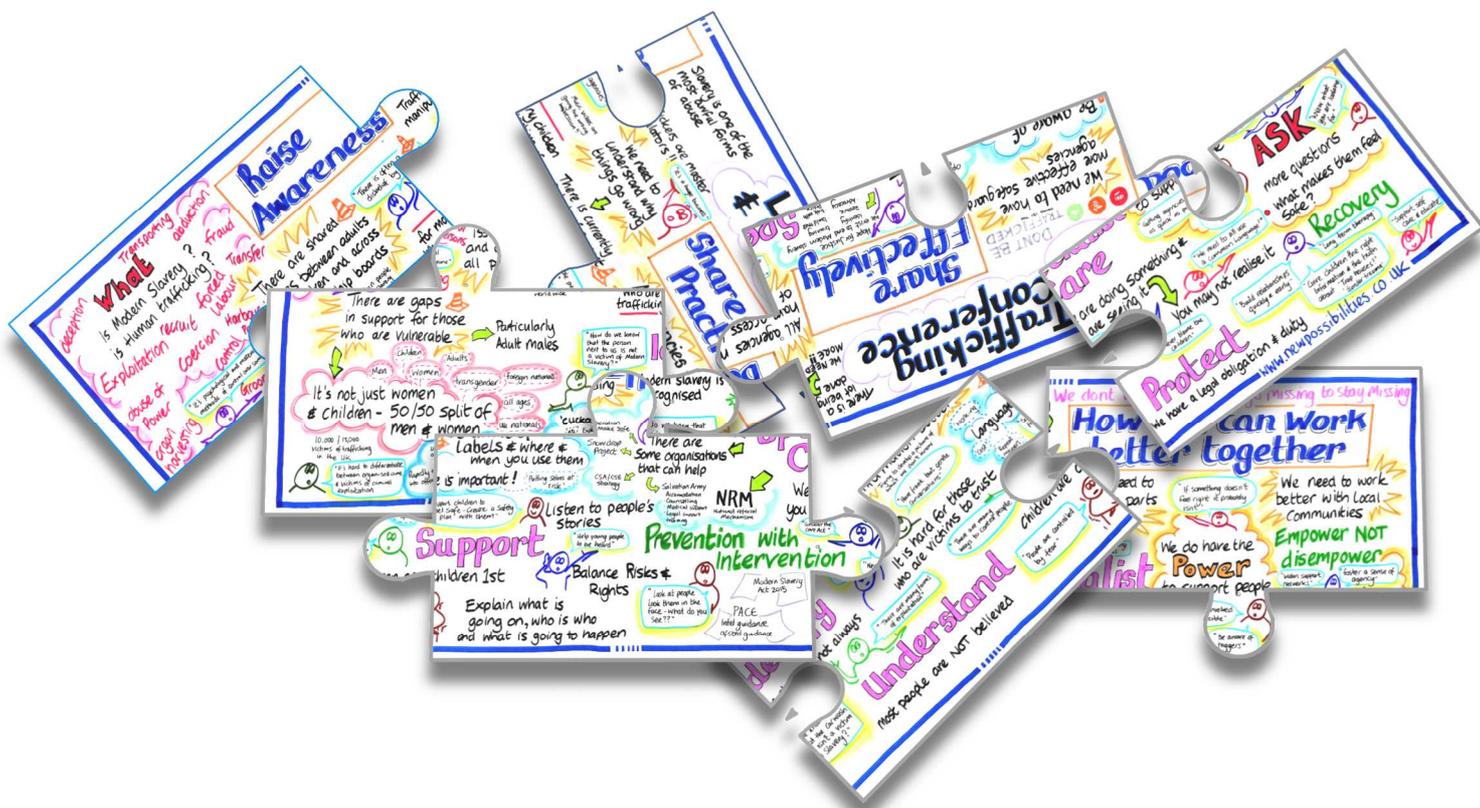


MODERN SLAVERY

London Borough of Lewisham – Human Trafficking and Modern Slavery Statement (December 2018)



Our commitment:



This statement sets out Lewisham Council's commitment to the opposition of modern day slavery and human trafficking, and sets out the role it plays as a public sector organisation, together with its partners, to drive the identification, recognition, raising of awareness and disruption of this abhorrent crime.

Lewisham Council is clear about its zero tolerance approach to modern day slavery and human trafficking in all its forms. The Council will use all avenues open to it using proportionate and appropriate measures through its statutory powers, 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.



The Council is not legally obliged to publish a statement on modern slavery and human trafficking under the Modern Slavery Act 2015. However, as a public sector body we are legally required to operate in ways that are compatible with the Human Rights Act 1998. The rights under this Act include the right for people to be free from slavery and forced labour. We also have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. Publishing this statement – and taking the actions contained within it helps us to fulfil these duties.

The statement outlines the principles, policies, recruitment practice, procurement practice and actions to be taken to ensure there is no modern day slavery or human trafficking within the organisation.

The statement is further supported by the Modern Day Slavery and Human trafficking protocol which sets out Lewisham's local partnership approach to tackling Modern Slavery. This protocol outlines the definition and identifying indicators of Modern Slavery, sets out the referral pathways services need to follow to support any potential victim and identifies the tools and powers available to identify, disrupt and investigate Modern Slavery in Lewisham.



Why modern slavery and human trafficking is relevant to Lewisham Council



Modern slavery intersects with many different areas that councils are involved with and a number of different officers might come across it while going about their everyday activities. Key examples where officers might come across victims include housing and homelessness services, community safety work, trading standards and licensing services, social services and customer services.'

Lewisham Council has a strategic focus on¹:

1. Identification and referral of victims (prevention)
2. Supporting victims (support)
3. Community safety services and disruption activities (disruption)
4. Using a risk based assessment ensuring proportionate checks are made on supply chains through procurement practice to safeguard against modern day slavery and human trafficking. (Organisational Policies)
5. Monitoring effectiveness

Definition of modern day slavery and human trafficking:

Modern slavery and human trafficking includes a range of types of exploitation, many of which occur together. These include but are not limited to:

- sexual exploitation: this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images / videos;



- domestic servitude: this involves victims being forced to work in usually private households, performing domestic chores and childcare duties;

- forced labour: this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (e.g. nail bars);



- criminal exploitation: this can be understood as the exploitation of a person to commit a crime, such a pick pocketing, shop lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the Trafficker;

- Marriage and illegal adoption.

Our organisation - Lewisham Council

Lewisham is the fourth largest inner London Borough with a population of 301,300 with a working age population of 211,000. We currently have 2,295 employees working in the Council’s central functions; 4,617 employees in schools; and approx. 600 agency workers. The Borough is responsible for delivering and co-ordinating a wide range of services, including adult and children’s social care, community, regeneration and environmental services.

Our vision for [The London Borough of Lewisham](#) is:

“Together we will make Lewisham the best place in London to live, work and learn”

To support this vision, our aim is to improve fairness, develop greater transparency and good people practices as highlighted through a series of publications including:

- Code of corporate governance
- Council ethical standards
- The constitution
- Code of Conduct
- Whistleblowing policy

This framework, is read in conjunction with a range of strategies and HR policies

Policies:

The Council reviews its policies and procedures on an ongoing basis to ensure 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 2010-2020;
- safeguarding policies;
- HR and employment practices including agency workers / pay / employee Code of Conduct / Respect and Dignity at Work / recruitment practice, whistleblowing; and
- Sustainable Procurement Code of Practice

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EMPLOYMENT POLICIES

The Council will do the following in regard to our people policies in order to support and deliver the commitment set out in this statement to tackling slavery and human trafficking abuses:

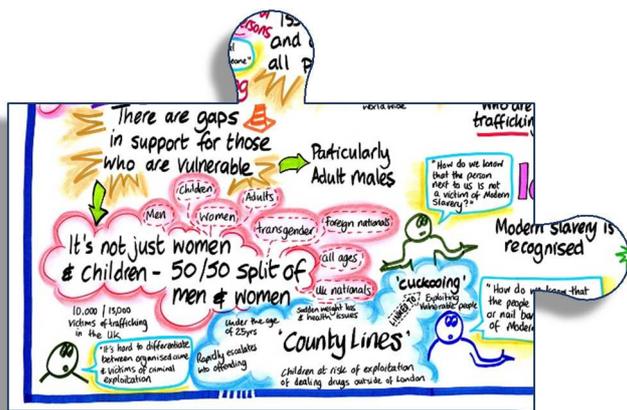
- **Whistleblowing policy** the current whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. We continue to regularly review our policies and where appropriate the Council whistleblowing policy could be used by partners and supply chain where there are concerns.
- **Employee code of conduct** our code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. As part of the next review, we will explicitly take into account the commitment set out in this statement.
- **Recruitment/agency workers** Lewisham Council has only used specified, reputable employment agencies, via recognised public sector procurement frameworks such as those provided by CCS, YPO or ESPO to source labour as part of our resourcing approach. As part of our regular review meetings, we will jointly work together to highlight and discuss existing procedures with [REED](#), our current provider of agency staff, to agree how they may take steps to further mitigate the risks in accepting workers subject to modern slavery or human trafficking. We are currently working on redrafting our recruitment and selection policy and guidance for managers.
- **Audit of HR policies** we will incorporate the commitment set out in this statement in our next review of HR policies, and raise awareness with our TU representatives and through our Schools' Forum.

Training and awareness raising

Through its Community Safety Partnership function the Council leads the Lewisham Modern Day Slavery Partnership bringing together public, private and voluntary sector organisations to deliver on the 5 strategic focus areas above.

The Council is working in partnership with both the Lewisham Safeguarding Children and Adults Boards to ensure that Modern Slavery and Human Trafficking training is embedded in their annual training offers. The partnership is committed to annual master class awareness raising sessions and communications to ensure there is a wide scale understanding of the issues and what to do. The Whistleblowing policy for the Council could be used by partners and our supply chain where appropriate if Modern Slavery or Human trafficking concerns arose.

Our Learning and Development Team offer an e-learning package Human Trafficking and Modern Day Slavery which is available for all staff to access through our on-line Learning Management System. We will identify who this will be targeted as part of our wider awareness raising programme across the Council.



There are currently four Lewisham Council officers who have completed the **ADASS Human Trafficking and Modern Slavery Multi-agency Awareness Raising Train the Trainer** accreditation and these officers have already delivered a number of training sessions to social care staff in 2017/18.

This training, which will be delivered to a range of different departments and agencies over the next year, will equip officers with knowledge of;

- The principles of the Modern Slavery Act 2015; and
- The National Referral Mechanism (NRM) process.

Within our supply Chain:

The Council spends in excess of £275m each year with a large number of private and public sector organisations through procurement activities in the pursuit of our strategic objectives. Our contractors and suppliers are predominantly UK and EU based. We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within our supply chain.

We will deliver that commitment by:

- Where using pre-negotiated framework contracts set up by other organisations, use regional purchasing consortia e.g. Crown Commercial Service (CCS) for goods and services required for service delivery. These frameworks will have tested suppliers’ credentials during the selection process, so that the Council can obtain goods, works and services in reliance on those credentials.
- Seeking to identify those parts of its supply chains where there is a risk of slavery and human trafficking taking place. We have identified that ICT hardware is one such area of higher risk. A number of measures have been taken to mitigate the risks in this area, working in conjunction with the ICT Shared Service provided by the London Borough of Brent. These include:
 - The use of frameworks for procuring hardware: recently the Crown Commercial Service (CCS) Technology Products 2 RM3733 Lot 1 (Technology Hardware) has been used for end user device procurement.
 - The signing of the Co-operative Party Charter against Modern Slavery by Brent Council on 17 September 2018.

Steps already taken:



✓ When we procure goods, work and services we use a 'standard selection questionnaire' to shortlist suppliers for tender. We have included a question in this asking organisations whether they are required by the Modern Slavery Act 2015 to produce a Modern Slavery Statement, and ask them to provide a link to the statement on their website. This information allows us to verify compliance with the statutory duty, and potentially to exclude those non-compliance.

- ✓ We have included a question in our standard selection questionnaires asking whether suppliers or persons in control of or representing them have been found guilty of using child labour or guilty of any other form of human trafficking, and if they have been potentially to be excluded from the tender process;
- ✓ The Council have committed to signing and adopting the Co-operative Party Charter against Modern Slavery;
- ✓ Revised the Sustainable Procurement Code of Practice to ensure that all Council contractors agree to adhere to the Council's principles and practices with regards to the identification and eradication of human trafficking and modern slavery as set out in its annual Modern Day Slavery and Human Trafficking Statement;
- ✓ As part of our current recruitment process, standard employment contracts are issued subject to satisfactory clearances against the following criteria:
 - References
 - Right to work in the UK. We are a registered Tier 2 and 5 A-rated employer for visa sponsorships
 - Health – through our Occupational Health provider
 - DBS, depending on the role
 - Sight of qualifications, depending on the person specification and role, especially relevant to social work. Prospective employees are also required to complete declarations of any potential conflicts of interest
- ✓ For our agency workers, the clearances undertaken for our agency workers mirrors that for our staff. Our current MSP also ensures that clearances checks are undertaken by any third party agency suppliers and are audited on a monthly basis

Commitments for 19-20



- ❖ Revise the Sustainable Procurement Code of Practice to include those requirements of the Co-operative Party Charter against Modern Slavery not already implemented;
- ❖ Review the Council’s standard contract terms and conditions to require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance;

- ❖ Affiliate with Electronics Watch to further reduce the risk of modern slavery and human trafficking within the supply chain for ICT hardware.
- ❖ Council wide mandatory training for all staff to raise awareness, provide effective support to victims where appropriate including a protocol advising on the duty to notify and process to follow.
- ❖ Publicising of the Council’s Whistleblowing policy and procedures
- ❖ Training for the Procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply’s (CIPS) online course on Ethical Procurement and Supply;
- ❖ Additional training will be made available to officers and partners who might encounter victims of modern day slavery to improve identification, risks and pathways for support.
- ❖ Continue to work with partners to reduce the risks, detect, report and support victims.
- ❖ Continue to review and risk assess the supply chain and report back on measures taken to mitigate and reduce risk in those areas considered to be moderate and high;
- ❖ We review the Council’s contractual spending regularly to identify any potential issues and areas of higher risk exposure to modern slavery.
- ❖ Revise the Council’s grant application process to ensure that all Council grant recipients agree to adhere to the Council’s principles and practices with regards to the identification and eradication of human trafficking and modern slavery as set out in this statement;



Guidance / documents / links: <https://party.coop/local/councillors/modern-slavery-charter/https://www.lewisham.gov.uk/my-services/business/tendersandcontracts/Documents/CodeofPracticeContractors.pdf>

The full picture

