

Enfield Council

Modern Slavery Statement 2023/2024

Introduction

Enfield Council is a London borough delivering a range of statutory and discretionary services to over 333,000 residents and 15,000 businesses. The Council spends over £400m per annum on goods and services with over 4,000 suppliers, from a wide range of locations.

Enfield Council is fully committed to transparency and ethical practice within its supply chain. This statement is issued in accordance with the requirements of Section 54 of the Modern Slavery Act 2015, detailing the Council's approach to tackling Modern Slavery within the Borough, particularly within its supply chains.

Enfield Council signed the [Charter Against Modern Slavery](#) on 18 October 2018 to demonstrate its commitment to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking. A copy of the Charter Against Modern Slavery is attached.

What is Modern Slavery?

Modern slavery, as defined by the Modern Slavery Act 2015 ("The Act"), includes the criminal offences of slavery, servitude, compulsory labour and human trafficking.

The Act imposes a duty on certain commercial organisations to issue an annual statement, detailing the organisation's commitment to taking steps toward transparency in supply chains. The Borough is obliged to issue a modern slavery statement under the Modern Slavery Act 2015.

As a public sector organisation, Enfield Council has a duty to report instances of suspected modern slavery. The Council understands that instances of modern slavery are not always easy to identify. As such, it encourages anyone who thinks there is a possibility of modern slavery, to call the dedicated modern slavery helpline on 08000 121 700 or to report it online at www.modernslaveryhelpline.org.

Policies

Enfield has implemented a number of policies which aim to tackle modern slavery within its supply chains and the borough. These include:

Risk Assessments - which are undertaken where there is a risk of human trafficking of modern slavery. These are recorded in line with departmental procedures.

Safeguarding policy – all Council staff are expected to work within the Council's safeguarding policy, which has been designed to protect children and vulnerable adults, at risk of modern slavery, human trafficking and other risks.

Confidential Reporting Code (whistle blowing) policy – this policy encourages Enfield Council employees, staff and business partners to report any concerns related to the direct activities or the supply chain of an organisation; including the risk of modern slavery and human trafficking.

Investigations/due diligence policy – the Multi Agency Safeguarding Hub (MASH) team within Children and Adult Services, investigates reports of modern slavery and human trafficking. MASH shares the findings of its investigations at the monthly Modern Slavery Board, where cases are discussed and opportunities for partnership working are explored.

Training policy – Enfield Council requires staff to undertake Modern Slavery and Human Trafficking training.

Collaborative working policy – The Council is committed to working collaboratively with all relevant organisations across all sectors to support the residents of Enfield, who have been affected by modern slavery.

Recruitment policy – Enfield Council regularly reviews its recruitment policies to ensure transparency. This includes the vetting of staff to confirm their identities and ensuring that remuneration is paid directly to their personal bank account.

Remuneration and Pay Policy – Enfield Council works to ensure that all employees are paid fairly and equitably. The council pays a minimum of the National Living Wage to all its employees.

Agency workers – The Council is committed to transparency in the labour it sources. As such, Enfield Council will only use reputable employment agencies to source labour. Any new employment agency is rigorously vetted before the Council may accept workers from them.

Sustainable & Ethical Procurement Policy – The Modern Slavery Act implemented new measures which are directly related to businesses and their supply chains. Section 54 of the Act requires companies with an annual turnover above £36m, and carrying out a business, or part of a business, in the UK, to develop a Modern Slavery Statement.

Tackling Modern Slavery in our Supply Chain

Enfield Council spends over £400 million a year with over 4,000 suppliers. Enfield recognises the need to ensure better supply chain visibility to eradicate instances of modern slavery and human trafficking in its supply chain.

A large proportion of the council's procurements are conducted throughout the business, not just within the procurement and commissioning hub. Contracts are managed throughout the various business units. The Council has limited resources to directly monitor/audit its supply chain, and so the Council will focus on our direct suppliers and will require our suppliers to ensure that their supply chain is free from modern slavery.

The Council has rewritten its Contract Procedure Rules to include the need to monitor its supply chain from 2020.

Our progress so far:

1. Established a multi-agency partnership board
 - Multi agency anonymous data sharing to develop an intelligence picture of exploitation in the borough
 - Modern Slavery multi-agency board to develop and discuss improved ways of working
2. Developed a [modern slavery strategy](#)

- Dedicated members of staff specialising in modern slavery through partnership with multi agency partners
- 3. Developed a coordinated community response to ending modern slavery in the borough focusing on:
 - Identifying victims
 - Supporting victims
 - Bringing exploiters to justice
 - Preventing exploitation
- 4. Developed a new Sustainable and Ethical Procurement Policy that brings Modern Slavery awareness into the supply chain and to suppliers and commissioners
- 5. Enfield created the first ever modern slavery team who take a lead on internal and external modern slavery concerns
- 6. Councillor briefing sessions to ensure that councillors are kept up to date with modern slavery
- 7. Employee training is embedded into all departments. Over 700 First Responders have been trained within the local authority to respond to modern slavery concerns and modern slavery awareness raising has been extended to external partners and local businesses
- 8. Mandatory Modern Slavery online training for all council employees
- 9. Increasing organisational governance around modern slavery. The local authority is linked into regional and national modern slavery partnerships which supports communications and the sharing of best practice
- 10. Enfield Council chairs the London Modern Slavery leads Group which aims to support London Councils in developing their approach to supporting victims of modern slavery and in gathering information at a local level to support our partner agencies in targeting those who perpetrate offences under the Modern Slavery Act 2015

What the Council is already Doing

Enfield Council is committed to improving the transparency of its supply chain and in doing so it has taken the following steps:

Unite construction charter

Enfield has signed up to the Unite Construction Charter (“the charter”). The charter implements a number of construction practices aimed at improving standards in areas such as staff payment. For example, the requirement for all construction staff to be directly employed on to a Pay as You Earn (PAYE) system. These processes promote a more transparent supply chain, making it difficult for modern slavery to occur.

Modern Slavery Charter

Enfield Council’s Modern Slavery Charter has been signed by the Chief Executive Officer, demonstrating the council’s commitment to the fight against modern slavery in the supply its chains.

Modern Slavery Board

The Council has a cross-departmental Modern Slavery Board, which works to monitor, and take action to prevent modern slavery in all areas of council business. This board is chaired by a member of the Executive Management Team; and reports to the Safeguarding partnership. Escalations are taken to the Executive Management Team.

Contract Procedure Rules (CPRs)

In early 2020, Enfield Council updated its CPRs to reflect the actions above and its commitment to tackling modern slavery. All Council Contracts have terms and conditions to cancel contracts with any supplier that is found to be in breach of the Modern Slavery Act. Our contract management framework asks that Contracts over £100,000 total value have a nominated contract manager, and that Modern Slavery is on the agenda with the supplier, at Contract management meetings. The top 10 contracts by value provide a monitoring report to Procurement Services to ensure robust contract management, including the embedding of any Sustainable and Ethical Procurement.

Implementation of a Procurement Assurance Group, and Gateway process, means that all procurements managed by Procurement Services go through assurance. Part of this process is how procurements are embedding the Sustainable and Ethical Procurement Policy, which includes Modern Slavery.

Standard Selection Questionnaire (SSQ)

Enfield Council has will be adopting the new Selection Questionnaire that comes into effect June 2023 that new incorporates more robust questions around Modern Slavery. It allows for discretionary exclusion for breach of labour laws, and, where a potential supplier is covered by the Modern Slavery Act – it must be meeting its obligations in publishing a statement and requirements under Section 54 of the Act. All potential suppliers tendering for council contracts must state and demonstrate their compliance with the reporting requirements set out in Section 54 of the Modern Slavery Act 2015, relating to transparency in supply chains.