

## NON-KEY EXECUTIVE OFFICER REPORT TEMPLATE

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> All
<b>REPORT TITLE</b> Modern Slavery Act 2015 – Transparency Statement 2022 - 2023	
<b>REPORT OF</b> Osian Jones, Head of Corporate Strategy	
<b>FOR SUBMISSION TO</b> Executive Director Corporate Services	<b>DATE</b> 18 October 2023
<b>SUMMARY OF REPORT</b> <p>This report is Camden’s Modern Slavery Act 2015 Transparency statement 2022 - 2023</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 2022 – 31 March 2023.</p> <p>It also sets out the plans for improvements in the next year 2022 – 2023.</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:</p> <ul style="list-style-type: none"><li>• <a href="#">Modern Slavery Act 2015 - Transparency Statement 2021-22</a></li></ul> <p><b>Contact Officer:</b> Osian Jones Head of Corporate Strategy Corporate Services London Borough of Camden 5 Pancras Square London N1C 4AG Email: <a href="mailto:osian.jones@camden.gov.uk">osian.jones@camden.gov.uk</a></p>	
<b>RECOMMENDATIONS</b>	

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

- That the appended statement satisfactorily captures the activities undertaken by Camden Council regarding Modern Slavery in 2022 – 2023; 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:** 18 October 2023

### **Purpose of the Report**

1.1. This report presents Camden's draft Modern Slavery Act Transparency Statement 2022 – 2023.

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 2022 to 31 March 2023. It also sets out the plans for activity in the next year.

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

1.3. Camden Council has committed to adopting the Co-operative Party's Charter Against Modern slavery and 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. The Council is in the process of reviewing and implementing the Commitments of this Charter and will report on this in the next year's Annual Statement.

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 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 2022 - 2023 period (see appended statement below), capturing planned actions that we completed during the period and setting out actions and ongoing work currently planned for 2022 - 2023 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 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 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 2022 – 2023

<b>Task</b>	<b>Deadline</b>
Review and update the Statement with Corporate Services DMT	12 <sup>th</sup> September 2023
Consult with Cabinet Member Cllr Richard Olszewski (Cabinet Member for Finance and Cost of Living)	19 <sup>th</sup> September 2023
Executive Director to review revised Statement to determine whether “significant changes” have been made, requiring further Cabinet decision	12 <sup>th</sup> October 2023
Publish refreshed Modern Slavery Statement after delegated authority or Cabinet decision	18 <sup>th</sup> October 2023

## **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 2023-2024 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**

- 12.1. 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

These are reflected in the statement below.

### **13. Appendix**

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

**REPORT ENDS**

## **Appendix**

### **Modern Slavery Act 2015 - Transparency Statement 2022 - 2023**



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 2022 to 31 March 2023. 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 several 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 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.
- Worked strategically and proactively with suppliers to identify risks across supply chains particularly with regards to contractor staff welfare, 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:**

Following the publication of Procurement Policy Note on Tackling Modern Slavery in Government Supply Chains we are incorporating the guidelines by:

- Using the guide to identify and minimise risks in both new procurement activity and existing contracts
  - Reviewing and amending where necessary our procurement operating procedures, process, and related documentation
- Assessing our existing contracts
- Identifying and implementing action when victims of Modern Slavery are identified; and
- Mandatory external training for procurement staff under these new processes
- Assessing and incorporating the additional guidance on enhanced due diligence activities and on using existing exclusion grounds

There is a new requirement for supply chain information to be provided at selection stage (SQ) of new procurements designated as high risk of Modern Slavery.

The new SQ has introduced additional requirements under Modern Slavery and bidders must also demonstrate that they are tackling Modern Slavery in their supply chains. Whilst this is mandatory for Central Government contracts, the Cabinet Office has said other public sector contracting authorities may wish to apply the approach and Camden Council has built this requirement into our procurement documentation from 1st June 2023.

### **Next steps**

The Procurement team are currently in the process of recruiting a Social Value Lead that will have oversight in ensuring how the Council's procurement activity aligns with our organisational values and ambitions as set out in We Make Camden – including our commitment to equity and justice. This Social Value Lead will also form part of the core procurement team that will have responsibility for reviewing our contracts through a number of lenses including risk of exploitation and modern slavery.

The Lead will be responsible for:

- Leading and managing the procurement social value aspects at Camden Council
- Collating and reporting on the delivery and co-ordinating our social value contractual commitments
- Supporting, shaping, and steering social value across all directorates of the procurement and contract management process
- Manage the organisation's Social Value Matrix – advising in appropriate social value asks, ensuring they are fully embedded within Camden and all the organisations we contract with
- Advise on social value within contracts and relationships with suppliers to the Council
- Taking social value projects from initiation through to contract implementation
- Working closely with service leads from across the Council providing a professional, 'value adding', social value service

### **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 in order 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 is the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude. It is a crime hidden from society where victims are subjected to abuse, inhumane and degrading treatment.

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](#)

[County Lines and Criminal Exploitation – CLICK HERE](#)

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

Four ASC staff members have completed Train the Trainer courses for Modern Slavery, and we are working with the Human Trafficking Foundation to develop our train the trainer programme and learning offer within the council and wider safeguarding partnership.

We have reviewed and updated our Modern-Day Slavery guidance with the support of the Human Trafficking Foundation over the last twelve months.

Adult Social Care notifies the Home Office if they come across suspected victims of modern slavery, by making a National Referral Mechanism (NRM). When an adult who is a suspected victim of Modern-Day Slavery does not consent to the NRM process then we notify the Home Office via the Duty to Notify (DtN) processes.

## **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.

The Council's e-learning module 'Modern Day Slavery and Human Trafficking' has recently been updated with the support of the Human Trafficking Foundation and is available to all staff. It is designed to help staff recognise their role in identifying and reporting concerns relating to Modern Day Slavery.

We have also developed a joint project with Westminster Council working with the organisation The Passage. The Passage works with Camden and Westminster to support individuals off the streets while awaiting outcomes of National Referral Mechanism (NRM) referral from the Home Office. The project is a referral point for homeless people who are identified as a potential or confirmed victim of Modern Day Slavery in Camden.

Duties include:

- To conduct modern slavery assessments with survivors ensuring they are carried out in a trauma informed way.
- To provide independent advocacy to survivors, helping them navigate services across local or national providers.
- To draw up psychologically informed action plans for survivors ensuring they are person centred and taking into consideration their views and wished outcomes.
- To refer survivors to both internal and external agencies as appropriate to their action plans
- To assess any risk to survivors, the environment, and staff, to record and communicate any risks identified using appropriate channels.
- To work closely with Camden Council to ensure victims have a seamless route out of danger and into safety.
- To work with NRM / No-NRM providers to assess the needs of survivors, based on multi-agency risk profiles.
- Risk and vulnerability assessment (re victim and/or witness of ongoing crime and exploitation).
- Referral to the NRM or MS1 (duty to notify form).

The Council and partners have also worked collectively in considering the safety and wellbeing of displaced Afghan and Ukrainian refugees, which includes the risks of Modern Day Slavery.

### **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 by Executive Director Corporate Services"  
**Date:** 18 October 2023

