

Lambeth Council Modern Slavery Annual Statement 2021-22

1. Introduction

This is Lambeth Council's statement for the financial year ending 31 March 2022 to meet the voluntary requirements of Section 54 of the Modern Slavery Act 2015, including information on:

- Its structure, business and supply chains.
- Its policies in relation Modern Slavery and Human Trafficking.
- Its due diligence processes in relation to Modern Slavery and Human Trafficking in its business and supply chains.
- The parts of its business and supply chains where there is a risk of Modern Slavery and Human Trafficking taking place, and the steps that it has taken to assess and manage that risk.
- Its effectiveness in ensuring that Modern Slavery and Human Trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
- The training about Modern Slavery and Human Trafficking available to its staff.

1.2 The Council recognises its responsibility to take a robust approach to Modern Slavery and Human Trafficking as an employer, commissioner and contractor of other bodies, and acknowledges its duty to notify the Secretary of State of suspected victims of Modern Slavery and Human Trafficking as required by section 52 of the Modern Slavery Act 2015. The Council, as part of the public sector, is committed to improving its practices to identify and combat crime under the Act.

1.3 Lambeth Council is committed to preventing and taking action against identified Modern Slavery and Human Trafficking in its corporate activities, supply chains and the wider community. This statement covers the activities of the Council in relation to direct employees of the Council, agency workers and third parties delivering services on behalf of the Council and the Council's supply chains.

2. Organisation Structure and Supply Chains

2.1 Lambeth Council provide a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. These services are managed and delivered directly or through third parties.

2.2 The Council procures goods and services from various third parties and this is governed by our procurement strategy and related Council policies and guidelines.

2.3 The Modern Slavery Steering Group (MSSG), comprised of Directors, Assistant Directors and Heads of Service has been established to address how the Council responds to issues around Modern Slavery and Human Trafficking. Led by the Community Safety Team, the role of this group is to ensure that as an organisation we work collaboratively and link with partners to both tackle these issues and support the potential victims that colleagues encounter in their respective frontline roles.

2.4 Reporting to this group will be thematic working groups, each with the responsibility for developing the approach taken by the Council and its partners to reducing the various types of Modern Slavery, including:

- Sexual Exploitation
- Domestic Servitude
- Forced Labour
- Criminal Exploitation
- 'Other' (such as forced begging, benefit fraud and marriage and illegal adoption)

2.5 Collectively the groups will:

- Identify when and how officers are likely to come across Modern Slavery and Human Trafficking in their respective roles.
- Ensure policies and processes in place are regularly reviewed and amended when necessary.
- Review the impact the introduction of the Independent Child Trafficking Guardians programme from May 2021 has on services and the support provided for potential victims.
- Identify any gaps in knowledge and areas that would require additional training or mentoring.
- Identify partners we continue to engage with (and in what capacity).
- Raise the profile of the work of partners and identify possible future collaborative working.
- Raise the profile of Modern Slavery and Human Trafficking across the borough and the process through which incidents should be reported and actioned.
- Review the effectiveness in which incidents or safeguarding concerns raised, are responded to.

2.6 Procurement of goods and services

2.6.1 All Lambeth staff involved in a procurement and supply role as well as contractors providing goods, services and works to Lambeth must adhere to the highest ethical standards.

2.6.2 Lambeth Procurement is committed to the prevention of, and taking action against, identified Modern Slavery and Human Trafficking in its corporate activities and supply chain. This is achieved through:

- Ensuring all Procurement staff undertake on an annual basis the CIPS course on Ethical Procurement and Supply.
- Embedding the 10-point pledge through the Co-operative party Charter Against Modern Slavery into procurement policies and procedures.
- Providing guidance and training materials covering Responsible Procurement and Ethical Procurement.
- Embedding requirements covering Modern Slavery and Human Trafficking into Procurement documentation and Terms and Conditions.
- Ensuring that necessary due diligence checks are undertaken at all stages during the procurement and contract lifecycle.

3. Policies and Procedures

3.1 Lambeth Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

- **The Borough Plan 2019-21**
The Borough Plan is a key document that describes the Council's priorities, resources and how progress is monitored. The Plan also shows how we will work more closely with our partners, the voluntary sector, businesses, the health service and residents to ensure we maximise all our resources and provide better joined-up services.
- **Employee Code of Conduct**
Under the Council's Employee Code of Conduct, all employees are aware of the actions and behaviours expected of them when representing the Council. The Council strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.
- **Safeguarding**
The Council has responsibility to develop, implement and monitor policies and processes to safeguard the welfare of adults and children and to work within multi-agency partnerships to protect and safeguard people. All staff are aware of and expected to work within approved safeguarding policies and procedures.
- **Whistleblowing**
Lambeth Council's whistleblowing procedure is designed to make it easy for employees to make

disclosures, without fear of retaliation. All staff, clients and other customers and business partners are encouraged to report any concerns related to the direct activities or the supply chains of the Council.

- **Equality and Diversity**

The Council is committed to making equality an integral part of its business, by making equality a reality for all and to taking action to eradicate discrimination and inequality when delivering services, employing others to deliver services on its behalf and when providing funding to others to provide services. This includes a commitment to fair pay having been registered to the London Living Wage since 2014.

- **Responsible Procurement**

The policy sets out the general principles that the Council will follow for all procurement and commissioning activities in excess of £100,000. This will ensure that these activities focus on the delivery of value for money, meet the needs of residents and achieve additional economic, social and environmental benefits for its residents.

4. Due Diligence & Audit Process

- 4.1 Lambeth Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of Modern Slavery and Human Trafficking will be referred to the police and the designated officers who deal with incidents and potential victims within the Council.
- 4.2 A review of cases referred to the National Referral Mechanism made by a Council officer will take place annually through the MSSG. This will allow the respective teams making the referrals to reflect on existing processes, provide areas of best practice (including referencing case studies when possible) and identify areas for improvement that the members of the respective Thematic Groups can consider on implementing.
- 4.3 To support this process a Task and Finish Group will be established to review how teams across the Council report and record data regarding Modern Slavery with a view to improving access to data / data sharing agreements and tracking individuals being supported through the NRM process.
- 4.4 Contract management: working with the Procurement team, the MSSG will review the Ethical Procurement and Modern Slavery requirements within contracts to promote, monitor and challenge contractors in the delivery of the Modern Slavery Act 2015 through their activities and that of their supply chain.

5. Risk Assessment & Management

5.1 Contract Management

- 5.1.1 Lambeth is in the process of implementing a corporate contract management model, which will set out a policy, supported by guidance and procedures aimed at providing a consistent approach to the way in which contracts are managed. The implementation of the new model will involve several activities that will improve the way in which we manage our contracts.
- 5.1.2 Staff involved in contract management activity will have a responsibility to challenge suppliers to ensure that effective contract management is applied within their supply chains to ensure that all requirements in relation to the Modern Slavery Act are adhered to in the most cost-effective manner. This will include the identification and management of risks in relation to modern slavery and human trafficking and will be done by:
 - Increasing openness, transparency and efficiency in the management of supply chains.
 - Improving ability to identify strengths, weaknesses, opportunities and threats in supply chains.
 - Improving communications with suppliers.
 - Enhancing relationships with existing suppliers.
 - Establishing effective supplier relationship management strategies.
 - Conducting audits to ensure supplier compliance with Lambeth ethics, policies and procedures.

6. Performance indicators

6.1 The Council's key performance indicators (KPIs) aligned to the Modern Slavery Act 2015 are:

- Refer for investigation via the Modern Slavery and Exploitation Helpline (08000 121 700) or the police (101) should any of its contractors identify as a cause for concern regarding Modern Slavery and Human Trafficking.
- Raise safeguarding concerns if a child or adult appears to be a victim.
- Report publicly on the implementation of this policy annually.
- Provide an annual review of cases referred to the National Referral Mechanism.

6.2 The KPIs will be reviewed and when necessary refreshed on an annual basis in line with the objectives and priorities of the Safer Lambeth Partnership.

7. Training and Awareness

7.1 Due to the Covid-19 pandemic, Lambeth Council had to adapt the way staff training was delivered, using more online options as face-to-face engagement was not possible. Developing the online training resources (such as those currently available to staff in Adult Social Care and Housing) across the Council will be a priority for the MSSG during 2021-22. This basic awareness course will be available to all staff, with a view to making it mandatory training. This online training package (on Trafficking, Exploitation and Modern Slavery) will cover:

- What Modern Slavery is.
- How the crime can be identified.
- What can be done to flag potential concerns.
- How to support potential victims.
- Who to speak to for support and guidance.
- The Duty to Notify.

7.2 Five officers will attend a "train the trainer" workshop (hosted by FLEX – Focus on Labour Exploitation) in June 2021 that will enable them to deliver smaller Modern Slavery awareness workshops (in person or online) to specific teams upon request.

7.3 All staff are required to complete an induction programme if they are new to Lambeth and ongoing mandatory training, including Safeguarding, Equalities and Diversity. A priority for 2021-22 is that this will include specific training around Modern Slavery and Human Trafficking.

7.4 Additional training is made available to staff that is tailored to the needs of their job. This includes staff In Procurement completing the Chartered Institute of Procurement and Supply (CIPS) course on Ethical Procurement and Supply every two years.

7.5 Any gaps in knowledge and awareness that arise from the annual review of this policy and/or the Safer Lambeth Partnership Executive, the Lambeth Safeguarding Adults Board or the Lambeth Safeguarding Children Partnership will be addressed accordingly and noted in future Annual Statements. This particularly applies to training being delivered that enables officers in frontline roles to:


- Identify and report incidents of abuse and neglect, including Modern Slavery and Human Trafficking.
- Ensure the safeguarding of all vulnerable people and recognises at risk groups including workers in certain occupations such as car washes, care work, nail bars and large numbers of adults in multiple occupancy domestic properties.

Statement Approval and Review

- This Statement to be approved by the Safer Lambeth Partnership Executive in July 2021.
- This Statement will be reviewed annually and adopted formally from July 2021 – June 2022.

- This Statement will be submitted to the Government's Modern Slavery Statement Registry to share the steps Lambeth Council is taking to prevent Modern Slavery in our supply chains.

I approve the above recommendations:

Signature: 

Date: 26th July 2021

Post: Andrew Travers, Chief Executive, Lambeth Council