

Modern Slavery Report 2024-2025

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| LONDON BOROUGH OF CAMDEN | WARDS: All |
| REPORT TITLE Modern Slavery Act 2015 – Transparency Statement 2024 - 25 | |
| REPORT OF Head of Equalities and Social Purpose | |
| FOR SUBMISSION TO Interim Executive Director Corporate Services (Hanad Mohamed) | DATE 28 October 2025 |
| SUMMARY OF REPORT This report sets out Camden’s Modern Slavery Act 2015 Transparency Statement 2024- 25 (“Statement”). It also outlines the plans for improvements next year. The Statement is made in reference to section 54 of the Modern Slavery Act 2015 and recent updated statutory guidance (i.e. Transparency in Supply Chains and Modern Slavery). Whilst the Council is not required to publish a Transparency Statement, it is considered good practice and it also confirms the Council’s ongoing commitment to tackling issues relating to modern slavery. It explains the steps that Camden Council has taken to address modern slavery risks in our operations and supply chains. This Statement relates to actions and activities implemented during the 2024-25 financial year. Local Government Act 1972 – Access to Information No documents that require listing have been used in the preparation of this report: Contact Officer: Mathurini Visakan Head of Equalities and Social Purpose Corporate Services London Borough of Camden 5 Pancras Square London N1C 4AG Email: Mathurini.Visakan@camden.gov.uk 020 7974 3792 | |
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RECOMMENDATIONS

The Interim Executive Director Corporate Services approves the Modern Slavery Transparency Statement 2024– 2025.

Signed:

A handwritten signature in black ink, appearing to read "Matthew Eagle", with a horizontal line underneath.

Date: 27 October 2025

1. Purpose of the Report

- 1.1 This report outlines Camden’s Transparency Statement (Statement) pursuant to the Modern Slavery Act for the previous financial year 2024-25.
- 1.2 The Statement is prepared with reference to section 54 of the Modern Slavery Act 2015. It considers recent updated statutory guidance under s49(1) Modern Slavery (October 2025), and Transparency in Supply Chains (March, July 2025). Also, it takes into account the Organisation for Economic Co-operation and Development (OECD) due diligence process and relevant UN Guiding Principles on Business and Human Rights. It details the measures Camden Council has implemented to manage modern slavery risks in our operations and supply chains.
- 1.3 The Statement also presents plans for the upcoming year.

2. Camden’s commitment to tackling Modern Slavery

- 2.1 As part of our commitment to tackling Modern slavery, Camden officially joined the Co-operative Party’s Charter Against Modern Slavery on 4 December 2024. In doing so, we committed to understanding and addressing the risks that all forms of modern slavery pose to our residents, visitors, and the international community, given the pervasive nature of global supply chains. This charter is a vital framework that will guide our actions and policies in combating exploitation.
- 2.2 The Council commits to using all avenues open to us to tackle modern slavery, including our statutory powers and role as a public procurer, utilising the strengths of all our partnerships with the Police, the NHS, and other organisations, and finally, awareness-raising.
- 2.3 Camden Council mitigates modern slavery risks through targeted enforcement, strategic partnerships, and procurement oversight. Trading Standards focuses on counterfeit goods, unsafe products, illicit tobacco and vapes, underage sales, and teen vaping—areas often linked to exploitative labour practices. Officers are trained to identify and refer modern slavery concerns, working closely with police and immigration services during investigations.
- 2.4 This approach aligns with Camden’s commitments under the Procurement Act 2023, which integrates modern slavery due diligence into all tender documentation, with enhanced scrutiny for high-risk sectors. The Council may terminate contracts for non-compliance and is advancing strategic supplier engagement, real-time risk monitoring, and improved accountability.
- 2.5 Community engagement includes scam awareness talks in sheltered housing and toy safety checks during donation drives. Future priorities include enforcing the single-use vape ban, improving licensing compliance, and promoting safe market practices. Camden also supports workforce development through apprenticeships in Trading Standards.
- 2.6 Through Good Work Camden and the Inclusive Business Network, the Council

promotes ethical employment practices, supports vulnerable residents into work, and delivers modern slavery awareness training to partners and staff.

- 2.7 Camden participates in the National Referral Mechanism (NRM) for child victims, with 30 referrals reviewed in 2024/25. The borough continues to lead in devolved NRM decision-making, supported by multi-agency panels and targeted training.
- 2.7 Together, these efforts reflect Camden's broader objective to uphold ethical standards, safeguard vulnerable individuals, and ensure responsible business practices across the borough.

3. About the Transparency Statement

- 3.1 The Modern Slavery Act 2015 imposes several statutory obligations that the Council is mandated to fulfil, however the Council is not obliged to publish this Statement but does so as a good practice measure and to show its ongoing commitment to tackling modern slavery. Section 54 of the Act encourages the Council to integrate considerations of the Modern Slavery Act and related guidance into its procurement strategy and to reflect these considerations within its commercial agreements. This can be partly achieved by the Council publishing a Transparency Statement that outlines the measures undertaken to ensure that instances of slavery and human trafficking are not occurring within the Council or its supply chain.
- 3.2 Cabinet has previously endorsed the publication of the inaugural Modern Slavery Transparency Statement and has granted the Executive Director of Corporate Services delegated authority to review and publish a revised statement in subsequent years, following consultation with the relevant Cabinet Member.
- 3.3 However, with the recent publication of updated guidance designed to strengthen Modern Slavery reporting arrangements, we intend to seek Cabinet approval of the next Statement covering actions delivery in 2025-26.
- 3.4 The Statement has been updated for financial year 2024-25. It details the planned actions that were successfully completed during this time and outlines the ongoing initiatives scheduled for the upcoming years. The focus areas include our policies on recruitment, the use of agency staff, learning and development, pay structures, and collaboration with suppliers. Additionally, we are revising sections to highlight how we have integrated our commitments into our Human Resources, Procurement, Inclusive Economy, Safeguarding, and Learning activities.

4. Options

- 4.1 The Modern Slavery Act 2015 guidance recommends that previous statements be kept on the Council's website for the public to review and also uploaded onto the Modern Slavery Register.
- 4.2 Since the Statement reaffirms Camden's proactive, collaborative, and evolving approach to reducing modern slavery risks, ensuring ethical governance and protecting vulnerable individuals across the borough, it is advised that the statement does not need to be presented to the Cabinet this year but rather next

year.

5. Risks and Mitigations

5.1 The range of risks and mitigations identified by the officer are detailed in the appended Transparency statement.

6. Timetable for Implementation and Next Steps

6.1 Timeline for reviewing and publishing the Statement for 2024 – 2025

| Task | Deadline |
|--|------------------|
| Review and update the Statement with cross-council officers | 7 September 2025 |
| Consult with Cabinet Member Councillor Camron Aref-Adib (Cabinet Member for Finance and Cost of Living) | 15 October 2025 |
| Executive Director to review the revised Statement to determine whether “significant changes” have been made, requiring further Cabinet decision | 7 October 2025 |
| Publish refreshed Modern Slavery Statement after delegated authority or Cabinet decision | 28 October 2025 |

6. Consultation/Engagement

6.1 Engagement has taken place with the council officers responsible for implementing the actions specified in the statement.

6.2 The Cabinet Member for Finance and Cost of Living has been consulted on this matter.

6.3 No additional engagement has occurred, as this process aims to update an existing policy.

7. Human Resources implications

7.1 No Human Resources implications have been reported in the refresh of this Statement.

8. Procurement issues

8.1 The 2024-25 Transparency Statement (see Appendix 1) details a list of completed actions since last year, and some actions to be completed.

9. Environmental implications

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

10. Equality Implications

10.1 The implications of equalities have been considered during the formulation of this statement, and a more in-depth examination will be conducted in the upcoming 2024-2025 statement.

11. Comments of the Director of Finance

11.1 The Director of Finance has been consulted and has no comments to add.

12. Legal Comments of the Borough Solicitor

12.1 There is no statutory requirement for the Council to publish a Transparency Statement but the Council is publishing this Statement in line with best practice and as part of our commitment to tackling modern slavery.

12.2 In March 2025 the Home Office published updated statutory guidance, amongst other things, designed to improve the content and quality of Transparency Statements. It is recommended that a full review be undertaken of the Transparency Statement ahead of publishing the next Statement for 2025/26. The Transparency Statement should be published within six months of the end of the previous financial year.

12.3 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 Independent Anti-slavery Commissioner and sets out the functions of the Commissioner. Finally, the Act introduces a number of measures focussed on supporting and protecting victims, including a statutory defence for slavery or trafficking victims and special measures for witnesses in criminal proceedings. Part 6 of the Act requires certain businesses (eg with an annual turnover of over £36M) to disclose what activity they are undertaking to eliminate slavery and trafficking from their supply chains and their own business.

13. Appendix

[Appendix](#) 1 - Modern Slavery Act 2015 - Transparency Statement 2024 - 25

Appendix

Modern Slavery Act 2015 - Transparency Statement 2024 - 2025

The role of the London Borough of Camden

Camden has statutory obligations under the Modern Slavery Act 2015 to respond to modern slavery and human trafficking and to safeguard residents from being exploited. In short, there are two obligations: 1) not to subject anyone to modern slavery or human trafficking; and 2) to act and safeguard residents when we suspect they have been a victim of modern slavery or human trafficking.

As a local authority, we have a duty to notify the Home Office of any individual encountered who we believe is a suspected victim of modern slavery or human trafficking. By referring a victim to the National Referral Mechanism (NRM), the Home Office can investigate the circumstances of someone's exploitation further and provide the necessary support to potential victims and survivors of modern slavery.

The latest official estimates of Camden's population are 218,000 usual residents at Mid-2022. The mix of social and economic conditions in Camden are like nowhere else, and the Council takes seriously its role in stewarding our local communities to tackle inequalities, support our residents to thrive, and keep our Residents and those who work and travel to Camden can do so safely and competently. Most Camden residents were born in the UK. In terms of countries of birth, after In England, more Camden residents born outside the UK were born in the United States, Bangladesh, France, Italy, India, China, Ireland, Somalia, Scotland and Germany, than any other individual country. The most spoken languages other than English are French, Bengali, Spanish, Italian, Arabic, Portuguese, Somali and Greek; and Albanian.

Over the past few years, Camden has become a home for over 800 Ukrainian refugees, as part of the Homes for Ukraine scheme, 1,800 Afghan refugees have been supported by Camden teams, and 109 former Syrian refugees were supported to apply for UK citizenship.

Camden employs over 4,300 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, as well as 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 – and these are outlined below.

Our policies – HR

We pride ourselves on clear and rigorous HR policies and procedures, and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation and our suppliers. These include:

Whistleblowing (WB) policy:

The WB Policy advises staff to contact the Head of Internal immediately Audit, Investigations and Risk Management if they suspect that modern slavery or human trafficking is occurring to ensure that potential exploitation is identified. It also signposts readers to the Government's website on modern slavery for further information. We have several courses and learning offers for staff across the organisation, focusing on raising awareness of modern slavery and human trafficking and the role of all staff in identifying and reporting concerns. Our mandatory learning for staff includes modern slavery and human trafficking integrated within a module on safeguarding. The required learning programme was re-run for all employees again during the period from the end of 2022- 24 to early 2024- 25. We also have specific courses for staff working in roles with increased safeguarding responsibilities, including for children's and young people's services

Our Gifts and Hospitality Policy sets a straightforward process for reporting any conflicts of interest, including a disclosure form, so that we can manage any potential personal or commercial gain for members of staff across the organisation.

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 works closely with Matrix SCM, our Managed Service Provider for agency workers, to ensure that all workers, including agency employees, contractors, and consultants, go through the same checks as Camden employees. Agency/ casual workers are a vital part of our workforce. Camden renewed its contract with Matrix SCM in 2025, and a retendering process is due to commence in early 2026. February 2022 for two years – Matrix SCM have a clear and comprehensive commitment to tackling Modern Slavery and Human Trafficking that is available on their website, and we will continue to monitor risk and respond to changing circumstances over the life of the contract. The commitment to tackling Modern Slavery and Human Trafficking is a requirement of the contract specification for the retendering process.

We ensure that all agencies in our supply chain comply with our rigorous process and adhere to all legal requirements, minimising the risk of unscrupulous employment practices. Any supplier who fails to comply with our ethics will be suspended or

terminated from the supply chain until such compliance can be evidenced.

Alongside renewing our contract with Matrix SCM, Camden created a Camden Talent Pool, which was established in 2022, is providing opportunities for entry-level temporary Camden roles to be directed in the first instance to our residents and tenants, complementing our wider work with the Camden Jobs Hub and Good Work Camden to provide pathways for our residents into high-quality work. This pathway will continue to be rigorously monitored in the same way as our direct employment routes as listed above.

Pay:

Camden Council recognises the importance of maintaining pay at a level that allows people to provide their families with the essentials of life, and has for several years ensured that employees are paid above the rate of the London Living Wage (LLW). From 1 January 2015, the Council further increased the pay of its lowest-paid staff. With the introduction of a minimum earnings guarantee of more than the LLW rate. From 1 April 2019, the Council also extended its application of the London Living Wage. Wage to cover all apprentices.

Camden became a Living Wage Employer in February 2012 and extended its commitment to pay the LLW across the wider workforce, including agency workers and staff delivering services on behalf of the Council in outsourced contracts. Almost all contracts awarded are inclusive of LLW, and the Council has carried out two Living Wage supplier surveys to help us understand the level at which suppliers are delivering on the LLW. We will continue to audit pay and conditions amongst suppliers to manage risk and respond to the needs of our wider supplier workforce.

[Click here to view our 2025/26 Annual Pay Policy Statement.](#)

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 and outside working hours which 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 that includes information on safeguarding (and modern slavery) and code of conduct, as well as regular reviews of declarations of interest and declarations of gifts and hospitality

Procurement

Procurement remains unwavering in its commitment to preventing modern slavery within our procurement activities and supply chains. Our approach combines rigorous compliance with legislative requirements, proactive collaboration, and continuous improvement of our practices and procedures.

Our work to date:

- Procurement strives to ensure compliance with modern slavery legislation through its operations. We may terminate a contract where a supplier is in breach of its obligations in respect to the Modern Slavery provisions, and/or require a contractor to remove any subcontractor or staff member suspected or known to have committed a Modern Slavery offence from the performance of the services
- Work strategically and proactively with suppliers to identify risks across supply chains, particularly about contractor staff welfare, access to fair wages, and
- We continually review and update our due diligence in procurement documentation, where identified as necessary.
- Mandatory training on modern slavery for the procurement team, and continuous learning on best practices processes to build into our tenders and contracts to combat modern slavery in our supply chain.

Steps taken since the last statement:

- We expanded the integration of Modern Slavery due diligence criteria across all tender documentation, with enhanced scrutiny applied to sectors identified as high risk.
- Our tender documentation and evaluation processes have been further refined to require comprehensive evidence of suppliers' proactive measures against modern slavery. Supplier responses and/or strategies are routinely scrutinised within tender award reports reviewed by the Procurement Board.
- We are working with our stakeholders, suppliers and contractors to strengthen our collaboration to collectively work on eradicating modern slavery from our supply chain.

Areas of focus for 2025 - 2026

Looking ahead, we are committed to continuously improving our procurement practices to combat modern slavery. Our plans include:

- **Strategic Supplier Engagement:** Establishing deeper strategic partnerships with key suppliers and industry bodies, promoting transparency, ethical standards, and collaborative actions toward eradicating modern slavery.
- **Continuous Improvement of Practices:** Regular updates and refinements to procurement documentation, ensuring alignment with the latest legislative changes, statutory guidance (i.e. s49(1) Modern Slavery (October 2025), and Transparency in Supply Chains (March, July 2025), and recognised best practice frameworks.
- **Enhanced Internal Accountability:** Reinforcing internal accountability measures through clear performance indicators, periodic reporting, and regular reviews at procurement boards and the senior procurement team.
- **Risk Monitoring:** Explore data solutions that allow us to enable real-time monitoring and reporting on modern slavery risks across key procurement categories.

Procurement will remain proactive, innovative, and collaborative in the ongoing fight against modern slavery, prioritising integrity, accountability, and ethical procurement practices across our operations.

Good Work, Camden and the Inclusive Business Network

Good Work Camden is our employment support service. Through Good Work Camden, our Good Work Brokers and Job Hubs staff work with employers to encourage the London Living Wage and flexible work where possible:

- i. We check and register all candidates we support through training and into employment. Candidates are asked to provide identification, and the team verifies that they are eligible to work and/or have access to public funds. In terms of employer placements, we review those to ensure that the placements are appropriate and that the host organisations adhere to our requirements, primarily around Health and Safety.
- ii. The Inclusive Business Network (IBN) creates a community of practice enabling employers who encourage, promote, and share learnings around good work standards. Network members receive support to develop and showcase good work practice, whilst having access to a variety of tools/resources. They can also be signposted to other services, such as Good Work Camden Job Hubs. More broadly, the Network will enable businesses to form stronger connections with residents and other local businesses within the borough.
- iii. To help employers adapt their work practices to offer 'good work' jobs, the IBN focuses on four key strands, each with tangible actions for businesses to adopt:
 1. Making recruitment inclusive and accessible
 2. Ensuring roles are flexible around people's lives
 3. Supporting progression and development
 4. Providing people with enough job security and pay
- iv. In January 2024, an in-depth session on Modern Slavery was delivered for our Employment and Skills Network – 35 partners attended, and the slides were also circulated to the wider network
- v. In addition, the Human Trafficking Foundation delivered a briefing session on Modern Slavery for the Good Work Camden team, where all our Job Hub Advisers/Leads attended.

Safeguarding Activity

Modern-day Day Slavery remains an important safeguarding priority for the Council and our partners. While sixteen full safeguarding enquiries were completed between April 2024 and March 2025, this figure does not fully represent the level of concern or impact in the community. Modern-day Day Slavery is often hidden and complex, and Adult Social Care is not always the lead agency when exploitation is identified. Many people affected do not have care and support needs as defined under the Care Act 2014, meaning they may not meet the threshold for a statutory enquiry led by Adult Social Care.

In practice, first responders such as the Police, Border Force, outreach teams and voluntary sector organisations often identify victims at an early stage and make direct referrals into the National Referral Mechanism (NRM), enabling individuals to access safe accommodation and specialist support elsewhere. This means some adults at risk are protected and moved to safety before any contact is made with Adult Social Care. Others may receive proportionate safeguarding support through joint working,

information sharing or signposting to more appropriate agencies where this is the best way to meet their needs. As a result, while the number of formal Section 42 enquiries remains relatively low, the number of initial concerns raised and managed at the early stage is higher, ensuring that appropriate action is taken when needed.

When a concern about Modern Day Slavery does come to Adult Social Care, our Multi-Agency Safeguarding Hub (MASH) acts as the first point of contact for screening and decision-making. MASH brings together partners to share information swiftly and determine whether the concern meets the threshold for a statutory safeguarding enquiry under Section 42 of the Care Act 2014. In cases where exploitation is confirmed, referrals are also made to the Home Office through the NRM, providing individuals with specialist support and protection, which sometimes involves moving away from Camden to remain safe.

Alongside this, Camden has continued to strengthen its approach. We are an active participant in the LMSL Buddying Pilot, working alongside the City of London to develop and test ways to improve local practice and shape a dedicated Modern Slavery Strategy and Action Plan. This work supports better coordination across Adult Social Care, Community Safety, Housing and other frontline teams.

Awareness raising and building confidence among staff and partners remains central to this effort. Camden's safeguarding training consistently highlights Modern Day Slavery as a form of abuse that professionals must remain vigilant for, including its links with mate crime, cuckooing and county lines exploitation. Over the past year, tailored sessions have been delivered to teams working with some of the borough's most vulnerable residents, including staff based in contingency hotels for asylum seekers and refugees, and Camden's Employment Support Service. In addition, safeguarding leads have delivered at least twenty-five multi-agency safeguarding sessions in the last twelve months, helping staff recognise signs of exploitation and respond safely, which includes Modern Day Slavery. This is supported by Camden's safeguarding e-learning module, which is regularly reviewed and updated by the Safeguarding Adults Leads in collaboration with the Human Trafficking Foundation to ensure it reflects current risks and good practice.

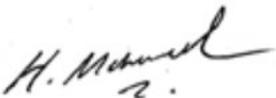
The Camden Safeguarding Adults Partnership Board (SAPB) continues to provide strong strategic oversight. The SAPB brings together local partners, including the NHS, Police, voluntary sector organisations and the Council, to ensure that safeguarding arrangements remain robust and that emerging issues, such as Modern Day Slavery, are addressed as shared priorities. Through learning reviews, data analysis, and joint training, the SAPB helps strengthen practice and supports professionals to protect those most at risk. Camden's Safeguarding Leads also continue to play an active role in regional human trafficking networks and learning forums, helping to develop local knowledge and strengthen our response.

Each case of modern-day Day Slavery represents an individual who may be facing significant harm. Our priority is to identify concerns as early as possible, take swift and proportionate action, and work closely with partners to prevent exploitation wherever possible. We remain committed to developing local intelligence, promoting prevention and disruption activity, and maintaining strong partnerships to tackle Modern Day Slavery across Camden.

Approval for this statement

This statement was approved by the Council's Interim Executive Director for Corporate Services, under delegated authority from the Cabinet.

Name: Hanad Mohamed



Signature:

Date: 28 October 2025

