

Modern Slavery Act 2015 - Transparency Statement 2018-19



Camden Council understands the risk that all forms of modern slavery pose both to our residents and visitors - and internationally, through the global nature of modern supply chains.

The Council is committed to opposing modern slavery and recognises the role we can play as a public sector organisation, and with our partners, in its identification and disruption. We are fully committed to using all avenues open to us to tackle modern slavery by using our statutory powers, role as a public procurer and through utilising the strengths of all our partnerships with the Police, the NHS and other organisations and through wider awareness-raising.

Camden Council has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and explains the steps that Camden Council has undertaken to ensure that there is no slavery or human trafficking within the organisation, our sub-contractors, partners or supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019. It also sets out the plans for improvements in the next year.

Our organisation

Camden Council is a London local authority with a jurisdiction of approximately 8.5 square miles and a population of 249,300. Camden Council spends approximately £460 million per year on external goods, services and works ranging from construction of new buildings and facilities management, cleaning, supply of IT equipment, clothing and foods to care services and a wide range of other support, professional and people-based services. These goods, services and works are procured from a wide variety of local, national and international organisations, businesses and voluntary sector organisations. Each supplier in turn may have its own supply chain. The challenge for Camden is to ensure compliance and best practice - not only within the organisation and our suppliers but also in the supply chains that serve them.

Our policies

We pride ourselves on clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers.

Recruitment:

We have a robust and transparent recruitment and selection process and ensure that all new workers recruited into a post at Camden, whether full or part-time employees, agency employees or contractors/consultants, have the requisite checks, which includes identification and right to live and work in the UK. Our offer of employment is subject to the following rigorous process:

- Acceptance of the terms and conditions contained within the contract of employment
- The receipt of satisfactory references
- Evidence of any required professional qualifications (e.g. social work qualifications) and essential requirements, such as a clean driving licence

- Any necessary Disclosure and Barring Service checks, where applicable
- The receipt of eligibility to work in the UK
- Identification check.

Agency staff:

Camden Council ensures that all workers, including agency employees, contractors and consultants, go through the same checks as Camden employees. We ensure that all agencies in our supply chain comply with our rigorous process and adhere to ‘the Camden Way’, minimising the risk of unscrupulous employment practices.

Pay:

The Council has invested in implementing the London Living Wage (LLW) and improving conditions for all our workers. Camden became a Living Wage Employer in February 2012 and almost all contracts awarded are inclusive of LLW. The Council has carried out two Living Wage supplier surveys to help us understand the level at which suppliers are delivering on the LLW.

Code of Conduct:

Camden employees must behave honestly and follow Camden’s policies and procedures. Our code of conduct makes it clear that staff must not behave in a manner inside and outside working hours which could damage the Council’s reputation. All employees are expected to keep within the law during their employment at all times.

Our suppliers

We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

Steps already taken:

- We have included a question in our standard selection questionnaire, used to shortlist suppliers for tender, asking organisations whether they are required to produce a Modern Slavery Statement and provide a link to the statement on their website. This information is to allow us to verify those within our supply chain this applies to
- We have included a question in our standard selection questionnaire asking whether suppliers or persons in control of or representing them have been found guilty of using child labour or guilty of any other form of human trafficking – and, if they have been, they are excluded from the tender process
- We have included a reference to this statement in our guidance to suppliers, ‘Being a Camden Supplier’
- The Council’s standard terms and conditions of contract and amendments to industry standard terms and conditions have been reviewed and now include clauses to reduce the risk of slavery and penalise human trafficking and these are also required to be passed down the supply chain to all subcontractors
- We have identified monitoring bodies to affiliate with which screen the practices of large supplier organisations and their supply chains. These are Ethical Trading Initiative (ETI), Worldwide Responsible Accredited Production (WRAP) and Electronics Watch
- Supply chain mapping of relevant contracts has commenced to help identify areas for further investigation, support, monitoring and awareness
- We have appointed a Strategic Contract and Responsible Procurement Manager to lead, shape and steer delivery across all Council directorates of the contract management process.

Steps to be taken in 2019-20:

- Include within supplier monitoring a requirement for annual submission of policy statements and proof of compliance
- Improve our supplier due diligence practices to include assessment of the impact and requirement to engage and monitor
- Affiliate or require affiliation with identified monitoring bodies which screen practices in large supplier organisations and their supply chains, to provide additional intelligence to support risk assessment
- Continue to map our supply chains of impacted contracts, identifying areas for further investigation, support, monitoring and awareness
- Revise procurement practices to include an assessment of risk and strengthening of alignment with ethical values. A requirement to assess the risk of Modern Slavery will be added to our procurement procedures
- The Strategic Contract and Responsible Procurement Manager will increase the capacity of the organisation to monitor and challenge contractor performance in relation to modern slavery and help to develop and embed our wider approach to ensuring social value in our contracts, ensuring we achieve positive outcomes for our residents while maximising the delivery of savings and operational efficiencies from contracts and strategic suppliers.

Training

The Council has developed training courses to increase understanding of all forms of modern slavery and to enable staff to provide effective support to victims and to reduce the risks they experience. Modern slavery is included in face-to-face safeguarding courses undertaken by staff who work directly with the public and in the Council's mandatory e-learning module – 'An Introduction to Safeguarding'. This module has been completed by 91% of Camden staff. Referrals to the National Referral Mechanism have increased year-on-year as awareness of modern slavery, and what action to take in response to it, has become embedded within the organisation.

Steps to be taken in 2019-20:

- A new e-learning module helps raise awareness of modern slavery and human trafficking and helps staff recognise their role in identifying and reporting concerns. Moving this learning away from face-to-face training and towards e-learning ensures we can reach a far wider audience.

Approval for this statement:

This statement was approved by the Council's Executive Director for Corporate Services, under delegated authority from the Cabinet, on 27 September 2019.

Name: Jon Rowney
Signature: 'Agreed by Executive Director Corporate Services'
Date: 27 September 2019