

Birmingham City Council:

Modern Slavery Transparency Statement

April 2022 to March 2023

Introduction

Birmingham City Council (the “Council”) as part of Local Government and as an employer, commissioner, and contractor of other bodies, recognises that it has a responsibility to take a robust approach to modern slavery.

Modern slavery is very much present in Birmingham today, and West Midlands Police continues to record a year-on-year increase in the number of reported cases of trafficking and exploitation. This is in line with a global and national increase in modern slavery reporting, indicating both an endemic problem, but also an improving understanding of modern slavery and the variety of forms it can take. The Council recognises that this is a highly complex issue, and as with any form of violence in our communities, other vulnerabilities can exacerbate the likelihood of modern slavery, including homelessness, poverty and austerity, immigration policy, the availability of support structures, and the intersectionality with structural racism, gender inequality, discrimination, LGBTQ+, and so on.

The Council acknowledges that as a result, there will be many ways in which the issue of modern slavery affects our diverse community. The Council is committed to seeking to reduce the risk and harm of modern slavery as a local authority, and one of the ways in which we do so is by looking closely at our supply chains and procurement practices, and reporting on this work in our annual Transparency Statement.

This 2022-23 Modern Slavery Transparency Statement operates within the scope of the previous [Transparency Statements](#), our [Pledge to becoming a Slavery Free Community](#), and the Council’s [Declaration of Intent to Tackle Modern Slavery and Human Trafficking](#)

This Statement also demonstrates the Council’s commitment to the Co-operative Party’s [Charter](#) Against Modern slavery, of which it became a proud signatory in 2021, featuring in the Co-Operative Councils Innovation Network Case Study [pack](#) for 2021 and on their website as a national [article](#) featuring Councillor John Cotton, our Cabinet Member for Social Inclusion, Community Safety and Equalities.

This statement reports back on the initiatives the Council has taken in 2021-22 to proactively reduce the likelihood of exploitation, trafficking and modern slavery from our supply chains. It also sets out the future proposed activities for the 2022-23 financial year ahead, to ensure the Council is working to reduce any risk of modern slavery in its supply chains.

We are very proud of the work that has taken place over the past year across our many teams and directorates, and the steps that the Council has taken to mainstream modern slavery across procurement, strategy, partnerships, and operations. We will look to continue this work, and proactively strive to develop and demonstrate best practice across these areas alongside our valued partners.

Our progress in 2021-22

Over the past 12 months we have carried out significant levels of activity which have strengthened our approach to modern slavery, a number of which were detailed as commitments in our 2021-2022 transparency statement. Many of these activities will continue to be undertaken to ensure that the Council is compliant with the Modern Slavery Act 2015 and actively works to develop best practice.

1. Organisation structure and governance

The Council has continued to publish key information about the organisational structure and workings of its senior leadership team on its [website](#) for transparency.

Throughout 2021-22, the Council continued to work in partnership with a wide range of local and national agencies to prevent abuse, and to detect and report occurrences and support survivors. We will commit to continue to build on the relationships with West Midlands Police, including continued representation at key partnership forums. These forums included:

- Birmingham Modern Slavery Operational Group (chaired by West Midlands Police)
- The Modern Slavery and Human Trafficking Strategic Board (chaired by West Midlands Police)
- The Criminal Exploitation and Missing Board (chaired by the Violence Reduction Unit)
- The Contextual Safeguarding Strategic Board and Implementation Subgroup
- The West Midlands Anti-Slavery Network and related subgroups
- The Birmingham City Council Community Safety Operational Group and related Local Partnership Delivery Groups
- The Birmingham Community Safety Partnership
- The Victims and Vulnerability Theme Group under the Community Safety Partnership
- The National Network Coordinators Forum, chaired by Human Trafficking Foundation
- The Local Government Association
- The West Midlands Local Authority Modern Slavery Leads Working Group
- The West Midlands Local Authority Leads and Subcontractors Working Group

2. Policies in relation to modern slavery

The Council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following broad policy areas are considered to be key in meeting the requirements of the Modern Slavery Act and preventing slavery and human trafficking in our services and operation:

- Council Procurement Strategy 2021+
- Safeguarding
- Whistleblowing policy
- Officer and Members Codes of Conduct
- Employee Code of Conduct
- Recruitment
- Remuneration and pay
- Agency workers

In a further development for 2021-22, the Council included Modern Slavery within its revised [Birmingham Business Charter for Social Responsibility](#). The Charter is a set of guiding themes which the Council adheres to and invites all organisations to adopt as a mechanism for managing how they deliver social value.

It is a compulsory requirement of Birmingham City Council that all contractors including grant recipients must become accredited to the Charter, however any organisation can become Charter accredited voluntarily. Often organisations become accredited to the Charter to help them manage their CSR (Corporate Social Responsibility) activity. The new modern slavery elements of the Charter are outlined below in Section 3: 'Suppliers and Partners'.

3. Suppliers and partners

i. Ongoing Procurement Activities

As outlined in the 2021-22 Transparency Statement, the Council committed to the following actions related to suppliers and partners which it has been carrying out over the past year:

- Requiring contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
- Challenging any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- Highlighting to suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one, as covered in our existing [Birmingham Business Charter for Social Responsibility](#) Good Employer Theme.
- Publicising our [whistle-blowing system](#) for staff to blow the whistle on any suspected examples of modern slavery. The Council's Whistleblowing Procedure makes it easy for employees, customers and other business partners to report any concerns related to any direct activities or the supply chains of the Council. It makes it easy for employees to make disclosures without fear of retaliation.
- Requiring our contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery. Our existing

[Birmingham Business Charter for Social Responsibility](#) Good Employer Theme further promotes this as good practice.

- Highlighting for our suppliers any risks identified concerning modern slavery and referring them to the relevant agencies to be addressed. At SQ stage suppliers are required to inform the Council if they are a “relevant commercial organisation” as defined by section 54 (“Transparency in supply chains etc.”) of the Modern Slavery Act 2015. If they are, then they must declare if they are compliant with the annual reporting requirements and provide the relevant link. [Our website](#) provides information about how to recognise and report Modern Slavery and if any risks were identified they would be addressed with the contractor.
- Referring for investigation any contractors identified as a cause for concern regarding modern slavery.

ii. Cooperative Party Charter Against Modern Slavery

In July 2021, Birmingham City Council signed the Co-operative Party’s [Charter Against Modern Slavery](#). This was one of the commitments in our 2020-21 Transparency Statement, and the council was pleased to see this completed in the past financial year.

The signing was widely publicised, including via [press release](#); a recorded public signing and [video release](#); in the Co-Operative Councils Innovation Network Case Study [pack](#) for 2021, and featuring on the Co-operative party website as a national [article](#) featuring Councillor John Cotton, our Cabinet Member for Social Inclusion, Community Safety and Equalities.

As Europe’s largest local authority, Birmingham was the biggest council to sign the Co-operative Party’s charter. The charter takes a 10-step approach, ensuring that local authorities work proactively to ensure there are no instances of modern slavery taking place within their supply chains.

As part of the preparation for the charter, the Council completed an assessment against each of the 10 points below and identified that it had already met all the conditions and standards required by the charter as part of existing good practice. The Charter therefore confirmed and publicised the Council’s commitment to good practice that had already been undertaken.

This practice included providing enhanced training for procurement staff; reviewing the internal modern slavery training; providing enhanced training to Modern Slavery Champions across the council; and encouraging all employees to report serious wrongdoing through a publicised whistleblowing hotline. The 10 steps from the Charter are covered within the scope of this Transparency statement, and for clarity are as follows:

- 1) Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply’s (CIPS) online course on Ethical Procurement and Supply.
- 2) Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.

- 3) Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- 4) Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
- 5) Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
- 6) Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
- 7) Review its contractual spending regularly to identify any potential issues with modern slavery.
- 8) Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
- 9) Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
- 10) Report publicly on the implementation of this policy annually.

iii. Birmingham Council Management Directorate Priorities for Commissioning and Procurement for 2022-26

During 2021-22, the Council explicitly drafted modern slavery commitments in its Council Management Directorate Priorities for Commissioning and Procurement for 2022-26. The Council sees this as positive and robust step, and the specifics of these commitments are highlighted in the sections below, looking at commitments for 2022-23.

4. Due diligence and risk assessment

As in previous years, the Council continues to review contractual spending regularly to identify any potential issues with modern slavery, and we also [publish our spend](#) under transparency rules.

Where appropriate, we now direct procurers to the comprehensive guidance given under the government's [Procurement Policy Note \(PPN\)](#), and implement as appropriate where modern slavery is considered to be a possible issue. This is also included as an action in our Corporate Procurement Plan for 2022-26.

In our previous Transparency Statement, we outlined how we planned to target our top 10 suppliers and ask them to complete the government's [Modern Slavery Assessment Tool](#). We have now included this as an action in our Council Management Directorate Priorities for Commissioning and Procurement for 2022-26 so will be looking at this in the forthcoming year ahead.

5. Effective action taken to address modern slavery

Additional to its commitments in relation to procurement and supply chain, the following key activities were identified as specific commitments in our 2021-22 Transparency Statement:

i. Development of Modern Slavery Champions approach

Over 2021 and 2022, the Council continued to embed a 'Champions' approach across the local authority and supported key external partners to adopt this approach. To date there are over 100 Modern Slavery Champions within the local authority and embedded across multiple directorates. We also supported the adaption of the Champions training alongside key partners, rolling this out with the West Midlands Violence Reduction Unit and SIFA Fireside Homeless Hub.

2021 saw a record number of NRM referrals submitted in Birmingham, with Birmingham City Council acting as a First Responder for 123 potential survivors of modern slavery, in comparison to the 113 referrals made by Birmingham City Council in 2020.

The monthly Council Modern Slavery update now goes out to hundreds of Champions and key stakeholders and partners across Birmingham and beyond, raising the profile of Birmingham's modern slavery work, and driving forward change and best practice.

ii. Survivor Care Pathways

In the 2021-22 Transparency Statement, the Council committed to reviewing its survivor care pathways both internally and in partnership with external organisations.

Over the past financial year, the Council has made positive strides in this area. One example is that in the over-18s space, we worked in partnership with SIFA Fireside and the West Midlands Anti-Slavery Network to develop an innovative modern slavery pathway for homeless individuals presenting at the over-25s homeless hub. This was accompanied by a new casework toolkit for frontline practitioners, and a tiered training package for all staff. This piece of work was launched at a national event in January 2022 which had over 140 attendees and received national press [coverage](#). A briefing paper was co-authored and published [here](#) explaining the work and linking to the pathway and toolkit.

Additionally, the Council has been pleased to see the development of its Preparation for Adulthood and Transitions Service, which supports 14-30 year olds with additional needs as they transition to adulthood, and those whose transition has been challenging resulting in homelessness, mental health, and involvement with the criminal justice system. This service supports young people around four key outcomes: employment, housing, health and relationships, and is at the beginning of an exciting journey implementing a new service offer. A new tiered offer provides a universal offer through to a dedicated service for those young people with acute needs. The new service will provide the following benefits:

- Citizens – it will improve timeliness of intervention and provide strengths based support to our young people.

- Colleagues – it will help clear the backlog of statutory assessments and will improve retention rates by providing promotion opportunities.
- Organisation – it reflects the prevention & early intervention philosophy within the Council and will contribute to the savings targets.
- Culture - it embraces the mantra that transition is everybody's business.

The Council also supported the Office of the Police and Crime Commissioner with developing a modern slavery scoping exercise for all seven local authority areas in the West Midlands, to understand the gaps and challenges in survivor care pathways at a regional level. This has resulted in a set of recommendations to improve local authority pathways, which will now be tested and trialled over the coming financial year

The Council have also begun to look at other key areas for survivor care pathways, including working in partnership with HMPSS to explore modern slavery pathways in prisons; and seeking to replicate the SIFA Fireside pathway work at our other hubs across Birmingham for Domestic Abuse, Youth Homelessness, and Offender Wellbeing.

Birmingham City Council has been nationally recognised for their innovative survivor care pathway work over 2021-22, including being asked by the LGA to input on their forthcoming national modern slavery guidance, presenting at the NHS Safeguarding Adults National Network (SANN), and being shortlisted for the Human Trafficking Foundation Anti-Slavery Day [Awards](#) for Outstanding Contribution to Statutory Services.

iii. Commitment to Survivor-Led Approaches

In the previous Transparency Statement, the Council committed to including survivor-led approaches in its modern slavery agenda and working towards an embedded commitment to ethical imagery.

The Council was pleased to co-host a Survivor LEAD student between September and December 2021 in partnership with the West Midlands Anti-Slavery Network. This was part of a new Survivor Alliance [initiative](#) to fill the gap for survivor leadership in the anti-slavery movement. The placement student supported a review of the Modern Slavery Champions training to ensure that it was appropriate and ethical for future delivery.

The Council also developed an internal Modern Slavery Communications Briefing which linked to a good practice image bank developed by the West Midlands Anti-Slavery Network and contained examples of appropriate language substitutes for modern slavery talking points. We identified that as a local authority we will continue to use language to reflect our understanding of modern slavery as a safeguarding and abuse issue which is rooted in structural harms. We will continue to ensure that our language around this represents the topic in a respectful, dignified, accurate and empowering way.

6. Training

In the previous Transparency Statement, the Council committed to developing and implement training related to Modern Slavery, including but not limited to:

- i. **Councillor Induction and Training:** We now routinely circulate guidance to councillors who are signed up to the Birmingham City Council modern slavery distribution list.
- ii. **All-Staff Training:** The Council has mandatory e-learning training for all employees on modern slavery enabling them to recognise and report on relevant concerns.
- iii. **Tailored Staff Training:** The Council has developed and delivered bespoke training to meet the needs of teams within the local authority that are most likely to encounter potential survivors. For the dedicated EMPOWERU Exploitation Hub within Birmingham Children's Trust, this has meant training on exploitation including dedicated inputs on child sexual and criminal exploitation; contextual safeguarding; screening tool good practice; language matters; safety planning for missing children; and contextual safeguarding assessments. Additionally, as part of the service redesign for the Preparation for Adulthood and Transitions Service, the Council is developing a training offer which will be rolled out incrementally, firstly to internal staff and then to partner agencies.
- iv. **Enhanced Procurement Staff Training:** As part of the self- assessment for the Cooperative Party Charter it was agreed that the procurement training sourced by the council met the criteria required by the charter.
- v. **Modern Slavery Champions:** The Council committed to designing and developing the third session of the Modern Slavery Champions training package, in line with the revised survivor care pathways. This was completed and delivered.

Next steps for 2022-23

In the spirit of continuous improvement, over the next 12 months we will continue to build on our above existing strands of our work, and under the same headings have identified the following key priorities for the year ahead.

1. Organisation structure and governance

The council will continue to publish key information about the organisational structure and workings of its senior leadership team on its [website](#) for transparency.

Throughout 2022-23, the Council will continue to work in partnership with a wide range of local and national agencies to prevent neglect and abuse, and to detect and report occurrences and support survivors, and will commit to continue to build on the relationships with West Midlands Police, including continued representation at key partnership forums.

The Council has included delivering of the commitments under this Transparency Statement in its Procurement Strategy 2021+ and in its Council Management Directorate Priorities for Commissioning and Procurement for 2022-26, and will report back on implementation in future Statements.

The council continues to commit to working widely across West Midlands with the other six local authorities in a collaborative manner, reporting back internally and to the MSHT Strategic Board.

2. Policies in relation to modern slavery

The Council will continue to review its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose.

3. Suppliers and partners

i. Commissioning and Procurement for 2022-26

As part of the Priorities for Commissioning and Procurement for 2022-26, the Council has made the following commitments for the financial year ahead:

- That by August 2022 the Council will ensure that contract clauses incorporate both reiteration of supplier statutory obligations under Modern Slavery Act and also rights of termination if offences committed (either on BCC contracts or as an organisation)
- That the Council will continue to monitor that commitments within the Cooperative Party Charter are being delivered and in the event that they are not, corrective plans will be put in place to address this
- That we will explore the potential opportunity for utilising the Cabinet Office Modern Slavery Assessment Tool in how the Council engages with Supply Chain and if this is viable, set out any costed recommendations on next steps identified as a result
- That the Council will look to develop and implement a comprehensive and coherent communications strategy within our supply chain to highlight and promote awareness on Modern Slavery and what they can do to help alleviate the chances of its existence through their business practices.

ii. Birmingham Business Charter for Social Responsibility

The Birmingham Business Charter is a set of guiding themes which the Council adheres to and invites all organisations to adopt as a mechanism for managing how they deliver social value.

It is a compulsory requirement of Birmingham City Council that all contractors including grant recipients must be accredited, but any organisation can also be accredited to the Charter

voluntarily. Often organisations become accredited to the Charter to help them manage their CSR (Corporate Social Responsibility) activity.

The Charter has been revised during 2021 and 2022. The Charter has always contained elements of good practice which relate to modern slavery and exploitation, particularly under the Good Employer Theme, as outlined above.

In the revised version, the Charter also makes specific mention of modern slavery, including as one of the categories of need that could be targeted in social value offer as part of an organisation's action plan. It also includes a requirement that all bidders and grant applicants are required to pay the real Living Wage to employees servicing Council Contracts, regardless of contract or grant value.

Additionally, one of the six themes under the Charter is 'Ethical Procurement'. It is a requirement that accredited organisations will commit to the highest ethical standards in their own operations and those within their supply chains, and modern slavery has now been specifically included within the points of reference for this theme, namely that accredited organisations are now required to:

- Ensure the well-being and protection of work forces in the supply chain, which must be supported by robust systems and procedures.
- Uphold the principles of the Universal Declaration of Human Rights and the Fundamental International Labour Organisation Conventions; including the use of child and forced labour.
- Comply fully with the Modern Slavery Act 2015 wherever it applies and consider publishing a voluntary Modern Slavery Transparency statement where signatories are under the turnover threshold for a compulsory statement.
- Ensure there is a whistle-blowing policy in place which enables staff to raise concerns around any suspected examples of modern slavery
- Consider the comprehensive guidance given under the government's Procurement Policy Note (PPN) and implement as appropriate where modern slavery is considered to be a possible issue.
- Adopt best practice when procuring goods and services, e.g., procure low energy products, buy Fairtrade and avoid the use of rainforest timber from unmanaged sources.
- Contractors and their supply chains within the construction industry should work collaboratively to provide responsible industry-wide solutions aimed at supporting and sustaining the construction industry for the benefit of the local economy and communities.
- Contractors and their supply chains should promote and encourage the recognition of the right of all construction workers to be employed under and to be protected by the appropriate national industry collective agreement applicable to the construction industry.

Furthermore, a specific measure within the Charter action plan, under the Ethical Procurement theme, is: "Percentage of procurement contracts that includes commitments to verify anti-slavery and other relevant requirements."

The Birmingham Business Charter will continue to be a key tool in the encouragement of ethical practice with our partners and suppliers and we will report on the implementation of the revised version in our next Transparency Statement.

4. Due diligence and risk assessment

The Council will continue to review its contractual spending regularly to identify any potential issues with modern slavery. We [publish our spend](#) under transparency rules and as outlined above, we will explore the potential opportunity for utilising the Cabinet Office Modern Slavery Assessment Tool.

Additionally, we will continue to direct procurers to the comprehensive guidance given under the government's [Procurement Policy Note \(PPN\)](#), and implement as appropriate where modern slavery is considered to be a possible issue.

5. Effective action taken against modern slavery

Additional to its commitments in relation to procurement and supply chain, the following key activities will continue to be undertaken to ensure that the Council is not only compliant with its responsibilities under the Modern Slavery Act 2015, but works towards a best practice approach.

i. Survivor Care Pathways

The Council has committed spend through its Community Safety Partnership to several key survivor care pathway initiatives for 2022-23, including:

- Recommissioning a Modern Slavery Coordinator within the Community Safety Team to oversee work strands that sit outside the statutory child safeguarding response to modern slavery
- Commissioning a pilot project at the St Basils Homelessness Hub for Young Adults in Birmingham and embedding a modern slavery specialist worker to embed survivor pathways.
- Funding the second year of a pilot project at the SIFA Fireside Homelessness Hub for over-25s in Birmingham, to continue to develop their modern slavery specialist work, and capacity build across the homelessness sector in Birmingham and develop specialists within the Council's Homelessness Housing team.

ii. Commitment to survivor-led approaches

The Council will continue to commit to including survivor-led approaches in its modern slavery work for 2022-23 including consulting with survivors and experts by experience where possible.

It will continue to embed a commitment to ethical imagery and language when discussing modern slavery, in line with the [My Story, My Dignity pledge](#) from Freedom United.

1. Training

The Council will continue to develop and implement training related to Modern Slavery, including:

i. All staff training

The Council will continue to review its mandatory modern slavery training for all new staff, and ensure processes are in place for modern slavery concerns coming into front-facing services.

ii. Tailored staff training

The Council will continue to develop and deliver bespoke training to meet the needs of teams within the local authority that are most likely to encounter potential survivors. This will include a dedicated package being developed and delivered for all new Housing Officers, and continued development of training specific to the EMPOWERU Exploitation Hub and the Preparation for Adulthood & Transitions Teams.


This statement has been approved by Council Leadership Team of Birmingham City Council on 4th July 2022.



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