

A8 Appendix 2



Equality Impact Analysis Template

Section 01: Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	EqIA completed in Q4 2021-2022
Name & details of proposed activity (i.e. the policy/ strategy/ process/ function / service/ restructure/ programme etc) to be assessed - hereafter referred to as ' <i>proposed activity</i> '	<p>Title of EqIA: Kensington and Chelsea Modern Slavery Statement</p> <p>Short summary: The Council is publishing a second annual Modern Slavery Statement covering the prior financial year which sets out the work undertaken to mitigate the risks of modern slavery and exploitation in its business and supply chains. The annual Statement is produced by the Community Safety and Procurement teams and is focused on procurement practices and transparency in supply chains.</p> <p>This is a piece of work within a wider response to tackle modern slavery and exploitation by the Council, as set out in the Strategy 'Ending Modern Slavery: Our Strategy for a Coordinated Community Response 2021 – 2026'.</p>
Lead Officers (i.e. those responsible for /managing the proposed activity)	<p>Stuart Priestley, Chief Community Safety Officer, 0207 361 2799, stuart.priestley@rbkc.gov.uk</p> <p>David Hughes, Director of Audit, Fraud, Risk and Insurance, 020 7361 2389, David.Hughes@rbkc.gov.uk</p>
Single or BI-Borough	Single - Royal Borough of Kensington and Chelsea
Date of completion of final Full EqIA	12 / 11 / 2021

Section 02	Scoping of Full EqIA		
Analyse the impact of the proposed activity	Analyse the impact of the proposed activity on the protected characteristic groups (including where people / groups may share more than one protected characteristic). You should use this to determine whether the proposed activity will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality .		
	(See guidance for more information on relevance and proportionality)		
	Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
	Age	The Modern Slavery Statement will affect all residents, irrespective of age. Data from the UK's system to identify potential victims of modern slavery, the National Referral Mechanism (NRM), indicates that children constitute almost half of the 10,613 NRM's completed in 2020. By virtue of age children have an increased vulnerable to exploitation. The Modern Slavery Statement will seek to mitigate the risks of the Council using supply chains impacted by modern slavery, which includes child exploitation.	Positive
	Disability	The Modern Slavery Statement will affect all residents, irrespective of disability. The statement can be made available in differing formats to meet accessibility needs. The NRM does not currently collect data on the disability status of potential victims of modern slavery, however people who have disabilities may be at higher risk of exploitation due to vulnerabilities associated with care and support needs. The Modern Slavery Statement will seek to mitigate the risks of the Council using supply chains impacted by modern slavery, including people who are exploited and have disabilities.	Positive
Gender reassignment	The Modern Slavery Statement will affect all residents, irrespective of gender reassignment. The NRM data does not currently collect information on gender reassignment, however marginalised communities may face an increased risk of modern slavery and exploitation. The Modern Slavery Statement will seek to mitigate the risks of the Council using supply chains impacted by modern	Positive	

		slavery, including people who are exploited and have undergone or are undergoing gender reassignment.	
	Marriage and Civil Partnership	The Modern Slavery Statement will affect all residents, irrespective of marriage and civil partnership. The NRM data does not reflect marital or civil partnership status of potential victims and the Statement will have no known impact on marriage and civil partnership.	Neutral
	Pregnancy and maternity	The Modern Slavery Statement will affect all residents, irrespective of pregnancy and maternity. The NRM does not share data on pregnancy and maternity and there is no known impact from the Statement.	Neutral
	Race	<p>The Modern Slavery Statement will affect all residents, irrespective of race. The NRM does not provide information on race, however it includes the nationalities of potential victims. In the 2020 NRM data the UK, Albania and Vietnam were the most referred nationalities.</p> <p>Data from the Council's Modern Slavery and Exploitation Operational Group collected by Stop the Traffik from April 2019 to November 2020 shows the UK, Philippines, Albania and Morocco as the most commonly identified nationalities for potential victims in Kensington and Chelsea.</p> <p>The Modern Slavery Statement will seek to mitigate the risks of the Council using supply chains impacted by modern slavery, which includes the nationalities most referred in to the NRM and identified by the Modern Slavery and Exploitation Operational Group.</p> <p>The Modern Slavery Statement encompasses mitigating exploitation in supply chains for people of all races, ethnicities, and nationalities.</p>	Positive
	Religion/belief (including non-belief)	The Modern Slavery Statement will affect all residents, irrespective of religion and belief. Information on religion and belief is not currently shared in the NRM data and modern slavery cuts across all religions, beliefs, or non-beliefs.	Neutral

	Sex	<p>The Modern Slavery Statement will affect all residents, irrespective of sex. The 2020 NRM data shows that 74% of potential victims referred in were male, and 26% were female.</p> <p>Data from the local Modern Slavery and Exploitation partnership for Kensington and Chelsea and Westminster suggests 42% of potential victims are female and 58% are male. Additionally, it is important to recognise the impact of violence against women and girls and how this can create an increased vulnerability to exploitation and modern slavery for women and girls.</p> <p>The Modern Slavery Statement seeks to mitigate the risk of people being exploited in the Council's supply chains, regardless of their sex.</p>	Positive
	Sexual Orientation	<p>The Modern Slavery Statement will affect all residents, irrespective of sexual orientation. The NRM data does not provide information on sexual orientation, however marginalised communities, for example people who identify as LGBTQ+, may face an increased risk of modern slavery and exploitation. The Modern Slavery Statement will seek to mitigate the risks of the Council using supply chains impacted by modern slavery, including those who are exploited from the LGBTQ+ community.</p>	Positive
	<p>The following groups are not specifically protected by the Equality Act, but RBKC considers them as part of our broader approach to supporting equal outcomes for communities that may be disadvantaged, marginalised or excluded. Please consider whether they may be impacted.</p>		
	Socio-economic	<p>The Modern Slavery Statement will affect all residents, irrespective of socio-economic background. Data from the NRM does not reflect the socio-economic background of potential victims, however people from disadvantaged socio-economic backgrounds can be at a heightened risk of exploitation and modern slavery because of financial pressures or lack of access to support services. The Modern Slavery Statement will work to mitigate the risks of the Council using supply chains impacted by modern slavery, including those who are exploited from all socio-economic backgrounds.</p>	Positive
	Geographical	<p>The Modern Slavery Statement will affect all residents, irrespective of geographical location. Many of the people working in the Council's supply chains will reside outside of the borough and may be providing services in other</p>	Neutral

	countries with varying legislative frameworks. The Modern Slavery Statement will seek to work with the Council's suppliers to mitigate the risk of exploitation throughout the supply chains, including locally and in other countries.	
Carers	The Modern Slavery Statement will affect all residents, irrespective of their carer status. The NRM does not provide information on the carer status of potential victims and the Statement will have no known impact on carers.	Neutral
Other relevant groups:	n/a	Neutral

Human Rights & Children's Rights

Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?
(See guidance for more information on this)

Yes No

There will be a positive impact on human rights. The Human Rights Act 1998 incorporates the European Convention on Human Rights into UK law. Article 4 of the European Convention on Human Rights sets out the prohibition of slavery and forced labour. The Modern Slavery Statement upholds the Human Rights Act 1998 through seeking to mitigate the risks of modern slavery in the Council's supply chains.

Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

Yes No

There will be a positive impact on the rights of children. The United Nations Convention on the Rights of the Child sets out the prohibition of child labour, exploitation and trafficking in Article 32, 34, 35 and 36. The Modern Slavery Statement seeks to mitigate the risks of children being exploited through the Council's supply chains.

[If your decision has the potential to affect Human Rights or Children's Rights, please contact your Borough Lead for advice.](#)

Section 03	Analysis of relevant data Examples of data include census data; customer satisfaction surveys; customer complaints data workforce demographic data. Data should involve specialist data and information and, where possible, should be disaggregated by different protected characteristics.
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Documents and data reviewed	<p>Section 54 of the Modern Slavery Act 2015 was reviewed, which states that commercial organisations with an annual turnover of over £36M must prepare a Modern Slavery Statement to demonstrate the action that is being taken to mitigate the risk of modern slavery and exploitation in the business and supply chains. Although the Council is exempt from this requirement, an annual statement will continue to be published to provide transparency and demonstrate a commitment to tackling modern slavery.</p> <p>The 2020 NRM data was reviewed to inform the impact assessment. There are limitations to this data, as it does not provide a true representation of the scale of modern slavery in the UK. Some reasons for this include a lack of professional knowledge of the duty to refer to the NRM, potential adult victims of modern slavery not providing consent for a referral and modern slavery being a hidden crime.</p> <p>The Modern Slavery and Exploitation Operational Group shared data with Stop the Traffik in 2020. There were 56 potential victims of modern slavery identified or supported in the borough. This data is currently not available with a breakdown of protected characteristics and will be an action to take forward.</p>
New research	<p>Consultation has taken place as part of the Modern Slavery and Exploitation Operational Group, no equalities issues were raised.</p>

Section 04	Consultation
Consultation	<p>The Council's Modern Slavery and Exploitation (MSE) Group was consulted on the creation of the inaugural Modern Slavery Statement for Kensington and Chelsea and were consulted again on the 2020 - 2021 statement. The MSE Group reports to the Violence Against Women and Girls Strategic Board, members include Metropolitan Police, local NHS trusts and Non-Governmental Organisations.</p> <p>The Community Safety, Procurement and Human Resources Teams were involved in the review and update of the Statement.</p>
Analysis of consultation outcomes	<p>All consulted parties are in agreement to continue Kensington and Chelsea's commitment to produce an annual Modern Slavery Statement.</p>

Section 05	Analysis of impact and outcomes
Analysis	<p>The Modern Slavery Statement will contribute towards upholding the Human Rights Act and the UN Convention on the Rights of the Child by seeking to mitigate the risks of modern slavery in the Council's supply chains. As modern slavery often impacts marginalised communities, the Statement will have positive implications for the protected characteristics of age, disability, gender reassignment, race, sex and sexual orientation. All other protected characteristics will not be negatively impacted by the Statement.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	It is recommended that the Council proceed with the second annual Modern Slavery Statement, as supported by the MSE Operational Group, to continue work with our business and supply chains to prevent modern slavery and protect potential victims.

Section 07	Action Plan					
Action Plan	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan
	Local partnership data is not available with information about protected characteristics	Data collection to include information on protected characteristics and will be shared with the Council	From January 2022	Charlotte Jamieson, Community Safety	Next year there will be local data with information about protected characteristics and modern slavery	Already in progress

Section 08	
Director/ Head of Service sign-off	Name: Tunde Olayinka Position: Director for Communities Email: tunde.olayinka@rbkc.gov.uk Telephone No: 07790 363 761
Key Decision Report (if relevant)	Name of Lead/ Cabinet Member: Councillor Will Date of report to Lead/Cabinet Member: 16 / 11 / 2021 Key equalities issues have been included and the EqIA presented alongside the KDR: Yes
Lead ED&I Officer (where involved)	Name: Hannah Ralph Position: Head of Strategy, Corporate Strategy Team Date advice / guidance given: 19 / 11 / 2021 Email: Hannah.ralph@rbkc.gov.uk Telephone No: 07890045918

Review Date/s Recommended at: 3 months; 6 months and 12 months	1st Review: 2 nd Review: 3rd Review:
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