

# Modern Slavery Statement

## April 2024 – March 2025

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps Havering Council has taken during the financial year ending March 2025 to prevent modern slavery and human trafficking in our business and supply chains.

### 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 is 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 involves 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 working in partnership locally in identifying and supporting victims. The Modern Slavery Act 2015 designates councils as 'first responders'; organisations with a legal requirement to refer suspected victims of Modern Slavery to the Home Office. 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 a zero tolerance to Modern Slavery and human trafficking in all forms. The Council has an agreed vision "The Havering you want to be a part of" and a refreshed agreed Corporate Plan. This includes our strategic aims of making Havering "a great place to live, work and enjoy", "supporting our residents to stay safe and well" and "enabling a resident-focused and resilient Council".

A commercial organisation is required to publish a statement, each year, within six months of the end of the financial year if it:

- is a 'body corporate' or a partnership, wherever incorporated or formed
- carries on a business, or part of a business, in the UK
- supplies goods or services, and
- has an annual turnover of £36 million or more

Organisations are responsible for determining whether the legislation applies to them.

The publication of this Transparency in Supplies Chain (TISC) Statement is part of the Council's commitment to the [Modern Slavery Act 2015](#). Although the Council is not legally obliged to publish a statement on Modern Slavery under the Modern Slavery Act, publishing our statement puts Modern Slavery at the forefront of our minds and helps us to maintain our commitment. This will be Havering's third TISC statement.

### Legal Requirements

The Modern Slavery Act states that a transparency statement it is required to be publish, on an annual basis and 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.

In February 2025 the new Procurement Act came into force. Under that act, organisations which are found guilty of modern slavery offences may be automatically disqualified from bidding for publically funded contracts.

## Organisation structure and supply chains

This TISC statement covers the activity of the Council as a Local Authority purchasing and providing local government services. The TISC 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. The Council now serves a population of 268,145<sup>1</sup> with 54,800 (20.4%)<sup>2</sup> under the age of 16. Our updated Corporate Plan and Vision includes how we will support all our residents alongside our businesses, which can be found on the council's website<sup>3</sup>.

The Council provides a wide range of services to our communities, spending more than £180 net million every year. We employ over 3000 staff to fulfil our statutory and discretionary services for our residents, visitors, partners and businesses. In 2024 we agreed to a £54m capitalisation loan and in 2025 we have had to apply for a further £88m to assist us in making sure we are able to continue to provide our services in the future.

The real living wage is based on the cost of living and is voluntarily paid by employers who believe, we all need a wage that meets our everyday needs, as well as helping employers remain competitive whilst retaining existing staff and attracting new staff. As at the end of March 2024, the [Living wage for London](#) is £13.85 (£12.60 nationally). The council is looking to move towards being London Living Wage accredited.

## Risk assessment and Due diligence processes

The Council undertakes relevant and proportionate due diligence when considering new suppliers and reviews existing suppliers. This is overseen by the Procurement Team and devolved to the individual departments within the council. Where relevant, a question at the selection stage is higher-value contracts asks providers if they are compliant with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015.

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 are:

**Documentation** – Although identified in last year's statement, following a number of factors including a realignment of staff, reviewing our key corporate governance documents is once again on our list of risks. The Council's Contract Procedure Rules and its procurement documents and policies are being reviewed to ensure compliance with new legal obligations and to capture best practice.

**Awareness** – We have taken steps to discuss and promote Modern Slavery and exploitation across the council, as some professionals may not recognise signs of modern slavery due to lack of training, cultural assumptions or the person's fear of disclosure. Children may not self-identify as victims to grooming or loyalty to abuser.

We are aware that not all services come into contact with modern slavery and that some services, like children services, need to be more vigilant to factors like immigration, exploitation and lack of safeguarding structures in

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<sup>1</sup> <https://www.haveringdata.net/population-demographics/#metadata:1351>

<sup>2</sup> Date: 2023 | Source: ONS, Population Estimates

<sup>3</sup> [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)

community settings and family contexts. This is why more work needs to be done to ensure awareness raising is a regular activity, especially across those services who do not deal with modern slavery on a day to day basis.

**Partners working collaboratively** – The Council is committed to working collaboratively with all relevant organisations across all sectors to support the residents of Havering, who have been affected by Modern Slavery. We also work closely with Neighbouring boroughs, and CQC sharing intelligence and reciprocating with boroughs.

**Identifying high profile risk areas of possible Modern Slavery in Havering LA** – The risk of Modern Slavery and exploitation has increased in social care, since the immigration rules for social care workers changed in late 2022 meaning more international recruits were able to come to the UK.

**Increase in poverty** – The increase in poverty in the borough remains a risk factor when it comes to modern slavery, as those residents who are in poverty are more susceptible to exploitation. As well as the continuation of work on the Poverty Reduction Strategy, we are also developing an Employment and Skills strategy to help us improve skills and better paid employment in the borough.

**Supply chain** - The new Procurement Act came into force on 24<sup>th</sup> February 2025. We have been busy identifying what that means for us as a council.

We are developing our policy to identify the high-risk areas of modern slavery within our supply chains and the practical steps we can take to mitigate the risk.

## [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.

- Bullying and Harassment policy
- Serious Violence Strategy
- BHR GP Safeguarding Handbook
- Child Exploitation policy
- Children's Services Procedure manual
- Integrated Starting Well Plan 2024-2027
- Corporate Parenting Strategy
- HSCP Neglect Strategy
- Strategy for the Delivery of Early Intervention Services in Havering
- Community Safety Partnership Plan
- Housing Services Domestic Abuse policy 2024
- Violence Against Women and Girls Strategy 2025-2029

## [Key performance indicators to measure effectiveness of steps being taken](#)

We will be working with our legal team to include in all contracts, where potential Modern Slavery risks are identified, the appropriate provisions to combat modern slavery. We will work with our suppliers to develop, where relevant, proportionate appropriate key performance indicators to monitor and manage performance in regards to these risks.

In the meantime, we aim to start measuring the following to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains, with data being available for the Local Safeguarding Partnerships, and Executive Leadership Team (ELT) when requested:

- Feedback through our Integrated Team at Place reports

- Numbers of children identified, risk levels and activity undertaken to decrease the incidences of child exploitation
- Adult social care providers (such as care homes and home care agencies) are able to apply to the UKVI for a sponsorship licence, to sponsor social care workers into the UK. In late 2022, a new scheme to address workforce capacity issues in the sector was launched. UKVI information is shared with a regional steering group in order to support potentially displaced workers from this scheme whose employer has had their licence revoked.

From April 2024 to March 2025 there were 12 new National Referral Mechanism (NRM) referrals recorded on the system; 2 for CSE, 9 for CCE and 1 for modern day slavery and trafficking. Prior to this there were 24 NRM's already open for CCE (four also had trafficking concerns noted and 2 also had CSE concerns noted), which remained open for part of the specified timescales. We continue to remain vigilant and proactive to identify any form of slavery in the borough.

### 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.

Havering Safeguarding Partnership provides a comprehensive training and workforce development programme for all professionals and volunteers across the local footprint. Training is offered in safeguarding children 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".

However all resident facing staff within the council and its partners should undertake some basic training around the signs to look for and how to refer to safeguarding teams is essential, to ensure they are able to identify and report any modern slavery if they encounter victims in the first instance. This includes roles such as parking enforcement officers, housing officers, public protection and building control officers, school crossing guards and school employees.

The council has provided some links to resources (Videos, Training, Documents and Resources) to support with spotting signs of modern slavery and human trafficking. Links have been provided on the council's website for all staff, residents and visitors to view and these link have been promoted during Modern Slavery week October 2024.

Although there is no specific training to address modern slavery for our procurement team, all staff are aware of the basic obligations, excluding someone from the procurement and reporting to the Home Office where appropriate. If anyone is discovered in a current contract we would explore the options for terminating the contract.

In any instances where a report of modern slavery regarding a child has been received into the safeguarding teams, these will be referred into the Children's Multi Agency Safeguarding Hub (MASH) for a strategy discussion. This is to determine the next steps and agree who will complete the referral onto the NRM). All reports of possible modern slavery and human trafficking involving adults are referred to the Adults Safeguarding Team to ensure consistency of response. These referrals are triaged using a robust framework, including completion of a Modern Slavery & Human Trafficking questionnaire to ensure compliance with both the Care Act and Modern Slavery Act. Threshold for safeguarding and referral to the NRM is considered as part of the process. We work in partnership with police and other agencies to prioritise risk assessment and safeguarding of adults.

### Next Steps

Over the last 12 months we have updated our website to ensure everyone can help to identify and reduce the amount of Modern Slavery in the borough by being aware of the signs that someone might be a victim of modern slavery.

In October 2024 the council celebrated anti-slavery week and anti-slavery day for the first time. Throughout the week, Officers from across the council were brought together to raise awareness of modern slavery, human

trafficking and exploitation and to encourage action to address them. As well as a 'Let's Talk' staff information session where case studies were discussed, posters were distributed across council owned buildings highlighting the signs to spot. To celebrate anti-slavery day colleagues across the Council and police held a stall at the Liberty Shopping Centre to help people spot the signs and report modern slavery practices, as well as offering general advice for how to keep yourselves safe. Both events were a huge success in helping to raise awareness and bringing the issue into the forefront of people's minds.

For 2025/26 we have identified the below priorities for us:

### Documentation

The LGA has recently updated the councils guide to modern slavery, and within this new guide a [Council modern slavery maturity matrix](#) has been developed. The matrix provides a framework for councils to assess their current progress and plan future activity on modern slavery. The council will use this matrix to assess our progress in modern slavery.

The Council will continue to monitor and review the key policies we have in our corporate policy library to ensure Modern Slavery has been included where needed, and where it has been included, strengthen the content and guidance to staff, making sure any changes are communicated to our staff. Any new policies will continue to be reviewed to identify if modern slavery should be considered.

### Commissioning and Procurement

A new policy on how to tackle modern slavery through procurement and contract management will be prepared and training will be developed for all relevant staff.

### 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 website; providing topic briefings and staff bulletins. Awareness of Modern Slavery is incorporated in our training to social care staff from the Havering Social Care Academy, and training is available to all council staff via the Havering Safeguarding Partnership training programme.

### Declaration

This statement is the Council's third statement and relates to actions and activities during the financial year ending March 2025.

Approval has been granted from our Executive Leadership Team, comprising of the Chief Executive, three Strategic Directors and Director of Children's services and will be reviewed and updated annually.

This Statement was agreed by: Havering Executive Leadership Team on 1<sup>st</sup> July 2025