

# Birmingham City Council Modern Slavery Transparency Statement April 2021 to March 2022

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. As a local authority, the Council additionally recognises that it will soon be legally required by the government to regularly report on the steps taken to prevent modern slavery in its supply chains, and will be submitting both the 2020/21 Statement and the 2021/22 Statement to the government’s new Modern Slavery Statement Registry.

There is currently a year-on-year increase in the number of reported cases of trafficking both globally and within the UK, indicating an improved understanding of modern slavery and the variety of forms it takes. Trafficking, exploitation and modern slavery can be uncovered across vast supply chains as we become more aware of the changing industries and the varying forms that exploitation can take. The Council is fully committed to preventing and taking action against identified modern slavery in its corporate activities, its supply chains, and in the wider community. The Council also acknowledges its duty to notify the Secretary of State of suspected victims of modern slavery.

This Statement operates within the scope of the previous two [Transparency Statements](#), Birmingham’s [Pledge to becoming a Slavery Free Community](#), and the Council’s [Declaration of Intent](#). It reports back on the initiatives we have taken to proactively reduce the likelihood of exploitation, trafficking and modern slavery from our supply chains. It also sets out our future proposed activities, to ensure we are working to reduce any risk of modern slavery in our supply chains.

## Our progress in 2020/2021

Over the past 12 months we have carried out the following activities which have strengthened our approach to modern slavery, a number of which were detailed as commitments in our 2020/21 transparency statement. Many of these activities will continue to be undertaken to ensure that the Council is not only compliant with the Modern Slavery Act 2015, but actively works to develop and model best practice for local authorities.

### 1. Organisation structure and governance

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

More specific to modern slavery, the Council works in partnership with a wide range of local and national agencies including the Independent Anti-Slavery Commissioner and the West Midlands Anti-Slavery Network to prevent neglect and abuse, and to detect and report occurrences and support victims. In 2020, the Council committed to continuing to build on the strong relationship with West Midlands Police, including representation at key partnership forums, including but not limited to:

- Birmingham Modern Slavery Operational Group (chaired by West Midlands Police)
- Modern Slavery and Human Trafficking Strategic Board (chaired by the Violence Reduction Unit)
- The Criminal Exploitation and Missing Board
- The West Midlands Anti-Slavery Network and related subgroups
- Community Safety Operational Group and related Local Partnership Delivery Groups
- Birmingham Community Safety Partnership Victims and Vulnerability Theme Group
- National Network Coordinators Forum

## 2. Suppliers, due diligence, and risk assessment

In the 2020/21 Transparency Statement, the Council outlined that it would continue to undertake due diligence processes with regards modern slavery in supply chains. During the procurement process and as part of tender evaluation and ongoing contract management, managers consider the potential and likelihood of modern slavery and seek mitigations from suppliers through a clear understanding of the suppliers’:

- 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.

Additionally, the Council acknowledged that all contracts contain terms for default events and breaches of contract, and that these could be activated if modern slavery was found in our supply chains.

The Standard Selection Questionnaire covered the requirements for relevant commercial organisations as defined in Section 54 of the Modern Slavery Act 2015 and it was agreed that there would be non-selection if suppliers do not meet selection criteria.

The Council committed to review its contractual spending regularly to identify any potential issues with modern slavery, and we [published our spend](#) for 2020/21 under transparency rules.

In the 2020 Transparency Statement, the Council aimed to become accredited with the Cooperative Modern Slavery Charter. During 2020, the Council undertook an Initial Self-Assessment of Compliance against the Charter requirements, and was approved for ratification by the Co-Operative party.

## 3. Effective action taken to address modern slavery

The Council acknowledged in the 2020/21 Transparency Statement that it was fully aware of its designation as a First Responder under the National Referral Mechanism and its responsibility to identify potential victims and refer cases to the National Referral Mechanism. The following measures are several of the key actions that were taken to meet this designation, and address modern slavery.

**Implementation of Modern Slavery Champions:** The Council developed and rolled out a new voluntary skilled role within the Council, which key staff members across local authority teams were invited to take up. The Birmingham City Council Modern Slavery Champions initiative was designed in acknowledgment that not every staff member within a First Responder Organisation would be an appropriate First Responder.

**Support for the West Midlands Anti-Slavery Network SafePlace:** In 2020, the Council provided a three-bedroom house to the WMASN as a designated Place of Safety for male modern slavery victims recovered in the West Midlands. This provides up to 10 days of wraparound support where their needs are met, and provides additional support to West Midlands Police as a partner and First Responder.

**Website:** The [Council’s website](#) was updated with resources about modern slavery, including information on how to spot indicators of modern slavery, and information about the National Referral Mechanism. It included advice for individuals who were concerned about modern slavery, including phoning the Police on 999, using the Modern Slavery Helpline, and phoning the Salvation Army. It also included the details of Birmingham Children’s Services if the concern was about a child.

## 4. Training

In the 2020/21 Transparency Statement, the Council committed to continuing to undertake training activities related to Councillors Induction, and Employee Training. Outlined below are key training milestones which were achieved in 2020/21.

**Councillor Induction and Training:** This includes safeguarding and modern slavery awareness. We also routinely circulate the LGA's Councillors Guide to Modern Slavery, which is distributed out via the Modern Slavery Human Trafficking Strategic Board, chaired by the Violence Reduction Unit.

**Staff Training:** The Council has mandatory training for all employees on modern slavery enabling them to recognise and report on relevant concerns. Additionally, a document of key external training available to local authority staff has been compiled and circulated out via the Community Safety Team.

**Enhanced Procurement Staff Training:** Specific training has been provided to those employees with procurement and contract management functions to consider appropriate measures in projects. As part of the self-assessment against the Co-operative Modern Slavery Charter, the Co-operative Party agreed that the in-house training arranged for the Council was more comprehensive than initially required.

**Modern Slavery Champion Training:** As outlined above, the Champions' role was developed with the acknowledgement that not all Council employees could appropriately carry out First Responder duties, as required by the Modern Slavery Act 2015. To date, the Champions' training consists of two training packages: an initial half-day session on the responsibilities of the Local Authority under the Modern Slavery Act 2015, and a two-hour session on exploring the National Referral Mechanism with potential victims. In September 2020, our partners at the West Midlands Anti-Slavery Network delivered the first half-day training session to the MS Champions, which reached over 40 staff. This was then followed by the second session, which was delivered by the Modern Slavery Coordinator on multiple dates in December 2020, January 2021, and February 2021.

## Next steps for 2021/22

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

As above, the Council publishes key information about the organisational structure and workings of its senior leadership team on its [website](#) for transparency.

Throughout 2021, 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 victims, 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 also commits to working more widely across the 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 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:

- Safeguarding
- Whistleblowing policy
- Officer and Members Codes of Conduct
- Employee Code of Conduct
- Council Procurement Strategy 2021+
- Recruitment
- Remuneration and pay
- Agency workers
- [Birmingham Business Charter for Social Responsibility](#)

## 3. Suppliers and partners

As above, the Council has conducted a self-assessment against the Co-Operative Party's Modern Slavery Charter. Following this self-assessment, the Council will continue to:

- 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.
- Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- 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, as covered in our [Birmingham Business Charter for Social Responsibility Good Employer Theme](#).
- Publicise its 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. See our [website](#) for further information.
- Require its contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery. Our [Birmingham Business Charter for Social Responsibility Good Employer Theme](#) further promotes this as good practice.
- Highlight for its suppliers any risks identified concerning modern slavery and refer 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.
- 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.

## 4. Due diligence and risk assessment

The Council has committed to review its contractual spending regularly to identify any potential issues with modern slavery. We [publish our spend](#) under transparency rules and in 20/21 we plan to target our 10 top suppliers by spend to ask them to complete the [Modern Slavery Assessment Tool](#).

Additionally, we will 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 to address 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 looks to model best practice for local authorities.

**Further development of BCC Modern Slavery Champions:** The Council will continue to embed this approach across the local authority and support external partners such as the Violence Reduction Unit to adopt this approach. The effectiveness of this role will be measured through NRM referral data and staff feedback.

**Victim Care Pathways:** The Council recognises that without effective pathways to exit exploitation and receive support, it is extremely challenging for victims to make themselves known to the local authority and partners, and exit exploitation. It also recognises that it has a responsibility to respond to indicators of modern slavery, and safeguard effectively where a potential victim is identified. The Council will commit to reviewing its victim care pathways, both internally and in partnership with external organisations, to ensure that these are robust and effective, and that they both ensure effective safeguarding of individuals, and are subject to regular monitoring and evaluation.

**Commitment to survivor-led approaches:** The Council will look to include survivor-led approaches in its modern slavery work for 2021/22 and ensure that it works towards a commitment to ethical imagery, considering the [My Story, My Dignity pledge](#) from Freedom United.

## 6. Training

The Council will continue to develop and implement training related to Modern Slavery, including but not limited to:

**Councillor Induction and Training:** This includes safeguarding and modern slavery awareness. We also routinely circulate the LGA's Councillors Guide to Modern Slavery, which is distributed out via the Modern Slavery Human Trafficking Strategic Board, chaired by the Violence Reduction Unit.

**All-Staff Training:** The Council has mandatory training for all employees on modern slavery enabling them to recognise and report on relevant concerns. This will be reviewed during 2021/22 to ensure that the mandatory training remains fit for purpose.


**Tailored Staff Training:** The Council will develop and deliver bespoke training to meet the needs of teams within the local authority that are most likely to encounter potential victims.

**Enhanced Procurement Staff Training:** We recognise that ongoing training will be required for our procurement staff and commit to regularly reviewing such training.

**Modern Slavery Champions:** The Council will design and develop the third session of the Modern Slavery Champions training package, which will be designed in line with the reviewed victim care pathways process within the Local Authority.

This statement was approved by the Council Leadership Team of Birmingham City Council on 9<sup>th</sup> August 2021.

**Deborah Cadman**  
**Chief Executive, Birmingham City Council**

Signed: 

**Date: 24<sup>th</sup> August 2021**

**Councillor Ian Ward**  
**Leader of the Council**

Signed: 

**Date: 25<sup>th</sup> August 2021**

**Councillor John Cotton**  
**Cabinet Member – Social Inclusion, Community Safety and Equalities**

Signed: 

**Date: 24<sup>th</sup> August 2021**

**Rob James**  
**Managing Director – City Operations**

Signed: 

**Date: 25 August 2021**