Slavery is therefore undertaking a series of work to support the Council in its approach to addressing this problem in our supply chains. This includes designing and delivering tailored training to staff and ensuring that measures are recorded for reporting purposes in our statements.

3.8 The statement will be co-signed by the Chief Executive and the Leader of the Council prior to being published.

#### **4. Analysis and consideration of alternative options**

4.1 There are no known arguments against the recommendation.

#### **5. Community engagement and consultation**

5.1 Community engagement was not carried out. Due to the scope of the legislation, the following groups were consulted in the drafting and reviewing of the Modern Slavery Statement: representatives from Legal, Procurement, Audit, Human Resources, Safeguarding, Community Safety; Orbis Procurement Senior Leadership Team; Governance, People & Resources Directorate Management Team; and the Executive Leadership Team.

#### **6. Conclusion**

6.1 Brighton & Hove City Council's draft 2021/2022 Modern Slavery Statement has been brought for to the Policy & Resources committee for approval in advance of its publication.

#### **7. Financial implications**

7.1 There are no material financial implications in this report. No BHCC staff are directly employed in this work, which is managed by a member of the Orbis Procurement Team working at Surrey CC. A share of the costs is incurred by BHCC under the Orbis Partnership arrangement, expected to be in the region of £0.015m per annum

Name of finance officer consulted: Peter Francis

Date consulted :16/06/2022

## **8. Legal implications**

- 8.1 The legal implications are covered in the body of the report. The Council is not currently required by law to publish a Modern Slavery Statement, but it is good practice to do so.
- 8.2 Policy & Resources Committee (P&R) is the appropriate Committee under the Council's Constitution to consider this report. The statement relates to the Council's potential exposure to modern slavery risks occurring in its supply chains and own organisation. The appropriate committee to make the decision is therefore P&R which is responsible for procurement, Human Resources and Council-wide contract management issues.

Name of lawyer consulted: Alice Rowland Date consulted: 8/6/22

## **9. Equalities implications**

- 9.1 The publishing of Brighton & Hove City Council's Modern Slavery Statement will not negatively impact on equality and those with protected characteristics groups from the Equality Act 2010. The publication of the statement aligns with the Council's equality responsibilities and priorities. This is because certain vulnerable, marginalized, and underrepresented groups are at a higher risk of modern slavery practices. The Modern Slavery Statement references the relevance of our Equality, Diversity and Inclusion policies in addressing modern slavery risks.

## **10. Sustainability implications**

- 10.1 The publication of our Modern Slavery Statement and associated actions will have a positive impact on sustainability, particularly in the area of sustainable procurement and consideration of the ethical impacts of our procurement activities. Additionally, it contributes to the wider global sustainability agenda as target 8.7 of the United Nations Sustainable Development Goals focuses on the eradication of forced labour and modern slavery practices.

## **Supporting Documentation**

### **1. Appendices**

1. Brighton & Hove City Council draft 2021/2022 Modern Slavery Statement

# Appendix 1

## Brighton & Hove City Council Modern Slavery Statement for the Financial Year Ending 2021/2022 June 2022 [DRAFT]

Modern slavery is an umbrella term encompassing exploitative practices such as slavery, servitude, forced or compulsory labour and human trafficking. This statement is pursuant to Section 54 (transparency in supply chains) of the UK's Modern Slavery Act 2015 and sets out actions taken by Brighton & Hove City Council to address the risk of modern slavery in our operations and supply chains. This includes ensuring that the goods and services we procure do not contribute to modern slavery in the UK and globally and protecting and safeguarding vulnerable people and workers from exploitative practices. We are committed to understanding where the risks to people being exploited lie within our own organisation and supply chains and putting in place measures to prevent and respond to cases.

In Brighton & Hove, we are aiming to achieve a fairer city with a sustainable future. This includes: a city to call home; a city working for all; a stronger city; a growing and learning city; a sustainable city; and a healthy and caring city. Our [Corporate Plan for 2020 to 2023](#) details how we aim to create a fairer and sustainable city.

The Council has made public declarations regarding modern slavery and has engaged in collaborative forms of work at community level. We have also taken a number of steps to tackle modern slavery such as raising awareness of modern slavery to our communities, establish measures to protect vulnerable groups against exploitation, and working together to support the identification and safeguarding of victims. However, we have recognised the need to undertake further work in our operations and supply chains to ensure that our own activities do not contribute, cause or are linked to modern slavery practices. Brighton & Hove City Council is therefore committed to tackling this problem and being transparent in our anti-slavery activities and outcomes.

As this is our first statement, it demonstrates how we have started responding to modern slavery risks in our operations and supply chains and some of our planned actions. We believe that tackling modern slavery requires continuous improvement and therefore we are committed to keeping track of measures that are put in place to ensure effectiveness of actions taken.

This statement relates to the steps taken by the Council during the financial year 1 April 2021 to 31 March 2022.

## Contents

Our organisational structure and supply chains .....	6
Responsibility for anti-slavery activities in our operations and supply chains .....	8
Our policies in relation to modern slavery .....	9
Modern slavery due diligence .....	9
Training on modern slavery .....	11
Looking ahead: Our plans for 2022/2023.....	12
Approval of statement .....	13
Annex: Organisational Policies .....	14

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## Our organisational structure and supply chains

Our Executive Leadership team provides strategic direction to the whole council which is organised into the following directorates:

- Economy, Environment and Culture
- Families, Children and Learning
- Health and Adult Social Care
- Housing, Neighbourhoods and Communities
- Governance, People and Resources

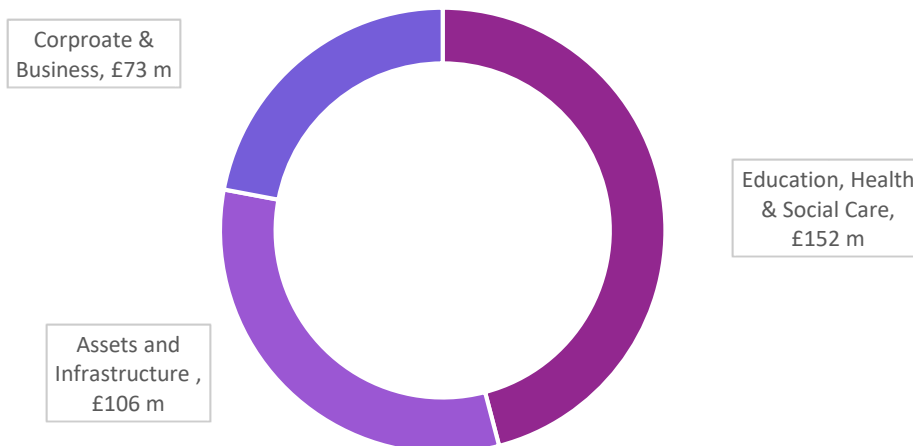
Brighton & Hove City Council has partnered with East Sussex County Council and Surrey County Council to develop Orbis Procurement – a shared service partnership working together to deliver lean procurement support, shared learning to achieve excellent outcomes, and shared resource for the delivery of achieving value for money for our residents. Collectively, we comprise of one of the largest public procurement spend in local government. Orbis Procurement service delivers a significant amount of our projects annually, and therefore its contribution to our anti-slavery activities is vital.

The three authorities have committed to developing an approach to respond to modern slavery in our operations and supply chains. This responsibility will rest with Orbis Procurement on behalf of Surrey County Council, East Sussex County Council and Brighton & Hove City Council. The three authorities have also jointly funded the establishment of a new Senior Policy Lead on Modern Slavery role for Orbis Procurement to help design, deliver and co-ordinate our anti-slavery in supply chain activities.

For each of the authorities where services are not procured directly by the Councils, they are procured via Orbis Procurement on behalf of the Council. This statement reports on activities related to these services. Further work will be required to map services procured directly by the Council. These services are often significantly lower in value and spend and are governed by the Council's procurement and contract standing orders. Therefore, it is anticipated that such work would require longer-term assessments in collaboration with other teams working across the Council. Focusing on services procured via Orbis Procurement in the short-term allows us to ensure adequate prioritisation of modern slavery risks and allocation of shared resources to respond to these risks.

During the 2021/2022 financial year the Council spent approximately **£330 million** with **3,902 suppliers**, procured using Orbis Procurement's services on behalf of the Council.

The diagram below demonstrates the distribution of this spend:



## Responsibility for anti-slavery activities in our operations and supply chains

Activity	Responsibility
Approving the modern slavery statement	- Policy and Resources Committee
Signing the modern slavery statement	- Leader of the Council - Chief Executive
Drafting and reviewing the modern slavery statement	- Orbis Procurement Senior Policy Lead on Modern Slavery - Orbis Procurement Senior Leadership team - Representatives from: Procurement; Legal; Human Resources; Audit; Safeguarding; and Community Safety teams
Assessment and prioritisation of modern slavery risks for services procured via Orbis Procurement on behalf of the Council	- Orbis Procurement Senior Policy Lead on Modern Slavery
Modern slavery due diligence in the supply chain for services procured via Orbis Procurement on behalf of the Council	- Orbis Procurement Senior Policy Lead on Modern Slavery - Heads of services - Commissioning managers - Procurement teams - Contract managers
Education and training of procurement personnel	- Orbis Procurement Senior Policy Lead on Modern Slavery
Education and training of wider council and staff	- Orbis Procurement Senior Policy Lead on Modern Slavery - Safeguarding and Community Safety teams
Identifying and responding to suspected cases of modern slavery	- All staff is responsible for identifying and responding to suspected cases of modern slavery



## **Our policies in relation to modern slavery**

Brighton & Hove City Council recognises the importance of policies to communicate commitments and our expectations of our staff, suppliers, and those who we do business with, to effectively address modern slavery. We recognise that modern slavery sits on the extreme end of the labour exploitation continuum. Therefore, we have several policies with respect to fair labour and employment conditions that work to prevent and respond to a range of issues, including modern slavery, in our operations and supply chains.

The following are our key policies, procedures, and codes of conduct in relation to modern slavery.

- Council Constitution
- Whistleblowing Policy
- Sustainability and Social Value Policies
- Employee Code of Conduct
- Health and Safety Policies
- Recruitment Policies
- Grievance and Workplace Conflict Policies
- Equality, Diversity and Inclusion Policies
- Domestic Abuse Policy
- Trade Union Policy

Details of these policies and their relevance to modern slavery can be found in the **Annex**.

## **Modern slavery due diligence**

In addition to our existing policies which are relevant to the anti-slavery agenda, Brighton & Hove City Council has undertaken the following due diligence measures to respond to modern slavery risks within our operations and supply chain:

### **i. Anti-Slavery Commitments**

In 2018 we joined the Co-operative Party Charter Against Modern Slavery. The Charter commits Councils across England and Scotland to proactively vet their own supply chain to ensure no instances of modern slavery are taking place. This includes committing to take actions such as reviewing contractual spending to identify potential modern slavery risks, train procurement teams, and engaging with suppliers. In 2020 we also signed a joint pledge on modern slavery coordinated by the Sussex Anti-Slavery Network. This pledge commits us to work proactively with local and national actors to take actions such as demonstrating strong local leadership for anti-slavery initiatives and removing slave-based labour from our supply chains. We recognise that while commitments are important, they alone cannot address modern slavery and that further practical action is needed.

### **ii. Partnership and Collaboration**

In addition to our shared-service partnership through Orbis Procurement which helps to coordinate our anti-slavery approach, we are engaged in multi-agency anti-slavery partnerships. We have representatives who are part of the Sussex Anti-Slavery Network. Members of this multi-agency partnership include West Sussex County Council, East Sussex County Council, Brighton & Hove City Council, Office of the Sussex Police and & Crime Commissioner, East and West Sussex Fire and Rescue Services, Sussex Clinical Commissioning Groups, and the Gangmasters and Labour Abuse Authority. The aim of the partnership includes asserting and supporting organisations' responsibility towards tackling modern slavery, sharing intelligence and best practice, and developing preventative strategies. The Council is also part of the Brighton & Hove Anti-Slavery Network. This group also focuses on monitoring progress in addressing modern slavery and includes representatives from within the local authority (such as children's and adult social care, housing) and organisations such as Sussex Police, Sussex Clinical Commissioning Groups and East Sussex Fire and Rescue. While these partnerships contribute to action against modern slavery, we have recognised the need to bring a business and supply chain element to their focus. This includes co-ordinating with the network to engage with local businesses and suppliers.

**iii. Supplier Engagement**

We recognise the need to ensure that modern slavery requirements are consistently implemented throughout our procurement to effectively tackle this problem. We are developing and strengthening existing measures to engage with our suppliers on the problem of modern slavery. Such measures include reviewing modern slavery clauses in contracts and procurement materials such as tender and specification documents to ensure that the Council and our suppliers adequately respond to modern slavery risks.

**iv. Victim Support and Protection**

Brighton & Hove City Council recognises that having adequate safeguarding measures can help identify potential victims, support them in their rehabilitation and protect them from further victimisation. In April 2020, we introduced the Council's Modern Slavery Referral Pathway for referring potential adult and child victims of modern slavery. There has been an increase in the number of referrals made into the National Referral Mechanism and we have received valuable intelligence related to the demographics and characteristics of victims and the type of exploitation experienced. This information has been particularly useful due to the COVID pandemic and being able to identify potential victims and vulnerabilities such as those facing vulnerable migrant workers, adults with multiple complex needs and children forced into criminal exploitation. Consequently, a key area of focus has been to prevent further victimisation and increased risks to exploitative practices such as labour exploitation

where there are limited opportunities for victims and vulnerable people to support themselves.

## Training on modern slavery

We recognise the importance of raising awareness of modern slavery amongst our staff. We are committed to designing and delivering training to our staff, including providing targeted training to key personnel.

We have delivered one virtual training session on modern slavery risks in supply chains staff. The training was delivered on three different slots to enable staff to attend. It lasted approximately 2 hours and focused on improving our staff's understanding of the problem of modern slavery in supply chains. The training, which will be distributed in phases to different teams, was first delivered to our staff working across Orbis Procurement for the three authorities. Sixty-eight percent (68%) of procurement staff undertook the training. This included people working in various roles such as Heads of Procurement, Procurement Specialists, Contract & Supply Specialists, and Strategic Procurement Managers. The contents of the training included:

- Definition of modern slavery
- Types of modern slavery
- Vulnerabilities to exploitation
- General signs of exploitation
- Nature and scale of slavery globally and in the UK
- Introduction to the UK's Modern Slavery Act and Section 54 on Transparency in Supply Chains
- Enablers of modern slavery in supply chains and high-risk sectors
- Relevance of modern slavery to the public sector
- Different responsibilities within our organisation for tackling modern slavery
- Commitments of Surrey County Council, East Sussex County Council and Brighton & Hove City Council in addressing modern slavery, including planned actions (see following section).

To assess our staff's knowledge and awareness of modern slavery, we assessed a short questionnaire completed by staff before and after the training was delivered. Of those responding to the questionnaire, there was a marked difference in their understanding of modern slavery. Prior to the training, most respondents (56%) reported that they had a poor (knew hardly anything about modern slavery) or fair (knew a little about it, but was unsure of how it was relevant to their role) understanding of modern slavery. Forty-two (42%) reported that they felt they had a good understanding of modern slavery and its relevance to their role but were unsure how to embed this into their work to address it. Only 2% of respondents reported an excellent understanding i.e., good understanding of the problem, its relevance to their role and how to embed anti-slavery action into their work. Following the training, most respondents rated their understanding as either good or excellent. See table below.

<i>Level of understanding</i>	<i>Before training</i>	<i>After training</i>
Poor (I hardly know anything about it)	9%	0%

Fair (I know a little about it, but I am not sure how it is relevant to my role)	47%	6%
Good (I have a good understanding of modern slavery and its relevance to my role, but I am unsure how to embed this in my work)	42%	74%
Excellent (I have a good understanding of modern slavery, its relevance to my role and how to embed this in my work)	2%	21%

We also collected feedback from staff to inform future training and materials to ensure usefulness and effectiveness of training delivered. This is particularly important for ensuring that our staff have the knowledge, confidence, and skills to embed anti-slavery action into their work. It is anticipated that the training will be reviewed and repeated on an annual basis.

### **Looking ahead: Our plans for 2022/2023**

Brighton & Hove City Council is committed to ensuring that our anti-slavery approach is effective in tackling modern slavery in our operations and supply chains. Therefore, over the next financial year some of the activities we aim to undertake include:

- Review policies to consider how we can strengthen them.
- Working with other stakeholders across the Council to understand services procured directly by the Council to support modern slavery due diligence of these activities.
- Assess and prioritise areas within our organisation and supply chains at high-risk of modern slavery.
- Review our procurement processes and identify areas to embed anti-slavery activities in the procurement lifecycle.
- Strengthen engagement with our suppliers to address modern slavery in supply chain risks.
- Design and deliver targeted training to key roles and responsibilities within our organisation.
- Develop performance indicators to measure the effectiveness of actions taken.
- Publish a modern slavery statement for the 2022/2023 financial year.

## Approval of statement

This statement has been approved by the **Policy and Resources Committee** on **7 July 2022**. It will be reviewed and updated on an annual basis.

**Signed:**

**Geoff Raw, Chief Executive**

**Phélim Mac Cafferty, Leader of the Council**

**[Insert signature here]**

**[Insert signature here]**

**Date: [Insert date here]**

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## Annex: Organisational Policies

Policy	Relevance to tackling modern slavery
Council Constitution	Our Constitution describes the procedures which are followed to ensure that the Council acts in a way which is efficient, transparent, and accountable to local people. The Constitution is divided into several articles, which set out the basic rules governing the Council's business. The "Contract Standing Orders" is included in the Council's constitution and sets out how the Council authorises and manages spending and contracts with other organisations. This is relevant to tackling modern slavery as it requires consideration to be given to all tenders with respect to sustainability and social value issues.
Whistleblowing Policy	The Council is committed to applying the highest standards of openness, honesty, integrity, and accountability through the services it provides. However, the Council recognises that there is always the risk that things can go wrong. Therefore, the Council is keen to encourage those working for the Council, its elected and co-opted members, and members of the community to express their concerns when they think that there may be something seriously wrong regarding the activities of the council. This gives the Council the opportunity to stop any unethical or unprofessional practices or wrongdoing within the organisation. Our Whistleblowing Policy sets out how concerns about serious wrongdoing by the Council can be raised and how the Council will respond to these. This policy is important for individuals wanting to raise concerns about modern slavery and/or related issues.
Sustainability and Social Value	Our Sustainable Procurement Policy sets how sustainability will be embedded into every procurement process or purchasing decision. Relatedly, our Social Value Framework aims to maximise the social, economic, and environmental benefit of all public investments. Our framework is underpinned by a set of guiding principles which organisations from all sectors are encouraged to adopt. Our principles such as being inclusive in the way we work, supporting people in securing work and paying the Living Wage, and ensuring ethical standards of purchasing and delivering services is relevant to the anti-slavery agenda as they promote good work and procurement practices beyond the cost of a service.
Employee Code of Conduct	This Code sets out the responsibilities and rights of employees when carrying out their duties. This includes encouraging employees to raise concerns confidentially of malpractice and ensuring dignity and respect in their roles. The Code applies to employees of Brighton & Hove City Council, whether employed on a permanent, temporary, or casual basis. This Code of Conduct and the council's Behaviour Framework underpin these

	<p>six organisational values by setting out in more detail the standard of behaviour expected of you as an officer whilst you are carrying out your duties. This is relevant to the anti-slavery agenda as the Code expects employees to behave ethically and maintain high standards of personal conduct and be aware of and act in accordance with the Council's values and behaviours.</p>
Health and Safety	<p>The Council has various policies which aim to promote high standards and good practices in relation to health, safety, and welfare. This includes the Health and Safety Policy and Health and Safety Management Standard which sets out health and safety arrangements and responsibilities for all staff. These procedures are important to tackling modern slavery as victims of forced labour and modern slavery may be at increased risk of work-related injuries due to inadequate protective equipment and health and safety measures, including appropriate training.</p>
Recruitment	<p>The Council's Recruitment and Selection Policy provides a framework to ensure the Council has a fair, objective, consistent and transparent recruitment, and selection process that promotes good practice and supports a proactive approach to equality and diversity. This policy applies to all individuals employed by Brighton &amp; Hove City Council. Our recruitment policies include undertaking pre-employment checks such as reviewing references, verifying qualifications, conducting Disclosure &amp; Barring Service checks where appropriate to the post, and Right to Work in the UK checks.</p> <p>The Council recognises that victims of modern slavery can be exploited in legitimate jobs with legal terms of employment but exploited by others unrelated to the Council. Therefore, the checks undertaken as part of our recruitment and selection process are important for identifying potential vulnerabilities and victimisation.</p>
Grievance and Workplace Conflict	<p>The Council is committed to providing a working environment where individuals are treated with fairness, dignity and respect and will take all employee complaints seriously. The Grievance Procedure sets out the process and stages of dealing with concerns raised by employees, as soon as reasonably possible. This includes the right of workers to be advised and/or represented by a Trade Union representative, where requested.</p> <p>The Council also has a Dignity and Respect at Work Policy which aims promote a respectful and inclusive culture where everyone is treated with professionalism, dignity and respect and supporting a working environment and culture in which bullying and harassment, will not be tolerated.</p>

	<p>Grievance mechanisms are important to tackle modern slavery as it involves an additional route by which employees can raise complaints or concerns. Additionally, as victims of modern slavery are likely to be subject to forms of intimidation and threats and degrading and humiliating conduct, the Dignity and Respect at Work Policy is particularly relevant to tackling modern slavery.</p>
Equality and Inclusion	<p>In addition to other Council policies such as those on recruitment and our Code of Conduct which includes equality and diversity within our organisation, the Council has an Equality and Inclusion Policy Statement and Strategy. This describes how we promote, facilitate, and deliver equality. The Council recognises that certain vulnerable, marginalised, and underrepresented groups are at a higher risk of poor labour and employment practices and therefore equality and diversity policies ensure that every member, manager, and employee have a duty to be aware of equality issues in their daily activities.</p>
Domestic Abuse	<p>Our Policy to Support Employees experiencing Domestic Violence &amp; Abuse (DVA), or Sexual Violence (SV) sets out the Council's framework for supporting employees who have experienced or are experiencing DVA or SV and the steps the Council will take where it is alleged an employee has, or is, perpetrating this type of abuse. The policy covers elements of abuse such as controlling and coercive behaviour. While this policy focuses specifically on domestic abuse, it is important for tackling modern slavery as cases may share similar indicators of abuse.</p>
Trade Unions	<p>The Council has adopted a policy of seeking mutually acceptable solutions to employee relations problems by discussion and agreement and recognises that effective collective bargaining, negotiation, consultation, and communication can be best achieved at a local level between union representatives, union members and management. The Council has a Trade Union Facilities Agreement with recognised trade unions representing our employees. This agreement ensures that facilities such as paid time off are available to ensure that union representatives can carry out their duties.</p> <p>The Council recognises that trade union representation in the workplace can help reduce the risk of modern slavery by representing the interest of workers, ensuring fair working practices, supporting workers in negotiating their terms and conditions, and the resolving of grievances.</p>