



West Midlands
Combined Authority

MODERN SLAVERY POLICY

1 POLICY STATEMENT

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.

2 PRINCIPLES

- WMCA will release a Modern Slavery Statement each financial year, in compliance with Section 54 of the Modern Slavery Act 2015. This statement will be made publicly available on our website and intranet. Regular reviews of the policy will be conducted to ensure it adheres to regulatory and legislative requirements.
- WMCA 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.
- Safeguarding will continue to remain a mandatory e-learning course for all new starters within the business alongside the compulsory reading of this policy, with additional training being provided as necessary. Any amendments/updates added to this policy will be communicated to all staff.
- WMCA will provide a working environment that 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 CA will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. An employee will not suffer any detrimental treatment as a result of reporting, in good faith, a suspicion that modern slavery is taking place in any part of the organisation or our supply chain.

3 SCOPE

The prevention, detection and reporting of modern slavery in any part of WMCA business or supply chain, whether in the UK or abroad, is the responsibility of all who work for WMCA.

This policy applies to all persons working for WMCA in any capacity, including employees at all levels, directors, officers, agency staff, interns, contractors, consultants, volunteers and people on a formal secondment.

4 PROCEDURE

4.1 Indicators of trafficking

The following questions can help indicate if an individual is a victim of human trafficking:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

4.2 Procedure if someone is suspected of being trafficked/enslaved

Being a 'First Responder', WMCA has a Duty to Notify (DtN) the Home Office if anyone working within the CA identifies an individual with indicators that suggest they may be trafficked/enslaved. If someone suspects that this is occurring, they are to inform either their manager, HR, a Safeguarding Officer or by following the procedure outlined in the Whistleblowing policy.

5 RESPONSIBILITIES

5.1 Employee's Responsibilities

Preventing and reporting suspected Modern Slavery is the responsibility of all WMCA employees. Employees are expected to be proactive take any necessary and appropriate steps when procuring goods or services to ensure that modern slavery does not occur. This encompasses assessing any risks to modern slavery and human trafficking.

Employees are required to be aware of the signs of modern slavery and human trafficking and to be vigilant during their day-to-day job roles. Employees must assess the risk of modern slavery when awarding as well as when managing a supplier contract. This involves questioning whether a supplier is based in a high-risk geography (such as conflict-affected zones) or if the contract being awarded is of a high-risk sector (i.e. construction, hospitality and agriculture).

It is the employee's responsibility to complete the mandatory e-learning courses as part of their induction, this includes courses on Safeguarding Children and Safeguarding Adults which have sections on modern slavery. Employees are also responsible for familiarising themselves with the WMCA Safeguarding Policy, which outlines how to identify and report suspected incidents, and follow the correct procedure as/when necessary.

If you believe or suspect a breach of this policy has occurred, is occurring, or is at risk of taking place, you must report it by speaking to your line manager, the HR Department, a Safeguarding Officer or by following the procedures outlined in the Whistleblowing Policy. Any concerns should be raised as soon as possible, as long as it is safe to do so.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, this should be raised with their manager, HR, a Safeguarding Officer or by following the Whistleblowing Policy.

All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 Manager's Responsibilities

If a contract manager has any reason to believe that an individual within their supplier workforce is a victim of modern slavery then they must report to either their manager, HR, a Safeguarding Officer or by following the procedure outlined in the Whistleblowing policy.

Management at all levels are responsible for ensuring their direct reports understand and adhere to this policy.

Managers are responsible for seeking out further guidance from HR should they be unsure of any aspects of this policy or the corresponding Modern Slavery Statement.

5.3 Human Resources Team's responsibilities

The Human Resources team has a responsibility to make sure Business Partners are fully knowledgeable on this policy and are taking a proactive approach to ensure their delegates are also aware of the relevant policies and procedures.

Should any modern slavery legislation be updated, it is the responsibility of the HR department to ensure that all relevant policies and procedures are amended, if necessary, to make sure they are fit for purpose in order for the organisation to remain compliant.

HR are to deal with any employee/ manager queries surrounding this policy and relevant legislation accordingly.

If a member of the HR team is made aware of any slavery/ human trafficking suspicions, they are responsible for informing the Designated Safeguarding Lead, or a Nominated Deputy Lead in their absence.

5.4 Procurement Team's responsibilities

Our zero-tolerance approach to modern slavery must be communicated to all suppliers at the outset of our business relationship with them. It is the responsibility of the Procurement team to ensure that the WMCA external supply chain is compliant with the Modern Slavery Act 2015.

Through a self-questionnaire, suppliers are required to confirm their agreement and compliance with this policy. If the supplier meets the criteria for Section 54 for the Modern Slavery Act 2015, they must provide their current Modern Slavery Statement.

At the Procurement team's discretion, appropriate audits of any supplier will be implemented should a potential risk of modern slavery be identified.

Relationships with suppliers may be terminated if they breach this policy, fail to show their commitment to the Modern Slavery Act 2015 and/or do not consent to appropriate audits taking place.

The Procurement team are responsible for considering modern slavery risks when making procurement decisions. WMCA procurement staff are to seek clarification on abnormally low tenders for amplification as to why this is the case. The tender is to be rejected 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.

5.5 Appointed Safeguarding Officers' responsibilities

It is the responsibility of the Safeguarding Officers to follow the 'First Responder' procedure in line with Section 52 of the Modern Slavery Act 2015, the 'Duty to Notify'. This includes referring the case to the NRM (National Referral Mechanism) or by submitting an 'MS1' form if an adult does not give consent to be referred to the NRM.

6 ASSOCIATED DOCUMENTS

- Modern Slavery Statement 2020/21
- Whistleblowing Policy
- Safeguarding Policy
- Grievance Policy
- Social Value Policy
- Dignity at Work Policy



7 USEFUL LINKS

Further information on Modern Slavery and Human Trafficking is available from the following websites:

<https://www.antislavery.org>

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

<https://www.modernslaveryhelpline.org/>

<http://www.antislaverycommissioner.co.uk/>

<https://www.westmidlandsantislavery.org/>

<https://www.stophetraffik.org/>

<https://www.bsab.org/>

8 MONITORING AND REVIEW

The Strategic Leadership Team will monitor the effectiveness of this policy as well as review its implementation. Considerations will be undertaken regularly to assess the suitability, adequacy and effectiveness of this policy. Any improvements identified will be made as soon as possible.

All WMCA staff, in any capacity, are responsible for the success of this policy and should ensure they use it to raise any concerns regarding modern slavery.

This policy does not form any part of an employee's contract of employment and we reserve the right to amend it at any given time.