

Kingston Council Modern Slavery Transparency Statement 2022/23

1.0 Summary

1.1 The Modern Slavery Act 2015 requires commercial entities with an annual turnover of £36m or more to report annually on their actions to identify, prevent and mitigate modern slavery in their supply chain. On a voluntary basis, Kingston Council has determined to annually publish a statement setting out the actions that are being undertaken to understand all potential modern slavery risks related to its business and actively ensure that there is no slavery or human trafficking in its own business and supply chains. This statement covers the period October 2022 to September 2023.

For the purposes of this statement and associated Policy, the term 'Modern Slavery' covers slavery, servitude, human trafficking, forced or compulsory labour and child labour.

2.0 Our Commitment

- 2.1 Kingston 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. We expect all those who work for us, or on our behalf, to share our zero-tolerance approach and are taking steps to help tackle forced labour, protect vulnerable workers and help prevent human rights violations.
- 2.2 The Council understands the risk that all forms of modern slavery pose, both to its own residents, visitors, and internationally through the global nature of modern supply chains. Accordingly we are putting in place steps to eliminate and eradicate acts of modern slavery and human trafficking within our business, supply chains, sub-contractors and partners by adopting a zero tolerance policy in respect of modern slavery and human trafficking.
- 2.3 The Council is fully committed to using all available avenues to tackle modern slavery by using its statutory powers, its role as a public procurer, through utilising the

strengths of all its partnerships with the Police, the NHS and other organisations, and through wider awareness raising.

- 2.4 This statement explains the steps that the Council has undertaken to ensure that there is no slavery or human trafficking within the organisation, its sub-contractors, partners or supply chains. It also sets out the plans for improvements in the next year.

3.0 Organisational structure and supply chains

- 3.1 The 'Making Kingston Better, Together' [Kingston Corporate Plan 2019-23](#) sets out an ambitious vision for Kingston, which we are determined to work with residents, businesses and local strategic partners across the public, private and voluntary sectors to achieve. This also focuses on delivering the following strategic outcome:

“A safe borough which celebrates our diverse and vibrant communities, with local priorities shaped through participatory democracy”

- 3.2 Kingston's communities are places where residents feel safe and the fear of crime is low, with a zero-tolerance approach to domestic violence, hate crime and action against anti-social behaviour and modern slavery.

- 3.3 In July 2022, the Council agreed its new [Commissioning framework](#) for 2022/26. Having established effective governance arrangements for commissioning activity across the organisation, the Council determined that it was an opportune time to review the overarching Commissioning Framework and develop a new strategy, with associated policies and guidance. This includes a clear commitment and principle to achieving social value. Working with partners that understand and share the council's values is vital. We expect that partners will commit to supporting key policies, including paying staff working on council contracts the London Living Wage, adopting a robust approach to Modern Slavery, promoting good mental health in the workplace through initiatives such as the Time to Change Pledge, signing up to the White Ribbon campaign, ensuring equality and diversity considerations permeate all aspects of their delivery, and responding to the climate change emergency.

- 3.4 The Council is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

- 3.5 Responsibility for the organisation's anti-slavery and human trafficking initiatives sit as follows:

Anti-slavery and human trafficking initiatives	Where the responsibility sits
1. Developing local policies, responses and protocols that can identify and protect potential victims of modern slavery. Over the past year, this forum has: • Brought in specialist training around Modern Slavery into the borough • Developed a Sexual Exploitation Partnership Protocol/Policy • Developed a local referral pathway/flow-chart for the risk assessment of those at risk of modern slavery, which has been shared with partners • Started to map out local data and needs • Developed and delivered Modern Slavery Awareness multi agency training for both adults and childrens services practitioners using a pool of local trainers.	Modern Slavery working group, a forum for safeguarding and community safety partnerships across both children and adults services in Kingston and Richmond.
2. Producing and revising the council's modern slavery and human trafficking statement in line with current legislation and guidance	Assistant Director, Culture, Communities and Engagement and Corporate Strategy and Partnerships Manager
3. Including the Council's approach to eliminating modern day slavery and human trafficking in its procurement policies, procedures and practices.	Assistant Director, Contracts & Commercial and Corporate Head of Commissioning
4. Ensuring staff are appropriately trained and equipped to minimise the risk of modern slavery and human trafficking through the Council's corporate responsibilities, and to spot signs and report concerns through the appropriate routes.	Assistant Director, People and Organisational Design & Director of Public Health.

4.0 Policies in relation to slavery and human trafficking

4.1 Kingston Council has set out clear and rigorous policies and procedures and high standards for employees that support early identification and management of risks in relation to modern slavery and human trafficking within the organisation and its suppliers.

4.1.1 **Recruitment and agency workers:** The Council has a robust and transparent recruitment and selection process and ensure that all new workers recruited into a post at Kingston, 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. There are additional DBS checks for anyone working with vulnerable people, including 5 years of referencing, ID validation and police checks. The Council uses Matrix SCM to supply temporary and interim staff. Matrix SCM has a proven and successful track record of delivering a managed service for temporary staff provision and the agencies in their supply chain have their practices verified to ensure that they are complying with good practice and employment legislation.

4.1.2 **Code of Conduct:** Kingston employees must behave honestly and follow Kingston'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.

4.1.3 **[Whistle-blowing policy](#)** published for staff, providing the mechanism to report any suspected examples of modern slavery.

4.1.4 **Safeguarding children and vulnerable adults:** The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults. The Modern Slavery Working Group ensures there is strong partnership links between Adult Social Care, Kingston Safeguarding Adults Board, Children's Services, the Kingston and Richmond Safeguarding Children Partnership and Community Safety to ensure a coordinated response to tackle Modern Slavery in Kingston.

4.1.5 **Real Living Wage and London Living Wage:** The Council operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably. As part of its commitment to being a good employer, the Council has been an accredited Living Wage Employer since September 2019. To maintain the Living Wage accreditation it is mandatory for Kingston to pay all staff the living wage.

Ensuring suppliers pay their staff the Living Wage is mandated through our procurement process.

4.1.6 Commissioning framework, policies and procedures: Mandatory modern slavery requirements are built within the commissioning, procurement and contract management process. Our standard contract terms include clauses that specify the supplier's contractual obligation concerning Modern Slavery. The Council's contract management principles and scorecards set out quarterly measurement of modern slavery risks under the ethical measurement criteria for all Tier 1 suppliers.

4.1.7 Equality and Inclusion: Being Respectful of difference and valuing diversity, is one of our STAR values that also reinforces our ongoing commitment to equality, diversity and promoting a cohesive community in Kingston. We are in the process of reviewing actions linked to our [Equalities, Diversity and Inclusion Strategy and Action Plan](#) for Kingston (2021-26). The strategy has a focus on being a safe borough for all where diversity is celebrated and respected. We aim to work with all our partners to promote this within the borough and beyond. We have plans to further explore how we can promote equality and inclusion within our procurement processes. The Council has a commitment to creating a diverse and inclusive workplace, where staff feel respected and valued in their job. We will continue to work with and involve our equalities networks in our approaches to both valuing diversity and supporting staff to raise any incidents of inequality.

5.0 Due diligence processes

The following activities and actions have been undertaken during the past 12 months period:

5.1 In the standard selection questionnaire, it is a requirement for bidding organisations to produce a Modern Slavery Statement and provide a link to the statement on their website if they are in-scope. All tender processes require bidders to provide confirmation that they are compliant with the Modern Slavery Act 2015.

5.2 The standard terms and conditions make provision for our supplier base to comply with the Modern Slavery Act 2015. Further updates are being introduced to the council's new terms and conditions to strengthen the anti modern slavery measures through contracting to give a stronger stance to deliver RBK's objectives.

5.3 Progress has been made with the Council's contract management practice. The review of scorecards for high value contracts continues quarterly at the Strategic

Commissioning Board. In addition, a forward plan for contract management reviews at the Commissioning Governance Board has been developed and is underway, providing corporate oversight of management for 27 high value and high risk contracts. The scorecard approach has now been rolled out to an additional 50 Tier 2 suppliers. The scorecards include an evaluation criteria on ethical sourcing with requirements for suppliers to meet their legal obligations and take proactive action to prevent Modern Slavery, ensuring legal working rights in the UK, human rights and equality requirements.

- 5.4 The Council has developed a modern slavery measurement framework - a Modern Slavery self-assessment tool for assessing Modern Slavery Risks in Council contracts, designed in collaboration with our internal and external partners and shared with over 580 key suppliers during 2021. A RAG rating system is now implemented, highlighting areas that require validation and mitigating actions to be taken.
- 5.5 A [Modern Slavery referral pathway](#) for adults and children, created by our working group to help professionals in Kingston know how to respond when a victim of modern slavery is identified by an external organisation, was published in July 2022 and distributed across the partnership and supply chain.
- 5.6 A webpage with information and guidance to all staff and external stakeholders on managing modern slavery risks and useful resources and contacts is now created and is found on the following link:
<https://www.kingston.gov.uk/neighbourhood-community-safety/modern-slavery>
- 5.7 Safeguarding the most vulnerable children and young people - Ofsted inspection commended the Council and Achieving for Children for protecting vulnerable adolescents from sexual and criminal exploitation, gang involvement, missing children, radicalisation, trafficking and modern slavery. A [protocol](#) has been created to support those who are at risk of sexual exploitation through a multi-agency response. The Adult Vulnerable Adult Multi Agency risk assessment panel (VAMA) oversees the adult safeguarding modern slavery reported cases to ensure awareness of these cases with the right professionals and elements such as NRM referrals or notifications take place.
- 5.8 Developing Good Business Charter - we are seeking to embed this within the Council's procurement processes and encouraging suppliers to adopt its principles, with the ultimate goal that they will seek accreditation. The Good Business Charter is a comprehensive yet simple way for organisations to demonstrate their values through an accreditation based on the promotion and implementation of ethical practices including prevention of modern slavery.

- 5.9 The Council's commitment to London Living Wage has resulted in 260 suppliers now confirmed as paying London Living Wage to 9,497 contractor staff delivering services in Kingston. This is an increase of nearly 600% contractor staff being paid London Living Wage since initial accreditation in 2019. We have seen this year Living Wage adopted on leisure service contract, adult social care and voluntary and community sector.
- 5.10 The Council has been able to demonstrate its strengthened commissioning and ethical procurement practice, achieving a number of national and international accreditations. During 2021 the Council was accredited by the Good Business Charter, only the second local authority nationally. It also achieved the Chartered Institute of Purchasing and Supply (CIPS) Corporate Ethics Mark, the third local authority in London and the seventh nationally. 38 procurement and contract manager colleagues completed the CIPS Corporate ethical procurement and supply e-learning course.
- 5.11 Recognising the Council's improvement work across commissioning and procurement over the past three years, the Council was shortlisted as a finalist in the CIPS Excellence in Procurement Awards 2022 in the category of Procurement Team of the Year (Small Organisation).

6.0 Risk Assessment and Management

- 6.1 The COVID-19 pandemic has had an unprecedented impact on the activity and finances of the council since March 2020 but this has also meant that we have had to be more diligent in managing our relationships with our supply base. As an authority we have learnt a new way of working with the impacts of Covid-19 and have played a leading role in continuing to support our local community and businesses through the impacts of the pandemic. This will continue to present a challenge for the council due to the increasing rate of inflation, rising energy costs and the 'cost of living crisis' impacting adversely not only on the council but also the supply chain.
- 6.2 The council has been supporting staff to prepare for hybrid working with the aim of maintaining a good work life balance, and work flexibly whilst staying connected to our residents. How and when you work has changed radically because of the COVID-19 pandemic.
- 6.3 There has been a recent spike in migrant populations in Kingston through the various Home Office led migration initiatives such as Afghan Resettlement, the Hong Kong BNO¹ Warm Welcome, the Homes for Ukraine schemes and other migrant schemes.

¹ British National Overseas

These communities have fled violence, conflict and dislocated from their communities and family support structures. Serious post-traumatic effects, including depression and anxiety and specific vulnerabilities and the inability to navigate their way in their new environment puts them at risk of exploitation and abuse.

- 6.4 The Council has been working with key partners to ensure there is commissioned targeted integration support available through direct case work, welfare checks and integration activities available to individuals and families arriving in Kingston across all schemes. The Council has set up a Kingston United for Ukraine Welcome Centre at Guildhall 2 for walk in appointments and for new arrivals to learn about the range of community offers available. New arrivals are provided with local emergency contact phone numbers. This space is also used for all vulnerable migrant families living in Kingston.
- 6.5 Future Workplace Team charters had give a chance for collaboration within our teams and agree how we will work together in the future in line with the Future Workplace principles, as we pilot a hybrid style of working. There is a wealth of information about the hybrid working arrangements for Council staff on the Future Workplace intranet pages.
- 6.6 In addition, ongoing work is undertaken with our supply chain to identify areas for further investigation, learning, support and monitoring. Commissioning teams engaged with over 580 suppliers to validate the findings from the survey and to identify improvement actions. A targeted training programme for members and officers was delivered in 2021.
- 6.7 In post-Brexit surge in migration and COVID-19 pandemic, victims of Modern Slavery may have become even more isolated, therefore awareness raising is occurring throughout the whole Council. There are E-learning courses for staff and numerous communications on the intranet. The commissioning network provides thorough training on new updates in legislation and then filters these learnings throughout their teams. Additionally, the Richmond and Kingston safeguarding partnership regularly sends out best practice updates. The Modern Slavery Working Group also supported the delivery of modern slavery training in 2022 to the wider partnership - a total of 4 sessions have been run with over 100 attendees with further sessions to be scheduled for 2023.

7.0 Actions moving forward

The following actions will be completed over the next monitoring period:

- 7.1 Continuing to map our supply chains of impacted contracts, identifying areas for further investigation, support, monitoring and awareness;
- 7.2 Implement the new contractual provisions relating to modern slavery;
- 7.3 Incorporate the modern slavery referral pathway into a protocol once the modern slavery working group establishes this.
- 7.4 Incorporate provisions for our contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
- 7.5 Continue to monitor all reported modern slavery safeguarding adults cases through our Vulnerable Adult Multi Agency Risk Assessment Panel (VAMA) and work with partners and other Kingston panel to ensure we have oversight of reported modern slavery concerns.

8.0 Key performance indicators to measure effectiveness of steps being taken

- 8.1 Kingston Council will use the following performance indicators to measure the effectiveness of actions in managing the modern slavery and human trafficking risks in any part of its business or supply chains:
 - A. All suppliers confirming their adherence to the Modern Slavery Act 2015.
 - B. Annual monitoring of modern slavery risks with our suppliers which informs gap analysis and reflective action log and programme.
 - C. % of Contract Management scorecards receiving 'meeting expectations' under ethical sourcing assessment criteria.
 - D. All Corporate procurement and Contracts teams complete CIPS ethical procurement training.
 - E. Completion rate of modern slavery e-training module.
 - F. The percentage of suppliers reporting that all their staff have completed modern slavery training.
 - G. The number of cases reported, how it results in action and the lessons learned moving forward.

9.0 Training on modern slavery and trafficking

As well as training key staff, the council will raise awareness of modern slavery issues by circulating information through intranet links and messages and inclusion of information in briefings of operational staff. This will be done in conjunction with the Safer Kingston Partnership, Healthy & Safe Communities. This includes:

- 9.1 **Anti Slavery Training** - A continued commitment to bring modern slavery training into the borough to support the partnership around understanding what modern slavery is, the indicators and how to support those at risk of modern slavery.
- 9.2 **Identifying and reporting the signs of modern slavery** - Developing a corporate e-learning training programme on Modern Slavery for all council employees. The length of the training (60- 75 minutes). This is designed to raise awareness and to help recognise individuals' roles in identifying and reporting concerns. The council also provides additional in-depth training for staff, including Train the Trainer, who are involved directly in working with communities. A new pathway for managing modern slavery risk has been approved and is now being implemented. Modern Slavery Awareness multi agency training-this training to be reviewed with a view to roll it out again in 2023.
- 9.3 **Renewal of the CIPS Corporate Ethical Procurement and Supply accreditation** - staff will complete a bespoke e-learning Ethical test module developed by the Chartered Institute of Procurement and Supply (CIPS). This training covers Environmental Procurement; Human Rights/ Modern Slavery; Fraud Bribery and Corruption. By completing this training the team will maintain its CIPS Corporate Ethics mark and additionally will be listed on the CIPS Global Corporate Ethical Register.
- 9.4 **Recruitment and agency staff** - The Council ensures all HR professionals are suitably qualified in relation to recruitment procedures and all recruiting managers are supported by HR staff, with training offered in recruitment and interviewing techniques.
- 9.5 **All Party Members briefing and awareness raising sessions** - recorded sessions, resources and infographics/posters that can be used to raise members' awareness.
- 9.6 **Awareness-raising through its partnership:** The organisation has raised awareness of modern slavery issues through its partnership work and working group and in line with its statutory duty to identify and refer victims through the National Referral Mechanism. An example of this is the inclusion of "Roy's Story ²" as part of the Annual Adults Safeguarding Report. This demonstrates how agencies are reviewing cases through the Kingston Safeguarding Adults Board and highlights how partners are working together to identify learning points

regarding modern slavery through in depth understanding of real local examples. There is a modern slavery working group that works on referral pathways in Kingston and Richmond to also provide awareness raising and training.

Approval for this statement

This statement has been approved by Ian Thomas CBE, Chief Executive, Kingston Council and will be reviewed in September 2023.

A handwritten signature in black ink, appearing to be 'Ian Thomas', written on a light blue background.

Signed

05.12.2022

Date