

Toft Newton Parish Council

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Modern Slavery Act Transparency Statement

Commitment

This Statement sets out Toft Newton Parish Council's commitment to understanding and addressing all potential modern slavery risks related to its business and its planned actions to ensure that there is no slavery or human trafficking in its own business or supply chains.

Toft Newton Parish Council recognises its responsibility to take a robust approach to modern slavery and human trafficking as an employer, commissioner and contractor of other bodies, and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as required by section 52 of the Modern Slavery Act 2015. The Council is absolutely committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community, and ensuring these are free from slavery and human trafficking. This Statement sets out the Council's existing policies and practices and specific actions in response to the Modern Slavery Act.

Organisation Structure and Responsibilities

This statement covers the full activities of WLDC as determined by the Council's Organisational Structure.

Modern Slavery Transparency Statement

The Proper Officer is responsible for the Council's Modern Slavery Statement.

Developing and Updating the Statement

The Proper Officer, in conjunction with the Chair of the Parish Council, monitors and updates the Modern Slavery Statement in line with national guidelines and organisation development priorities.

Risk Assessments and Prevention

The Proper Officer is responsible for:

- working with West Lindsey District Council as our Principal Authority and Lincolnshire County Council as the Safeguarding Authority, as well as any other relevant third party organisations, to identify high risk activities and appropriate actions relating to modern slavery and human trafficking
- ensuring appropriate information and training for staff and councillors
- ensuring that this Statement and resulting actions are embedded within the Council's Safeguarding Policies and Procedures, known as Vulnerable Persons Policy.

Early Identification and Notification

All employees, Councillors and volunteers will notify any suspected modern slavery concerns encountered in the course of their work, these should be raised with the Proper Officer or the Chairperson of the Parish Council.

Toft Newton Parish Council will ensure that all staff, Councillors and volunteers complete any relevant training and that resources are available via the Toft Newton Parish Council website and Zoho WorkDrive.

Investigations

The Chairperson of the Parish Council will lead on collating initial information where there is the potential of an investigation in relation to any confirmed or suspected incidents of modern slavery and will be responsible for the appropriate reporting of these incidents in line with the Council's Early Help, Safeguarding Children and Adults and Domestic Abuse Policy and Procedures.

Identifying and Reporting Concerns

All employees, Councillors and volunteers, as with all safeguarding concerns are required to share these in order that they can be investigated and action taken as required.

Scope

The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

- The Council's constitutional arrangements (Standing Orders 2026 v002) are regularly reviewed and updated to take account of legislative requirements and best practice.
- Financial and Contract Procedure Rules (Financial Regulations 2026 v002) are clearly articulated to support best practice and prevent financial abuse and ensure transparency and probity in all matters.

Corporate Strategy

The Council's aims are to support the most vulnerable people and to support the local economy. It prioritises resources to services which seek to deliver these ambitions and is therefore well paced to act, and to refer, any incidents it becomes aware of. The Council also clearly states our aim to support and develop the people it employs, growing their knowledge and skills, now and for the future.

HR / Employment Policies and Practices

The Council has a robust and ongoing Policy review programme with input from employees, Councillors, volunteers and the support of Officers from West Lindsey District Council, Lincolnshire County Council, Lincolnshire Association of Local Councils and the National Association of Local Council. The Personnel Committee reviews all HR policies on a rolling programme, ensuring that these comply with national legislation and guidance. This includes Recruitment and Whistleblowing.

Recruitment

The Council's recruitment processes are transparent and reviewed regularly. Procedures are in place for vetting new employees and confirming their identities and qualifications, and ensuring that they are paid directly into an appropriate, personal bank account.

Agency Workers

The Council commits to using reputable employment agencies, where they are required to source labour and verifies the practices of any new agency before accepting workers from them.

Pay

The Council operates a Job Evaluation Scheme which ensures that all employees are paid fairly and equitably. The Council is currently exploring committing to ensuring that all staff are paid a Living Wage.

Employee Code of Conduct

The Employee Code of Conduct is reviewed updated regularly. On renewal, this is circulated to all staff who are asked to sign a copy to confirm that they are aware of and work within the Code. The Code makes clear to employees the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour. Breaches are investigated and may lead to disciplinary action or, in extreme cases, dismissal.

Councillor Code of Conduct

All Councillors are expected to demonstrate the highest standards of conduct and behaviour, in line with a formal Code of Conduct. Breaches are investigated by West Lindsey District Council's Monitoring Officer.

Councillors Declarations of Interests

All Councillors must record and declare personal and prejudicial interests, these are accessible via both the Toft Newton Parish Council and West Lindsey District Council websites.

Complaints and Whistleblowing

The Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing policy aims to make it easy for employees to make disclosures, without fear of retaliation.

Safeguarding Policy

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults and protect them from harm. The Council has a comprehensive policy which all staff and councillors are expected to read and work within, which includes information relating to Modern Slavery and Human Trafficking. The Council works within local multi-agency partnerships to protect and safeguard people. The policy is reviewed on an annual basis to ensure it is robust and clearly provides details of reporting mechanisms, internally and externally, regarding suspected or confirmed instances of Modern Slavery.

Councillors Induction and Training

Councillors complete induction training on election, including Equality and Diversity Training. Safeguarding training will also be provided.

Training

The Council has a programme of induction and ongoing training that employees and volunteers complete, including Safeguarding Awareness Training and modern slavery and human trafficking. This enables officers in community-facing roles to identify and know how to report incidents of abuse and neglect, including modern slavery and human trafficking.

Contractors and Service Providers

The Council is committed to ensuring that its contractors adhere to the highest standards of ethics. The Council expects its key contractors to have safeguarding policies, procedures and training in place.

Partnership Working

The Council works in partnership with a wide range of agencies to prevent neglect and abuse, to detect and report occurrences and to support victims.

Primacy

Where any conflict exists between this policy and the Government's guidance or legislation on the subject of Public Sector Complainants, the legislation shall have primacy over this policy.

Reviews

Toft Newton Parish Council will review this policy as per the schedule below, or sooner if changes to local or national guidance or legislation require a revision to take place sooner.

Previous versions of this policy will be retained on the Zoho WorkDrive and will have a version number appended to their file name.

Approved by Toft Newton Parish Council on:	7 th July 2026
First review due:	May 2027
Then review:	Annually
