

Report of: Executive Member for Finance, Performance and Community Safety

Meeting of:	Date:	Ward(s):
Council	28 February 2019	All

Delete as appropriate:	Exempt	Non-exempt
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SUBJECT: Islington Council's first annual report on tackling modern slavery**1. Synopsis**

- 1.1 Islington Council is committed to combatting all forms of modern slavery.
- 1.2 Demonstrating that commitment, the Council signed the Charter Against Modern Slavery in March 2018 (the "Charter").
- 1.3 The Charter placed a requirement on the Council to report publicly on its implementation annually. This first such report responds to that requirement and goes further to highlight other areas of the Council's work to combat modern slavery.

2. Recommendations

- 2.1 To note the collaborative work done across the Council and with its partners to combat modern slavery.
- 2.2 To note the specific work completed to date regarding the Council's supply chain and implementation of the Charter.
- 2.3 To agree the proposals, detailed in Part C of this report, to develop further the Council's response to the Charter.

3. Background

Introduction

- 3.1 **Modern slavery** is defined within the Modern Slavery Act 2015 (“the Act”). The Act covers the offences of slavery, servitude, forced labour and human trafficking.
- 3.2 **Human trafficking** is the trade and/or movement of someone from one place to another for the purpose of enslavement and exploitation through:
- Forced labour
 - Domestic servitude
 - Organ harvesting
 - Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds, etc.
 - Forced marriage and illegal adoption (if other constituent elements are present).
- 3.3 Modern slavery occurs to men, women and children. Figures from the National Crime Agency suggest that 51% of victims are female and 66% are adults.
- 3.4 Modern slavery is illegal. The Act places a number of duties on local authorities, for example:
- A duty to cooperate with the Independent Anti-Slavery Commissioner (Section 43)
 - A duty to identify and refer victims through the National Referral Mechanism (Section 53).
- 3.5 Islington Council and Islington Police have each identified a single point of contact to lead on developing a joint response to modern slavery.

A Key Priority

- 3.6 The Home Office estimated that in 2013 there were between 10,000 and 13,000 potential victims of modern slavery in the UK. However, the victims of modern slavery are often hidden in plain sight within neighbourhoods and communities. Many of us may be encountering the victims within our everyday lives without realising.
- 3.7 In 2018, Islington became the first council nationally to sign the Charter Against Modern Slavery. Over 80 local authorities across the UK have now signed the Charter, which Islington Council helped draft. Addressing modern slavery is a key priority for the council, with work on it overseen by the Safer Islington Partnership.
- 3.8 The Council is committed to eradicating modern slavery in all its forms, both within our community and within our supply chain. There is much work going on around the Council

to identify, rescue, safeguard and support victims and there is further such work planned.

3.9 The Council has committed publicly to report on its work to tackle modern slavery annually. This annual report will focus on:

- collaborative work across the Council and with its partners to combat Modern Slavery (see **Part A**);
- specific work completed regarding the Council's supply chain and implementation of the Charter (see **Part B**);
- proposed strategy for further development of the Charter (see **Part C**).

PART A: Collaborative work across the Council and partners to combat modern slavery

Coordination

- 3.10 The Council's Community Safety Team are in the process of creating a Modern Slavery sub-group to oversee the Council's work on this agenda. This sub-group will report into the Safer Islington Partnership (principally) as well as to the Adult and Children Safeguarding Boards.
- 3.11 The Modern Slavery sub-group will ensure Home Office guidelines are followed in local Council policies and procedures.

Adult Social Care

- 3.12 Adult Social Care received 4 safeguarding concerns reported in 2018/19 where the 'type of abuse' cited was modern slavery. They related to enforced domestic servitude, prostitution and trafficking of a pregnant woman. The referrers included a GP, the Police and another local authority.
- 3.13 In three cases, we were unable to meet with the victims before they had left the area and, in the fourth case, Children's Services followed up by liaising with the Home Office/National Referral Mechanism. The numbers of referrals are relatively low but reveal that the referrers of concerns regarding Modern Slavery are varied.

Children's Social Care

- 3.14 The Exploitation and Missing Safeguarding Manager manages the Exploitation and Missing Team. The team consists of a Project Officer and three Specialist Social Workers for:
- child sexual exploitation (CSE) and harmful sexual behaviour (HSB)
 - gangs and serious youth violence (SYV)
 - missing young people.

- 3.15 The team works to develop the safeguarding response to children and young people through providing consultations, developing safety and intervention plans, chairing strategy meetings, developing and delivering training and awareness programmes, and linking in with multi-agency partners to create practice pathways and develop joint working.

Co-located services:

- 3.16 The Integrated Gangs Team (IGT) is a multi-agency team co-located with the Police Gangs Unit, consisting of specialist workers from St Giles Trust, Victim Support, the Abianda Project as well as clinical expertise. The IGT works with children and young people up to the age of 25 who are at risk of, or involved in, gangs and serious youth violence. In addition, they work with a number of children and young people who are at risk of criminal exploitation through County Lines. This includes the Abianda Project that works to support and empower young women affected by gang violence.
- 3.17 A CSE, Gangs and Exploitation Analyst works across services and data systems to develop exploitation network and risk profiles.
- 3.18 The Return Safe Team undertake Return Home Interviews and provide ongoing support to children and young people that go missing. The Return Safe Team are key in identifying any safeguarding risks to children who go missing and ensuring that they receive a safeguarding response and wrap-around support.
- 3.19 SaferLondon Empower Project have a co-located Young Person's Advocate that works with young women at risk of CSE.

County Lines

- 3.20 The County Lines phenomenon sees children as young as 12 exploited and trafficked to sell drugs in towns and cities using dedicated mobile phones (or 'lines'). They are often made to travel alone and stay in unfamiliar places, sometimes for days at a time – putting them at significant risk.
- 3.21 The Children's Services Contact Team codes referrals in relation to County Lines as CSE, gangs and SYV or missing. There is no specific code on recording systems for County Lines at the current time. These factors may be the presenting concern at the time of referral and, upon further assessment, there may be indicators of County Lines. It is not possible to identify referral numbers specifically in relation to County Lines. This highlights the links and overlaps between different forms of exploitation.
- 3.22 There was an increase in young people linked to County Lines between April 2017 and March 2018. During this period, 7 young people were identified as at risk of criminal exploitation due to County Lines. A referral to the National Referral Mechanism (NRM) was completed for each of these young people.
- 3.23 A new hazard system on ICS (the Children Services' recording system) was introduced in October 2018. The new hazard system will enable children and young people at risk of County Lines to be identified more easily. As of 7 January 2019, a total of 14 children

(under 18 years of age) have been identified as at risk of criminal exploitation due to County Lines. This is a significant increase during 2018/19, due to the earlier identification of risk of exploitation through County Lines. The early identification of risk is thanks to training and awareness raising across the service. The improvements made to recording on ICS have positively impacted upon data collection.

- 3.24 Children at risk of modern slavery and trafficking are provided with a safeguarding response from Children's Social Care. The Social Work Team in consultation with the Exploitation and Missing Team, to ensure appropriate support, holds strategy discussions for children at risk of Modern Slavery and Trafficking. Appropriate intervention is identified and provided for all children considered to be at risk of Modern Slavery and Trafficking.
- 3.25 A referral to the NRM is considered for any child/young person as part of the strategy discussion. Where a risk around County Lines is identified, a referral to the Rescue and Response Team is considered, for both intelligence purposes and/or specialist intervention and support.
- 3.26 The Exploitation and Missing Team are developing a gangs/SYV and County Lines toolkit, which provides practitioners with direct work tools to support their work with children at risk of exploitation.
- 3.27 Out of the 14 children identified as at risk or criminal exploitation due to County Lines (as of 7 January 2019):
- 2 were female and aged between 15 and 16 years old
 - 12 were male and aged between 15 and 17 years old

Of these 14 cases, 10 were referred to the National Referral Mechanism, resulting in 5 'positive conclusive grounds' decisions. This means that, in half of the cases referred to the NRM, the children were found to have been coerced as victims of modern slavery. This, in turn, has informed the police response. In one of those cases, for example, the young person was therefore not prosecuted for the possession of drugs.

- 3.28 The analyst for CSE and Gangs/SYV has started to map the areas in the UK to which County Lines activity from the borough has been linked. Any child identified at risk of County Lines is referred to the Rescue and Response Team for intelligence purposes. The Rescue and Response Team also ensure that each child or young person is provided with the appropriate support and intervention required to address their vulnerability and risk of exploitation.

Case Study - Jay

Presenting Situation

Jay is a 15-year-old boy who lives with his grandmother, Beryl, under a Special Guardianship Order.

Jay was previously subject to a child protection plan due to being exposed to domestic violence between his parents, and his mother's drug use, before being placed in the care of his grandmother. Jay's school attendance is an increasing concern and he is at risk of permanent exclusion, due to on-going disruptive behaviour in class.

Beryl reports that Jay is spending increasing amounts of time out of the home with peers and older adults. She has reported him missing on 3 occasions, during one period he was missing for 6 days. Beryl reported that when he returned he was dirty, wearing the same clothes and presented as withdrawn.

Beryl reports that she is really worried about Jay as he has not been himself lately and is increasingly angry towards her when she asks him where he is going or what he is doing. He often leaves the house soon after receiving a phone call and presents as secretive about where he is going.

Partnership Response to the Risks and Needs

Missing/Gangs Strategy Meeting held to discuss the Missing episodes and concerns around County Lines and Criminal Exploitation.

NRM referral completed and was granted a successful outcome for Child Criminal Exploitation. This means that if Jay was picked up by the police it is likely that he will be treated as a victim of exploitation, rather than as a perpetrator of crime.

A County Lines Risk Hazard was added to the Children's Social Care database so that it's clear to professionals that Jay has been assessed as at risk of County Lines.

Referral to Integrated Gangs Team for Intelligence checks revealed that Jay has links to gang members and those that are suspected of running County Lines. This included Jay being linked to an adult offender in another borough. The Police issued a Child Abduction Notice to this adult. This means that if Jay is found with this adult, it is treated by the police as an abduction which can carry up to 7 years of imprisonment.

Jay and his family were referred to Targeted Youth Services and he received an allocated St Giles Trust worker to complete work around grooming, gangs and Child Criminal Exploitation.

Discussions were also held with the Safer Schools Police officer to inform the risk assessment and safety plan at school.

Training and awareness

- 3.29 A briefing was provided to all practitioners regarding the response to modern slavery and trafficking, including guidance around referring to the National Referral Mechanism (NRM).

- 3.30 Mandatory training on modern slavery and human trafficking is being rolled out across Safeguarding Family Support and Youth and Community between January and March 2019. Practitioners and managers are trained in the identification of modern slavery and human trafficking and the safeguarding response (including referral to the NRM). The delegates are supported to develop their understanding of intervention and support for children, young people and adults who are victims of, or at risk of modern slavery and trafficking.
- 3.31 The Exploitation and Missing team deliver a number of training sessions through Islington Safeguarding Children's Board for partners, with a focus on exploitation. This includes CSE, HSB, gangs and SYV, modern slavery and Trafficking (including County Lines), and the overlap with children who go missing.
- 3.32 Modern slavery and trafficking will be included in the Exploitation and Missing Multi-Agency Protocol document, which will be completed in Spring 2019.
- 3.33 The Council is also delivering training on modern slavery for front-line staff through the Community Safety and Safeguarding Adults teams. 221 delegates have received training from March to December 2018 in facilitated sessions. Sessions will run through to the end of June 2019.
- 3.34 The delegates for the modern slavery training for front-line staff come from the Council, VCS organisations (many of whom have dealt with victims of modern slavery or have victims starting to pass through their services), the NHS, Mental Health Foundation Trust, the Police and Probation Service.
- Those attending from the Council have included first responders who would refer potential victims to the Home Office/National Crime Agency. Members of the police service have also attended training, which has resulted in stronger links being developed with the Met.
- 3.35 Since delegates have attended training, there has been an increase in the number of concerns flagged. The concerns are raised either with the police or with our in-house Access and Advice Team/Urgent Response team.
- 3.36 Modern Slavery is delivered within our core safeguarding adults training which is accessed by colleagues across the council and partners. The Council are finalising some additional e-learning to supplement the resources and support for staff and expect to be able to launch it across the council by the end of March 2019.
- 3.37 The Salvation Army is delivering training in February/March 2019 for all Council first responders on how to complete the National Referral Mechanism form and refer potential victims.
- 3.38 Making modern slavery training mandatory across all areas within the Council is being considered. It would also be suggested to Voluntary and Community Sector (VCS) partner organisations who have contractual arrangements with the Council.
- 3.39 Planned work includes making people (including members of the public) more aware of modern slavery. This includes:
- better information made more accessible;
 - more awareness raising on the signs and symptoms of modern slavery; and
 - identifying victims and perpetrators.

PART B: Specific work regarding the Council's supply chain and implementation of the Charter

- 3.40 Modern Slavery is a crime that can lurk within seemingly legitimate businesses. Victims often have their freedom taken away and are forced to work for no pay or in cruel working conditions. The practice is often difficult to identify. However, the Council is committed to working to ensure its extensive supply chain shares its commitment to eliminating all forms of Modern Slavery.
- 3.41 Section 54 of the Modern Slavery Act in relation to transparency in supply chains applies to commercial organisations that supply goods or services and have a turnover of not less than £36m. Whilst currently the Council is not subject to this requirement within the Act because it is not a commercial organisation, a number of Council suppliers will be subject to the requirement. Those suppliers subject to this requirement must publish an Anti-Slavery Statement. Any commercial organisations set up by the Council would also be subject to this requirement.
- 3.42 Charter Requirements

The Council made a clear commitment regarding its determination to tackle modern slavery by signing up to the Charter. The Charter places ten commitments on the Council. The Council's response to each is shown below.

1. Train the Council's corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.

Having staff who appreciate the requirements of the Charter is essential to successful implementation of the Charter. The Chartered Institute of Procurement and Supply (CIPS) offers an online series of modules, followed by an examination. The benefits of the CIPS course include improving understanding and when to consider ethics and social responsibility, commitment to ethical practice, gaining public recognition for specific training and protection in terms of safeguarding the organisation.

The ten members of both the Strategic Procurement and Contract Assurance functions of the Council have completed the training. The confirmation of completion is included on the CIPS Professional Register and is in the public domain. The training is updated annually and needs to be repeated for the professional accreditation so the latest standards are maintained.

2. Require the Council's contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.

As noted above, section 54 of the Act requires organisations who:

- Carry on business, or part of a business, in the UK; AND
- Supply goods and services; AND

- Have an annual turnover of £36million or more

to produce an annual statement on the steps they are taking to prevent modern slavery in their supply chains and in their own organisation.

The Council operates the national standard Selection Questionnaire (SQ) to short list organisations to be invited to tender for Council contracts. The SQ includes a requirement to disclose whether the requirements of section 54 apply. If the organisation is required to make a disclosure, the provider must also declare if they are compliant with the annual reporting requirements.

The Council maintains the right to terminate any contract if a provider (or any person employed by it or acting on its behalf) commits an offence or anything contrary to the law, which would include breaches of the Act.

3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.

When a supplier submits an abnormally low tender for a contract, this could be a sign of an issue such as fraud, but also potentially a sign of human exploitation. The Council routinely challenges abnormally low-cost tenders when they are received to ensure that those suppliers are not relying on modern slavery in order to bring down their costs. The Council is able to use Regulation 69 of the Public Contracts Regulations 2015 to require tenderers to explain the costs within the tender.

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.

Trade Unions have an important role to play in the fight against modern slavery and exploitation by supporting and championing workers' rights. The Human Rights Act 1998 provides the power for workers to form and join a trade union and makes it illegal to offer a worker an inducement to leave a trade union, or to refuse to employ or dismiss a worker for being part of a trade union. Workers and providers are frequently not aware of their rights and responsibilities. It is for that reason that the Council has taken a stand to emphasise this requirement.

The Council includes this requirement on its:

- 'Selling to the Council' web pages – to advise potential suppliers
- Invitation to Tender – to explain our commitment to the Charter
- Tender Resource Pack downloadable from the Council's website – to inform providers about the various procurement steps.
- 'Supplier Tips' guides on the Council's website – included the sustainability guide and the equalities guide.

5. Publicise the Council's whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.

It is essential that those who witness possible cases of potential human exploitation are encouraged to speak up. The Council has whistleblowing arrangements in place and reported to Audit Committee on 15 October 2018 that these are "operating effectively".

Whistleblowing arrangements form a key element of the Council's overall governance arrangements. Whistleblowing provides a mechanism to empower the honest majority, whether they be employees, members, contractors or others to report concerns without fear.

The Council's updated whistleblowing policy was agreed at Audit Committee on 31 January 2019. It now includes specific reference to whistleblowing regarding Modern Slavery. The policy is located within the Human Resources policies and procedures section of the Council's intranet. The Council's Whistleblowing Officer is the Head of Internal Audit, Investigations and Risk Management.

The Head of Internal Audit, Investigations and Risk Management has arranged for the policy to be publicised as part of the Council's internal electronic newsletters.

6. Require the Council's tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.

It is important that staff working for suppliers feel able to report concerns about exploitative or illegal practices, just as our own staff should. Contracts include a requirement for suppliers to adopt a whistle-blowing policy. The policy provides the supplier's staff with a mechanism to blow the whistle within their own organisations. Like the Council's arrangements, the policy would protect the whistle blower from being treated unfairly or dismissed. Although we expect our contractors to offer their staff a mechanism for whistleblowing without fear of reprisals, we do not prevent their staff from reporting concerns using the Council's own whistle blowing policy if they prefer.

The requirement for contractors to adopt a whistle-blowing policy is included in the tender documents.

7. Review the Council's contractual spending regularly to identify any potential issues with modern slavery.

The Council reviews spending as part of the work of Commissioning and Procurement Board, with the Executive Member for Finance, Performance and Community Safety in attendance.

Services review spend with their suppliers as part of their ongoing commissioning and contract management practice.

In addition, as part of the outcome based budgeting work, all service areas are required to review their spending to ensure it is still in keeping with the current objectives of the Council.

Whenever spend is reviewed, best practice is to include consideration of modern slavery.

8. Highlight for the Council's suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.

Central government has issued clear guidance on modern slavery and a guide for suppliers. To support suppliers to Islington, the Council has added a link to the guide on the Council's website.

In addition, we have included relevant information in the following as mentioned in 4 above:

- 'Selling to the Council' web pages – to advise potential suppliers
- Invitation to tender – to explain our commitment to the Charter
- Tender resource pack, downloadable from the Council's website – to inform providers on the various procurement steps.
- 'Supplier Tips' guides on the Council's website – included the sustainability guide and the equalities guide.

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.

The Council acknowledges this as a clear and specific responsibility, which it will discharge whenever necessary. It has not had to refer any suppliers to the National Crime Agency's national referral mechanism for modern slavery in the past year.

10. Report publicly on the implementation of this policy annually.

The Charter places a requirement on the Council to report publicly on its implementation annually. This report is the Council's first such report in response to that commitment.

PART C: Proposed strategy for further development of work related to the Charter

- 3.43 The Charter consists of a series of simple and low-cost actions to help reassure the Council that its supply chain is not contributing to modern slavery. However, it is important not to consider this the end of the matter. Whilst awareness is important in spotting the signs of modern slavery, those involved in the trade are continuously developing new ways of enslaving their victims.
- 3.44 The corporate procurement team are committed to maintaining their CIPS ethical training certificates. Additionally, we will seek to encourage other teams to consider completing the training, particularly where they have a high level of supply chain engagement.

- 3.45 To further enhance knowledge, the corporate procurement team will be provided with presentations on Protecting Human Rights in the Supply Chain, based on the guidance developed specifically for public procurement practitioners by the London Universities' Purchasing Consortium (LUPC) and the University of Greenwich.
- 3.46 Safeguarding Adults are also developing a relevant e-learning module for staff and the public to access.
- 3.47 Training of staff at the Council and its partners is planned for 2019 as part of our ongoing commitment (see Training in Part A).
- 3.48 Finally, the Leader and the Executive Member for Finance, Performance and Community Safety have recently joined others nationally in writing to the Prime Minister to ask that hand car washes (where modern slavery is a real concern) be subject to compulsory licensing.

4. Implications

4.1 Financial implications:

There are no significant additional costs associated with the implementation of the Charter Against Modern Slavery. Training and implementation costs can be managed within existing service revenue budgets. The continued development of the policy is not expected to create a budget strain and can be managed without additional contingency. Consequently, there are no material financial implications from this report.

4.2 Legal Implications:

Under the Act, the Council has specific statutory duties, including the following:

- a) A duty to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (*Section 52*);
- b) A duty to notify the Home Secretary of adults who do not consent to enter the National Referral Mechanism;
- c) A duty to cooperate with the Independent Anti-Slavery Commissioner (*Section 43*).

The Council's work is also guided by the LGA's "*Tackling modern slavery: a council guide*".

4.3 Environmental Implications

This is an information report. Consequently, there are no negative environmental impacts expected as a result of this report.

4.4 Resident Impact Assessment:

The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

A Resident Impact Assessment has not been completed because this is an information only report on an existing policy.

5. Reason for recommendations

- 5.1 The Council has undertaken to implement the Charter Against Modern Slavery. The Charter requires an annual update on its implementation.
- 5.2 This report set out the progress made in that implementation to date. In addition, this report sets out the wealth of other work the Council is doing to combat modern slavery.

Appendices: None

Background papers: None

Related documents:

Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Charter Against Modern Slavery

<https://party.coop/publication/modern-slavery-briefing-for-local-councillors/>

<https://party.coop/publication/co-operative-party-modern-slavery-charter/>

Councils implementing the Charter Against Modern Slavery

<https://party.coop/local/councillors/modern-slavery-charter/>

Information on modern slavery

<https://www.gov.uk/government/collections/modern-slavery>

National Referral Mechanism guidance

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

Victims of modern slavery: guidance for frontline staff

<https://www.gov.uk/government/publications/victims-of-human-trafficking>

Duty to Notify the Home Office of potential victim of modern slavery guidance

<https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>

Forms for reporting potential victims of modern slavery

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

Protecting children from criminal exploitation, human trafficking and modern slavery

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756031/Protecting_children_from_criminal_exploitation_human_trafficking_modern_slavery_addendum_141118.pdf

Tackling modern slavery: a council guide
<https://www.local.gov.uk/modern-slavery-council-guide>

Islington Council web pages: Selling to the Council and Contract Opportunities
https://www.islington.gov.uk/business/opportunities/selling_council
https://www.islington.gov.uk/business/opportunities/selling_council/procurement-oppo

Final report clearance:

Signed by:



19 February 2019

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