

## **Modern Slavery and Human Trafficking Statement April 2021 - March 2022**

### **Introduction by Mayor Glanville & Chief Executive**

The Modern Slavery Act was passed by Parliament in 2015; it consolidated existing duties and powers and brought in new responsibilities, specifically around procurement. Local Authorities responsibilities under the Act can be broadly split into four areas: the identification and referral of victims; support for victims; identifying and tackling modern slavery in their area, and; ensuring their own supply chain is free from modern slavery. This statement addresses the latter of these and the steps Hackney Council takes to ensure that none of the goods or services it procures benefit from modern slavery and that the providers it contracts with have taken the strongest steps to eradicate and prevent modern slavery in their own supply chain

Hackney Council will continue to use its purchasing power to address social, economic and environmental issues and deliver enhanced social value benefits. As an integral part of our Sustainable Procurement Strategy, the Council has made a commitment that it will adopt a dynamic approach for tackling any modern slavery and human trafficking practice in the Council's supply chain. The Council's Modern Slavery and Human Trafficking Statement 2020-2021 demonstrates the Council's resolve to support the process of eradicating forced labour and exploitation of people in the UK and across the world. The statement also summarises our ongoing practical activity to support this commitment.

### **Our Vision**

Hackney Council is committed to taking a stand against Modern Slavery and Human Trafficking in its entirety. Our Modern Slavery Strategy sets out four priorities:

- To tackle modern slavery through strong leadership and effective partnerships
- To raise awareness of modern slavery
- To identify and support victims of modern slavery
- To pursue perpetrators of modern slavery

This statement describes the Council's actions to identify and address all potential modern slavery risks relating to the activities that we undertake directly, through our contracted suppliers and in collaboration with our partners, in accordance with these priorities. Our actions in this regard, while not being limited to, will focus more specifically on the following elements of Modern Slavery:

- **Forced labour** - where individuals or group of people are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence. This can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars)
- **Debt bondage** - where individuals or groups of people are forced to work for a person who has lent them money, often with no prospect of the debt ever being cleared.
- **Sexual exploitation** - where individuals or groups of people are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography including where they are coerced often under the threat of force, or another penalty.

- **Criminal exploitation** - where individuals or groups of people are controlled, maltreated, or forced into crimes and mandated to commit unlawful acts against their will.
- **Domestic servitude** - where individuals or groups of people are forced to carry out housework and domestic chores in private, often without pay

### **Our Organisation & Structure**

This statement covers all the activities of the London Borough of Hackney which are underpinned by the Council's corporate plan and strategic objectives (which are located here: [Corporate plan | Hackney Council](#)) as determined by its organisational structure and values

### **Actions - within own business**

The Council has the following policies that describe its approach to the identification of modern slavery risks and steps being taken to prevent slavery and human trafficking in its own directly managed operations:

**Whistleblowing Policy** - the organisation encourages all its workers; including all individuals working at and for all levels of the organisation, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers, to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can use our dedicated and confidential phone line

**Employee Code of Conduct** - the Council's Code makes 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 undertaking its business.

**Recruitment/Agency workers** – the Council's process for recruiting staff includes a check of the prospective employee's right to work in the UK. Employees are also paid in accordance with evaluated job descriptions within an agreed salary scale. The Council uses the services of a single third party provider as its preferred supplier of agency staff, requirements regarding employee checks are included in that contract ensuring that agency workers are subject to the same pre-employment checks as directly employed staff.

**Equality and Cohesion Policy** - this sets out our overall approach to equality and diversity and what we expect from our staff and our equality objectives. The Council recognises, and will challenge practice, where people may experience discrimination and less favourable treatment or privilege. This includes in the areas of age, disability, race, colour, ethnic or national origin, gender or marital status, gender identity, religion or belief, sexual orientation, and financial or economic status, homelessness or lack of a fixed address, political view or trade union activity.

**Pay** - the Council operates a Job Evaluation Scheme which ensures that all employees are paid fairly and equitably. In addition to this, the Council, in 2012, introduced the London Living Wage ensuring everyone working for the Council is guaranteed to receive at least the London Living Wage and this commitment extends to contractors working for the Council.

**Domestic Abuse and the Workplace** - The Council takes extremely seriously the safety of its employees. Hackney Council managers have a duty to respond appropriately to concerns about the safety and welfare of staff members. We publish a managers and employees guide to Domestic Abuse and the Workplace which provides information about the Council's approach and the support available.

**Safeguarding** - The Council is committed to safeguarding and promoting the welfare of children

and young people and adults receiving some services. This is through safe, careful recruitment and vigilant ongoing management. Recruitment and Selection is in accordance with our Safer Recruitment policy and we rigorously apply all lawful safeguarding measures including DBS checks. More widely, we work in partnership with other local organisations as part of the City and Hackney Safeguarding Children Partnership and City and Hackney Safeguarding Adults Board. These Boards establish protocols for identifying and addressing safeguarding risks, including setting out minimum expectations regarding safer recruitment, safer commissioning and guidance on dealing with suspected modern slavery concerns. Details of the Child Protection Procedures which we follow should a young person be identified to be at risk of exploitation and/ or modern slavery can be found here: <http://www.chscb.org.uk/wp-content/uploads/2016/09/Modern-Slavery-Hackney.pdf>

**Training** - To help our staff recognise the part Hackney has to play, a Modern Slavery and Human Trafficking training module is being developed for the Council's Learning Hub. This will raise awareness of modern slavery and human trafficking and help staff recognise their role in identifying and reporting concerns.

**Campaigning** - Seeking to raise awareness of Modern Slavery and Human Trafficking by running proactive campaigns, which promote the action the Council is taking, what other organisations and residents can do, launching our wider Modern Slavery Strategy and supporting the work of other relevant organisations such as signing up to the Modern Slavery Charter. More information can be found on Hackney's modern slavery web page: <https://hackney.gov.uk/modern-day-slavery>

### **Actions - Procurement & Supply Chain**

The Council's Sustainable Procurement Strategy 2018-2022 sets out our commitment with regards to delivering wider community benefits through our contracting activities. A key component of our policy is the need to continue to ensure fairness for those involved in delivering Council services right through our supply chain. Our policies and approach in this regard include:

**Sustainable Procurement Strategy** - While all suppliers are expected to comply with the spirit of this statement, businesses with an annual turnover of at least £36M which contract with Hackney are additionally required to show that they have fully complied with the requirements of the Modern Slavery Act (2015) or risk facing exclusion at the qualification stage of a tender exercise. This stance is in addition to existing stipulations, on equalities and non-discrimination of workforce, which suppliers working with the Council must comply with.

An audit has been carried out by the Procurement Team, for suppliers who are contracted for more than £36M, to check the robustness of their modern slavery statements. The Procurement Team aims to support suppliers, regardless of contract value, to tackle modern slavery throughout their supply chains.

**Risk assessments on contracts** - We will actively seek to understand the various interactions within our supply chain to specifically identify risks relating to modern slavery and where they are likely to occur with a view to put in place mitigating actions.

**Modern Slavery Risk Register** - Linked to the above risk assessments, the Council will develop a risk register for Modern Slavery based on the three departmental areas over the next 18-24 months. This will work alongside the Council's Procurement Pipeline and will be monitored by the Procurement team. The areas which have proven prevalent for Modern Slavery risks previously will be highlighted, with additional oversight from the Head of Procurement, who chairs the Hackney Procurement Board, and at any other relevant decision-making boards.

**Contract Management** - The Council requires its suppliers to establish a whistleblowing process that allows contracted staff to report concerns about how their employer deals with workforce matters in their workplace, particularly if the issue being reported is widespread within the organisation. Our contract managers will ensure that annual Slavery and Human Trafficking Statements of our contracted suppliers are submitted, checked and demonstrate improvements over the previous year.

**Trade Union recognition** - We will encourage Trade Union recognition as part of the operation of our contracted services.

**Training** - The Council will continue to ensure that all staff working in its corporate procurement team are trained to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply. We will also educate all employees involved in procurement activities and as part of the implementation and dissemination of the Sustainable Procurement Strategy, provide training on Modern Slavery requirements.

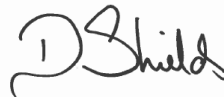
**Compliance** - The Council will refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.

### Improvements during 2020-2021

- Commitment to and publication of an [inter-board Strategy against Modern Slavery](#)
- Implementation of the actions committed within the Co-operative Party Charter against Modern Slavery which we signed up to in 2018.
- Renewed training of our Procurement Team on ethics and introduction of a new Sustainable Procurement training course for all procuring officers.
- Annual monitoring by Procurement Leads of payment of LLW within our contracts, along with establishing a means to capture this information on our eTendering system.
- Revised standard tender documents state our commitment to tackling modern day slavery and requiring suppliers to implement a whistleblowing policy for staff.
- Key stakeholders in the London Borough of Hackney met to initiate work around developing a problem profile for modern slavery in Hackney. This profile will be developed over the course of 2021 and will be used to inform the Council on further actions to take to support residents affected by modern slavery.

**Signature:**

**Signature:**



**Phillip Glanville**  
Mayor of Hackney

**Tim Shields**  
Chief Executive