

Royal Borough of Greenwich

Modern Slavery and Human Trafficking Statement 2025/26

I Introduction

- 1.1 This statement sets out the steps that the Royal Borough of Greenwich is taking to prevent modern slavery in its supply chains and through its own business. This Statement relates to the financial year 1st April 2025 to 31st March 2026 and is pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) which requires “commercial organisations” to disclose the steps they have taken to ensure human trafficking and slavery does not occur within them or their supply chains. The Royal Borough of Greenwich also acknowledges its duty, as set out in Section 52 of the Modern Slavery Act 2015, to notify the Secretary of State of any individual encountered in England and Wales who it believes is a suspected victim of slavery or human trafficking.
- 1.2 The Royal Borough of Greenwich understands the risks that all forms of modern slavery and human trafficking pose to our residents and communities. Royal Greenwich has a zero-tolerance approach to all forms of modern slavery and is committed to using all measures it can to prevent and disrupt it, including through its role as a commissioning and procurement activity.

2 What is Modern Slavery

- 2.1 The Modern Slavery Act 2015 (the Act) was published in March 2015 in response to growing concerns about the treatment of individuals and groups of people whose human rights are being abused through trafficking, enforced labour and servitude.

The term ‘Modern Slavery’ captures a range of types of exploitation, many of which occur together. These include but are not limited to:

- Sexual exploitation
- Domestic servitude
- Forced labour
- Criminal exploitation
- Other forms of exploitation include organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption.

- 2.2 Section 52 of the Act imposes a duty on public authorities to notify the Secretary of State of suspected victims of slavery or human trafficking.

Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the United Kingdom and have a global turnover above £36 million, to publish a slavery and human trafficking statement each financial year.

- 2.3 Royal Greenwich's commitment to the elimination of modern slavery is set out in its approach to procurement and commissioning activity for goods, works and services. Royal Greenwich also recognises that, to stamp out all forms of modern slavery, staff need to be trained and made aware of the signs that may indicate that criminal activity is taking place.

3 Our Policies and Standards

- 3.1 Royal Greenwich, both as an employer and through its provision of services through external organisations, has in place a number of procedures which contribute to the elimination of modern slavery and human trafficking.
- 3.2 *The Council's Organisation and Management responsibilities:* The Council's departmental structure and management team, including how services are organised and areas of responsibility can be found at [here](#).
- 3.3 *Recruitment and Remuneration:* Royal Greenwich has robust recruitment processes which are compliant with UK legislation, including pre-employment checks, referencing and Disclosure and Barring Service (DBS) checks, as appropriate. This includes full or part time employees, agency employees and contractors/ consultants. The Royal Borough of Greenwich became a London Living Wage employer in 2015.
- 3.4 *Employee and Councillor Codes of Conduct:* These Codes of Conduct make it clear both to employees and Councillors the behaviour and actions expected of them when representing the organisation. The Council expects the highest standards of conduct and ethical behaviour in all aspects of its activities and is committed to investigating/reporting any breaches. The Council's Constitution can be viewed in full [here](#).
- 3.5 *Whistleblowing procedure:* Royal Greenwich's Whistleblowing Procedure enables all staff to report confidentiality any concerns, including those relating to the abuse of people's human rights. This procedure is designed to make it easy for staff to make disclosures, without fear of retaliation. Additionally, any member of staff can raise concerns through their manager, director or other designated officers.

- 3.6 *Safeguarding*: Royal Greenwich has in place robust procedures to safeguard the welfare of vulnerable adults and children, working within multi-agency partnerships. Royal Greenwich's information on the protection of vulnerable adults can be viewed [here](#). The Council's information on family support and safeguarding children can be found [here](#).
- 3.7 *Training and Awareness*: there is bespoke training on Modern Slavery and Human Trafficking available to staff. In addition to this Royal Greenwich will work with Procurement to provide and deliver comprehensive awareness training programs to educate, contractors, and suppliers about modern slavery, its indicators, and reporting mechanisms. These sessions may be provided online or a signpost to best practice training from a specialist provider such as the Government Commercial College.
- 3.8 Royal Greenwich understands that those who have been abused and trafficked may not feel able to disclose their situation and understands the importance of raising awareness of signs of modern slavery across all areas of service delivery.
- 3.9 Royal Greenwich will proactively raise awareness of modern slavery risks and prevention strategies through internal and external communication channels.
- 3.10 Royal Greenwich will foster a culture of vigilance and reporting by providing guidance and support to individuals who encounter potential instances of modern slavery.

4 Due Diligence and Procurement, Commissioning and Supply Chain

- 4.1 The Royal Borough of Greenwich spends in excess of £400m per year on external goods, works and services and these are procured from a wide variety of local, national and international organisations, businesses and voluntary sector organisations. Each supplier, in turn, may have its own supply chain. The Council's approach to procurement and commissioning requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, subcontractors and other participants in their supply chain where their annual turnover exceeds £36 million. For organisations with a turnover below this sum, suppliers will be asked to confirm their acceptance of this Modern Slavery and Human Trafficking Statement.

- 4.2 Additionally, as part of our procurement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 4.3 RBG recognise that preventing modern slavery requires proactive measures and will perform due diligence to enable better judgement on transactions and the integrity of our supply chain. Exploitation, fraud and avoidance are easier to hide below the surface of a supply chain when effective due diligence is not performed by all parties, therefore checks done purely in relation to your immediate suppliers and customers may not be sufficient.
- 4.4 Testing and analysing the credibility, legitimacy, legal and tax compliance of our suppliers and their supply chain too. It is also important to consider the credibility of the supply, payment arrangements and other surrounding circumstances.
- 4.5 Using supply chain due diligence principles of check, act and review will help us apply effective risk management and robust due diligence to assure the integrity of our supply chains, minimising our exposure to risks:-

Check

Know our own risk – legal, financial, tax and social obligations, and those of our suppliers. RBG can check for risks by performing supplier and supply chain risk assessments to understand what the risks are and decide how to mitigate them.

Act

If risks are identified do not ignore them, act to mitigate or remove the risk completely by:

- acting on our risk assessment by setting up effective systems and processes for due diligence for the future
- knowing your suppliers – do not assume tax compliance, be vigilant for previous business failures or possible criminal intent. Check the credibility of directors and verify signatories of contract documents are accountable officers.
- knowing our supplier's workforce – understand what the relationship is between the workers and the provider of the labour and who are the sub-contractors.

Review

Effective due diligence needs continuous monitoring and review which includes:

- due diligence procedures – these should be risk-based, relevant, reasonable, proportionate and most importantly, ongoing and discussed during contract management and performance reviews.

4.6 The Council's Standard Selection Questionnaire is used to assess whether an organisation satisfies minimum levels of economic and financial standing and technical and professional capability. The Standard Selection Questionnaire includes questions on safeguarding and Modern Slavery and can be obtained from the Procurement Team.

These questions will be reviewed annually and amended as necessary to ensure they are pertinent and effective.

4.7 Royal Greenwich expects the following standards to be met through its service delivery and contractual arrangements:

- Through our procurement procedures, all possible steps are taken to make potential contractors aware that slavery and human trafficking should not be present in our supply chains;
- That reporting mechanisms are in place through the supply chain to enable reports of suspected criminal activity to be recorded and investigated appropriately;
- Ethical business and operational practices are promoted across service delivery; and
- Every individual's right to live free from abuse and inhumane treatment is supported.

Our approach includes:

- Developing a central register of all Council contracts;
- Implementing a new approach to contract management where there will be an increased focus on proactive risk management and following up concerns
- A new contract management system will be implemented to allow logging of actions and follow up actions with dates and reminders to ensure an audit log is created
- Requiring potential suppliers to provide information regarding their financial stability and compliance with good practice in employment;

- Disqualification, at the tendering stage, for those potential contractors who fail to meet the terms of a contract;
- Invoking sanctions against contractors who fail to comply with the terms of a contract and who violate Greenwich's expectations; and
- The future inclusion of the following statement in all invitation to tender for business with the Council:

"The Royal Borough of Greenwich is committed to ensuring that supply chains associated with suppliers with whom it contracts are free from modern slavery and human trafficking. The Council requires all contractors with whom it does business to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance."

4.8 Royal Greenwich is undertaking a revision of its procurement procedures and guidance and this will include:

- The requirement for managers who commission and procure services, goods and works to be conversant in ensuring, both through the tendering process and contract monitoring, that potential areas of risk of modern slavery are identified and that appropriate actions are taken;
- Incorporating the requirement for contractors to fully comply with the Modern Slavery Act 2015, wherever it applies, with disqualification in place at the tendering stage and sanctions in place for non-compliance, including termination of contract if concerns are raised and not resolved sufficiently during the contract term;
- Requiring contractors to adopt a whistle-blowing policy, enabling their staff to report suspected examples of modern slavery. This should include requiring contractors to enable their staff to be aware of the signs associated with modern slavery;
- Awareness and monitoring of particular products or geographic areas that pose high risk of modern slavery and human trafficking and taking account of this in the assessment of potential suppliers;
- Providing advice to suppliers and requiring them to implement action plans, where any employment practices are found to be sub-standard; and
- Developing communication with monitoring bodies which screen practices in large supplier organisation and their supply chains, to provide additional intelligence to support risk assessment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Royal Borough of modern slavery and human trafficking statement for the financial year ending 31st March 2026.