



Sandwell Council Modern Slavery Statement

2021 - 2022



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Sandwell Council Transparency Statement

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Sandwell Council Modern Slavery Transparency Statement 2021 - 2022

Sandwell Council is absolutely committed to preventing slavery and human trafficking in our activities and in ensuring that our supply chains are free from this too. The council is uniquely placed to be at the forefront of the fight against modern slavery and by voluntarily completing this Modern Slavery Transparency Statement is demonstrating awareness and ethical leadership.

This is the Council's fourth modern slavery statement and explains the steps taken in 2021-22 to identify, prevent and mitigate modern slavery in our operations and supply chains across the Borough of Sandwell in accordance with the Modern Slavery Act 2015.

This statement also sets out the council's actions to understand and prevent all potential modern slavery risks relating to council services. The steps outlined in the delivery plan will improve the council's commitment to preventing slavery and human trafficking going forward.

2021-22 has been a challenging year, there have been several identified risks including the impact of the pandemic, Brexit and increased migration flows from several different countries. These conditions provide a perfect storm for organised crime gangs and exploiters who use these opportunities to isolate, groom and abuse people who are already vulnerable, heightening their vulnerability to slavery, worsening discrimination and pushing modern slavery deeper underground.

Since May 2021, several key changes have helped move this work along including refreshing the Corporate Plan to reflect the needs of Sandwell's communities. This provides a compelling vision for taking the borough forward with modern slavery high on the council's agenda. The appointment of an interim Chief Executive in August 2021, a new Leader in November 2021, and a new permanent leadership team is also supporting tangible strides forward and greater stability.

Sandwell continues to build towards the ambition of a 'Slavery-Free Sandwell' through strengthening community resilience and raising awareness to enable better recognition and how to respond. Modern slavery and human trafficking are very much on the agenda with the council, statutory partners, voluntary sector organisations and communities coming together to tackle modern slavery across Sandwell and beyond.



Section 1: Progress

Progress during the last 12 months includes:

- ✓ Refreshing the corporate plan to ensure that modern slavery remained on the corporate agenda
- ✓ Developing improvement plans following an external review conducted to help ensure robust structures and systems are in place across the council
- ✓ Strengthening the council's modern slavery team who lead on and co-ordinate internal and external modern slavery concerns
- ✓ Reviewing modern slavery training and aligning to the Skills for Care Training Framework
- ✓ Embedding modern slavery training into all departments as well as partner agencies and the community
- ✓ Delivering modern slavery training to 2246 individuals
- ✓ Incorporating modern slavery into members development programmes
- ✓ Reviewing modern slavery victims' pathways to ensure these are effective and working
- ✓ Reviewing the council's role in relation to the statutory guidance to ensure compliance across all departments
- ✓ Developing modern slavery data sets at town level reflecting what modern slavery looks like in each of Sandwell's 6 towns enabling targeted preventive partnership actions
- ✓ Ongoing analysis of the modern slavery dashboard to identify risks and threats and enable a preventative, upstream approach to be developed
- ✓ Sharing best practice with other local areas on modern slavery through LGA modern slavery workshops
- ✓ Effective responses to modern slavery concerns, throughout this period, 164 incidents of modern slavery reported to the Slavery and Human Trafficking Operational Partnership (SHOP) which is coordinated by the local authority. 77 multi-agency visits undertaken, 97 safeguarding visits made and 47 locations where modern slavery was reported identified and disrupted through multi-agency interventions
- ✓ 260 potential victims were screened for modern slavery and were safeguarded, educated and sign posted where further support was needed



Section 2: Structure, Business and Supply Chains

Sandwell Council is a Local Authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners. Its management structure is shown on its website

“My vision for Sandwell is a Borough that is totally focussed on the needs of our residents, where everyone can fulfil their potential and be proud to live here”

Leader of Sandwell Council - Cllr Kerrie Carmichael

There are some key strategies and plans that pave the way to respond to modern slavery in Sandwell, these include;

- **The Corporate Plan** sets out what the council will do to deliver Vision 2030 and Sandwell’s 10 ambitions over the next five years, underpinned by three values - trust, unity and progress.
- **The Community Safety Strategy 2022 – 2026** reinforces that modern slavery remains a priority for the local authority and the wider community safety partnership.
- **The Prevention of Violence and Exploitation Strategy and Plan** – preventing modern slavery is a priority for this board
- **The Modern Slavery Delivery Plan** forms part of this vision highlighting the importance of raising awareness of modern slavery across the local authority, partner agencies, businesses and communities.

The full version of Sandwell Councils vision can be found [here](#)



Procurement

Effective procurement, commercial decisions and contract management are important to the council to make sure that value for money is achieved and that commercial decisions focus on outcomes for residents.

An external review of the councils procurement processes was completed over the last 12 months and identified concerns in relation to poor specifications, insufficient timescales and decision makers not being fully aware of context and detail.

In addition, key contracts were found to have been impacted by:

- **A lack of clear contract management responsibility**
- **Poorly defined approaches to contract management**
- **A lack of appropriate focus on performance indicators, service quality or outcomes**

As a result of these findings, there is a comprehensive improvement plan in place that will;

- **Ensure that learning in relation to issues around commercial decisions, procurement and contract management are understood across the council**
- **Ensure corporate ownership and effective contract management of major contracts**
- **Ensure that major contracts have an effective focus on service quality and outcomes**
- **Conduct effective procurement for the new systems that are needed to support the delivery of the council's improvement plan**

The Transparency in Supply Chains Provision (TISC, s.54) of the Modern Slavery Act (MSA) requires commercial entities with an annual turnover of £36m or more to report annually on their actions to identify, prevent and mitigate modern slavery in their supply chains.

As a public body using public resources, Sandwell Council aims to set the highest possible standards of financial control and stewardship, to address exploitation effectively it is essential that a risk-based approach to procurement is in place.

The council's Procurement and Contract Procedure Rules give elected members and employees procedures to follow which ensure the council's expected standards are met in terms of managing public money and assets.

Procurement and Contract Procedure rules were updated in March 2021: The Council is committed to ensuring that its suppliers adhere to the highest standards of ethics. The Council's procurement and contract procedure rules require its contractors to provide confirmation of compliance with the act.

[\(Accessed Here\)](#)



Section 3: Policies in Relation to Slavery and Human Trafficking

The council reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act and preventing slavery and human trafficking across services and operations.

- **Safeguarding:** The council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults.
- **Confidential Reporting Code (Whistle Blowing Policy):** The council encourages all of its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's Whistle Blowing Policy and procedure is designed to make it easy to make disclosures without fear of retaliation.
- **Officers and Members Codes of Conduct:** The codes make it clear to employees and members the actions and behaviour expected of them when representing the council. The organisation strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing supply chains. All breaches are investigated.
- **Procurement and Contract Procedure Rules:** The council is committed to ensuring that its suppliers adhere to the highest standards of ethics. The Council's procurement and contract procedure rules require its contractors to provide confirmation of compliance with the act.
- **Recruitment:** The council's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications and they are paid directly into an appropriate, personal bank account.
- **Remuneration and Pay:** The council have a Pay Policy Statement which provides transparency with regard to the council's approach to setting the pay of its employees. It operates a job evaluation scheme to ensure that all employees are paid fairly and equitably. The Council has paid the National Living Wage or more to its employees since April 2016.
- **Agency Workers:** The council uses only specified, reputable employment agencies to source labour. It verifies the practises of any new agency it is using before accepting workers from that agency.



Section 4: Risk Assessment and Due Diligence

The council undertakes due diligence when considering new suppliers and regularly reviews existing suppliers. This is the responsibility of the individual contract managers.

A series of external reviews conducted between August 2021 and February 2022 have helped the council to develop improvement plans that will help ensure robust structures and systems are in place for strong governance, procurement and organisational culture which all contributes to helping maintain a slavery free Borough.

The organisation's due diligence and reviews include:

- ✓ The council has undertaken a risk assessment using its professional, legal, risk and procurement teams to determine the risk exposure
- ✓ Mapping and reviewing the supply chain broadly to assess particular product or geographical risks including the risk of modern slavery and human trafficking
- ✓ In the standard selection questionnaire, used to shortlist suppliers, organisations are asked whether they are required to produce a Modern Slavery Statement and provide a link to the statement on their website if they are.
- ✓ All tender processes require bidders to provide confirmation that they are compliant with the Act
- ✓ Conducting supplier assessments on a regular basis focusing on financial stability, including insurance, compliance with various employment policies and focusing on those most related to slavery and human trafficking where general risks are identified
- ✓ Contract monitoring and taking steps to improve poor supplier performance and practices, including providing advice to suppliers and requiring them to implement action plans, to demonstrate compliance with the contract, such as compliance with safer recruitment requirements
- ✓ Invoking sanctions against suppliers who fail to improve their performance in line with an action plan or who seriously violate the council's expectations of suppliers, including the termination of the business relationship
- ✓ Participating in collaborative initiatives focused on human rights in general and slavery and human trafficking in particular
- ✓ All invitations to tender for business with the council include the following statement:

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains. Sandwell Council will not support or deal with any business knowingly involved in slavery or human trafficking.

We use the Crown Commercial Services Standard Selection Questionnaire which includes a self-certification element to our tendering processors. These are used to assess suppliers' policies and practises on slavery and human trafficking.



Risk Assessment

The council undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. This is the responsibility of the individual contract managers. The organisation's due diligence and reviews include:

Following external assessments and a council wide improvement plan, an initial risk register has been populated with key risks and an assessment of their impact and severity. This will guide the development of action plans to provide further mitigation, where required.

A monthly report of the risk register is made to the Improvement Review Meeting and quarterly to the councils Cabinet.

Key Risks

The main risks identified in relation to help preventing modern slavery are:

Resources – for delivery of key components of the plan including the performance management framework, asset management system implementation and culture change programme. The financial resources required have been identified and will be put in place, subject to council's approval.

Organisational Culture – if the organisational culture doesn't change, this will limit the improvements that can be made. A theme within the Improvement Plan focuses on organisational culture. It includes plans for a comprehensive engagement programme with staff and members to define a collectively owned culture.

Communication – the councils communications approach is set out within the Improvement Plan and a detailed communication plan will be developed to ensure effective and timely communication with stakeholders.

Governance Policies and Procedures – Key corporate governance documents are being reviewed and once approved, will provide an important foundation for improvement.

Management Framework – to ensure that progress can be effectively monitored and improvement evidenced. Each theme includes an outline of how success will be evidenced and processes for monitoring and evaluating evidence of improvement will be developed within the governance arrangements.

Progress Monitoring and Risk Management - approach – if the assessment of progress and risk assessment contains optimism-bias this will prevent an accurate and realistic view of progress. Assurance mechanisms will help mitigate this risk.



Section 5: Training, Awareness and Capacity Building

As well as training key staff, the council will raise awareness of modern slavery issues by circulating information through intranet links and messages and inclusion of information in briefings of operational staff

- ✓ Procurement and contract management staff will complete a bespoke e-learning Ethical Test Module developed by the Chartered Institute of Procurement and Supply (CIPS)
- ✓ Targeted modern slavery awareness week as part of the safer 6 programme, includes training, social media campaigns and newsletters to raise awareness of modern slavery across the council and the Borough
- ✓ Recruitment and agency staff - The council ensures all HR professionals are suitably qualified in relation to recruitment procedures and all recruiting managers are supported by HR staff, with training offered in recruitment and selection
- ✓ Modern Slavery briefing sessions are completed with members to raise awareness
- ✓ Employee training – the council has mandatory training for all employees on modern slavery enabling them to recognise and report on relevant concerns
- ✓ Awareness raising within business communities associated with the local authority on how they can identify and respond to modern slavery concerns within their areas
- ✓ Almost 2246 individuals have been trained to recognise and respond to modern slavery
- ✓ Support to a range of other organisations to recognise and respond to modern slavery.
- ✓ Bespoke training on modern slavery has been delivered to third sector organisations to help them to recognise modern slavery in their supply chains

Approach to modern slavery training

Equipping communities and professionals to recognise and respond to modern slavery

Introducing modern slavery 1

Level 1: Modern slavery is now a key part of LA training to all staff, this is a quick overview of what modern slavery is and how it can be reported and is delivered to all staff regardless of their role

Recognising modern slavery 2

Level 2: Modern slavery awareness is aimed at any professional or member of the community to raise awareness of what modern slavery is, how to recognise indicators and how to respond

Responding to modern slavery 3

Level 3: Is aimed at those frontline workers more likely to encounter victims of modern slavery, training includes the role of the first responder and referring to the NRM

Equipping the modern slavery workforce 4

Level 4: training provides more specialist knowledge to work with victims of modern slavery, pursue those who perpetrate modern slavery and disrupt locations where modern slavery happens

1655
individuals
trained to
date

2673
individuals
trained to
date

Section 6: Next Steps

The next 12 months are really important, especially in the context of moving through the reset and recovery from Covid. The council's main areas of focus will be

- ✓ Review and refresh key corporate governance documents laying the foundations for robust decision-making audit and scrutiny and culture change
- ✓ Create a clear and strong role for scrutiny and audit and embed in practice
- ✓ Lessons learnt around procurement, commercial and contract issues will be documented
- ✓ Adherence to the Improvement Plan that sets out what the council must do to improve its governance arrangements
- ✓ Development of a modern slavery strategic needs assessment as part of the upcoming Serious Violence Duty
- ✓ Implement a best practice in training and embed a modern slavery training framework
- ✓ Develop an effective communication strategy to raise awareness of modern slavery internally within the local authority, with organisations in our supply chains and the wider community
- ✓ Ongoing revision and refinement of Modern Slavery Risk Register and associated policies and procedures
- ✓ Develop 'Slavery-Free Sandwell' through continuing to raise awareness within Sandwell Council, with businesses and supply chains and with partners and local communities
- ✓ Develop the internal response for modern slavery concerns with effective victim pathways
- ✓ Continue to lead on the modern slavery response through the Strategic Anti-Slavery Partnership and ensure supply chains remains an active feature
- ✓ Build on the operational response to modern slavery across the Borough through the work of the Slavery and Human Trafficking Operational Partnership (SHOP)
- ✓ Develop an updated data set to understand what modern slavery looks like in Sandwell and ensure effective responses are in place
- ✓ Develop a set of performance indicators
- ✓ Annual review of the modern slavery statement and publish on council website and on government website



Agreement

This transparency statement is reviewed and updated on an annual basis

This statement was agreed and approved by

Signed 

Councillor Kerrie Carmichael, Leader of the Council

Date: 11th October 2022

Signed: 

Kim Bromley-Derry,
Managing Director Commissioner

Date: 11th October 2022

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