

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE: Modern Slavery and Human Trafficking Transparency Statement 2025–2026	
REPORT OF Head of Equalities and Social Purpose	
FOR SUBMISSION TO Executive Director Corporate Services	DATE 05 August 2026
STRATEGIC CONTEXT Camden Council's overarching strategy, "We Make Camden," emphasises inclusivity, safety, and support for our diverse community. As we work towards these goals, addressing modern slavery and human trafficking is paramount in fostering a safe and equitable environment for all residents. Modern slavery, which encompasses forced labour and human trafficking, deeply impacts vulnerable individuals within our borough. The Council recognises its critical role as both an employer and a procurer, placing an obligation on us to identify and mitigate the risks of modern slavery in our operations and supply chains. Camden's commitment aligns with the Home Office's guidance, reiterating our responsibility to ensure transparency and accountability in all undertakings. Focused on safeguarding human rights, the Council is dedicated to continually improving our response to modern slavery. This includes implementing robust due diligence processes and assessing supply chains for potential risks. The 2025-2026 Transparency Statement reflects Camden's integrated safeguarding approach while embedding anti-slavery commitments into our strategic framework. It serves as a foundation for ongoing efforts to protect vulnerable populations and uphold the dignity of all individuals in Camden, aligning with our vision of making Camden a safer, fairer place to live and work.	
SUMMARY OF THE REPORT • Modern slavery is a hidden but serious crime, including forced labour, servitude, and human trafficking, which disproportionately affects vulnerable individuals. • As a major employer, commissioner, and procurer, Camden has a responsibility to mitigate risks within both its direct operations and its supply chains. • The Home Office's updated guidance places increased emphasis on: ❖ Clear identification of risks	

- ❖ Robust supply chain due diligence
- ❖ Measurable outcomes
- ❖ Continuous improvement
- This statement reflects those expectations and builds on Camden’s existing safeguarding and partnership arrangements.

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RECOMMENDATIONS

Executive Director Corporate Services **is asked to:**

- Approve the Modern Slavery & Human Trafficking Transparency Statement 2025-26 (Appendix 1).

1. PURPOSE OF REPORT

- 1.1. This report introduces the Council's Modern Slavery and Human Trafficking Transparency Statement (Modern Slavery Statement) for 2025–2026, setting out the actions taken to prevent, identify and respond to modern slavery across the Council’s operations and supply chains. Whilst section 54 of the Modern Slavery Act 2015 (the Act) does not specifically require the Council to publish a Modern Slavery Statement, the Act does require commercial organisations which carry on a business (or part of one) in the UK which supplies goods or services and has an annual turnover of £36M or more to provide one.
- 1.2. The Home Office regularly updates Statutory Guidance to assist organisations with compliance in considering the contents of and publishing their Modern Slavery Statement annually.
- 1.3. In March 2025, the Home Office published updated statutory guidance, amongst other things, designed to improve the content and quality of Transparency Statements.
- 1.4. The Transparency Statement should be published within six months of the end of the previous financial year. The Modern Slavery Act 2015 consolidates and clarifies the existing offences of slavery and human trafficking whilst

increasing the maximum penalty for such offences. The Act establishes the Office of the Independent Anti-slavery Commissioner and sets out the Commissioner's functions.

1.5. Finally, the Act introduces a number of measures focused on supporting and protecting victims, including a statutory defence for slavery or trafficking victims and special measures for witnesses in criminal proceedings.

1.6. The Act requires any organisation publishing a Modern Slavery Statement to state the steps taken during the previous financial year to ensure that slavery and human trafficking are not taking place in any of its supply chains, in any part of its own business or a statement that the organisation has taken no such steps. |

1.6.1. Key Points

1.6.2. Safeguarding and frontline response

1.6.3. Adult Social Care recorded 24 safeguarding concerns relating to modern slavery, involving 21 individuals during the reporting period.

1.6.4. The Council continues to act as a First Responder to the National Referral Mechanism (NRM), with referrals enabling access to specialist support.

1.6.5. Multi-agency responses are coordinated through the Multi-Agency Safeguarding Hub (MASH) and overseen by the Safeguarding Adults Partnership Board.

2. Risk areas

2.1. Camden operates a hybrid model, combining in-house and commissioned services across key areas (e.g. social care, housing, ICT). It spends over £400m annually with third-party suppliers and manages a large and diverse supply chain.

2.2. We take a risk-based approach to due diligence, with particular focus on labour-intensive sectors where there is greater potential for exploitation, including construction, care services and agency labour.

2.3. This is supported by a central procurement function working with services to identify and manage risk

2.3.1. Workforce training and awareness

2.3.1.1. During 2025-2026, there were 316 completions of modern slavery-related training across the workforce.

2.3.1.2. The review of training has been informed by work on the Modern Slavery and Human Trafficking Transparency Statement, internal safeguarding discussions, and alignment with updated Home Office guidance.

2.4. Procurement and supply chains

2.4.1. Modern slavery considerations are embedded within procurement processes, including:

2.4.2. Supplier compliance with the Modern Slavery Act

2.4.3. Use of contract clauses addressing exploitation risk

2.4.4. Ongoing monitoring through contract management

2.4.5. This reflects the Council's role in influencing labour standards through its significant third-party spend.

2.5. Partnership working and prevention

2.5.1. Camden continues to work in partnership through:

2.5.2. The London Modern Slavery Leads Network

2.5.3. Metropolitan Police (Modern Slavery / Exploitation teams)

2.5.4. National Crime Agency (NCA)

2.5.5. Home Office / Single Competent Authority (SCA)

2.5.6. NHS (ICB, hospitals, GPs)

2.5.7. Safeguarding Adults Board (SAB) & Safeguarding Children Partnership Board (SCPB)

2.5.8. Good work, Camden and the Inclusive Business Network, promoting fair work and ethical employment

2.5.9. This approach supports both prevention and early identification of exploitation risks

2.6. Governance

2.6.1. Oversight is provided through the Community Safety Partnership Board (CSPB), ensuring that modern slavery is embedded within broader safeguarding governance.

2.6.2. An internal officer group coordinates delivery across services, including procurement, HR, housing and community safety.

2.7. Key Challenges

- 2.7.1. The statement identifies some areas for improvement:
- 2.7.2. Inconsistent data recording, particularly in relation to NRM referrals
- 2.7.3. Variable awareness across some frontline services
- 2.7.4. Limited visibility of risks beyond direct (Tier 1) suppliers
- 2.7.5. Need for strengthened supplier assurance and monitoring
- 2.7.6. Addressing these issues will support improved evidence, accountability and impact measurement.

3. Future Priorities

- 3.1. Priorities for 2026–2027 include:
- 3.2. Strengthening supply chain due diligence and contract monitoring
- 3.3. Improving data quality, including capturing NRM activity
- 3.4. Enhancing training and workforce capability in higher-risk services
- 3.5. Continuing to embed a partnership-led, preventative approach

4. CONSULTATION AND ENGAGEMENT

- 4.1. Engagement has taken place with the council officers responsible for implementing the actions specified in the statement.
- 4.2. The Cabinet Member for Finance and Cost of Living, Cabinet Member for Community Resilience and Deputy Leader, and Cabinet Member for Safer Communities and Deputy Leader have been consulted on this matter.
- 4.3. Engagement has also taken place with key statutory and strategic partners, such as the Metropolitan Police, NHS partners, and safeguarding partnerships, to incorporate frontline insights.
- 4.4. This consultation has been undertaken through meetings, partnership forums, and information sharing, and has informed the identification of key risks, priorities, and actions reflected in the final Statement.

5. Human Resources implications

- 5.1. The Council recognises the role of its workforce in identifying and addressing risks related to transparency and safeguarding. Human Resources policies and procedures, including recruitment, pre-employment checks, and staff codes of conduct, are designed to ensure safe and ethical employment practices. The Council provides relevant training and guidance to staff to raise awareness of risks such as exploitation and modern slavery, and to support appropriate reporting and escalation. These arrangements are

reviewed periodically to ensure they remain effective and aligned with statutory requirements.

6. Environmental implications

6.1. No implications have been reported in the refresh of this statement.

7. Equality Implications

7.1. The implications of equality have been considered during the formulation of this statement.

8. Financial Implication

8.1. No implications have been reported in the refresh of this statement

9. Legal Comments of the Borough Solicitor

9.1. Section 54 of the Modern Slavery Act 2015 does not specifically require local authorities to publish a Slavery and Human Trafficking Statement, though it is considered best practice to do so, and as part of the Council's ongoing commitment to tackling modern slavery.

9.2. The Home Office continues to publish statutory guidance to support organisations, including the Guidance on publishing an annual Modern Slavery Statement as well as the Modern Slavery: Statutory Guidance for England and Wales (under s. 49 of the Modern Slavery Act 2015). Statutory Guidance is designed to improve the content and quality of Modern Slavery Statements. The Transparency Statement should be published within six months of the end of the previous financial year.

9.3. The Local Government Association and the Independent Anti-Slavery Commissioner (established by the Act) also regularly produce good practice briefings to promote coordination across all organisations.

9.4. A Slavery and Human Trafficking Statement should be for the previous financial year and should be a statement of the steps the Council has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of its supply chains, or in any part of the Council, or a statement that the Council has taken no such steps.

9.5. The Slavery and Human Trafficking Statement may include information about the Council structures, business and supply chains; our policies in relation to slavery and human trafficking; our due diligence processes in relation to any of our business and supply chains. The Statement can also include a focus

on specific areas where there is a risk of slavery and human trafficking taking place, and the steps the Council has taken to assess and manage that risk. The Statement can also include the effectiveness of the Council in ensuring that slavery and human trafficking are not taking place in our business or supply chains, measured against such performance indicators as it considers appropriate. Finally, the Statement can also include any training about slavery and human trafficking available to its staff.

10. Appendix

10.1. [Modern Slavery Report 2024-2025](#)

REPORT ENDS

Appendix 1

London Borough of Camden

Modern Slavery & Human Trafficking Transparency Statement

Financial Year: 1 April 2025 – 31 March 2026

Date approved: 5th August 2026

Approved by: Kathryn Myers, Executive Director Corporate Services

(signature/date): 5th August 2026

Link to previous statements: [Modern Slavery Report 2024-2025](#)

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This statement is made pursuant to **Section 54** of the **Modern Slavery Act 2015** and describes the steps Camden has taken during 1 April 2025 – 31 March 2026 to prevent modern slavery and human trafficking in our operations and supply chain.

1. Our Organisation, Structure and Supply Chains

London Borough of Camden

Camden employs over 5,000 staff in a flexible resourcing model that enables us to adapt to changing circumstances. This enables us to respond to emerging challenges, such as the pandemic. As an organisation, we use a combination of permanent and fixed-term contracts, agency workers, and, from time to time, interims and consultancy firms to provide specialist expertise. The use of a temporary workforce is recognised as an acceptable short-term resourcing decision to meet service needs, short-term demand increases, or to bring in specialist skills. Across all our employment contracts, we have mechanisms and policies to address the risk of modern slavery, which are outlined below.

Operating model: Camden operates a hybrid model that combines in-house and commissioned services across key areas (e.g. social care, housing, ICT). It spends over £400m annually with third-party suppliers and manages a large and diverse supply chain. We take a risk-based approach to due diligence, with particular focus on labour-intensive sectors where there is greater potential for exploitation, including

construction, care services and agency labour. This is supported by a central procurement function working with services to identify and manage risk.

Policies and charter

Whistleblowing Policy: The WB Policy requires staff to contact Audit, Investigations, and Risk Management if they suspect modern slavery or human trafficking, ensuring potential exploitation is identified. It directs readers to the Government's website for more information.

We offer several courses to raise awareness of modern slavery and human trafficking. Our mandatory training includes this topic integrated within a safeguarding module and has been re-run for all employees from late 2024 to early 2025, with another session planned for late 2026 to early 2027. Additional courses are available for staff in roles with heightened safeguarding responsibilities, particularly in children's services.

Our Gifts and Hospitality Policy includes a process for reporting conflicts of interest through a disclosure form to prevent personal or commercial gain for staff.

Recruitment: We have a robust and transparent recruitment and selection process and ensure that all new workers recruited into a post at Camden, whether full-time or part-time employees, agency employees or contractors/consultants, have the requisite checks, which include identification and the right to live and work in the UK. Our offer of employment is subject to the following rigorous process:

- Acceptance of the terms and conditions contained within the contract of employment.
- The receipt of satisfactory references;
- Evidence of any required professional qualifications (e.g., social work qualifications) and essential requirements, such as a clean driving licence;
 - Any necessary Disclosure and Barring Service checks, where applicable;
 - The receipt of eligibility to work in the UK; and
 - Identification check.

Agency staff: Camden Council collaborates with Matrix SCM, our Managed Service Provider for agency workers, to ensure all personnel—agency employees,

contractors, and consultants—undergo the same checks as Camden staff. Agency and casual workers are essential to our workforce, and we renewed our contract with Matrix SCM in 2026. Matrix SCM is committed to addressing Modern Slavery and Human Trafficking, a requirement included in our contract specifications.

We ensure that all agencies in our supply chain follow our strict processes and legal requirements to minimise the risk of unethical employment practices. Non-compliant suppliers may face suspension or termination until compliance is met.

Additionally, Camden established the Camden Talent Pool in 2022, directing entry-level temporary roles to our residents and tenants. This initiative supports our efforts through the Camden Jobs Hub and Good Work Camden to help residents secure quality employment, with ongoing monitoring like our direct employment routes.

Pay: Camden Council values maintaining pay levels that enable employees to meet their families' essential needs. For years, it has ensured that staff earn above the London Living Wage (LLW), with an increase for the lowest-paid staff from 1 January 2015 and a minimum earnings guarantee exceeding the LLW. Since becoming a Living Wage Employer in February 2012, Camden has extended its commitment to include all apprentices and agency workers, with almost all contracts reflecting LLW. The Council has conducted two supplier surveys to monitor LLW compliance and will continue to audit pay among suppliers.

[Pay Policy Statement 2026/27](#)

Good work, Camden and the Inclusive Business Network

Good Work Camden, through the Inclusive Business Network, promotes ethical employment practices, supports vulnerable residents into work, and offers modern slavery awareness training to partners and staff. Following the Mayor's Good Work Standards, Good Work Camden connects individuals with organisations that pay the London Living Wage and provide full employment contracts. The specialised team assists refugees and asylum seekers, including those in contingency hotels, many of whom are survivors of modern slavery. They build trust without pressuring residents

to share personal stories, understanding that discussions about employment can be triggering for those with trauma. The support is tailored and trauma-informed, addressing both practical barriers like language skills and internal fears about fair treatment and rights. The team coaches residents through challenges and refers them to additional services as needed. Discussions around modern slavery are crucial, ensuring residents understand fair wages. Many asylum seekers lack the Right to Work and face exploitation risks, making employability support essential to prevent modern slavery. Good Work Camden helps residents become work-ready and compliant with their legal status. In-employment support is also provided, offering residents a safe space to share concerns and access regular check-ins for immediate assistance. Many residents volunteer regardless of their work rights, receiving training and access to safe volunteering roles. Safeguarding remains a priority, with education on employee rights and escalation to relevant services when needed. Good Work Camden aims not just to place residents in jobs but to ensure they find fair and humane employment.

Code of Conduct : Camden employees must behave honestly and follow Camden's policies and procedures. Our code of conduct makes it clear that staff must not act in a manner, inside or outside working hours, that could damage the Council's reputation. All employees are expected to always keep within the law during their employment. The learning for staff is part of their mandatory learning (undertaken at the outset of employment and refreshed every two years – most recently over the period from the end of 2024 through to early 2025). Councillors, as elected members, will all undertake the same mandatory learning process, which includes information on safeguarding (and modern slavery) and the code of conduct, as well as regular reviews of declarations of interest and declarations of gifts and hospitality. The mandatory learning programme will run again from late 2026 into early 2027.

Charters & Commitments: Camden is a signatory to the **Co-operative Party's Charter against Modern Slavery** and publishes an annual transparency statement.

2. Due Diligence

Camden's Modern Slavery Statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the Council's approach to identifying and

addressing modern slavery and human trafficking within its operations and supply chains.

Camden recognises that procurement and contract management are critical levers in preventing modern slavery. We are committed to ensuring that our procurement practices reflect UK legislation and uphold ethical, social and environmental standards.

We embed these commitments throughout our procurement processes and contractual arrangements. Camden's contracts require suppliers to comply with modern slavery legislation, undertake due diligence within their own supply chains, and report any actual or suspected instances of modern slavery. The Council's standard terms and conditions enable it to access information, audit supplier compliance, and investigate concerns where they arise. Where issues are identified, Camden can require remedial action and take appropriate contractual enforcement action, including contract termination where necessary.

Suppliers are required, through Camden's tendering procedures and our standard contract conditions, to comply with the Modern Slavery Act 2015 and any other applicable legislation. These processes and terms require suppliers to take appropriate steps to ensure that modern slavery is not taking place within their own operations or supply chains. Where applicable, suppliers must also maintain their own modern slavery statements in line with statutory requirements.

While we assess the overall risk of modern slavery within the Council's supply chains as relatively low, we recognise that risks still exist in specific sectors and tiers of the supply chain. We therefore expect suppliers to undertake appropriate due diligence and to be transparent about the steps they are taking to identify and mitigate risks.

We work with suppliers, and where relevant, local employers to promote fair working practices, including compliance with London Living Wage requirements and wider workforce standards set out in Camden's procurement processes.

The Council is committed to continuous improvement. We regularly review our procurement procedures and contract terms to ensure they reflect current legislation, good practice, and Camden's wider commitment to social value.

3. Risk Assessment and Key Performance Indicators (KPIs)

Actions taken in the last financial year

Children services

In 2021, Camden was successful in securing a joint bid with the London Borough of Islington to become one of the first adoption sites for devolved Home Office National Referral Mechanism (NRM) decision-making for child victims. This has resulted in a cross-borough multi-agency panel assessing potential child victims of Modern Slavery. This has positively impacted children by significantly reducing the decision-making time, with lead professionals sharing the child's lived experience. In addition, it has facilitated effective information sharing across the two boroughs for emerging themes and trends for children at risk of exploitation. The impact of a positive Conclusive Grounds decision for a child includes consideration of a Section 45 defence for Court matters as well as access to specialist advice and support. Camden has secured funding through this Home Office pilot to support a 0.5 post to coordinate the NRM panel, ensuring robust evidence gathering to secure the most suitable threshold decision. This post also acts as a point of liaison with the Single Competent Authority, as well as key partners responding to Modern Slavery in police and health. There were 31 NRM referrals for children in 2025/26 which is a similar number as identified the previous year (30). Forced Criminality is the most frequently identified type of exploitation, with Child Criminal Exploitation (CCE) also the clearest type of exploitation to objectively evidence for the NRM threshold, due to the presence of police arrests and investigations. Victims were also referred due to experiencing forced labour and sexual exploitation. 19% of referrals were for Unaccompanied Asylum-Seeking Children, all referred due to experiencing forced labour outside of the UK.

Identification and Frontline Practice

Adult Social Care (ASC) identified 24 safeguarding records relating to modern slavery within the period reviewed. These relate to 21 individual adults, with some appearing in both the concern and enquiry stages. Of the 24 records, 18 were

managed at 42.1 Information Gathering stage, and 6 progressed to the Safeguarding Enquiry 42.2

Modern slavery is recognised within ASC as a category of abuse under the Care Act 2014, including offences of slavery, servitude, forced labour and human trafficking, and can include linked activity such as cuckooing and county lines.

Where concerns are identified, practice is to raise a safeguarding concern at the Section 42.1 stage and gather information to determine whether the three stage criteria for further safeguarding enquiries are met.

The Multi-Agency Safeguarding Hub (MASH) acts as the front door for screening these concerns. Responses are proportionate and may include information gathering, signposting, preventative support, or progression to enquiry where statutory criteria are met.

Adult Social Care (ASC) operates as a First Responder organisation and may refer potential victims into the National Referral Mechanism where appropriate. The NRM is the national framework for identifying and referring victims, and it enables access to specialist support, including a recovery period and support services, where consent is provided.

ASC does not currently consistently record whether an NRM referral has been considered or completed, which limits the ability to fully report on outcomes and onward support. A request has been made to MOSAIC analysts to add the NRM data field to support this process more easily going forward.

Adult Safeguarding and Multi-Agency Work

ASC operates within a multi-agency safeguarding framework. MASH brings together partners to share information and determine safeguarding thresholds, and the Safeguarding Adults Partnership Board provides strategic oversight across the system.

Camden is actively engaged in the London Modern Slavery Leads network and the buddying pilot, which supports cross borough collaboration, shared learning and development of practice.

Guidance confirms that all agencies have a duty to share information and work together in responding to modern slavery, and that safeguarding responses should be delivered through multi-disciplinary partnership working.

Internal audit findings confirm that partnership working is in place and developing across services including community safety and other council functions.

Areas for improvement are clearly identified. These include inconsistent awareness and reporting routes across some frontline services, limited data capture and analysis, and the need for stronger governance and oversight of modern slavery activity across the partnership.

In terms of vulnerability, the material reviewed identifies risks linked to migrant status, asylum and refugee populations, and individuals identified through partner agencies such as police, Border Force and outreach services. The available evidence does not provide a formal ASC cohort analysis covering all groups referenced in the question.

Training and Awareness

205 staff completed the Modern Slavery and Human Trafficking eLearning module
79 staff completed an overview course on child trafficking, modern slavery and exploitation

30 staff completed child trafficking, exploitation and modern slavery training

2 staff completed training on how to complete an NRM for child victims.

This equates to 316 training completions across modern slavery related courses during the period.

The dedicated modern slavery training module has also been updated to reflect current legislation and practice requirements.

In addition, safeguarding leads have delivered at least 25 multi agency safeguarding sessions over the last 12 months, including targeted sessions for staff working with higher risk groups.

ASC also has access to operational guidance and process tools, including internal practice guidance and NRM referral materials, which support practitioners in identifying indicators, gathering information, and responding appropriately.

4. Monitoring and Governance

Camden Council maintains clear and robust governance arrangements to oversee our response to modern slavery and to ensure that the organisation meets its statutory responsibilities under the Modern Slavery Act 2015. Oversight of modern slavery sits within the Council's established **Community Safety Partnership Board (CSPB)**, which receives regular updates on risks, progress, and operational activity. This approach ensures that modern slavery is integrated within existing safeguarding and community safety governance structures, rather than treated as a standalone strategic priority. Embedding this work in the CSPB avoids duplication, strengthens coordination, and supports a whole system response across the partnership.

The CSPB's role includes monitoring delivery against agreed actions, receiving assurance through established reporting mechanisms, and ensuring accountability via relevant subgroups. This provides a clear line of sight from operational practice through to strategic oversight.

Through these governance arrangements, Camden ensures a coherent, partnership-led and prevention-focused approach that strengthens our ability to identify, prevent and respond to modern slavery and exploitation within the borough.

An Officer Working Group, bringing together colleagues from Procurement, Legal, HR, Housing, and Community Safety, oversees the coordination and delivery of this work.

5. Future commitments and improvement plan

- Camden recognises the importance of strengthening our understanding and oversight of modern slavery risks within our supply chains. As part of our ongoing commitment, we will take a proportionate and evidence-led approach to improving our data, transparency and assurance.
- Our focus for the next period is on strengthening the foundations of our approach in a way that is practical and sustainable. This includes:
 - Improving the quality and consistency of supply chain data. We will work to improve the accuracy and completeness of contract and supplier data to better support supply chain visibility and risk assessment.
 - Strengthening risk-based due diligence and contract management. We will continue to embed modern slavery considerations into procurement processes and contract management.
 - Enhancing management information and internal oversight. We will develop proportionate management information to support better oversight, including exploring practical ways to track supplier compliance with contractual requirements related to modern slavery.
 - Continuous learning and alignment with best practice. We will continue to review emerging national guidance and local government best practice to inform the development of our approach over time.

Name: Kathryn Myers

Signature: "Agreed, Kathryn Myers, Executive Director Corporate Services"

Date: 05 August 2026