

London Borough of Waltham Forest

Modern Anti-Slavery and Human Trafficking Statement 2020/21

1. Introduction

- 1.1 This statement is pursuant with section 54 of The Modern Slavery Act 2015. It outlines the London Borough of Waltham Forest (LBWF) actions completed to date to Pursue, Prevent, Protect and Prepare. It highlights LBWF's policies and procedures and demonstrates LBWF's ongoing commitment to eliminating the risks of Modern Slavery and Human Trafficking within our organisation, our partners, our sub-contractors and supply chain; and to ensuring a coordinated, collaborative response, with defined roles and responsibilities across our local partnership, to disrupt and respond to concerns raised.
- 1.2 This work underpins LBWF's Corporate Priorities to:
- **Improve residents' life chances**
 - **Keep Waltham Forest clean and safe**
 - **Ensure a decent roof over residents' heads**

2. Our business

- 2.1 LBWF is a North East London Borough and is home to an estimated 271,200 residents and 104,000 households. The Council spends approximately £300m per year on purchasing services, supplies and works contracts to deliver public services. The Council employs 2658 staff to provide services to deliver statutory and non-statutory services for residents, businesses, visitors and partners.
- 2.2 LBWF has approximately 4000 suppliers, 79% of which are small to medium enterprises. The Council's Procurement strategy and the Sustainable Procurement Policy explains how we aim to have a positive impact socially, environmentally and economically through the way we spend money. The Council launched a Supplier Charter in 2018 explaining what our expectations are of our supply chain including a commitment to preventing Modern Slavery and Human Trafficking in its corporate activities and to ensuring that its supply chains are free from Modern Slavery and Human Trafficking. The Council requires that all suppliers to the Council are absolutely committed to preventing Modern Slavery within their own activities and through their supply chain which includes manufacturers, and producers.

3. LBWF's areas of focus

- 3.1 Our approach to keeping families at the heart of all we do helps to achieve the Council's priorities and vision for residents of Waltham Forest to be safe, well, independent and resilient.
- 3.2 Our activity is underpinned by the knowledge that Modern Slavery is often hidden and can be present, "hidden in plain sight" in local businesses, streets, communities and in houses next door to us. Women, men and children, regardless of age, are at risk of being victims of Modern Slavery and Human Trafficking, and victims include those trafficked into the UK as well as UK nationals. Victims do not always identify themselves as such, and if they do, there are a number of barriers to victims reporting Modern Slavery. Perpetrators can be organised crime groups or individuals who are close to the adult and indicators of exploitation must be investigated regardless of the intentions behind the exploitation.

4. Action completed to date

- 5.1 The London Borough of Waltham Forest signed up to the Cooperative Party Charter on Modern Slavery. LBWF have completed work on the following standards:
- LBWF Procurement test compliance with the Modern Slavery Act 2015 at the short-listing stage and have included this into all contract terms and conditions.
 - The Corporate procurement team have undertaken Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
 - Whistleblowing: The Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Council. The Council's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. This document can be accessed on LBWF's staff intranet and public website.
- 5.2 Awareness raising and training:
- Raised corporate, public and business awareness through the development of a "spot the signs" leaflet - highlighting potential key indicators of Modern Slavery and Human trafficking and how to report it if you have any concerns. This is displayed on the Council website and has been disseminated throughout the partnership, including GP surgeries, libraries, neighbourhood offices

- Identify single points of contact from both within the Council, in Housing, Neighbourhoods, Trading Standards, Children and Adult Social Care and across the partnership in Health, London Fire Brigade, Police, and the Community and Voluntary sector to provide advice, guidance and support to all relevant staff. Also creating an ongoing forum to oversee the embedding of Modern Slavery into business as usual.
- LBWF provides a half day training session for practitioners who will be involved in responding to concerns related to Modern Slavery which is delivered throughout the year. In addition, resources, including a video, how to “spot the signs” and how to report concerns thereafter is online. Modern Slavery is a core element of our basic awareness Adult and Children Safeguarding training.
- Visits are being made to local day opportunity centres for adults with Learning Disabilities to raise awareness of Modern Slavery

5.3 Policies and procedures

- Developed a robust, timely, multi-agency pathway; ensuring the effective and appropriate deployment of staff and resources when concerns are raised, with a single referral process through the Integrated Multi Agency Safeguarding Hub for both adults and children. Examples of a coordinated multi agency response include activity undertaken to pursue concerns related to the sex trade, concerns of illegal businesses being run from residential properties, beds in garden sheds, nail bars/salons and concerns related to car washing.
- Local systems are in place to meet the duty to notify provision, as set out in section 52 of The Modern Slavery Act 2015. Links to this statutory process are embedded into the Pan-London Child Protection Procedures and the London Multiagency Adult Safeguarding Policy & Procedures both of which govern practice in LBWF.
- LBWF operate a robust ‘Safer Recruitment and Selection Policy’, including conducting eligibility to work in the UK checks for all employees. Agency workers are also subject to rigorous employment checks complete by an established third-party organisation.
- Our ‘Code of Conduct’ explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- LBWF has implemented the London living wage.

- The Procurement Team is responsible for ensuring all procurement activity complies with the Council's Procurement Policy, Procurement Strategy and Sustainable Procurement Policy; and is in accordance with Public contracts Regulations 2015 and the Council's Contract Procedure Rules.

5. Further action to be taken in 2020/21

- 5.1 To explore how to further embed Modern Slavery within the wider work of the Council and partners to address exploitation of adults and children by organised crime groups to increase awareness and increase referrals and tracking with the National Referral Mechanism.
- 5.2 Review of publicity materials and re-circulation and dissemination across the partnerships and public areas. Continue to mark Anti-Slavery Day on 18 October through awareness raising activities.
- 5.3 Further work is being undertaken by Procurement:
- Incorporate a statement into the supplier charter requiring that contracted workers be free to join a trade union and not be treated unfairly for belonging to one.
 - Implement contractual terms requiring contractors to adopt a whistle-blowing policy that enables their staff to report suspected cases of modern slavery.
 - Review its contractual spend regularly to identify high risk industry sectors and suppliers.
 - Identify industry sectors at higher risk of Modern Slavery and:
 - publicise what suppliers can do to ensure Modern Slavery is not present in their supply chain;
 - through the procurement process, seek assurances from suppliers that they have measures in place to prevent this;
 - through contract management, ensure these steps are being taken.
 - Include reference to this Modern Slavery statement in guidance to suppliers.
- 5.4 Waltham Forest multi-agency Modern Slavery Single Points of Contact will carry out annual reviews of Modern Slavery and Human trafficking policies and procedures to ensure key priorities and objectives are refined; along with ensuring that policies, procedures and mandatory training materials are updated to reflect developments in associated legislation, national policy and national guidance.

6. Approval of this statement

This Modern Anti-Slavery and Human Trafficking Statement was approved by the Leader of the Council on 8 October 2020.

Name Cllr Clare Coghill, Leader of the Council

Signature

A handwritten signature in black ink, appearing to read 'Clare Coghill', written over a light grey circular stamp.

Date 8 October 2020

Date of next review October 2021