

Transparency in Supply Chains: Modern Slavery Statement (April 2024 – March 2025)

1. Introduction

1.1. Modern slavery is a violation of human rights and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking. This can include:

- forced labour
- sexual exploitation
- domestic servitude
- criminal exploitation
- organ harvesting

1.2. Estimations of the scale of modern slavery suggest there are 100,000 victims in the UK¹. The National Referral Mechanism (NRM) is the UK Government's system used both to record and support victims of modern slavery, and in 2024, 19,125 referrals for potential victims/survivors of modern slavery were made. This is an increase of 13% from 2023, (16,990 referrals) and is the highest number of referrals made in a year since the NRM began. In 2024 the Council reported 25 cases of modern slavery to the government's support system, the NRM (23 NRMs and 2 Duty to Notify, where an adult does not consent to enter the process). Further to this, anonymous data collection from partners working to tackle modern slavery across RBKC indicated there were 54 incidents of modern slavery reported over the financial year 2024/2025. Although this is the best data available, it is unlikely to be a true representation of the scale of modern slavery taking place.

2. The Council's response to modern slavery

2.1 The Act requires commercial organisations with an annual turnover of more than £36 million to report on the steps they have taken to ensure modern slavery is not taking place in the business or its supply chains. The Council has chosen to publish its fifth annual statement to provide transparency, show ethical leadership and demonstrate its commitment to tackling modern slavery. The Council has committed to a five-year strategy with Westminster City Council, *Ending Modern Slavery: Our Strategy for a Coordinated Community Response 2021-2026*.

3. Preventing modern slavery within the Council

3.1 The Modern Slavery Strategy states employers must tackle exploitation. As an employer, the Council is not exempt from this requirement and has the following measures in place, providing a code of conduct for employees which sets out both the expectations of staff and the organisation as well as:

- a. Being recredited as a London Living Wage Provider (June 2025, by the Living Wage Foundation), ensuring all employees, directly and indirectly, are paid in line with London Living Wage. Suppliers of services to the Council and its residents must verify they pay the London Living Wage as a requirement, and that this is also reflected throughout their supply chains as per the Council's T&Cs.
- b. Working with a recruitment provider to monitor employment through regular audits,

¹ Justice & Care and The Centre for Social Justice, (2020) *It Still Happens Here*

spot checks and compliance with equality law. The provider is monitored by Human Resources to ensure that measures are in place to provide equal opportunities and prevent bullying, harassment, and discrimination regarding all protected characteristics in line with the Public Sector Equality Duty (PSED). The provider publishes their own annual Modern Slavery Statement and ensures new staff are trained on modern slavery. In the financial year 2024/2025 they reported no breaches of the Modern Slavery Act.

- c. Providing a whistleblowing process with a confidential channel for reporting concerns and investigating any breaches of policies and procedures. There have been no whistleblowing concerns or referrals raised in the financial year 2024/2025 in relation to modern slavery.

4. Preventing modern slavery within the Council's supply chains

- 4.1 The Council understands its responsibility is ensuring suppliers understand and act in accordance with Council values outlined in [the Council Plan](#), this will be achieved through two of the Council's main priorities – to keep people safe and to make Kensington and Chelsea a fairer borough with the aim of ensuring that suppliers adhere to these values. The Council's approach to deliver a strategic review of modern slavery in policies and procedures through commissioning and procurement can be seen in the integration of Modern Slavery within the Council's new Social Value policy. In it a 'Development opportunities Map' has been created with bespoke modern slavery KPIs such as support to third sector organisations supporting victims of modern slavery in the area.
- 4.2 As procurement and contract management is devolved across the Council, a practical, risk-based approach has been developed to manage supply chains, during the training and upskilling of staff across the Council on the Procurement Act 2023 and the integration of the new procurement software system officers were reminded of the requirements for public bodies to assess and manage modern slavery risks in their supply chains, including mandatory exclusion of suppliers engaging in such misconduct.
- 4.3 Contract and commissioning terms and conditions have been reviewed, and a supplier code of conduct has been developed (and reviewed with the Citizens' Panel) to embed values in service and project delivery to ensure that modern slavery and exploitation are addressed throughout the procurement process. The code and other resources have been published on the Council's internal web pages.

5. Responding to modern slavery & exploitation within the Council and its supply chains

- 6.1 The Council is committed to ongoing due diligence and is working with our contract managers to ensure that suppliers reduce and mitigate the risk of modern slavery and exploitation. As such, we have officers in the Council undergoing training, from funding from the Department of Levelling Up, to enhance their knowledge and effectiveness in the next 12 months. Training will cover market engagement, supplier development and supply chain management incorporating best practice, ensuring contract managers that were less confident in monitoring modern slavery in their contracts can put measures in place to mitigate the risk of modern slavery and exploitation.
- 6.2 The Council has also created a Microsoft form of the Modern Slavery Assessment Tool (MSAT) for contract managers to send out to high-risk suppliers/ supply chains so that answers can be used to identify, manage, and reduce modern slavery risks, by asking suppliers about their processes and providing tailored recommendations for

improvement. This will allow for a risk mapping exercise, conduct a deep dive into high-risk contract(s) and review and monitor contract managers in terms of how Modern Slavery is addressed through Contract Management meetings

- 5.1 The Council will look to terminate a contract with any organisation which knowingly exploits its workforce and refers them to relevant law enforcement agencies. Should the Council identify suppliers that unwittingly exploit their workforce, or where an increased risk of exploitation is identified, the Council is committed to working with these organisations to help improve their practices and ensure employees are protected.

6. Training

- 6.3 Specialist training on modern slavery within supply chains is a priority action for the Council and in 2022 we worked with an external provider to deliver a webinar for procurement, contract, and commissioning officers. Practical information on combatting modern slavery through due diligence in supply chains, how to respond if modern slavery is identified and the approach the Council is taking to address the issue was provided. A recording of the webinar is available on an internal webpage for officers to access and review as a refresher or as and when needed.
- 6.4 Training for professionals who may encounter victims/survivors of modern slavery as part of their job roles is also available for council officers, statutory and non-statutory partners across the borough.

Appendix: Action Plan

No.	Actions for 2025 - 2026	Lead
1	Recruitment to a Contract Management/Supplier Relationship Management lead within the Strategic Procurement Team	Head of Strategic Procurement
2	Once a contract register has been collated by the procurement team, conduct a risk mapping exercise with a deep dive into high-risk contract(s).	Procurement
3	High-risk suppliers are supported to use the Modern Slavery Assessment Tool (MSAT) to assess compliance.	Contract Managers
4	Provide market engagement, supplier development (report and escalate concerns) and supply chain management incorporating best practice, ensuring the Council's suppliers put measures in place to mitigate the risk of modern slavery and exploitation.	Contract Managers, Procurement, Human Resources and Economic Development
5	Develop an enhanced training program for commissioning and contract managers to train staff on modern slavery and ethical procurement.	Procurement and Community Safety
6	Supplier development sessions are delivered for suppliers to develop their ability to report and escalate concerns, and for the Council to disseminate information and share best practice.	Community Safety

Advice and Support

In an emergency, call 999.

If you have concerns about modern slavery, you can contact the Modern Slavery & Exploitation Helpline 24/7 for help and advice: 08000 121 700.

A local directory of survivor support services can be found at:
www.angelou.org/human-trafficking