

Modern Slavery Act 2015 - Transparency Statement 2019-20



Camden Council understands the risk that all forms of Modern Slavery pose both to our residents and visitors - and internationally, through the global nature of modern supply chains.

Modern slavery comprises slavery, servitude, forced and compulsory labour, and human trafficking. The categories listed below are not exhaustive, but cover the main types documented in the UK.

- Labour exploitation
- Sexual exploitation
- Criminal exploitation
- Domestic servitude

The Council is committed to opposing Modern Slavery and recognises the role we can play as a public sector organisation, and with our partners, in its identification and disruption. We are fully committed to using all avenues open to us to tackle modern slavery by using our statutory powers, role as a public procurer and through utilising the strengths of all our partnerships with the Police, the NHS and other organisations and through wider awareness-raising.

Camden Council has a zero tolerance approach to any form of Modern Slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and explains the steps that Camden Council has undertaken to ensure that there is no slavery or human trafficking within the organisation, our sub-contractors, partners or supply chains.

This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020. It also sets out the plans for improvements in the next year.

Our organisation

Camden Council is a London local authority with a jurisdiction of approximately 8.5 square miles and a population of just over 250,000. Camden Council spends approximately £460 million per year on external goods, services and works ranging from construction of new buildings and facilities management, cleaning, supply of IT equipment, clothing and foods to care services and a wide range of other support, professional and people-based services. These goods, services and works are procured from a wide variety of local, national and international organisations, businesses and voluntary sector organisations. Each supplier in turn may have its own supply chain. The challenge for Camden is to ensure compliance and best practice - not only within the organisation and our suppliers but also in the supply chains that serve them.

Our policies

We pride ourselves on clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers.

- This year, we updated our [Anti-Fraud and Corruption Strategy](#), highlighting our zero-tolerance approach towards human trafficking and encouraging all employees to report any suspicions to Internal Audit for immediate investigation.
- We also refreshed our [Gifts and Hospitality Policy](#) to reflect a clear process on how to report any conflicts of interests, developing [a disclosure form](#) so we can manage any potential personal or commercial gain for members of staff across the organisation.

Recruitment:

We have a robust and transparent recruitment and selection process and ensure that all new workers recruited into a post at Camden, whether full or part-time employees, agency employees or contractors/consultants, have the requisite checks, which includes identification and right to live and work in the UK. Our offer of employment is subject to the following rigorous process:

- Acceptance of the terms and conditions contained within the contract of employment
- The receipt of satisfactory references
- Evidence of any required professional qualifications (e.g. social work qualifications) and essential requirements, such as a clean driving licence
- Any necessary Disclosure and Barring Service checks, where applicable
- The receipt of eligibility to work in the UK
- Identification check.

Agency staff:

Camden Council works closely with Matrix SCM our Managed Service Provider for agency workers to ensure that all workers, including agency employees, contractors and consultants, go through the same checks as Camden employees. We ensure that all agencies in our supply chain comply with our rigorous process and adhere to all legal requirements, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or terminated from the supply chain until such compliance can be evidenced.

Impact of Covid-19:

Agency/ casual workers are a vital part of our workforce and have been treated the same as all employees. As part of our response to Covid-19, we agreed that all non-

frontline agency workers should work from home, or be redeployed to an essential service. We also ensured all agency workers receive pay for the hours scheduled to work if they needed to self-isolate and were required to carry out a front line role. The Council developed a process to enable agency workers to notify their agency so information could be monitored and payment processed as normal to ensure we are supporting our whole workforce during these exceptional circumstances.

Pay:

Camden Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life and has for a number of years ensured that employees are paid above the rate of the London Living Wage (LLW). From 1 January 2015 the Council further increased the pay of its lowest paid staff with the introduction of a minimum earnings guarantee in excess of the LLW rate. From 1 April 2019 the Council also extended its application of the London Living Wage to cover all apprentices.

Camden became a Living Wage Employer in February 2012 and extended its commitment to pay the LLW across the wider workforce including agency workers and staff delivering services on behalf of the Council in outsourced contracts. Almost all contracts awarded are inclusive of LLW and the Council has carried out two Living Wage supplier surveys to help us understand the level at which suppliers are delivering on the LLW.

[Click HERE to view our Annual Pay Policy Statement.](#)

Code of Conduct:

Camden employees must behave honestly and follow Camden's policies and procedures. [Our code of conduct](#) makes it clear that staff must not behave in a manner inside and outside working hours which could damage the Council's reputation. All employees are expected to keep within the law during their employment at all times. In addition, we recently launched our [Commitment to Conscious Inclusion Statement](#), explicitly outlining our approach to ensuring all staff are treated fairly and highlighting the steps we're taking to become a truly inclusive organisation.

Our suppliers

We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

Steps already taken:

- Procurement strives to ensure compliance with modern slavery legislation through its operations. We may terminate a contract where a supplier is in breach of its obligations in respect to the Modern Slavery provisions and/or require a contractor to remove any subcontractor or staff member suspected or known to have committed a Modern Slavery offence from the performance of the services.
- Through its Strategic Contract Management and Responsible Procurement Lead the Council has collaborated with other Local Authorities, NGO's and

external partners to maximise our impact in identifying and combatting modern slavery. The Council has also contributed to the development of the central government response to combatting modern slavery and human trafficking.

- Worked strategically and proactively with suppliers to identify risks across supply chains particularly with regards contractor staff welfare and access to fair wages in light of the Covid 19 pandemic
- We have reviewed and updated our due diligence in procurement documentation, where identified as necessary

Steps to be taken:

- Incorporate guidance on modern slavery monitoring in new contract management framework
- Update internal and external websites to include information on identifying modern slavery and steps to combatting it
- Investigate monitoring bodies that may be able to assist in providing additional intelligence to support risk assessment
- Revise Procurement planning documents to specifically highlight early thinking around modern slavery as a potential risk for each contract
- Provide Modern Slavery refresher training for all procurement staff
- Identify high risk markets and categories within the supply chain in order to more proactively combat risks of modern slavery
- Incorporate specific guidance into our procurement governance documentation

Safeguarding Activity

The Adult Social Care (ASC) Safeguarding Team are working with the Human Trafficking Foundation and with the Vulnerability and Assessment Unit of the London Metropolitan Police, which leads on Modern Day Slavery in London. Together they are reviewing the Council procedures regarding Modern Slavery, and an ASC staff workshop is currently being scheduled to raise awareness of the work of both organisations and the role of the Police in Modern Slavery Cases.

Training

The Council continues to offer learning opportunities to increase understanding of all forms of modern slavery, to enable staff to provide effective support to victims, and to reduce the risks they experience.

Modern Slavery is included in the Council's mandatory e-learning module 'An Introduction to Safeguarding' which has been completed by 98% of Camden staff. To

enhance this learning a new 60 minute e-learning module 'Modern slavery and human trafficking' has been developed and accessed by over 80 members of staff. It is available to all staff and is designed to help staff recognise their role in identifying and reporting concerns.

A number of additional safeguarding courses further upskill staff who work directly with the public. These include 'Child trafficking, exploitation and modern slavery' and 'Child exploitation and extra-familial risk'. These usually classroom based sessions have been redeveloped into online workshops to ensure learning is available to those who need it regardless of Covid19 restrictions on classroom learning.

Approval for this statement

This statement was approved by the Council's Executive Director for Corporate Services, under delegated authority from the Cabinet, on 30th September 2020.

Name: Jon Rowney
Signature: 'Agreed by Executive Director Corporate Services'
Date: 30th September 2020

