

Modern Slavery Statement

April 2025 – March 2026

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 2026 to prevent modern slavery and human trafficking in our business and supply chains.

Introduction

Modern slavery is a serious human rights abuse that can take many forms, including but 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 play an important role in tackling modern slavery by identifying and supporting victims, and as designated first responders under the Modern Slavery Act 2015, they must refer suspected cases to the Home Office. Havering Council takes a zero-tolerance approach to modern slavery and human trafficking and is committed to preventing it in all aspects of its work. Although the Council is not legally required to publish a Transparency in Supply Chains statement (TISC), it does so voluntarily to demonstrate its ongoing commitment and keep the issue in focus. This will be Havering's fourth TISC Statement.

Legal Requirements

The Modern Slavery Act states that a transparency statement is required to be published annually 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.

The [Procurement Act 2023](#), came in force from February 2025, strengthens procurement consequences by allowing or requiring exclusion of suppliers involved in modern slavery offences from public contracts.

Organisation structure and supply chains

Havering recognises the responsibility that comes with its purchasing power and the importance of ensuring that ethical, social and lawful considerations are embedded within all commissioning and procurement activity. The council is committed to ensuring that its supply chains operate responsibly and that suppliers act in accordance with all relevant anti-slavery and human trafficking legislation.

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 280,787¹ with 57,059 (20.3%)² under the age of 16.

The Council provides a wide range of services to our communities, spending more than £180 net million every year. At the end of March 2026, we were employing 3,327 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 and 2026 we have had to apply for further funding 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 2026, the [Living wage for London](#) is £14.80 (£13.45 nationally). The council continues to look 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, for higher-value contracts, suppliers are asked at the selection stage whether they comply with the requirements of Section 54 of the Modern Slavery Act 2015.

Although we do not run any checks on providers for Modern Slavery, all our service specifications have the below in statement in them:

“Modern Day Slavery (MDS) is an important issue and unfortunately can be found across many supply chains. Despite the Modern Slavery Act 2015, a recent study by the Centre of Social Justice (17) suggested there are still tens of thousands of individuals who continue to work in slave-type conditions.

The service Provider should actively raise awareness of MDS within their organisation and hold regular risk assessments.

The service Provider should make it clear that their contracted workers are free to join trade unions with a clear whistle-blowing system throughout.

The service Provider should be compliant with S54 of the Modern Slavery Act 2015 and should be able to provide details on where their statement is available on their website, risk assessments and documentation of acts taken to prevent MDS.”

Havering uses Gateway Reviews to assess whether internal projects and programmes are ready to progress before key decisions, spending or implementation take place. As part of this process, the review documentation includes a Modern Slavery section, which is checked by the chair. This means projects considered through the Gateway Review Group are reviewed for modern slavery considerations where relevant.

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:

¹ <https://www.haveringdata.net/population-demographics/#metadata:l351>

² Date: 2024 | Source: ONS, mid 2024 Population Estimates

Documentation –The Council’s Contract Procedure Rules and its procurement documents and policies are being reviewed to ensure compliance with legal obligations and to capture best practice.

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, sponsored by inappropriate suppliers. Since 2023, many suppliers have had their licences revoked, and it remains unclear the whereabouts of the affected workforce in most cases..

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 have also developed an Education and Employment Skills strategy to help us improve skills and better paid employment in the borough.

Supply chain - The new Procurement Act came into force on 24th February 2025. The council has identified what that meant and a draft policy was written outlining the voluntary steps to tackle modern slavery via procurement. The legal position changed on 17 May, when the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 came into force, placing legal duties on public bodies to identify and manage modern slavery risks in procurement activity for the NHS for the first time. This means the policy is now being relooked at and ensuring the compulsory obligations for a small section of the procurement which the council carries out occasionally.

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.

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| - Bullying and Harassment policy | - Corporate Parenting Strategy |
| - Serious Violence Strategy | - HSCP Neglect Strategy |
| - BHR GP Safeguarding Handbook | - Strategy for the Delivery of Early Intervention Services in Havering |
| - Child Exploitation policy | - Community Safety Partnership Plan |
| - Children’s Services Procedure manual | - Housing Services Domestic Abuse policy 2024 |
| - Integrated Starting Well Plan 2024-2027 | - 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 numbers of children identified, risk levels and activity undertaken to decrease the incidences of child exploitation 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. From April 2025 to March 2026 there were 19 new National

Referral Mechanism (NRM) referrals recorded on the system; 1 for Child Sexual Exploitation (CSE), 14 for (Child Criminal Exploitation (CCE) and 4 for modern day slavery and trafficking. In addition to this, there were 15 NRM's already open, 13 for CCE, 1 for MDS and 1 for CCE/CSE. Hence they were open prior to April 2024 but remained open on Children's Services client record system for part of the specified time frame. These numbers are separate to the numbers above. 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". In April 2025 16 delegates completed our MS training.

Havering Social Care Academy has scheduled face-to-face Child Sexual Exploitation and County Lines training for December 2026, with a further sessions planned for March 2027. The training will help staff understand how exploitation works in practice, including grooming, recruitment, coercion and control, and the overlap between victimisation and offending. It will combine lived experience, real case examples, practitioner reflection and practical tools that staff can use in their safeguarding work.

However, all resident-facing staff within the council and its partners should undertake basic training on the signs of modern slavery and how to refer concerns to safeguarding teams. This will help ensure they can identify and report potential cases at the first opportunity. This includes roles such as parking enforcement officers, housing officers, public protection and building control officers, school crossing guards and school employees. At the end of quarter 1 2026/27, 56% of the 1,996 eligible officers had completed the safeguarding training.

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.

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 continued to update 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.

For 2026/27 we have identified the below priorities for us:

Documentation

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.

A new Corporate policy on how to tackle modern slavery is being drafted by council officers across departments ; including Community Safety, adult social care, children's social care and procurement. The policy will be, once approved, available for all staff and residents to view.

Commissioning and Procurement

On 17 May 2026, The National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 came into force, placing legal duties on public bodies to identify and manage modern slavery risks in procurement activity for the NHS for the first time. The Commissioning and Procurement teams are looking at and understanding the resources available to support us to implement the new requirements.

Awareness Raising

The Council will continue 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 fourth statement and relates to actions and activities during the financial year ending March 2026.

This statement has been approved by the Councils Executive Leadership Team (ELT), 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 13th October 2026.