



Lewisham

# **Modern Slavery Statement 2024-2025**

# Lewisham's position against Modern Slavery

This statement sets out Lewisham Council's commitment to work towards the elimination of Modern Slavery and Human Trafficking (MSHT) and sets out the role we play as a public sector organisation, together with our partners to achieve this (Prevent); as well as to ensure victims are fully and effectively supported (Protect); fully understand the local picture regarding modern slavery (Prepare); and to robustly tackle perpetrators of modern slavery (Pursue). This aligns with our Modern Slavery Human Trafficking Partnership Strategy and Guidance (MSHT).

Lewisham Council will empower people to move on safely and successfully from exploitation, and proactively target and pursue criminals. Lewisham is clear about its zero tolerance approach to modern slavery in all its forms and we are committed to ensuring that there is no modern slavery or human trafficking in any part of our organisation. Furthermore, the Council will use all avenues open to it to seek to eradicate this crime from the Borough and maintain our status as a Borough of Sanctuary. This includes:

1. The use of proportionate and appropriate measures through our statutory powers
2. Setting supplier standards via Procurement in our role as a procurer of goods, works and services
3. Taking, where necessary, direct action in our role as an employer
4. Influencing others, in our role as critical partner to a number of public sector bodies such as health, fire and police services - as well as voluntary sector bodies.



The Council is not legally obliged to publish a statement on modern slavery and human trafficking under the Modern Slavery Act 2015. As a public sector body, however, the Council has powers which allow it to act in certain ways, for example, the Council is legally required to operate in ways that are compatible with the Human Rights Act 1998. It can therefore (in a proportionate and appropriate manner) do this using its role in setting policy and practice; its role as a procurer of supplies and services; its role as an employer; and its role as critical partner and influencer of other public sector bodies such as the Police, health, fire service and voluntary sector bodies. Publishing this statement and taking the actions contained within it helps the Council deliver these outcomes.

The Council's Statement supports the approach set out in the Modern Slavery Act. Our statement outlines the principles, policies, recruitment practices, procurement practice and actions to be taken to ensure that there is no modern slavery or human trafficking within our organisation. These may also include safeguarding responsibilities and duties under adult and children's legislation. The statement is further supported by our Modern Slavery and Human Trafficking Partnership Strategy and Guidance, which outlines the referral pathways that services need to follow to support survivors of modern slavery.

What is Modern Slavery? It is estimated that more than 50 million people are enslaved worldwide, 28 million are in forced labour and 22 million people in forced marriages. Reports of sexual and criminal exploitation have risen alarmingly during the pandemic, according to new data measuring the scale of modern slavery and trafficking in the UK.

To understand modern slavery, you need to understand what slavery is and how human trafficking, a form of modern slavery, contributes to the problem. These are defined below.

**Slavery** – the condition of treating another person as if they were property - something to be bought, sold, traded or even destroyed

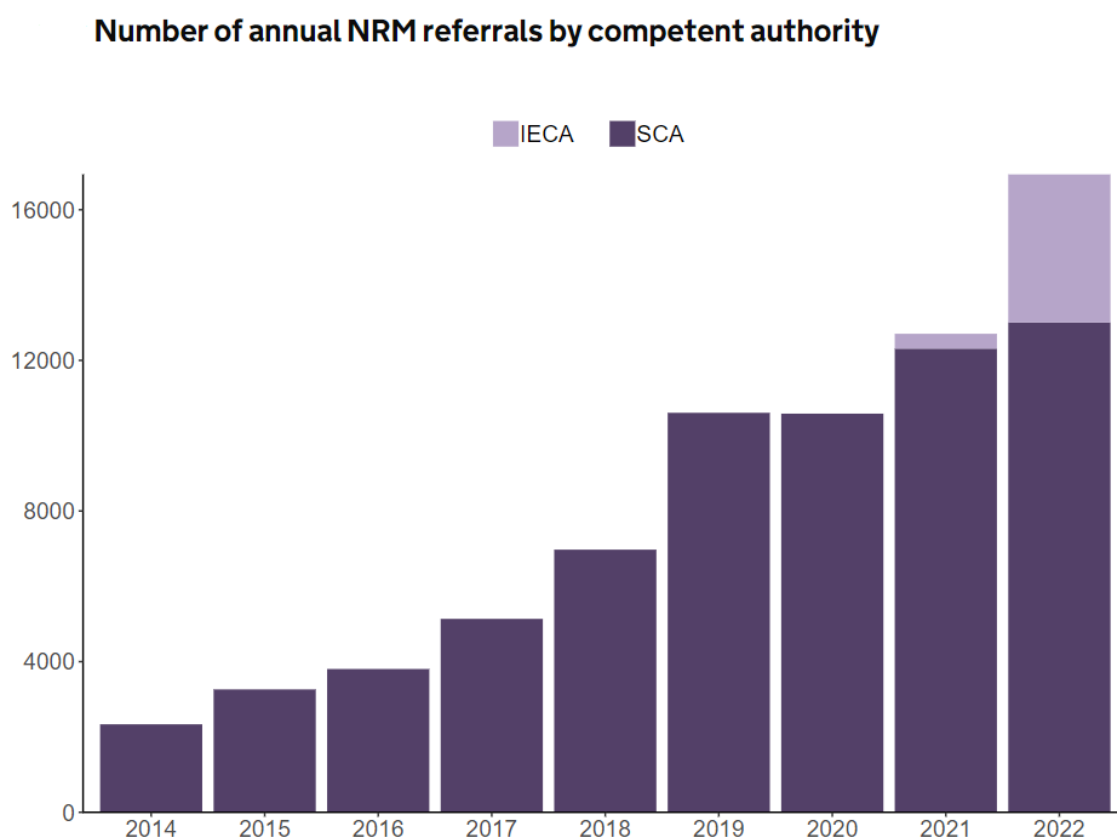
**Modern Slavery** – Any form of exploitation so severe that people are not able to leave their place of work.

**Human Trafficking** – the movement of people by means such as force, fraud, coercion or deception, with the aim of exploiting them.

There are many forms of exploitation that can constitute Modern Slavery, among them are: sexual exploitation, domestic servitude, forced labour, forced marriage, illegal adoption, criminal exploitation and exploitation of a minor. It is a harrowing but a true statistic that every 4th victim of modern slavery is a child.

## Modern Slavery in Numbers

The graph below shows that there has been a steady increase year on year, in the number of potential victims of modern slavery referred into the National Referral Mechanism (NRM). There were 16,938 potential victims of modern slavery referred to the Home Office in 2022, representing a 33% increase compared to the preceding year (12,706) and the highest annual number since the NRM began in 2009. This increase is probably partly down to greater awareness of the crime and improvements in referral and recording practices and shows the importance of continuing to prioritise Lewisham's response to modern slavery and renew our commitment to eradicating it.



**Source:** SCA, IECA

*around three-quarters of referrals (77%; 13,004) were sent to the Single Competent Authority (SCA) for consideration and the rest (23%; 3,934) were sent to the Immigration Enforcement Competent Authority (IECA).*

# Overview of Lewisham Council and Modern Slavery

Lewisham is the fourth largest inner London Borough, which, in 2021 had a population of 300,600, the population size has increased by 9%, from around 275,900 in 2011. Lewisham Council currently has around 2,412 employees working in the Council's central functions; 3,734 employees in schools; and approximately 575 agency workers.

The Borough is responsible for delivering and co-ordinating a wide range of services and as part of responding to the organisation's 2022-2026 Corporate Strategy, everyone at the Council strives to ensure that, as a priority, the London Borough of Lewisham is a welcoming place of safety for all and that every resident feels safe and secure living here.

To support these two priorities, our aim is to improve fairness, develop greater transparency and deliver good practice in our work. This aim is highlighted to our people through a series of policies and publications including the Council's:

- Code of Corporate Governance
- Code of Conduct
- Council Ethical Standards
- Whistleblowing Policy
- Council Constitution
- A wide range of other strategies and HR policies

The Council reviews its policies and procedures on an ongoing basis to ensure that they remain compliant and fit for purpose. The following policies and procedures support the Council's principles and approach to the eradication of modern slavery and human trafficking:

- Sustainable Communities Strategy
- Safeguarding Children and Adults Policies
- Employee Code of Conduct
- Agency Workers Policy
- Respect and Dignity at Work Policy
- Recruitment Practice Policy
- Sustainable Procurement Code of Practice

To touch on a few of the policies above that have a focus on employment and protecting our people:

The Council's Employee Code of Conduct sets out the standard of conduct expected of all employees when carrying out their duties for the Council, their relationship with Councillors and, in circumstances where their duties overlap or conflict with their private lives, the actions expected of them.

Our Whistleblowing Policy makes it easy for Lewisham employees, partners and supply chain operators to make disclosures of any kind without fear of retaliation.

Lewisham's Agency Workers Policy (in association with our redrafted Recruitment and Selection Policy) allows us to work with our current agency staff provider to review/agree how they can take further steps to mitigate the risk of accepting workers subjected to modern slavery. Clearances undertaken for our agency workers mirror those for permanent staff and clearance checks are undertaken by third party agency suppliers, after which time they are audited on a monthly basis.

The Council has only ever used specified, reputable employment agencies, via CCS, YPO and ESPO frameworks, to source vital labour resources as part of our agency staff approach. Nonetheless, modern slavery can intersect with a number of areas in which we as a Council operate. As a result of this, there are a number of different Officers who may come across modern slavery simply going about their everyday activities. Key areas in which officers might come across people in modern slavery include housing and homelessness services, community safety work, security, licensing services, social services and customer services.

The Borough has a focus on preventing modern slavery by seeking to identify, and refer to authorities, anyone who is suspected of being a victim of modern slavery. In addition to this, our community safety services seek to disrupt activities linked to modern slavery. Where these two actions do rescue people from the grip of traffickers and criminals, the Council has a strategic focus on supporting survivors of modern slavery through our support services – and we monitor the effectiveness of all of these actions on an annual basis.

Lewisham Council has organisational policies that outline the use of a risk-based assessment to ensure that our supply chains have proportionate checks carried out on them. For above and below threshold procurements, bidders are required to address modern slavery as part of the Standard Selection Questionnaire and the Suitability Questionnaire. For spend below £50,000 there is a requirement for bidder to complete the Supplier Self Certification which addresses modern slavery.

We work with Electronics Watch to verify the modern slavery-free nature of all IT and digital equipment that we purchase. We also conduct financial due diligence checks and run CreditSafe reports on bidders and successful suppliers, this process allows us to identify any potential risks and implement mitigation strategies where necessary. This provides assurance that we work with legally formed entities. It is our belief that following procurement best practice can do a great deal to safeguard against modern slavery in our supply chains and it is for this reason that our procurement team undertake ethical procurement and supply chain training from CIPS upon induction and then on a regular basis.

## **Background on our work to date**

In terms of training, the Council has committed, through its previous Modern Slavery Statement and Modern Slavery Partnership Strategy, to provide frontline staff and their supervisors with access to training on modern slavery. This will enable them to fulfil their statutory duty to identify potential victims of modern slavery and understand and deliver upon what they must do in such circumstances. During 2023

the Procurement Team delivered a number of training sessions, covering introduction to procurement, contract management and Social Value. These sessions provided an opportunity to discuss modern slavery and the active roles we can take to tackle modern slavery through procurement processes.

In addition to eLearning modules that cover the subject of Modern Slavery and Human Trafficking, it is covered in face-to-face/Microsoft Teams safeguarding courses undertaken by staff members who work with the public in a direct capacity. The action that our people need to take in relation to modern slavery has become well-known and regularly acted upon - and as a result our number of referrals to the National Referral Mechanism have been increasing on a yearly basis, with early identification resulting in some positive multi-agency action to support modern slavery survivors.

In terms of awareness raising, the Council has played a part, as a statutory partner, in embedding human trafficking and modern slavery training through the work of the Lewisham Safeguarding Adults Board, and the Lewisham Safeguarding Children Partnership. Lewisham Council is also a leading partner in the established Modern Slavery and Human Trafficking (MSHT) Network. The MSHT Network is committed to delivering local training sessions as well as regular communications to ensure that there is a wide-scale understanding of these issues, what to do when confronted with them, and the ways in which the Council's Whistleblowing policy can be used by partners and people in our supply chain. There is also a quarterly partnership meeting between the Councils, police and NHS colleagues from the three South East London Boroughs of Lewisham, Greenwich and Bexley, where concerns, local trends and cross border learning on modern slavery and human trafficking issues are discussed.

The MSHT Partnership Strategy highlights the following local strategic priorities 2022-2024

- a) Help to Prevent Exploitation
- b) Ensure Victims are Identified
- c) Support Victims
- d) Bring Exploiters to Justice

In terms of Procurement, our contractors and suppliers are predominantly UK-based and we are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within our supply chain. The Council has nominated a member of the Procurement team to be the lead contact for the London Procurement Network, which offers procurement 'best practice' advice and often includes insights into ethical Procurement.

We ask questions in all of our above threshold tenders as to whether organisations have produced (and can share) their modern slavery statement. We also ask whether suppliers or persons in control of/representing organisations have ever been found guilty of using child labour - or any other form of human trafficking - with involvement in either being mandatory grounds for exclusion from the tender

process. We revised our Sustainable Procurement Code of Practice (SPCOP) in 2022 to ensure that all Council contractors agree to adhere to the Council's principles and practices with regards to the identification and eradication of modern slavery. The SPCOP was also revised to ensure that all requirements of the Co-operative Party Charter against modern slavery that the Council has signed up to were implemented.

In terms of supply chain risk, Lewisham has in the last couple of years signed and adopted the Co-operative Party Charter against Modern Slavery and are committed to delivering upon its objectives by seeking to identify the parts of our supply chains where there is a risk of modern slavery taking place. We have identified that ICT hardware is one such area of higher risk and are therefore affiliated with and work with 'Electronics Watch' in this area as well as ensuring that we use CCS frameworks for procuring such hardware, as these ensure that supplier credentials are tested as part of the selection process. Furthermore, the Procurement Team undertake an annual risk-mapping exercise on the Council's contracts, categorising contracts into levels of spend, category management type groups, and risk. This consists of reviewing and risk assessing our supply chain and report back on measures taken to mitigate and reduce risks in areas considered to be moderate and high risk. This will continue to strengthen the Council's view and understanding of our supply network, where potential risks may lie, and allow proactive mitigation of any risks.

We have reviewed the Council's standard contract terms and conditions to require contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance. We also regularly review the Council's contractual spend to identify any potential issues and areas of higher risk exposure to modern slavery.

## Review of our Previous Commitments

As part of our last Modern Slavery Statement, we set ourselves six areas for targeted improvements across 2022-2023. These commitments require continuous action, they are ongoing, and the Council seeks to implement and adhere to these on a day-to-day basis. Progress has been made against each of the six target areas during 2022-2023. Further progress will continue to be made and the impact will be strengthened during 2023-2024 in line with the new Modern Slavery and Human Trafficking (MSHT) strategy and guidance which is currently being developed. These commitments and their delivery status are listed below:

Commitment	Action	Achieved
Improving protection and support offer for modern slavery survivors	• Modern slavery is included in all Procurement Training.	Ongoing
	• Continue to roll out Learning portal starter pack	Ongoing
		Ongoing



	<ul style="list-style-type: none"> <li>• Development of E-learning module for all new starters</li> </ul>	
Encouraging suppliers to consider their modern slavery obligations	<ul style="list-style-type: none"> <li>• Modern slavery and supply chain risk is a set discussion point in contract management/monitoring meetings on an annual basis, as included on the Contract Management Monitoring Plan</li> <li>• Working closely with Tier 1 suppliers to build a complete picture of the full supply chain.</li> <li>• Requesting and monitoring information from the Tier 1 suppliers on how they manage their own supply chain to address modern slavery risks</li> </ul>	Ongoing
Increasing the uptake of additional modern slavery training	<ul style="list-style-type: none"> <li>• Content on modern slavery included in existing training sessions run by HR</li> </ul>	Ongoing
	<ul style="list-style-type: none"> <li>• Introduction to Procurement, Contract Management and Social Value Training</li> </ul>	Ongoing
	<ul style="list-style-type: none"> <li>• To provide frontline staff and their supervisors with access to training on modern slavery</li> </ul>	Ongoing
	<ul style="list-style-type: none"> <li>• eLearning modules that cover the subject of Modern Slavery and Human Trafficking, it is covered in safeguarding courses undertaken by staff members who work with the public in a direct capacity.</li> </ul>	In development
	<ul style="list-style-type: none"> <li>• Meet the buyer event 2023</li> </ul>	In development
	<ul style="list-style-type: none"> <li>• Early market engagement for above threshold procurements</li> </ul>	Ongoing
	<ul style="list-style-type: none"> <li>• Regular supplier engagement and awareness raising with local businesses more widely.</li> </ul>	In development
	<ul style="list-style-type: none"> <li>• The MSHT Network is committed to delivering local training sessions as well as regular communications.</li> </ul>	Ongoing
	<ul style="list-style-type: none"> <li>• Delivery of a Modern Slavery Conference on 23.1.24 organised by the MSHT Network.</li> </ul>	Ongoing
Growing our work with the Human Trafficking Foundation	<ul style="list-style-type: none"> <li>• This is being achieved via the Lewisham MSHT Network</li> </ul>	Ongoing

Embedding modern slavery visibility in our quotes and tenders	<ul style="list-style-type: none"> <li>• All suppliers are asked to agree to our Sustainable Procurement Code of Practice 2023 upon their submission and at the contract award stage, this includes modern slavery commitments.</li> <li>• Modern slavery covered in the post-award stage through the Contract Management Framework.</li> <li>• Modern slavery is also covered off in SSQs/SQs and Annual Compliance Health Checks</li> <li>• Consider KPIs for relevant contracts to be discussed and agreed with suppliers and monitored regularly.</li> </ul>	Ongoing
Undertaking supplier SMETA Audits on procurements with a higher supply chain risk for modern slavery	<ul style="list-style-type: none"> <li>• To undertake a risk-mapping exercise annually on all of the Council's suppliers, those identified as high risk may be put forward for a SMETA audit.</li> </ul>	In development
		Ongoing

## Tackling Modern Slavery in 2024-2025

This statement has covered Lewisham's obligations with regard to modern slavery; explained and defined modern slavery; illustrated its prevalence within Lewisham and the UK; provided an overview of the Council and its policies; analysed the work the Council has carried out over the last few years to tackle the scourge of modern slavery within the Borough; and finally, looked at whether or not the Council has delivered upon its previous, measurable commitments and performance indicators in relation to this work and these actions.

A Modern Slavery Statement is not just about looking back, however, it is also about looking forward. This requires us to anticipate new developments and areas of risk that could lead to modern slavery-related negative externalities, in order for Lewisham Council as an organisation to be able to act pre-emptively to protect people from these risks and protect our organisation from being exposed to them. With the United Kingdom having now left the European Union, the civil society organisation Global Initiative has made it clear that there is a risk that hard won UK gains in tackling human trafficking and modern slavery will be lost due to the terms for UK collaboration with Europol and Eurojust being diminished. Lewisham Council will therefore have to improve its efforts to protect people from modern slavery as well as provide support to people who have experienced modern slavery. In order to be able to do this effectively, we need to make sure that more of our people are

accessing modern slavery training and that more of our suppliers are considering their modern slavery obligations. This means reaching out to more organisations working in this area and paying even closer attention to our procurement process and supply chain in order to ensure that modern slavery visibility increases.

Related to the above, the Council will continue to work upon the six areas of focus identified for the twelve months covered by this annual statement. We have set out a number of targeted and measurable commitments on the next page to ensure that we deliver specific projects that, taken in totality, will help the London Borough of Lewisham to achieve gains in our six target areas over the course of the year from 1st April 2023 to 31st March 2024.

## **6 Areas of Focus in 2024-2025**

### **1 Improving protection and support offer for modern slavery survivors**

- a) Roll out of Victim Care Pathway outlines how Survivors and Victims can be best supported in the Borough.
- b) Continue to develop and deliver training to staff on Modern Slavery.

### **2 Encouraging suppliers to consider their modern slavery obligations**

- a) Encourage that modern slavery is covered in pre-contract meetings and that all bespoke contracts include relevant modern slavery clauses.
- b) Working closely with Tier 1 suppliers to build a complete picture of the full supply chain and requesting information on how they manage their own supply chain to address modern slavery risks.

### **3 Increasing the uptake of additional modern slavery training**

- a) Considering a programme for additional training on modern slavery to be made available to officers and partners who might encounter victims of modern slavery. This is in order for the London Borough of Lewisham to improve identification, increase general awareness of modern slavery risk factors and implement the Victim Care Pathway that has been created as part of the new local MSHT Strategy and Guidance.
- b) As part of Meet the Buyer event the Council will incorporate an awareness session on modern slavery to local suppliers, partners and attendees.
- c) The Council is also committed to providing local suppliers with an understanding of modern slavery as part of its on-going “Ready to Supply” programme, encouraging supplier engagement and awareness raising with our local businesses more widely.

#### **4 Continuing to lead on the development of the Lewisham MSHT Network**

- a) Exploring through the Community Safety Team how the Council can provide the staffing resources to deliver the objectives set out within the new local MSHT Strategy and Guidance.
- b) Members of the Corporate Procurement Board have been identified as the service area champions on modern slavery and are therefore committed to discussions with the local MSHT Network, which includes representation from the Human Trafficking Foundation, to find out how else we can increase our output in this area and provide supply chain transparency to attempt to combat MS wherever it may appear.

#### **5 Embedding modern slavery visibility in our quotes and tenders**

- a) Continue to include modern slavery requirements in above threshold tenders and when procuring low value contracts.
- b) Ensure KPI's for relevant contracts are included in tender packs and agreed with suppliers and monitored.

#### **6 Undertaking supplier SMETA Audits on procurements with a higher supply chain risk for modern slavery**

- a) Committing to undertaking Sedex SMETA Audits of suppliers and their supply chains on procurements in areas with a greater risk of human trafficking and modern slavery, as required.

Signed by:

Jennifer Daothong, Acting Chief Executive

Mayor of Lewisham