

Lambeth Council Modern Slavery Annual Statement 2020-21

1. Introduction

This is Lambeth Council's statement for the financial year ending 31 March 2021 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

- 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 In order to address how the Council responds to issues around Modern Slavery and Human Trafficking a Steering Group consisting of Directors, Assistant Directors and Heads of Service has been established. 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 a collective of (senior) officers who in their respective roles are likely to, or lead teams that are likely to encounter incidents of Modern Slavery and Human Trafficking.
- 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.
 - 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.

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 vulnerable adults and children and works 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.

Procurement of goods and services

- 3.2 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.
- 3.3 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.

Contract Management

- 3.4 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.
- 3.5 Staff involved in contract management activity will have a responsibility to ensure that effective contract management is applied to suppliers and their supply chains to deliver the Council's requirements 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.

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 Modern Slavery Steering Group. 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 identifying areas for development that the members of the Operations Group will implement.
- 4.3 Contract management: working with the Procurement team and the Modern Slavery Steering Group 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. Training and Awareness

- 5.1 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 2020-21 is that this will include specific training around Modern Slavery and Human Trafficking.
- 5.2 Online training on Trafficking, Exploitation and Modern Slavery will be made available to all Council staff. Training 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.
- 5.3 Training is made available to staff that is tailored to the needs of their job. This includes:
- Training around 'Trafficking for the purpose of sexual exploitation', which is part of the Violence Against Women and Girls offer.
 - Officers in Housing who encounter issues of homelessness in their frontline role also receive training on Modern Slavery.

- Procurement staff complete the Chartered Institute of Procurement and Supply (CIPS) course on Ethical Procurement and Supply every two years (the last course was in December 2019; ALL Procurement staff completed and passed the course).
- 5.4 Any gaps in knowledge and awareness that arise from the annual review of this policy and/or the Safer Lambeth Partnership, 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.
- 5.5 The Adult Safeguarding Board has worked with groups such as Stop the Traffik to raise the profile of Modern Slavery and Human Trafficking within the local voluntary and charitable sector. Engagement workshops provide those attending with information on the indicators of Modern Slavery and Human Trafficking and an understanding of the process around how to support potential victims should they encounter the issue in their respective frontline roles.

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 National Crime Agency's National Referral Mechanism any of its contractors identified as a cause for concern regarding Modern Slavery and Human Trafficking.
 - 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 of the Safer Lambeth Partnership.

Statement Approval and Review

- This statement to be approved by the Management Board in May 2020.
- This Statement will be reviewed annually and adopted formally from June 2020 – May 2021.

I approve the above recommendations:



Signature: _____

Date: 24th June 2020

Post: **Andrew Travers, Chief Executive, Lambeth Council**