



West Midlands
Combined Authority

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2022/23

1 INTRODUCTION

The following statement, in accordance with the Modern Slavery Act 2015, is made in relation to the financial year 2022/23 and outlines the actions we are taking to ensure that neither modern slavery nor human trafficking is taking place within our own business and supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As a public sector organisation, West Midlands Combined Authority recognises that we have a corporate responsibility to take a robust approach to slavery and human trafficking. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity and transparency in all our business dealings and to implementing and enforcing effective systems and controls to safeguard against any form of modern slavery taking place anywhere within our own business or supply chains.

West Midlands Combined Authority acknowledges its responsibility as a 'First Responder' under Section 52 of the Modern Slavery Act 2015, to report all instances, when there are reasonable grounds to believe a person may be a victim of modern slavery or human trafficking, to the Home Office.

2 STRUCTURE

2.1 West Midlands Region

The West Midlands Combined Authority region has a population of approximately 2.8 million, with population growth sitting at 13.2% since 2002. With a growing population and economy, the West Midlands is considered a 'hot spot' for modern slavery; there were almost 300 potential victims of modern slavery (of which two thirds were children) throughout the region in 2018.

2.2 WMCA Organisational Structure

West Midlands Combined Authority (WMCA) is a legal body with powers of decision making granted by parliament. The organisation consists of eighteen local authorities and three Local Authority Enterprises (LEPs) who are working collaboratively to devolve powers from Whitehall to the West Midlands and our locally elected politicians. Individual councils still deliver services and retain their identity but on the big decisions we have the resources to work together. WMCA have a number of key priorities: economic growth, skills, transport and housing alongside reforming public services and reducing the regions welfare bill. West Midlands Combined Authority acknowledges its responsibility as a first responder under Section 52 of the Modern Slavery Act 2015, to report all instances when they have reasonable grounds to believe a person may be a victim of modern slavery or human trafficking to the Secretary of State.

3 SUPPLY CHAIN

WMCA has a responsibility to prevent slavery and human trafficking within its supply chain and in any part of the organisation. From a customer perspective, WMCA makes it clear to suppliers what is expected of them through the tender process and mandatory supplier questionnaire.

Suppliers are required to confirm that no part of their business operations, including their own suppliers and subcontractors, contradicts this policy. As part of the procurement process, if a supplier meets the criteria of Section 54 in the Modern Slavery Act 2015, they are required to provide their up-to-date Modern Slavery Statement.

4 DUE DILIGENCE

WMCA has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

West Midlands Combined Authority undertakes due diligence on all suppliers; we have in place a central register of all our suppliers.

In line with our procurement policy thresholds, the CA conducts a Pre-Qualification process to evaluate potential suppliers and contractors, this is a mandatory questionnaire built into the WMCA Electronic Tendering System. The Pre-Qualification questionnaire includes a section on the Modern Slavery Act 2015.

WMCA procurement staff seek clarification on abnormally low tenders for amplification as to why this is the case. Procurement will reject the tender if the bid is low due to: a breach of the tenderer environmental, social or labour law or illegal State aid is being provided to the Tenderer.

Buyers are expected to be proactive and take any necessary and appropriate steps when procuring goods or services. This encompasses assessing any risks to modern slavery and human trafficking.

5 RISK ASSESSMENT

West Midlands Combined Authority suppliers are predominantly UK based; the UK is one of four major European economies that has a low risk of slave labour. WMCA overseas suppliers are mainly obtained from the EU; all suppliers must be compliant with legislation. Whilst the majority of our contracts are deemed low risk, WMCA recognises that we do conduct business in sectors with a traditionally higher risk of modern slavery, including the construction and clothing industries.

It is made clear to all WMCA staff that they play a vital role in preventing and combatting modern slavery and human trafficking. WMCA operates strict procurement processes and has taken steps to ensure that such practices do not occur in its business nor any organisation that supplies goods and/or services.

6 POLICIES AND PROCEDURES

The West Midlands Combined Authority reviews its policies and procedures on an ongoing basis to ensure they remain compliant and fit for purpose. We offer a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Modern Slavery Policy**

This policy states the WMCA's approach to modern slavery and human trafficking. It offers guidance to employees on what they should do if they suspect modern slavery is taking place.

- **Whistleblowing Policy**

WMCA thoroughly encourages all its employees, customers and other business partners to speak out if they are aware of, or suspect, any wrongdoing or misconduct within the organisation. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking. The Combined Authority is committed to creating a culture where individuals can disclose without fear of retaliation.

- **Safeguarding Policy**

WMCA recognises its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults. We have a comprehensive Safeguarding Policy which all employees are expected to read as part of their induction into the organisation.

- **Recruitment Policy**

The Combined Authority has a clear recruitment and selection procedure that is fair and transparent. We have in place strict procedures for vetting new employees, which ensures they are able to confirm their identities, qualifications and right to work in the UK.

- **Social Value Policy**

WMCA has an effective procurement approach that enables social value outcomes for communities locally and across the region. The set of objectives outlined in the WMCA Social Value Policy provide a means of embedding and sustaining social value outcomes through alignment and delivery of funding and capacity.

- **Domestic Abuse Policy**

The Combined Authority recognises that domestic abuse can happen to anyone, the policy addresses domestic abuse including forced marriage and 'honour' based violence.

- **Equality and Dignity at Work Policy**

WMCA is committed to ensuring that no employee is subject to less favourable treatment on the grounds of age, ethnicity, sex, pregnancy and maternity, disability, marriage and civil partnership, sexual orientation, gender reassignment, or belief.



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- **Job Evaluation Scheme**

WMCA operates a Job Evaluation Scheme to ensure all employees are paid fairly in line with their job roles. WMCA currently pays above the National Minimum Wage and National Living Wage for all its employees.

- **Agency Staff**

All WMCA agency workers are sourced from a reputable recruitment agency. This company is compliant with the Modern Slavery Act 2015 and produces an annual Modern Slavery and Human Trafficking Statement.

7 STAFF TRAINING

All WMCA employees are required to complete mandatory e-learning courses on Safeguarding Children and Safeguarding Adults as part of their induction into the organisation. This includes a section on modern slavery. Employees are also required to read the WMCA Safeguarding Policy, which informs how to identify and report suspected incidents, and follow the correct procedure as/when necessary.