

Modern Slavery Statement April 2023 – March 2024

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 in identifying and supporting victims and working in partnership locally. 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 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.

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.

Organisation structure and supply chains

This statement covers the activity of the Council as 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. The Council now serves a population of 262,052 residents (2021 Census) and our refreshed Corporate Plan and Vision includes how we will support all our residents alongside our businesses. The plan can be found on our website: www.havering.gov.uk/vision

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 to assist us in making sure we are able to continue to provide our services in the future.

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 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 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. A procurement strategy will be one of the main documents written in 2024 to ensure all procurement activities complies with the Public Contract Regulations 2015.

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.

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.

Shortlisting 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 prices and homelessness – Work is underway to tackle poverty in the borough, through the newly approved Poverty Reduction Strategy. The objectives in the strategy include: "help people on low incomes to maximise their household income and minimise their costs", "strengthen families and communities", "improving access to a range of employment opportunities" and "improve housing affordability and quality".

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
- Bullying and Harassment policy
- Recruitment and Selection policy
- BHR Primary Care Safeguarding Handbook
- Child Exploitation policy
- Children's Services Procedure manual
- Speak up policy
- Diversity and Inclusion Policy
- Business Continuity Plan
- Community Safety Partnership Plan
- Housing Services Domestic Abuse policy 2020
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Key performance indicators to measure effectiveness of steps being taken

We will be working with our legal team to include an insert into all contracts that where potential Modern Slavery impacts are identified within a contract requirement, we will work with our suppliers to develop 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, the Equality, Diversity and Inclusion Committee (EDIC) and Executive Leadership Team (ELT) when requested:

- Feedback through procurement, contract management and 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. Adult social care will shortly have access to UKVI information due to the high number of potentially displaced workers from this scheme whose employer has had their licence revoked. Sponsorship visa figures within ASC is being requested, but more work is needed around formalising and reporting

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. The procurement team have access to some in-house training, with mandatory training

being worked up into the new LXP (learning experience platform). External organisations are currently being explored to provide some further detailed training.

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 need to undertake training, as some worker roles will see them (rather than social care staff) more likely to encounter victims of modern slavery in the first instance. This includes worker roles such as parking enforcement officers, housing officers, public protection and building control officers, school crossing guards and school employees. Training around the signs to look for and how to refer to safeguarding teams is essential.

Next Steps

Over the last 12 months we have undergone a large restructure of the organisation, bringing different services together. Our next steps are to embed the new teams and ensure the importance of Modern Slavery is being considered more widely across the whole organisation. We have identified the below priorities for the year ahead:

Documentation

The Council will continue to 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, making sure any changes are communicated to our staff.

The Council will also promote a broad range of resources for staff and the wider community on the key facts of modern slavery to assist those who do not regularly come across modern slavery, recognise the signs and respond, so that victims get help, and perpetrators are brought to justice.

Commissioning and Procurement

Upon the arrival of the Head of Procurement, the Council will 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 website; providing 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 second statement and relates to actions and activities during the financial year ending March 2024.

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

The board oversees the Council’s annual governance statement and risk management.

This Statement was agreed by: Havering Executive Leadership Team on 9th July 2024