

## Lambeth Council Modern Slavery Annual Statement 2022

### 1. Introduction

- 1.1 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. Commercial organisations with an annual turnover of over £36 million are statutorily required to publish a modern slavery statement which identifies the steps being taken to prevent modern slavery in its business and supply chains. However, although local authorities are currently not required to publish a statement, given the Council's annual turnover this statement is being published to model best practice.
- 1.2 In line with [guidance from the Home Office](#), this statement includes information on how Lambeth Council has taken steps during the financial year to deal with modern slavery risks in its supply chains and within the Council, covering the following areas:
  - a. Its structure, business, and supply chains.
  - b. Its policies in relation Modern Slavery and Human Trafficking.
  - c. Its due diligence processes in relation to Modern Slavery and Human Trafficking in its business and supply chains.
  - d. 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;
  - e. 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; and,
  - f. The training about Modern Slavery and Human Trafficking available to its staff.
- 1.3 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.
- 1.4 Lambeth Council is committed to preventing and acting 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 provides 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 its procurement strategy and related Council policies and guidelines (please refer to Section 3 – Procurement of Work, Service and Goods).
- 2.3 The Modern Slavery Steering Group (MSSG) comprised of Directors, Assistant Directors and Heads of Service and was 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 The MSSG agreed that in order to maintain effective oversight of this issue an annual Action Plan would be developed to work towards the aim of increasing the adoption of good practice across the organisation. The Action Plan will be reviewed and updated each year and where appropriate reflected in the Annual Statement.
- 2.5 Areas the Action Plan covered included:
  - a. Setting the Scene (producing the Annual Statement, developing the Action Plan);
  - b. Improving Governance (review the membership of the MSSG, develop a performance framework and improve internal communications);
  - c. Improve the way data is utilised (Identify and improve the reporting and recording processes);
  - d. Identify how services across the Council (and partners) support potential victims (mapping exercise and identify opportunities for improvement); and
  - e. Training (Improve awareness & understanding of Modern Slavery in the Council).

#### **Next Steps**

- 2.6 Progress made against the Action Plan will be reported through the appropriate governance processes within the Council and where appropriate, reflected in the 2023 statement.

### **3. Procurement of Works, Services and Goods**

- 3.1 All Lambeth staff involved in a procurement and supply role as well as contractors providing works, services and goods to Lambeth must adhere to the highest ethical standards.
- 3.2 Lambeth Procurement has 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:
  - a. Ensuring all Procurement staff undertake on an annual basis the CIPS course on Ethical Procurement and Supply.
  - b. Embedding the 10-point pledge through the [Co-operative party Charter Against Modern Slavery](#) into procurement policies and procedures.
  - c. Providing guidance and training materials covering Responsible Procurement and Ethical Procurement.
  - d. Embedding requirements covering Modern Slavery and Human Trafficking into Procurement documentation and Terms and Conditions;
  - e. Providing contract managers with a [checklist and guidance sheet](#) on how to manage risks across the various stages of the procurement process; and,
  - f. All contracts recorded on eCMS have to identify which of the 13 Responsible Procurement priorities will be delivered as part of the contract.

### **4. Policies and Procedures**

- 4.1 Lambeth Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. While policies and procedures may not directly reference the impact, they have on tackling Modern Slavery, their underlying principles are considered to be key in meeting the requirements of the Modern Slavery Act, in areas such as safeguarding, responsible procurement, reducing exploitation through fraud all underpinned by a collaborative approach across the Council and with key partners:
  - a. **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.

**b. 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.

**c. 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.

**d. 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 including [fraud](#) and [money laundering](#);

**e. 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; and,

**f. 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 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.

**Next Steps**

- 4.2 As the corporate lead on Modern Slavery in the Council, the Director of Community Safety and Resilience will develop a policy management process with the support of the Modern Slavery Steering Group.
- 4.3 The Director of Strategy & Communications will provide support to develop the review of the Council's policies and procedures.
- 4.4 This will be achieved by establishing a Task and Finish Group to review the policies that are currently in place; confirm ownership; identify changes that need to be made; agree timelines; ensure policies are cross-referenced; explore the use of the repository.

**5. Due Diligence & Audit Process**

**Contract Management**

- 5.1 Working with the Procurement team, the MSSG will review the Ethical Procurement and Modern Slavery **requirements** within the Council's contracts that require contract managers to promote, monitor and challenge contractors in the delivery of the Modern Slavery Act 2015 through their activities and that of their supply chain.

**Duty to Notify**

- 5.2 Lambeth Council adheres to Section 52 of the Modern Slavery Act - Duty to Notify. Incidents of Modern Slavery and Human Trafficking are referred to the police and the designated officers who deal with incidents and potential victims within the Council.

- 5.3 A review of cases referred to the National Referral Mechanism made by a Council officer takes place annually through the MSSG. This allows 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.

#### **Next Steps**

- 5.4 To support this review 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.

## **6. Risk Assessment & Management**

### **Contract Management**

- 6.1 Lambeth Council has a corporate contract management model (eCMS) which provides a consistent approach to the way in which contracts are managed.
- 6.2 Staff involved in contract management activity have the responsibility to challenge suppliers to ensure that effective contract management is applied within their supply chains and 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:
- a. Increasing openness, transparency, and efficiency in the management of supply chains.
  - b. Improving ability to identify strengths, weaknesses, opportunities, and threats in supply chains.
  - c. Improving communications with suppliers.
  - d. Enhancing relationships with existing suppliers.
  - e. Establishing effective supplier relationship management strategies; and,
  - f. Conducting audits to ensure supplier compliance with Lambeth ethics, policies and procedures.

## **7. Performance indicators**

- 7.1 The Council's key performance indicators (KPIs) aligned to the Modern Slavery Act 2015 are:
- a. All suppliers confirming their adherence to the Modern Slavery Act 2015.
  - b. Employees made aware of the Modern Slavery Act 2015 through internal communications and e-training completed by 75% of the workforce.
  - c. All Corporate procurement and Contracts teams complete CIPS ethical procurement training; and,
  - d. Provide an annual review of cases referred to the National Referral Mechanism by the Council, resulting action and the lessons learned moving forward.
- 7.2 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.

## **8. Training and Awareness**

- 8.1 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 remained a priority for the MSSG during 2021-22, including the provision of a basic awareness course that is available to all staff. This online training package (on Trafficking, Exploitation and Modern Slavery) covers:
- a. What Modern Slavery is.
  - b. How the crime can be identified.
  - c. What can be done to flag potential concerns.
  - d. How to support potential victims.

- e. Who to speak to for support and guidance; and,
- f. The Duty to Notify.

**Next Steps**

- 8.2 Five officers will attend a “train the trainer” workshop (hosted by FLEX – Focus on Labour Exploitation) that will enable them to deliver smaller Modern Slavery awareness workshops (in person or online) to specific teams upon request.
- 8.3 All staff are required to complete an induction programme if they are new to Lambeth and ongoing mandatory training, including Safeguarding, Equalities and Diversity. An ambition for the MSSG in 2022-23 is that this will include specific training around Modern Slavery and Human Trafficking.
- 8.4 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:
  - a. Identify and report incidents of abuse and neglect, including Modern Slavery and Human Trafficking; and,
  - b. 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.

**9. Statement Approval and Review**

- 9.1 The Council’s Modern Slavery Statement will be subject to the following review process:
  - a. This Statement to be approved by the Chief Executive of Lambeth Council.
  - b. This Statement will be reviewed annually by the Modern Slavery Steering Group.
  - c. 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 its supply chains.

**I approve the above recommendations:**



**Signature:** \_\_\_\_\_

**Date:** 31<sup>st</sup> March 2023

**Post:** Bayo Dosunmu, Chief Executive, Lambeth Council