

Modern Slavery Statement 2023-2024

This Statement sets out the London Borough of Bexley's commitment to tackle modern slavery and human trafficking in Bexley and sets out our role and policies as a public sector organisation, together with our partners.

This Statement supports the approach set out in the Modern Slavery Act 2015, outlining our principles, policies, practices, and actions towards eliminating modern slavery and human trafficking in Bexley and beyond. We do this in partnership, and have four overarching goals:

1. **Pursue:** prosecute and disrupt individuals and groups responsible for modern slavery
2. **Prevent:** prevent people from engaging in modern slavery
3. **Protect:** strengthen safeguards against modern slavery by protecting vulnerable people from exploitation
4. **Prepare:** reduce the harm caused by modern slavery through improved victim identification and enforcement support.

More information can be found in our Modern Slavery and Exploitation Strategy and Toolkit.

What is Modern Slavery?

The term 'Modern Slavery' is an umbrella term, encompassing:

1. **Human trafficking:** moving or recruiting someone for the purpose of exploitation.
2. **Slavery, Servitude and Forced or Compulsory Labour:** forcing someone to provide some service without their consent.

Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude, and inhumane treatment. Many active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators. There are different forms of exploitation, including:

- **Forced Labour:** being made to work for little or no money.
- **Sexual Exploitation:** being coerced or forced into selling sex.
- **Domestic Servitude:** being made to work within a home environment for little or no pay.
- **Criminal Exploitation:** being forced to break the law for someone else (e.g., stealing, selling drugs)
- **Forced/Sham Marriage:** being made to marry someone you don't want to marry.
- **Organ Harvesting:** bodily organs being removed for financial gain.

In 2022, 16,938 potential victims were referred to the Home Office nationally, representing a 33% increase compared to the preceding year (12,706 referrals). 89% of Conclusive Grounds decisions were positive, meaning they were found to be victims of modern slavery. 41% were children, a slight decrease from 43% in the previous year.

52% were adults, a slight increase from 50% in 2021. Albanians overtook UK nationals as the most commonly referred, with UK nationals second largest nationality referred. 78% were male and 21% female, seeing the highest proportion of male victims since the NRM began. ([Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022](#))

The Signs

We can all help end modern slavery by being aware of what to look for. Signs that someone might be a victim of modern slavery include:

- showing signs of injury, abuse, and malnourishment.
- they look unkempt, are often in the same clothing and have poor hygiene.
- appearing to be under the control and influence of others.
- living in cramped, dirty, overcrowded accommodation.
- they have no access or control of their passport or identity documents.
- appearing scared, avoiding eye contact, and being untrusting.
- they may allow others to speak for them when addressed directly, rather than speak for themselves.
- they're collected very early and/or returned late at night on a regular basis.
- may have inappropriate clothing for the work they are performing, and/or a lack of safety equipment.
- may be isolated from the local community and their family.
- they travel only with other workers.

The above list is not exhaustive and further information on the signs to look out for can be found on the [Unseen website](#).

The role of The London Borough of Bexley

The Local Authority has statutory obligations under the Modern Slavery Act 2015 to respond to modern slavery and human trafficking and to safeguard residents from being exploited. In short, there are two obligations: 1) not to subject anyone to modern slavery or human trafficking; and 2) to act and safeguard residents when we suspect they have been a victim of modern slavery or human trafficking.

As a local authority, we have a duty to notify the Home Office of any individual encountered who we believe is a suspected victim of modern slavery or human

trafficking. By referring a victim to the National Referral Mechanism (NRM), the Home Office can investigate the circumstances of someone's exploitation further and provide the necessary support to potential victims and survivors of modern slavery.

In the London Borough of Bexley, we are committed to the opposition of modern slavery and human trafficking and are working with our partners to drive the identification, recognition, awareness, and disruption of this heinous crime. The London Borough of Bexley's Modern Slavery and Exploitation Strategy 2023-2028 sets out our local partnership approach (including referral pathways) and is available to read on request to the Community Safety team via email to community.safety@bexley.gov.uk.

The Bexley modern slavery partnership is made up of the following:

1. Local Authority:

- Procurement
- Community Safety
- Adult Social Care
- Children's Social Care
- Youth Justice Services
- Trading Standards
- Licencing
- Housing
- Education

2. Public Bodies:

- Health
- Metropolitan Police
- Home Office
- National Crime Agency
- Gangmasters and Labour Abuse Authority
- Immigration Authorities
- London Fire Brigade

3. Non-Governmental Organisations:

- The Salvation Army
- The Children's Society
- Barnados
- Human Trafficking Foundation
- Stop the Traffik
- Unseen
- Rescue and Response

4. Decision-Makers:

- Single Competent Authority
- Immigration Enforcement Competent Authority
- Pilot Devolved Decision-Making Local Authority Sites

Supporting our Wider Objectives

Our Modern Slavery and Exploitation Strategy supports our [Corporate Plan \(Bexley Plan 2022-26\)](#). In particular:

Outcome 9: People and communities feel safe and inclusive.

Bexley prides itself on being one of London's safest boroughs, and that includes from Modern Slavery. We work to ensure Bexley continues to be a borough of low-risk and that requires the partnership working contained in the Strategy to ensure we respond robustly where we have concerns and to ensure we are proactive and preventing exploitation. Further information can be found in our Modern Slavery and Exploitation Strategy 2023-2028.

Outcome 14: Rigorous procurement and contract management to get the best services.

Many services are provided by partners and contractors on our behalf. This means that we have an obligation to ensure they provide services in a lawful and legitimate way, as we would expect of ourselves, and that they treat their own employees and contractors according to the law. We will manage our contracts in a way which ensures we identify and address risks of modern slavery in our supply chains and that we provide resources and awareness for our contractors around modern slavery and their duties. We will provide an Annual Transparency in Supply Chains Statement (below) to demonstrate what the risks are in our supply chains and how we mitigate them.

For professionals seeking latest advice on how to help potential victims:

For the latest advice on how to end modern slavery, including details about how to refer victims into the national referral mechanism (NRM) and the statutory guidance, please see the [Government's Modern Slavery website](#).

You can also find a directory of support services for victims of modern slavery on the [Bexley Safeguarding Adults Board \(BSAB\) website](#).

For training, please visit [Training for Professionals | London Borough of Bexley](#)

Our Work to Date

The Council has been committed to tackling modern slavery in line with our original Strategy in 2019. This included:

1. To raise awareness of Modern Slavery and how to spot the signs.
2. To ensure a whole system understanding of statutory responsibilities.
3. To ensure frontline staff have the tools, resources, and guidance to meet their legal duties.
4. Understanding of local context and improvement of partnerships for cross-sector working and information sharing.
5. Confidence to act when you are not a First Responder but have a concern.
6. Working in line with the Modern Slavery Act 2015 and new emerging laws, policies, and guidance.

We have developed public communications, tools, and resources to raise awareness of modern slavery, human trafficking, and child exploitation. We commit to partnership awareness activities every year on National Anti-Slavery Day. As a result of this, the number of referrals for modern slavery victims by the London Borough of Bexley increased from 20 in 2021 to 33 in 2022 (Stop the Traffik Pan-London Dashboard). This is a positive outcome; we need to identify victims to help them.

We have created a Modern Slavery Working Group with partners, in which we share and develop information, tools and resources to tackle modern slavery. Through this partnership, we have increased our network and put modern slavery on the agenda for many other agencies and organisations, and this is being more widely recognised. We joined the Pan-London Data Project run by Stop the Traffik to map our data to better understand our local context and guide our work.

We have developed a local authority internal referral process to ensure all required steps are followed. We have also developed an adult and child referral checklist for practitioners to follow an in-depth guidance tool and ensure all partners are involved in the safeguarding of victims.

We created our first Transparency-in-Supply Chains Statement in 2022-2023; while not a legal requirement, we seek to embed steps into our procurement practices to deter exploitation in our supply chains and address risks where they might arise. We have HR policies and practices, such as recruitment, whistleblowing, and grievance procedures, to ensure we have responsible recruitment practices and that no Council employee is exploited.

We require all local authority staff to undertake modern slavery training and offer more intensive training for frontline professionals in Bexley, including those who are not First Responders, to ensure a cross-sector understanding of modern slavery and confidence in all our roles and duties in tackling it. Recently, we have developed a Child Exploitation specific training for local partners to improve our understanding and actions responding to modern slavery of children and young people.

We keep updated of changing laws, policies and guidance and update our own policies and practices accordingly. We do this by participating in local, regional, and national networks and learning from best practice of other local authorities and partnerships. We report to the Bexley Community Safety Partnership bi-annually on our modern slavery work to ensure oversight of delivery against the Modern Slavery and Exploitation Strategy.

We were successful in becoming a pilot site for the Child NRM Devolved Decision-Making Panels, in which we coordinate a local panel of local authority, police and health professionals to make decisions about whether children referred into the National Referral Mechanism are victims of modern slavery or not. This panel will run for one year and is expected to make decision-making and partnership working more efficient and effective.

Areas of Focus in 2023-2024

Looking forwards into 2023-2024, our work to tackle modern slavery continues, but must also adapt to new legislative changes and local developments. We will continue to deliver against the four overarching goals of Prevent, Protect, Prepare and Pursue, but will adapt our actions to reflect progress and new needs.

Our main actions this year are to:

1. Increase the uptake of modern slavery training borough-wide and across all partners.
2. To increase confidence in understanding of modern slavery duties and ensure all local authority staff know where to access tools and resources.
3. To continue to raise awareness of modern slavery and human trafficking, engaging more with local groups and residents.
4. To risk assess our supply chains and procurement processes and develop practices to mitigate risks identified.
5. To pilot the NRM Devolved Decision-Making Panel, reflect on and learn from the outcomes.
6. To utilise new data coming from the Stop the Traffik pan-London project to identify new trends and needs.
7. To carry out proactive partnership enforcement activities to disrupt exploitation in at-risk sectors.

For our five-year Strategy and Toolkit and a longer-term perspective, please refer to our Modern Slavery and Exploitation Strategy 2023-2028.

Reporting, Advice and Support

In an emergency, always call 999.

In a non-emergency:

- Call 101 or visit your local police station.
- If an adult, call the London Borough of Bexley on 020 8303 7777 and ask for 'Screeners'.
- If a child, call the Children's Multi-Agency Safeguarding Hub (MASH) on 020 3045 5440.

For more information or confidential advice and support, call the 24/7 Modern Slavery Helpline free on 0800 0121 700 or visit the [Modern Slavery Helpline website](#).

Transparency in Supply Chains Statement 2023-24

The Modern Slavery Act 2015 requires commercial organisations with an annual turnover of more than £36 million to report on the steps they take to ensure modern slavery does not take place in their business or in their supply chains.

Although it is not currently a legal requirement for Local Authorities, the London Borough of Bexley publishes this statement to provide transparency and demonstrate our commitment to tackling modern slavery.

Preventing Modern Slavery in our Business

The London Borough of Bexley has a duty to prevent and tackle modern slavery or exploitation of its own staff. We do this by:

- our [Code of Conduct \(PDF\)](#) for employees which sets out the expectations of staff, management, and the whole organisation.
- our [Equality Policy \(PDF\)](#) ensures there is an equal opportunity and no one group is more vulnerable to exploitation than another.
- our [Whistleblowing Policy \(PDF\)](#) which provides a confidential channel for staff to report any concerns of exploitation and for these to be investigated.
- our [Employment Terms](#), including paying at least Minimum Wage to all employees.
- ensuring all staff complete mandatory training on modern slavery and human trafficking.

Preventing Modern Slavery in our Supply Chains

The London Borough of Bexley recognises the role and responsibility that comes with its buying power and the need to ensure that all purchasing practices consider the ethical, environmental, and law-abiding elements when determining who it may contract with. Part of this is ensuring suppliers act in accordance with the Modern Slavery Act 2015 and take their responsibilities under all modern slavery legislation seriously. This is not only to comply with the law but also to ensure we support and safeguard vulnerable people and to make Bexley a safer borough.

We do this by embedding in our standard contracting terms and conditions the obligation for all contractors to comply with the Modern Slavery Act and all other applicable modern slavery legislation in the UK and/or to comply with statutory duties. Such legislation includes the requirement to have their own modern slavery statement and anti-slavery practices if satisfying the criteria of a commercial organisation with a turnover of more than £36 million. The standard terms and conditions also enable the London Borough of Bexley to act if there is a breach, allowing modern slavery and exploitation identified in our supply chain to be addressed.

Although we feel there is a low risk of exploitation in the Council's supply chains, we encourage all contractors to take reasonable steps to ensure their own supply chains

are free from modern slavery. More information on transparency in supply chains can be found [here](#).

We are committed to ongoing due diligence and will work with our suppliers to put in place necessary measures to reduce or mitigate the risk of modern slavery and exploitation as necessary. The Council's contract terms and conditions are regularly reviewed to ensure they embed not only updated legislation but the London Borough of Bexley's values in service and project delivery.

Procurement Action Plan

This is the Procurement Action Plan for 2023/24, which will be reviewed annually. This sits under the [Procurement Strategy](#).

Task	Action
1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.	All appropriate staff now trained.
2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.	Part of due process for every order/contract.
3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.	We challenge abnormally low-cost tenders as part of our current process.
4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.	This has now been added as a clause on the declaration for tenders and to our standard purchase order.
5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.	Our Corporate Modern Slavery Strategy and toolkit, mandatory training courses and training offer will ensure staff are informed on the issue of Modern Slavery and know who to contact if they want to report an issue, within the council or externally. The Gangmaster Labour Abuse Authority are a named first responder in the Modern Slavery Act and their role is to protect vulnerable workers. Further information available at: http://www.gla.gov.uk/ Prospective contractors to the Council are urged to adopt a similar whistle blowing system to that of the Council via a 'Declaration' document provided to all bidders on tender exercises.
6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.	See above. Procurement to ensure contract managers are trained and share the information above with contractors.

7. Review its contractual spending regularly to identify any potential issues with modern slavery.	This is part of current process, the training under item 1 and understanding the Corporate Strategy and attending the Modern Slavery training will enhance staff understanding – this is increased, and staff are confident when reviewing spending to understand what to look for in terms of signs of Modern Slavery.
8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.	Information on the GLAA set out above. Procurement team continually work with Contract Managers to ensure they understand the issues, attend the training sessions and have seen the Corporate Strategy and toolkit.
9. 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.	Guidance on the NRM is available in the Corporate Strategy. Corporate staff training will provide further clarity over the coming year.
10. Report publicly on the implementation of this policy annually.	The Bexley Modern Slavery Strategy and toolkit includes an action plan. This includes an action to comply with the 10 points set out in this charter. The procurement team will provide an update on progress each year when the strategy is reviewed beginning in April 2024. The strategy and any review information will be published on the Councils website.

Responding to Modern Slavery and Exploitation within our Organisation or Supply Chain

Whilst the measures outlined above aim to prevent modern slavery in our organisation and supply chains and we hope not to identify modern slavery, we see fit to set out our response if we do.

If any cases are identified within our organisation, we have internal whistleblowing procedures to be followed to report and investigate these.

If any cases are identified within our business or supply chain, there may be contractual implications, including termination of the contract, and further investigation.

Information concerning suspected modern slavery or human trafficking will be passed on to the Police and any other appropriate authorities for full and proper investigation and action.

The London Borough of Bexley takes a coordinated community response to tackling modern slavery and safeguarding our residents. The same will be applicable if there is a suspicion of modern slavery in our organisation or supply chains. Please see the London Borough of Bexley's modern slavery partnership above. We will work together

to ensure victims access support and crimes are investigated to bring exploiters to justice.



Councillor Sue Gower MBE
Cabinet Member for Communities and Housing