

Modern Slavery Act 2015

Birmingham City Council Transparency Statement

This statement sets out Birmingham City Council's (BCC) actions to understand and address all potential modern slavery risks related to its business and the planned actions to ensure that there is no slavery or human trafficking in its own business and its supply chains.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking as an employer, commissioner and contractor of other bodies. The Council acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking. The relevant sections of the Modern Slavery Act 2015 are Sections 43, 52 and 54.

The Council is absolutely committed to preventing and taking action against identified slavery and human trafficking in its corporate activities, its supply chains and the wider community, and ensuring these are free from slavery and human trafficking. This Statement sets out the Council's existing policies and practices and specific actions in response to the Modern Slavery Act.

Organisational Structure and Responsibilities

This Statement covers the full activities of BCC:

- Modern Slavery Transparency Statement: Our Chief Executive and the leader of the Council are responsible for the Statement.
- Developing and updating the performance: Directors will manage the implementation and measure performance annually.
- Risk Assessments and Prevention: Directors;
 - Working with managers to identify high risk activities and actions related to slavery and human trafficking.
 - Providing appropriate information and training for staff;
 - Ensuring the Statement is embedded in the Council's Safeguarding Policies and Procedures and Strategic Plan.
- Procurement, Commissioning and Contracts: Designated Procurement / Commissioning/ Contract Managers;
 - When procuring goods or services, managers will ensure that the requirements refer to the Modern Slavery Statement and as part of tender evaluation and ongoing contract management, they consider the potential and likelihood of modern slavery and seek mitigations from the supplier through a clear understanding of their:
 - structure, business and supply chains;
 - policies in relation to slavery and human trafficking;

- due diligence processes in relation to slavery and human trafficking in its business and supply chains. Appropriate performance indicators and steps are taken to assess, monitor and manage any risks.
 - training available to all staff to support the identification of slavery and human trafficking;
 - A statement has been produced which is used in our Standard Selection Questionnaire which covers the requirements under the Modern Slavery Act 2015. The questions used by BCC are:
 - Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?
 - If you have answered yes to question 1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015? If Yes provide url, if No provide an explanation
 - Non selection if suppliers do not meet our pre-qualification requirements.
 - Remedies– all our contracts contain terms for default events and breaches of contract and these could be activated if modern slavery found in our supply chain.
- Early identification and notification: Managers and employees to notify any suspected modern slavery concerns encountered during the course of their work to their Directorate Safeguarding Lead. Each Directorate Safeguarding Lead will be responsible for ensuring all their staff receives the relevant mandatory training.
- Identifying and Reporting Concerns: All employees and Councillors are required to share safeguarding concerns to ensure that appropriate investigations and actions are taken.
- Co-operation/Investigations: Directorate Leads are responsible for ensuring appropriate policies and procedures are followed for any suspected issues, using the appropriate channels.

Scope

The following policies and procedures are considered key in meeting the requirements of the Modern Slavery Act:

- Constitution, Birmingham Business Charter for Social Responsibility (Ethical Procurement), Financial Procedures and Procurement Regulations - regularly reviewed and updated to take account of legislative requirements and best practice.
- Corporate Strategy - clearly states its aim to support and develop its people, growing their knowledge and skills, now and for the future.
- HR/Employment Policies and Procedures – using the ongoing Policy Review Programme with input from relevant stakeholders (e.g.HR, Employees, Unions, Senior Managers etc.).
- Recruitment - Processes and policies for vetting new employees and confirming their identities and qualifications and ensuring they are paid into an appropriate bank account.
- Agency Workers - are recruited from reputable employment agencies and always verifies the practices of any new agency it is using before accepting workers, from that agency.
- Pay – Job evaluation scheme used to ensure everyone is paid fairly and equitably.

- Employee Code of Conduct – to ensure everyone is aware of the actions and behaviours expected of them when they are representing the Council. Failure to adhere to these can lead to disciplinary action or in extreme cases dismissal. BCC strives to maintain the highest standards of employee conduct and ethical behaviour.
- Councillors Code of Conduct – All Councillors are expected to demonstrate the highest standards of conduct and behaviour in line with a formal Code of Conduct. Breaches are investigated by the Council.
- Councillors Declaration of Interests - all Councillors must record and declare personal and prejudicial interests.
- Whistleblowing – 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.
- Safeguarding Policies – it is the Council’s responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and adults with care and support needs and protect them from harm. The document includes information on modern slavery and human trafficking. The Council works within Multi Agency Partnerships and this protects people and is reviewed annually to ensure it is up to date.

Implementation and Assurance:

- Councillors Induction and Training – includes safeguarding and modern slavery and human trafficking.
- Employee Training – BCC requires all employees to complete training on modern slavery. BCC will utilise training approved by the seven West Midland Local Authorities in accordance with analysis carried out by The West Midlands Anti-Slavery Network. This training is tiered according to the employee’s job-role and the level of understanding they require.
- Suppliers, Contractors and Service Providers – all contractors must adhere to the highest standards of ethics and policies, procedures and training is in place to ensure they are aware of their responsibility with regard to safeguarding and modern slavery and human trafficking.
- Partnership Working – the Council works in partnership with a wide range of agencies to prevent neglect and abuse and to detect and report occurrences and support victims.
- Visibility of our Statement – BCC is fully committed to providing visibility to its BCC Statement and ensuring ‘Transparency in Supply Chains’. We are working in partnership with suppliers, service providers, colleagues and civil society to address Modern Slavery challenges and driving collaborative action and reducing risks and incidence of slavery.
- Assurance – BCC requires all employees, Contractors and supply chain personnel to have completed training on modern slavery as soon as possible.
 - A system to be developed for supply chain where we can confirm their adherence.
 - Review existing supply chains and arrange for them to complete adherence statements.
 - Key performance indicators will be used to monitor high risk areas and the reach of our training programmes by measuring the number of employees who have attended the training. We use qualitative feedback to continue to develop this training. In

addition, we review how we monitor the number of UK suppliers who we use who provide training to their employees.

This Statement has been approved by the Birmingham City Council Modern Slavery Partnership Group and will be reviewed and updated annually by that group or a delegated representative. It should be read in conjunction with the Modern Slavery Act 2015 ¹ and the National Referral Mechanism².

Additionally, this statement has been audited by the University of Derby, to establish good practice.

The performance against the Statement will be reviewed annually and reported to the Council's Cabinet each year for monitoring and assurance purposes.

For further information please see <http://www.birmingham.gov.uk>

The statement was approved by the Cabinet of Birmingham City Council on Tuesday 13th February 2018.

¹ <https://www.gov.uk/government/collections/modern-slavery>

² <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>