

## NON-KEY EXECUTIVE OFFICER REPORT TEMPLATE

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS: All</b>
<b>REPORT TITLE</b> Modern Slavery Act 2015 – Transparency Statement 2023 - 2024	
<b>REPORT OF</b> Mathurini Visakan, Head of Equalities and Social Purpose	
<b>FOR SUBMISSION TO</b> Executive Director Corporate Services	<b>DATE 16<sup>th</sup> November 2024</b>
<b>SUMMARY OF REPORT</b> <p>This report is Camden’s Modern Slavery Act 2015 Transparency statement 2023-2024</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 2023 – 31 March 2024.</p> <p>It also sets out the plans for improvements in the next year 2024 – 2025</p> <p><b>Local Government Act 1972 – Access to Information</b></p> <p>The following document(s) has been used in the preparation of this report: <u>Modern Slavery Statement 2022-23</u></p> <p><b>Contact Officer:</b> Mathurini Visakan, Head of Equalities and Social Purpose Corporate Services London Borough of Camden 5 Pancras Square London N1C 4AG Email: <a href="mailto:Mathurini.Visakan@camden.gov.uk">Mathurini.Visakan@camden.gov.uk</a></p>	

## **RECOMMENDATIONS**

The Executive Director approves the Modern Slavery Transparency Statement 2023 – 2024.

**Signed:** Jon Rowney Executive Director Corporate Services

**Date:** 14 January 2025

### **Purpose of the Report**

- 1.1. This report presents Camden’s draft Modern Slavery Act Transparency Statement 2023 – 2024.
- 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 2023 to 31 March 2024. It also sets out the plans for activity in the next year.

### **Camden’s commitment to tackling Modern Slavery**

- 1.3. The Full Council passed a motion on February 27, 2023, to adopt the Co-operative Party’s Charter Against Modern Slavery. This decisive action reinforces our commitment to understanding and addressing the risks that all forms of modern slavery pose to our residents, visitors, and the international community, given the pervasive nature of global supply chains.
- 1.4. The Council is fully committed to using all avenues open to us to tackle modern slavery, including our statutory powers and role as a public procurer, utilising the strengths of all our partnerships with the Police, the NHS, and other organisations, and finally, procurer, utilising the strengths of all our partnerships with the Police, the NHS, and other organisations, and finally awareness-raising.

### **About the Transparency Statement**

- 1.5. The Modern Slavery Act 2015 contains several 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 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. If “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 2023 - 2024 period (see appended statement below), capturing planned actions that we completed during the period and setting out actions and ongoing work currently planned for 2023 - 2024 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, Procurement, Inclusive Economy, Safeguarding and Learning activity.

## **3. Options**

- 3.1. The Modern Slavery Act 2015 guidance requires an annual Transparency Statement to be published each year, and the 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. The Modern Slavery Act 2015 guidance 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.
- 3.2. 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 2024 – 2025

<b>Task</b>	<b>Deadline</b>
Review and update the Statement with cross council officers	10 <sup>th</sup> October 2024
Consult with Cabinet Member Councillor Camron Aref-Adib (Cabinet Member for Finance and Cost of Living)	13th November 2024
Executive Director to review revised Statement to determine whether “significant changes” have been made, requiring further Cabinet decision	13th November 2024
Publish refreshed Modern Slavery Statement after delegated authority or Cabinet decision	21 <sup>st</sup> November 2024

## **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 was 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. Environmental implications**

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

## **10. Equalities implications**

- 10.1. Equalities implications have been considered in the development of this statement and will be explored further in the 2024-2025 statement.

## **11. Finance Comments of the Executive Director Corporate Services**

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

## **12. Legal Comments of the Borough Solicitor**

The Modern Slavery Act 2015 is the key legislation relating to the modern slavery and sets out the relevant criminal offences, prevention orders, the role of the Independent Anti-Slavery Commissioner and the obligations on organisations.

The Act is supported by various regulations and statutory guidance. The Council is under a duty under Section 52 of the Act to notify the Home Office when they come across potential victims of modern slavery. It is also under duties to safeguard child and vulnerable adults who may be involved in modern slavery. There is no current legal obligation to produce a Modern Slavery Transparency Statement.

### **13. Appendix**

#### **13.1. Modern Slavery Act 2015 – Transparency Statement 2022 – 2023**

**REPORT ENDS**

## Appendix

### **Modern Slavery Act 2015 - Transparency Statement 2023 - 2024**



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 2023 to 31 March 2024.

## **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 218,000 usual residents at Mid-2022. 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.

Most Camden residents were born in the UK. In terms of countries of birth, after England, more Camden residents born outside the UK were born in the United States, Bangladesh, France, Italy, India, China, Ireland, Somalia, Scotland and Germany, than any other individual country. The most spoken languages other than English are French, Bengali, Spanish, Italian, Arabic and Portuguese Somali and Greek; and Albanian

Over the past few years, Camden has become a home for over 800 Ukrainian refugees, as part of the Homes for Ukraine scheme, 1,800 Afghan refugees have been supported by Camden teams, and 109 former Syrian refugees were supported to apply for UK citizenship.

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.

## **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.

### **Whistleblowing (WB) policy:**

- The Council operates a robust and effective whistleblowing environment. Our provisions for WB are in the WB Policy, which was published in June 2023,

and includes clear guidance on how to report suspected instances of modern slavery. It is a public facing document to assist members of the public/residents who wish to make a report.

- The WB Policy advises staff to immediately contact the Head of Internal Audit, Investigations and Risk Management if they suspect that modern slavery or human trafficking is occurring to ensure that potential exploitation is identified. It also signposts readers to the Government's website on modern slavery for further information.
- We have several 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. The mandatory learning programme was re-run for all employees again during the period from the end of 2022 to early 2023. 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 workforce. 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 created a Camden Talent Pool which was established in 2022 and is providing opportunities for entry-level temporary Camden roles to be directed in the 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 several 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 more than 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 2023 - 2024 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 always keep within the law during their employment. The learning for staff as part of their mandatory learning (undertaken at the outset of employment and refreshed every two years – most recently over the period from the end of 2022 through to early 2023). 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.

## **Procurement**

### **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.
- Work strategically and proactively with suppliers to identify risks across supply chains particularly with regards to contractor staff welfare, access to fair wages; and
- We continually review and update our due diligence in procurement documentation, where identified as necessary.
- Mandatory training on modern slavery for the procurement team, and continuous learning on best practices processes to build into our tenders and contracts to combat modern slavery in our supply chain.

### **Steps taken since the last statement:**

Following the publication of Procurement Policy Note on Tackling Modern Slavery in Government Supply Chains we incorporated the guidelines that help identify high risk areas of modern slavery that enable us to identify and minimise risk in our procurement activities.

The selection questionnaire (SQ) introduced additional requirements under Modern Slavery and bidders must also demonstrate that they are tackling Modern Slavery in their supply chains This ensures that bidders must demonstrate their efforts in tackling modern slavery within their supply chains. These are reviewed in our tender award papers submitted to the Procurement Board for scrutiny.

We recruited a Social Value Lead to support the Council's procurement activity to have oversight of our commitment to equity and justice.

## Future Plans

Looking ahead, we are committed to continuously improving our procurement practices to combat modern slavery. Our future plans include:

- **Ongoing Training:** Regular updates and training sessions for procurement staff to keep them informed about the latest developments and best practices in tackling modern slavery.
- **Enhanced Monitoring:** Implementing robust monitoring and evaluation mechanisms to ensure compliance and effectiveness of our anti-slavery measures in our contracts.
- **Stakeholder Engagement:** Strengthening our collaboration with suppliers, contractors, and other stakeholders to foster a collective effort in eradicating modern slavery from our supply chains.
- **Updates:** Continuous updates to our procurement procedures and templates to incorporate the latest guidelines and best practice.

## Good Work Camden and the Inclusive Business Network

Good Work Camden is our employment support service. Through Good Work Camden, our Good Work Brokers and Job Hubs staff work with employers to encourage London Living Wage and flexible work where possible:

- We check and register all candidates we support through training and into employment. Candidates are asked to provide ID and the team check to ensure they are eligible to work and/or have recourse to public funds. In terms of employer placements, we review those to ensure that the placements are appropriate, and the host organisations adhere to our requirements primarily around Health and Safety.
- The Inclusive Business Network (IBN) creates a community of practice enabling employers who encourage, promote, and share learnings around good work standards. Network members receive support to develop and showcase good work practice, whilst having access to a variety of tools / resources. They can also be signposted to other services, such as Good Work Camden Job Hubs. More widely, the Network will enable businesses to form better connections with residents and other businesses within the borough.
- To help employers adapt their work practices to offer 'good work' jobs, the IBN focuses on four key strands, each with tangible actions for businesses to adopt:
  1. Making recruitment inclusive and accessible
  2. Ensuring roles are flexible around people's lives
  3. Supporting progression and development
  4. Providing people with enough job security and pay

Good Work Camden is planning to train employment support providers and Inclusive Business Network members to be able to spot and report instances of Modern Slavery over the coming year.

## **Safeguarding Activity**

Modern Slavery Overview:

Modern slavery entails the exploitation of individuals coerced, deceived, or forced into labour and servitude. This hidden crime subjects' victims to abuse and inhumane treatment, necessitating robust intervention.

Camden's Children's and Adults Safeguarding Partnership Boards are dedicated to combating modern slavery and addressing related exploitation and abuse risks, as outlined in their strategic plans and annual reports. The Safeguarding Adults Partnership Board (SAPB) in Camden incorporates priorities regarding modern slavery into its strategic frameworks, which are publicly accessible on the Camden Adults' Safeguarding Partnership Board website.

Both Partnership Boards have updated their materials and guidance on Modern Slavery and Human Trafficking, available on their respective websites.

[Child Trafficking and Modern Slavery - Camden Safeguarding Children Partnership CSCP](#)

[4206.1-County-lines-leaflet-final-web.pdf \(cscp.org.uk\)](#)

[Safeguarding Adults Partnership Board - Camden Council](#)

[Modern Day Slavery and Cuckooing | Practice Guide \(camden.gov.uk\)](#)

The Multi-Agency Safeguarding Hub (MASH) plays a crucial role in safeguarding individuals at risk. Upon identifying potential victims, MASH leads safeguarding enquiries and collaborates with charitable and governmental organisations, including the Home Office, to facilitate support through the National Referral Mechanism (NRM).

Adult Social Care promptly alerts the Home Office upon encountering suspected victims by submitting an NRM referral. If an adult does not consent to the NRM process, we notify the Home Office through the Duty to Notify (DtN) process.

## **Learning:**

Camden Council offers various learning opportunities to improve staff understanding of modern slavery. Over 90% of staff have completed the e-learning module 'An Introduction to Safeguarding', which includes a section on modern slavery. Additionally, a dedicated 60-minute e-learning module on 'Modern Slavery and Human Trafficking' is available to help staff recognise their roles in identifying and reporting concerns.

In recognition of Modern-Day Slavery Week (14th-18th October 2024), the council is raising awareness across the workforce by providing additional training, videos, and resources via email and Yammer. These materials will also be incorporated into the regularly updated Practice Guide.

The Council is committed to ongoing learning opportunities aimed at enhancing understanding of modern slavery. As recently as 2023, we updated the e-learning module 'Modern Day Slavery and Human Trafficking' in collaboration with the Human Trafficking Foundation to assist staff in recognising their roles in identifying and reporting concerns.

To enhance our response, several council staff members have completed Train the Trainer courses on Modern Slavery. Our guidance is regularly updated in collaboration with partners, such as the Human Trafficking Foundation, with the latest update occurring in 2023.

**Initiatives:**

The Council, in collaboration with its partners, is dedicated to ensuring the safety and wellbeing of displaced Afghan and Ukrainian refugees, with a focus on mitigating the risks of modern slavery. To promote the safety and welfare of refugees residing in the borough's hotels, safeguarding leads from both adult and children's services have conducted safeguarding awareness-raising sessions for the provider, Clearsprings in 2024.

**Approval for this statement**

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

**Name:** Jon Rowney

**Signature:** "Agreed, Jon Rowney Executive Director Corporate Services"

**Date:** 14 January 2025

