

COLNEY HEATH PARISH COUNCIL

- ✉ Postal Address: Highfield Park Visitor Centre, Hill End Lane AL4 0RA
- ☎ Telephone: (01727) 825 314
- 💻 Website: <https://colneyheathparishcouncil.gov.uk>
- ✉ E-mail: clerk@colneyheathparishcouncil.gov.uk



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy Statement

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. Colney Heath Parish Council has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Colney Heath Parish 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 the Modern Slavery Act 2015.

The Parish Council expects the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will specify 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.

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, staff, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This Policy does not form part of an employee's contract of employment and we may amend it at any time.

2. Responsibility for the Policy

The Clerk has overall responsibility for ensuring this Policy complies with any legal and ethical obligations and that all those under our control comply with it. The Clerk, Councillors and senior employees have primary and day-to-day responsibility for implementing this Policy, ensuring those reporting to them are made aware, read, understand and comply with this Policy, monitoring its use and effectiveness, dealing with any queries about it and ensuring that our internal procedures are effective in countering modern slavery.

3. Compliance with the Policy

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All employees must ensure that they read, understand and comply with this Policy as the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone working for us or under our control. Employees are:-

- required to avoid any activity that might lead to, or suggest, a breach of this Policy;
- notify the Clerk as soon as possible if they believe or suspect that a conflict with this Policy has occurred, or may occur in the future;
- encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

If an employee believes or suspects a breach of this Policy has occurred, or that it may occur, they must notify the Clerk or report it in accordance with the Council's Public Interest Disclosure (Whistleblowing) Policy, which is available on the Council's website, as soon as possible. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our supply chains constitutes any of the various forms of modern slavery, the matter should be raised with the Clerk.

The Parish 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. We are 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 own 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 an employee believes that they have suffered any such treatment, they should inform the Clerk immediately. If the matter is not remedied, it may be raised formally through the Parish Council's Grievance Procedure.

4. Communication and awareness

Advice or training on this Policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us and training will be provided as necessary. Our zero-tolerance approach to modern slavery must also be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Enforcement

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Any employee who breaches this Policy will face disciplinary action in accordance with the Parish Council Disciplinary Procedure, which could result in dismissal for misconduct or gross misconduct depending on the circumstances. The Parish Council may terminate our business relationship with other individuals and organisations working on our behalf if they breach this Policy and the Modern Slavery Act.

6. Evaluation and review

This Policy statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement and policy. The Policy will be reviewed periodically by the Parish Council to ensure its effectiveness and compliance with the law and any necessary changes made.

Any comments or questions about the operation of this Policy should be addressed in writing to the Clerk.

This policy was adopted 27th February 2023 for a period of 4 years or until legislation changes.