

# Modern Slavery and Human Trafficking Statement

April 2018 – March 2019

[www.southwark.gov.uk](http://www.southwark.gov.uk)

## 1. INTRODUCTION FROM THE CHIEF EXECUTIVE

- 1.1. This statement sets out Southwark Council's actions to understand all potential modern slavery risks related to our activities and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own activities and in our supply chains. This statement refers to actions and activities during the financial year 1 April 2018 to 31 March 2019.
- 1.2. As part of local government, Southwark Council recognises our responsibilities to take a robust approach to slavery and human trafficking.
- 1.3. We are committed to improving our practices to combat slavery and human trafficking in our corporate activities, and ensuring that our supply chains are free from slavery and human trafficking.

## 2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

- 2.1. This statement covers the activities of Southwark Council, a local authority purchasing and providing local government services. We have over 4,000 employees and operate in the London Borough of Southwark, England with an annual turnover of c.£1.2 billion. The statement covers direct employees of the council, agency workers engaged through the council's managed service contract; and services delivered on behalf of the council by third party organisations and in the council's supply chains.
- 2.2. Our supply chains include an extensive range of contracts with external providers involving the supply of a variety of goods and services.

### High-risk activities

- 2.3. The council will conduct dynamic risk assessments of our activities to assess whether or not particular activities are high risk in relation to slavery or human trafficking. Any concerns should be raised initially with the Monitoring Officer.
- 2.4. We consider that currently we have no high risk activities.

### Responsibility

- 2.5. Responsibility for the council's anti-slavery initiatives is as follows:

- **Policies:** The Chief Officer Team is responsible for reviewing this policy and the Corporate Contracts Review Board (CCRB) is responsible for keeping under review



contract procedures where a risk is identified in the supply chain. This policy will be reviewed on a three year cycle, when legislation changes, or if there are significant changes in the council's activities or in the delivery of them.

- **Risk assessments/investigations/due diligence:** It is the responsibility of the CCRB to ensure that procurement processes are robust in identifying risks in relation to slavery and human trafficking, and explain their specific role.
- **Responsibility:** It is the responsibility of the Corporate Governance Panel to ensure any risks or issues identified outside of the supply chain are dealt with appropriately and in a timely fashion and in accordance with safeguarding procedures.

### 3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

3.1. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

3.2. The council operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

- **Whistleblowing policy** – the council encourages all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the council. This includes circumstances that may give rise to an enhanced risk of slavery or human trafficking. The council's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** – the council's code makes it clear to employees the actions and behaviour expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- **Supplier selection** – the council is committed to ensuring that suppliers adhere to the highest standards of ethics. Relevant organisations are required to self certify that they have complied with the requirements of the Modern Slavery Act 2015 at supplier selection stage.
- **Recruitment/agency workers policy** – the council uses only agency workers recruited through the council's managed agency contract. New workers are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines as appropriate.
- **Safeguarding children and vulnerable adults policy** – our safeguarding policy sets out our duty to spot signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery.

### 4. PERFORMANCE

4.1. The council considers it is low risk on the basis that although the council has suppliers from outside the UK, these are not considered to be involved in high risk areas of activity. However, as part of our initiative to identify and mitigate risk we will:

- Require all HR professionals to be suitably qualified in relation to recruitment procedures and offer training in recruitment and interviewing techniques
- Have in place appropriate procurement procedures and ensure that all contracts with external providers have appropriate clauses
- Keep under review supply chain and contract procedures
- Ensure that in carrying out statutory functions officers are aware of potential risks and have clear reporting lines.

4.2. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.



- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## 5. Training

5.1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

5.2. The council will seek to develop an online/e-learning training package for staff including those regularly awarding EU contracts, those in roles involving significant contact with the public, and HR professionals working within the council.

5.3. The modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Southwark Council;
- what external help is available, for example through the Modern Slavery Helpline, Gang-masters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- the steps we should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## 6. Awareness-raising programme

6.1. As well as training staff, we will raise awareness of modern slavery issues by posting information in the Director of Law & Democracy Bulletin and on the Source.

## 7. Our effectiveness in combating slavery and human trafficking

7.1. We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Monitoring complaints
- Monitoring training needs
- Feedback from the Corporate Contracts Review Board.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019. It will be reviewed and updated annually.

SIGNATURE:.....



CHIEF EXECUTIVE

For and on behalf of The Mayor and Burgesses of the London Borough of Southwark

Date: 3rd October 2018