

NON-KEY EXECUTIVE OFFICER REPORT TEMPLATE

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE Modern Slavery Act 2015 – Transparency Statement 2021 - 2022	
REPORT OF Osian Jones, Head of Corporate Strategy	
FOR SUBMISSION TO Executive Director Corporate Services	DATE TBC
SUMMARY OF REPORT <p>This report is Camden’s Modern Slavery Act 2015 Transparency statement 2021 - 2022</p> <p>The 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 our organisation, our sub-contractors, partners or supply chains.</p> <p>This statement relates to actions and activities during the financial year 1 April 2021 – 31 March 2022.</p> <p>It also sets out the plans for improvements in the next year 2022 – 2023.</p> <p>Local Government Act 1972 – Access to Information</p> <p>The following document(s) has been used in the preparation of this report:</p> <ul style="list-style-type: none">• Modern Slavery Act 2015 - Transparency Statement 2018-19 <p>Contact Officer: Osian Jones Head of Corporate Strategy Corporate Services London Borough of Camden 5 Pancras Square London N1C 4AG Email: osian.jones@camden.gov.uk</p>	
RECOMMENDATIONS	

The Executive Director Corporate Services is asked to agree the following:

- That the appended statement satisfactorily captures the activities undertaken by Camden Council with regard to Modern Slavery in 2021 – 2022; and
- That the changes made to the statement since last year are not significant enough to require a Cabinet decision.

Signed: Jon Rowney, Executive Director Corporate Services

Date: 6 September 2022

Purpose of the Report

- 1.1. This report presents Camden's draft Modern Slavery Act Transparency Statement 2021 – 2022.
- 1.2. The 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 our organisation, our sub-contractors, partners or supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022. It also sets out the plans for activity in the next year.

Camden's commitment to tackling Modern Slavery

- 1.3. Camden Council understands the risk that all forms of modern slavery pose both to our own residents and visitors and internationally through the global nature of modern supply chains.
- 1.4. The Council is fully committed to using all avenues open to us to tackle modern slavery by using our statutory powers, our 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.

About the Transparency Statement

- 1.5. The Modern Slavery Act 2015 contains a number of statutory duties with which the Council is required to comply. Section 54 encourages the Council to consider Modern Slavery as part of its procurement strategy, and within commercial agreements, by requiring the Council to publish a Transparency Statement, setting out what it has done to ensure that slavery and human trafficking is not taking place in the Council or its supply chain.
- 1.6. The Statement may include information about how the Council requires contractors and third parties to have policies in place and adhere to the law and their responsibilities to prevent modern slavery within their organisations and also within their supply chains.

- 1.7. Cabinet previously agreed the publication of the first Modern Slavery Transparency Statement and granted delegated authority to the Executive Director Corporate Services to review and publish a revised statement in future years' in consultation with the relevant Cabinet Member(s).
- 1.8. In the event that "significant changes" are required to the Statement, the decision to publish should be returned to Cabinet. No definition of "significant" was set out in the original Cabinet report, therefore this determination will need to be made by Executive Director Corporate Services in consultation with Cabinet Member(s).

2. Proposals and Reasons

- 2.1. The statement has been revised to cover the 2021 - 2022 period (see appended statement below), capturing planned actions that we completed during the period and setting out actions and ongoing work currently planned for 2021 - 2022 period, focussing on our policies in relation to recruitment, agency staff, learning and pay, and our work with suppliers. There are additional sections updating on how we have reflected our commitments in our HR, Safeguarding and Learning activity.

3. Options

- 3.1. The Modern Slavery Act 2015 requires an annual Transparency Statement to be published each year, within six months of the end of the financial year.
- 3.2. Guidance also suggests that previous statements should be maintained on the website so that the public can review them, and that each year's statement should in turn be a refresh of the previous year's one.
- 3.3. Given the guidance stated above, then a refresh of the Transparency Statement is required to be published.
- 3.4. The key option is whether or not the report needs to be presented to Cabinet. As the statement mainly updates on existing actions from the previous statement, it is recommended that the statement does not require presentation to Cabinet.

4. Risks and Mitigations

- 4.1. The range of risks and mitigations identified by officer are detailed in the appended Transparency statement.

5. Timetable for Implementation and Next Steps

- 5.1. Timeline for reviewing and publishing the Statement for 2021 – 2022

Task	Deadline
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Review and update the Statement with Corporate Services DMT	September 2022
Consult with Cabinet Members <ul style="list-style-type: none"> • Cllr Richard Olszewski (Cabinet Member for Finance and Cost of Living) • Cllr Nadia Shah (Cabinet Member for Voluntary Sector, Equalities and Cohesion) 	September 2022
Executive Director to review revised Statement to determine whether “significant changes” have been made, requiring further Cabinet decision	September 2022
Publish refreshed Modern Slavery Statement after delegated authority or Cabinet decision	September 2022

6. Consultation/Engagement

- 6.1. There has been engagement with council officers directly involved in the delivery of the actions outlined in the statement.
- 6.2. The Cabinet Member for Finance and Cost of Living and the Cabinet Member for Voluntary Sector, Equalities and Cohesion were consulted.
- 6.3. No other engagement has been conducted as this is intended as a refresh of an existing policy.

7. HR implications

- 7.1. No HR implications have been reported in the refresh of this statement.

8. Procurement issues

- 8.1. The refreshed Transparency Statement (see Appendix) details a list of completed actions since last year, and some actions to be completed.

9. Finance Comments of the Executive Director Corporate Services

- 9.1. There are no further comments to this report.

10. Legal Comments of the Borough Solicitor

- 10.1. The Modern Slavery Act, states that the following points should be included in the statement:
 - the organisation’s structure, its business and its supply chains;
 - its policies in relation to slavery and human trafficking;
 - its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains; and
- the learning and capacity building about slavery and human trafficking available to its staff.

This is reflected in the statement below.

11. Appendix

11.1. Modern Slavery Act 2015 – Transparency Statement 2021 – 2022

REPORT ENDS

Appendix

Modern Slavery Act 2015 - Transparency Statement 2021 - 2022



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.

Modern slavery comprises slavery, servitude, forced and compulsory labour, and human trafficking. The categories listed below are not exhaustive, but cover the main types documented in the UK.

- Labour exploitation
- Sexual exploitation
- Criminal exploitation
- Domestic servitude

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 within our supply chains.

This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022. It also sets out the plans for improvements in the next year.

Our organisation

Comprising almost 22 square kilometres in the heart of London, Camden is a borough of diversity and contrasts. Business centres such as Holborn, Euston and Tottenham Court Road contrast with exclusive residential districts in Hampstead and Highgate, thriving Belsize Park, the open spaces of Hampstead Heath, Parliament Hill and Kenwood, the youthful energy of Camden Town, subdivided houses in Kentish Town and West Hampstead, as well as areas of relative deprivation. The latest official estimates of Camden's population is 279,500 at mid-2020. The mix of social and economic conditions in Camden are like nowhere else, and the Council takes seriously its role in stewarding our local communities to tackle inequalities,

support our residents to thrive, and to keep our residents and those who work and travel to Camden safe and well.

Camden employs over 4,300 staff in a flexible resourcing model that enables us to adapt to changing circumstances. This enables us to respond to emerging challenges, such as the pandemic. As an organisation, we use a combination of permanent and fixed-term contracts as well as agency workers and from time to time interims and consultancy firms to provide specialist expertise. The use of temporary workforce is recognised as an acceptable short-term resourcing decision to meet service needs, short term demand increases or to bring in specialist skills. Across all our employment contracts we have mechanisms and policies to address the risk of modern slavery – and these are outlined below.

Camden spends approximately £400 million per years on purchasing 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. Modern supply chains are complex networks that link organisations, industries and economies so operate within multiple relationships. Camden seeks as far as possible to ensure compliance and best practice across a number of priorities and commitments including modern slavery - not only within the organisation and our suppliers but also in the supply chains that serve them.

Our policies – HR

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.

- We have continued to implement our [Anti-Fraud and Corruption Strategy](#), highlighting our zero-tolerance approach towards human trafficking and encouraging all employees to report any suspicions to Internal Audit for immediate investigation;
- We have a number of courses and learning offers for staff across the organisation focusing on raising awareness of modern slavery and human trafficking, the role of all staff in identifying and reporting concerns. Our mandatory learning for all staff includes learning and information on modern slavery and human trafficking as part of the module on safeguarding. We also have specific courses for staff working in roles with increased safeguarding responsibilities including for children's and young people's services;
- Our [Gifts and Hospitality Policy](#) reflects a clear process on how to report any conflicts of interests, including [a disclosure form](#) so we can manage any potential personal or commercial gain for members of staff across the organisation.

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; and
- Identification check.

Agency staff:

Camden Council works closely with Matrix SCM our Managed Service Provider for agency workers to ensure that all workers, including agency employees, contractors and consultants, go through the same checks as Camden employees. Agency/casual workers are a vital part of our. Camden renewed the contract with Matrix SCM in February 2022 for two years – Matrix SCM have a clear and comprehensive commitment to tackling Modern Slavery and Human Trafficking that is available on their website and we will continue to monitor risk and respond to changing circumstances over the life of the contract.

We ensure that all agencies in our supply chain comply with our rigorous process and adhere to all legal requirements, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or terminated from the supply chain until such compliance can be evidenced.

Alongside renewing our contract with Matrix SCM, Camden has committed to creating a Camden Talent Pool which was established in 2022 and is providing opportunities for temporary Camden roles to be directed in first instance to our residents and tenants, complementing our wider work with the Camden Jobs Hub and Good Work Camden to provide pathways for our residents into high-quality work. This pathway will continue to be rigorously monitored in the same way as our direct employment routes as listed above.

Pay:

Camden Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life and has for a number of years ensured that employees are paid above the rate of the London Living Wage (LLW). From 1 January 2015 the Council further increased the pay of its lowest paid staff with the introduction of a minimum earnings guarantee in excess of the LLW rate. From 1 April 2019 the Council also extended its application of the London Living Wage to cover all apprentices.

Camden became a Living Wage Employer in February 2012 and extended its commitment to pay the LLW across the wider workforce including agency workers and staff delivering services on behalf of the Council in outsourced contracts. Almost all contracts awarded are inclusive of LLW and the Council has carried out two Living Wage supplier surveys to help us understand the level at which suppliers are delivering on the LLW. We will continue to audit pay and conditions amongst supplies to manage risk and respond to the needs of our wider supplier workforce.

[Click HERE to view our 2021 - 2022 Annual Pay Policy Statement.](#)

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. The learning for staff as part of their mandatory learning (undertaken at the outset of employment and refreshed every two years). Councillors as elected members will all undertake the same mandatory learning process that includes information on safeguarding (and modern slavery) and code of conduct, as well as regular reviews of declarations of interest and declaring of gifts and hospitality.

In 2019 we launched our [Commitment to Conscious Inclusion Statement](#), explicitly outlining our approach to ensuring all staff are treated fairly and highlighting the steps we're taking to become a truly inclusive organisation. Camden has been recognised by the Mayor of London's Good Work Standard demonstrating high quality employment practices across equality and disproportionality.

As part of our Building Equal Foundations work – our commitment to tackling inequality and disproportionality in Camden as an organisation and a community - we have continued to implement our anti-racism learning offer for all staff, supporting all colleagues to understand how to challenge themselves and others in order for us to become a truly anti-racist organisation, and address entrenched inequalities and injustice that we might encounter as part of our work. This forms part of the work of the Council to proactively identify and ensure our services and policies are addressing harm, risk and safety for the most vulnerable. This will continue to form part of the organisations mandatory learning for staff.

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:

- Procurement strives to ensure compliance with modern slavery legislation through its operations. We may terminate a contract where a supplier is in breach of its obligations in respect to the Modern Slavery provisions and/or require a contractor to remove any subcontractor or staff member suspected

or known to have committed a Modern Slavery offence from the performance of the services;

- Through its Strategic Contract Management and Responsible Procurement Lead the Council has collaborated with other Local Authorities, NGO's and external partners to maximise our impact in identifying and combatting modern slavery. The Council has also contributed to the development of the central government response to combatting modern slavery and human trafficking;
- Worked strategically and proactively with suppliers to identify risks across supply chains particularly with regards contractor staff welfare and access to fair wages; and
- We have reviewed and updated our due diligence in procurement documentation, where identified as necessary.

Steps taken since the last statement:

- All procurement staff in October 2020 were been trained in identifying and addressing the risk of modern slavery within procurement and ongoing learning will take place;
- Incorporated guidance on modern slavery monitoring in new contract management framework;
- Updated internal and external websites to include information on identifying modern slavery and steps to combatting it;
- Investigated monitoring bodies that may be able to assist in providing additional intelligence to support risk assessment;
- Revised Procurement planning documents to specifically highlight early thinking around modern slavery as a potential risk for each contract;
- Identified high risk markets and categories within the supply chain in order to more proactively combat risks of modern slavery; and
- Incorporated specific guidance into our procurement governance documentation.

Safeguarding Activity

Camden's Children's and Adults Safeguarding Partnership Boards both have a focus on tackling modern slavery and the risk of exploitation and abuse and this is reflected in their strategic plans and annual reports.

Both Partnership Boards have reviewed their materials and guidance available on Modern Slavery and Human Trafficking and this information is available on their websites

[Camden Safeguarding Children Partnership – CLICK HERE](#)

[Camden Adult's Safeguarding Partnership Board – CLICK HERE](#)

The Adult Social Care (ASC) Safeguarding Team are working with the Human Trafficking Foundation and with the Vulnerability and Assessment Unit of the London Metropolitan Police, which leads on Modern Day Slavery in London. Together they are reviewing the Council procedures regarding Modern Slavery, and an ASC staff workshop was held in 2020 to raise awareness of the work of both organisations and the role of the Police in Modern Slavery Cases.

Adult Social Care notifies the Home Office if they come across suspected victims of modern slavery, by making a National Referral Mechanism (NRM).

ASC are currently finalising detailed guidance on Modern Day Slavery for all staff working within the London Borough of Camden and Camden & Islington Mental Health Trust (C&I), commissioners, health workers and housing staff. We also have a number of ASC staff now who are also trained to deliver training on Modern Day Slavery under the 'train the trainer' programme.

Adult Social Care has developed a practice guide resource for all staff, and it has been updated with information about the National Referral Mechanism evidence gathering process, including reports, guidance, and information.

Learning

The Council continues to offer learning opportunities to increase understanding of all forms of modern slavery, to enable staff to provide effective support to victims, and to reduce the risks they experience.

Modern Slavery is included in the Council's mandatory e-learning module 'An Introduction to Safeguarding' which has been completed by 93% of Camden staff. To enhance this learning a complementary 60 minute e-learning module 'Modern slavery and human trafficking' is available to all staff. It is designed to help staff recognise their role in identifying and reporting concerns.

A number of additional safeguarding courses further inform, engage and support staff who work directly with the public. These include "Child trafficking, exploitation and modern slavery" and "child exploitation and extra-familial risk".

Approval for this statement

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

Name: Jon Rowney

Signature: 'Agreed by Executive Director Corporate Services

Date: 6 September 2022

