

# Modern Slavery Statement April 2022 – March 2023

## Introduction

Modern slavery is a serious crime that violates human rights. The term 'Modern Slavery' captures a whole range of types of exploitation, many of which occur together. These include but are not limited to:

- sexual exploitation: this includes, but not limited to sexual abuse and forced prostitution
- domestic servitude: this involves victims being forced to work or performing domestic chores
- forced labour: can happen in many different industries, including construction, hospitality and beauty
- criminal exploitation: encouragement of making another person to commit a crime i.e. drug trafficking, pick-pocketing, begging or anything that imply financial gain for the trafficker
- other forms of exploitation: organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Councils have a key role to play in tackling modern slavery, including in identifying and supporting victims and working in partnership locally. Havering Council recognises its responsibility to take a robust approach to modern slavery and human trafficking, and understands its duty to notify the Home Office of any individual encountered who we believe is a suspected victim of modern slavery or human trafficking. Havering Council has agreed a new vision "The Havering you want to be a part of" and corporate plan. This looks at the borough as a **place**, "a great place to live, work and enjoy" the **people** who live here, "things that matter to residents" while ensuring our **resources** are managed well "A well run Council that delivers for people and place".

The publication of this Transparency Statement is part of the Council's commitment to the Modern Slavery Act 2015, which requires a statement to be published each year, within six months of the end of the financial year.

## Legal Requirements for the Council

The Modern Slavery Act, states that it is required to publish, by law, an annual statement, which should include the following points:

- 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.

## Organisation structure and supply chains

This statement covers the activity of the Council, a Local Authority purchasing and providing local government services. The statement covers direct employees of the council, agency workers; and services delivered on behalf of the council by third party organisations and in the council's supply chains, which include an extensive range of contracts with external providers.

Havering Council is a London Borough Local Authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners.

Havering has an increasing population with an additional 24,800 residents moving into the borough in the last decade and the councils corporate plan and vision includes how we will support those residents alongside our

businesses. The plan can be found on our website ([https://www.havering.gov.uk/info/20007/council\\_and\\_democracy/654/the-havering\\_plan](https://www.havering.gov.uk/info/20007/council_and_democracy/654/the-havering_plan))

## Risk assessment and Due diligence processes

The council undertakes due diligence when considering new suppliers and regularly reviews existing suppliers. This is the responsibility of the Procurement, Contract Management and Commissioning Team. They also ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking, by building in a question in the Standard selection questionnaire (SQQ) asking providers if they are compliant with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015, so they can be tracked. As part of the ongoing compliance checks, a requirement for an annual submission of policy statements and proof of compliance for all providers with turnover >£36m has been included.

All council procurement staff have been made aware of the *Modern Slavery Helpline* as per the Cabinet Office Guidelines.

The main risks identified by the Council in relation to modern slavery this year were:

**Documentation** – Key corporate governance documents had not been reviewed including the modern day slavery protocol. This is currently underway and, pending council's approval, will be launched shortly.

**Awareness** – Modern Slavery and exploitation is known and discussed frequently across many services. However, more work is required to raise awareness of modern day slavery across the whole Council, not just specific services.

**Management** – Slavery and Exploitation was discussed at the council's Crime and Disorder Sub-Committee, which was decommissioned in June 2022. Since then we have established an SLT lead for Modern Slavery who is actively pushing the agenda forward.

## Policies in relation to slavery and human trafficking

The Council is committed to ensuring that its supply chains are free from slavery and human trafficking. The Council requires that all direct suppliers, service providers and contractors to the Council are absolutely committing themselves to preventing Slavery within their own activities and through their supply chain and are compliant with the Modern Slavery Act 2015.

The council holds a policy library which is reviewed regularly to ensure the policies remain compliant and fit for purpose. The following Policies best describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

- Code of conduct
- Business Continuity Plan
- BHR Primary Care Safeguarding Handbook
- Community Safety Partnership Plan
- Child Exploitation policy
- Housing Services Domestic Abuse policy 2020

## Key performance indicators to measure effectiveness of steps being taken

We measure the following performance indicators to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Feedback through procurement, contract Management and our Joint Commissioning Team reports
- Numbers of children identified, risk levels and activity undertaken to decrease the incidences of child exploitation

## Training on modern slavery and trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, access to online training is available to all our staff. The module is reviewed each year and available on the staff learning portal.

Our Procurement officers have access to CIPS Ethical Procurement and Supply e-Learning for Modern Slavery Awareness training and for those staff who are not members of CIPS are able to join the Government Commercial Function Knowledge Hub.

Havering Safeguarding Partnership provides a comprehensive training and workforce development programme for all professionals and volunteers across the local footprint. Training offered is for safeguarding children's and adults and online modules range from "modern slavery (how to identify and report potential victims; exploitation of vulnerable Adults: interventions and Motivations" to "CSE and Missing".

## Next Steps

Over the next 12 months we will be undergoing a large restructure of the organisation, bringing different services together, which will make sure that modern slavery is being looked at wider across the whole organisation. We have identified the below priorities for the year ahead:

### Documentation

The council will review the key policies we have in our library and ensure modern slavery has been included, and where it has been included, strengthen the content and guidance to staff. Our Modern Slavery protocol will be the first one we update to contain more of our first responders including our Emergency planners.

### Commissioning and Procurement

The council will be required to write a procurement strategy, and highlight our commitments for the financial year ahead regarding modern slavery. We will be sure to include all staff are up to date on their training, know where to go for information and how to refer should this be required. The procurement team will continue to review and store the annual submission of policy statements and proof of compliance for all providers with turnover >£36m.

### Awareness Raising

The council will develop an effective communication strategy to raise awareness of modern slavery internally within the local authority, with organisations in our supply chains and the wider community. Actions will include posting information on the council's websites; provide topic briefings and staff bulletins. Salvation Army has also offered to provide awareness training on the law and practice of modern slavery. This will be added to our training offer under the social care academy.

## Declaration

This statement is the council's first statement, and relates to actions and activities during the financial year ending March 2023.

Through delegated powers, approval has been granted from our Chief Executive for this statement to be approved by the councils Governance and Assurance Board, and will be reviewed and updated annually.

The board oversees the council's annual governance statement and risk management. This is chaired by Director of Finance.

This Statement was agreed by: Havering Governance and Assurance Board