



Modern Day Slavery Statement 2021/22

February 2021

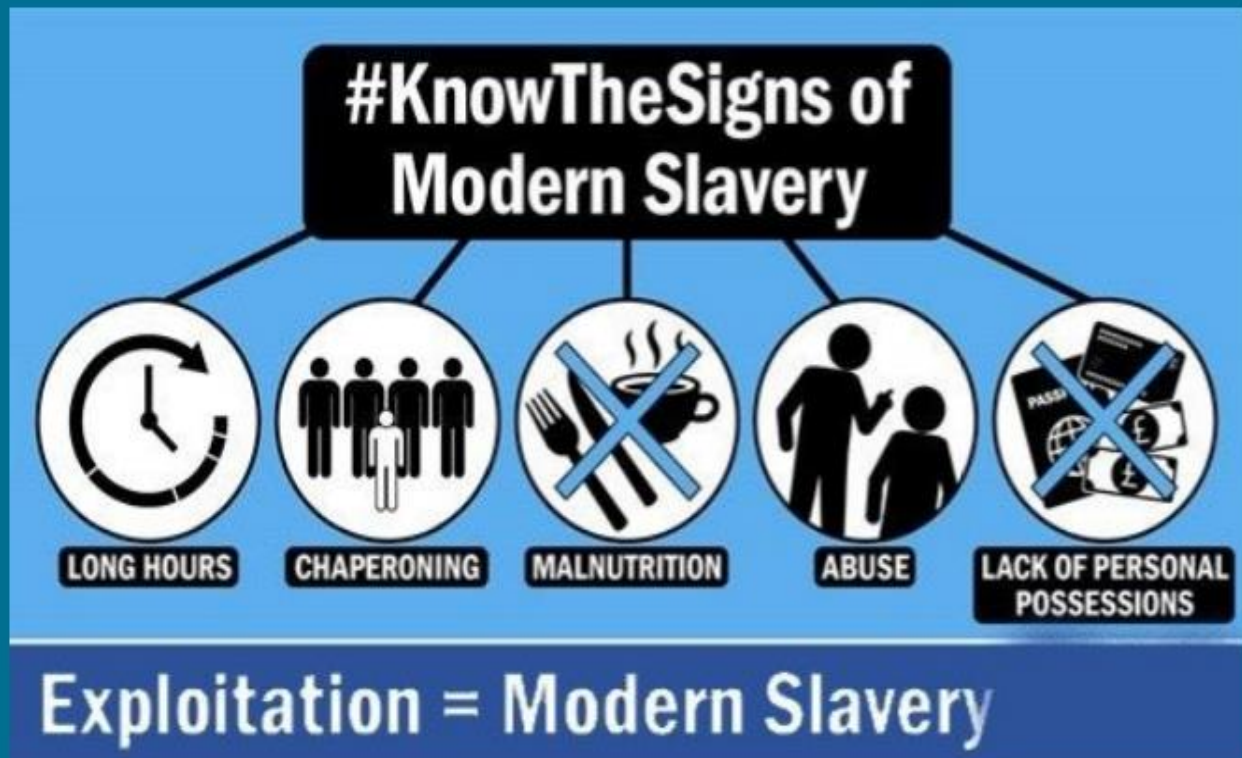


This statement sets out Lewisham Council's commitment to the opposition of modern day slavery (MDS) and human trafficking, and sets out the role we play as a public sector organisation, together with our partners, to drive the identification, recognition, raising of awareness and disruption of this abhorrent crime. Lewisham Council is clear about its zero tolerance approach to modern day slavery 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. These include:

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 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 those outcomes.

This statement outlines the principles, policies, recruitment practices, procurement practice and actions to be taken to ensure that there is no modern day slavery or human trafficking within our organisation. While acknowledging that the Council itself is not bound by the Act, the Statement is aligned with the approach set out in the Act. The statement is further supported by our Modern Day Slavery Protocol which outlines the referral pathways that services need to follow to support survivors of modern day slavery and identifies the tools and powers available to identify, disrupt and investigate Modern Day Slavery in Lewisham.



More than 40 million people are enslaved worldwide. Of these, 71% are female and 29% male. 15.4m are in forced marriages and 24.9m are in forced labour. In the UK, the number of people identified as having modern day slavery perpetrated upon them has been rising year on year, with over 10,000 people referred to authorities in 2019. To understand modern day slavery, you need to understand what slavery is and how human trafficking, a form of modern day 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.

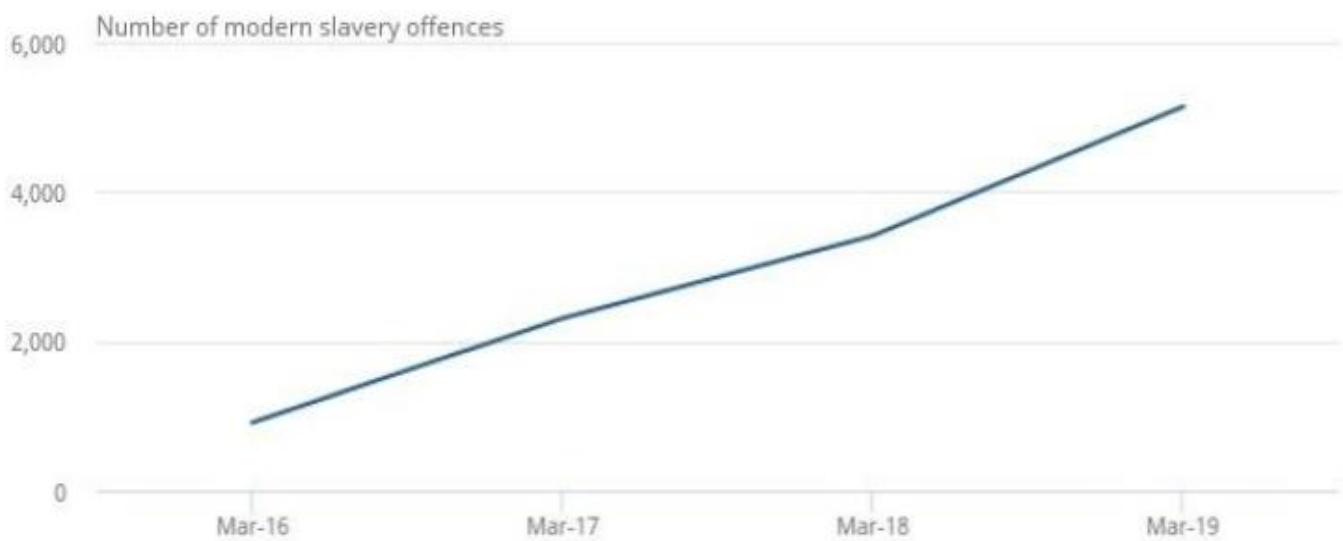


Human Trafficking - The movement of people by means such as force, fraud, coercion or deception, with the aim of exploiting them.

There are many forms of exploitation that can constitute Modern Day 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 true statistic that every 4th victim of Modern Day Slavery is a child. A person under 18 who has been deprived of their freedom in one of the ways listed above.

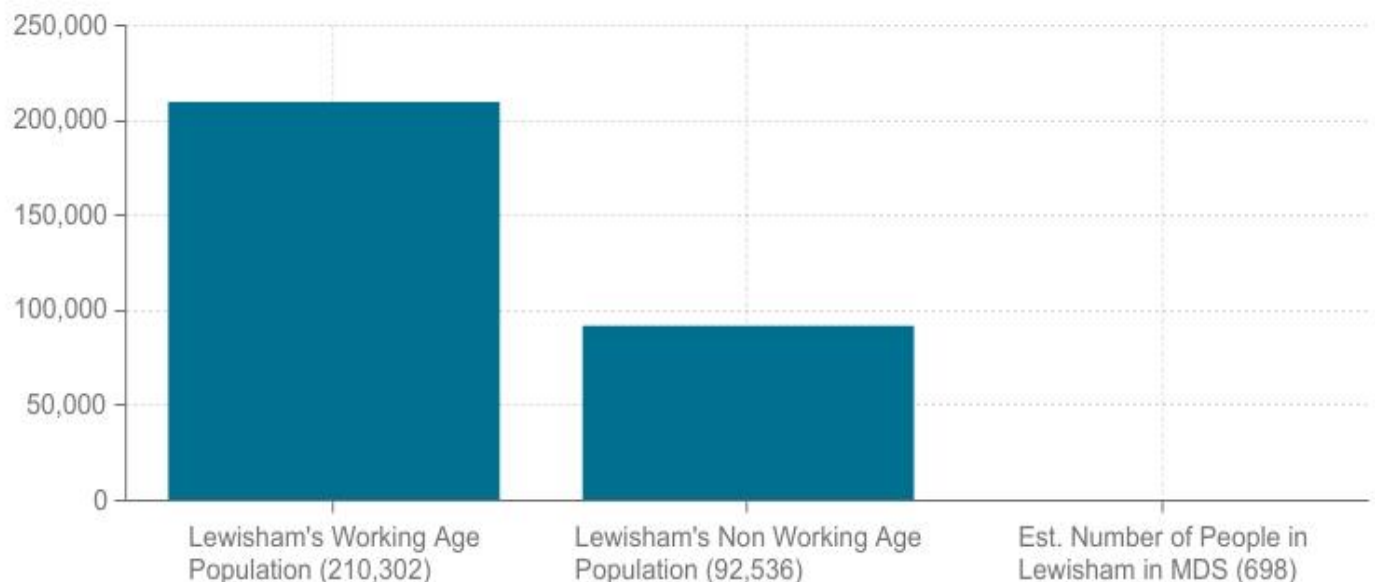
The graph below shows that there has been a steady increase year on year, in the number of Modern Day Slavery offences recorded by the police - with the number of offences reaching 5,144 by the year ending March 2019. This increase is probably partly down to greater awareness of the crime and improvements in police recording practices and shows the importance of continuing to prioritise Lewisham's response to Modern Day Slavery and renew our commitment to eradicating it.

Number of modern slavery offences recorded by the police, England and Wales, year ending March 2016 to year ending March 2019



Source: Home Office - Home Office Data Hub

The number above is instructive - but most estimates of the number of people in Modern Day Slavery in the UK are far higher. The 2018 Global Slavery Index, for example, forecasts that there are 136,000 people in Modern Day Slavery in the UK. The bar chart below shows this number as a proportion of the 2018 population of Lewisham (303,536) further sub-divided by working age and non-working age.



Lewisham is the fourth largest inner London Borough, which, in 2019 had a population of 303,800 and a working age population of 214,100. Lewisham Council currently has around 2,295 employees working in the Council's central functions; 4,617 employees in schools; and approximately 600 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 2018-2022 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, Adults and Vulnerable People 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 recently redrafted Recruitment and Selection Policy) allows us to work with REED (our current agency staff provider) to review/agree how they can take further steps to mitigate the risk of accepting workers subjected to modern day 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 day 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 MDS simply going about their everyday activities. Key areas in which officers might come across people in MDS include housing and homelessness services, community safety work, security, licensing services, social services and customer services.

The Borough has a focus on preventing MDS by seeking to identify, and refer to authorities, anyone who is suspected of being in Modern Day Slavery. In addition to this, our community safety services seek to disrupt activities linked to MDS. 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 day 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. We work with Electronics Watch to verify the MDS-free nature of all IT and digital equipment that we purchase. Where a particular procurement is thought to be especially high-risk, we commit to additional checks to certify the ethical nature of our purchases. It is our belief that following procurement best practice can do a great deal to safeguard against modern day 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.





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

In addition to eLearning modules that cover the subject of Modern Day Slavery, MDS is covered in face-to-face/MS 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 MDS 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 MDS survivors.

In terms of awareness raising, the Council has embedded Human Trafficking and Modern Day Slavery training through the Lewisham Safeguarding Adults Board and Lewisham Children's Safeguarding Partnership. Lewisham Council, through its Community Safety Partnership has also helped to found the London Borough of Lewisham Modern Day Slavery Partnership and this brings together public, private and voluntary sector organisations to focus on information-sharing with the aim of tackling this abhorrent crime.

The MDS Partnership is committed to an annual master class awareness raising session 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 monthly 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.



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 day 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 Responsible Procurement' group, which includes a focus on how ethical Procurement can help to eliminate MDS.

We ask questions in all of our above threshold tenders as to whether organisations have produced (and can share) their MDS 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 grounds for exclusion from the tender process. We have recently revised our Sustainable Procurement Code of Practice (SPCOP) 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 day 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 MDS 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.

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. As an ongoing project, we review and risk assess our supply chain and report back on measures taken to mitigate and reduce risks in areas considered to be moderate and high risk. We also regularly reviewed the Council's contractual spending to identify any potential issues and areas of higher risk exposure to modern slavery.



Review of our Previous Commitments

06

As part of our last Modern Day Slavery statement, we set ourselves eight areas for targeted improvements across 2019-2020. These commitments and their delivery status are listed below:

	Commitment	Action	Achieved?
	Revise the Sustainable Procurement Code of Practice to include those requirements of the Co-operative Party Charter against Modern Slavery not already implemented	This work was implemented in the Sustainable Procurement Code of Practice, revised policy approved in 2019	Yes
	Review the Council's standard contract terms and conditions to require contractors to comply fully with the MSA 2015, wherever it applies, with termination as a potential sanction for non-compliance	This work was completed in 2019.	Yes
	Affiliate with Electronics Watch to further reduce the risk of modern slavery/human trafficking in IT hardware supply chains	Lewisham Council became the second local authority in the UK to be affiliated with Electronics Watch in June 2019	Yes
	MDS and trafficking featured in training for all staff to raise awareness, provide effective support to victims where appropriate including a protocol advising on the duty to notify/the process to follow and publicising of the Council's Whistleblowing policy and procedures.	This work was completed in 2019.	Yes
	Training for the Procurement team to understand modern slavery via the CIPS course on Ethical Procurement and Supply	This work was last completed in mid-2020 and continues on a regular basis.	Yes
	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	Additional training was made available between 2018-2020 - but the Council is committed to increasing training uptake	Ongoing
	Continue to work with partners to reduce the risks, detect, report and support victims - and 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	This work has been delivered by being built into the Council's ways of working between 2018-2020 and will therefore continue going forward	Yes
	Revise the Council's grant application process to ensure all grant recipients agree to adhere to the Council's principles and practices with regards to the identification and eradication of modern slavery	This work was completed between 2018 and 2019 and will be revisited and built upon in 2022/23.	Yes

This statement has now covered Lewisham's obligations with regard to Modern Day Slavery, explained and defined Modern Day 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 Day 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 Day 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 MDS-related negative externalities, in order for Lewisham 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 day 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 MDS as well as provide support to people who have experienced MDS. In order to be able to do this effectively, we need to make sure that more of our people are accessing MDS training and that more of our suppliers are considering their MDS 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 MDS visibility increases.

Related to the above, proactive focus on the future the Council has identified six areas of focus 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 2021 to 31st March 2022.

6 Areas of Focus in 2021/22

- Improving protection and support offer for MDS survivors
- Encouraging suppliers to consider their MDS obligations
- Increasing the uptake of additional MDS training
- Growing our work with the Human Trafficking Foundation
- Embedding MDS visibility in our quotes and tenders
- Undertaking supplier SMETA Audits on procurements with a higher supply chain risk for Modern Day Slavery

01

Improving protection and support for MDS survivors

- a) Reviewing and updating Lewisham's Modern Day Slavery Protocol as well as including a complimentary 'best practice' one pager for how the Council and partners can support survivors.
- b) Developing and promoting a short, accessible information sheet for residents and practitioners outlining how they should proceed and who to contact when they have concerns about a person.

02

Encouraging suppliers to consider their MDS obligations

- a) Ensuring that Modern Day Slavery is covered in pre-contract meetings and that all bespoke contracts include relevant MDS clauses. MDS and supply chain risk will then form the basis of discussion for contract management/monitoring meetings on an annual basis.
- b) Challenging abnormally low tenders and advising suppliers that their MDS statements should include the right to freedom of association and collective bargaining as advised by UNISON.

03

Increasing the uptake of additional MDS training

- a) Delivering extra capacity for additional training on Modern Day Slavery to be made available to officers and partners who might encounter victims of modern day slavery. This is in order for the London Borough of Lewisham to improve identification, increase general awareness of Modern Day Slavery risk factors and highlight pathways for support more widely across the Council.

04

Growing our work with the Human Trafficking Foundation

- a) Broadening the remit of our engagement with the Human Trafficking Foundation (HTF) by exploring how the two Officers being trained as MDS trainers by HTF can further deepen our ties. We are currently compiling a list of service area champions on Modern Slavery and are therefore committed to discussions with HTF to find out how else they can increase our output in this area and provide supply chain transparency to attempt to combat MDS wherever it may appear.

05

Embedding MDS visibility in our quotes and tenders

- a) Looking to expand upon the MDS questions we already ask in above threshold tenders by similarly embedding these questions in the process for procuring low value contracts.
- b) Including a further, mandatory ITT question within above threshold tenders asking suppliers what specific actions they have taken - or will take - to combat Modern Day Slavery in their work.

06

Undertaking supplier SMETAs on high-risk procurements

- a) Guaranteeing that our Sustainable Procurement Strategy for 2021-2025 (which is currently being written) will contain a section focusing on the eradication of MDS from our supply chains.
- b) 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 Day Slavery.



February 2021

