



Sandwell Council Modern Slavery Statement

2023 - 2024



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Sandwell Council Transparency Statement

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Introduction

Sandwell Council actively engages with its suppliers and stakeholders to promote ethical practices and raise awareness of modern slavery risks. Through dialogue and collaboration, the council works towards creating a responsible and transparent supply chain. Furthermore, the council have conducted a thorough risk assessment in collaboration with its professional, legal, risk, and procurement teams to determine its risk exposure in relation to modern slavery and human trafficking. This assessment includes mapping and reviewing the supply chain broadly to assess product or geographical risks, including the risk of modern slavery and human trafficking.

Sandwell Council recognises that training, awareness, and capacity building are crucial elements in effectively preventing and addressing modern slavery. The council have implemented comprehensive training programs for its key staff members to enhance their understanding of modern slavery risks and empower them to respond effectively. Additionally, the council actively raises awareness of modern slavery issues through various channels and mandates that all employees complete training on modern slavery.

Looking ahead, over the next 12 months, Sandwell Council will prioritise key areas to combat modern slavery and human trafficking. The council aims to enhance transparency through initiatives guided by the LGA modern slavery maturity matrix and foster collaborations and partnerships with statutory partners, voluntary organisations, and local communities. Efforts will also be focused on measuring the impact of actions, ensuring continuous improvement, implementing robust measures, engaging stakeholders, increasing modern slavery referrals, and implementing the modern slavery maturity matrix action plan.

In conclusion, Sandwell Council's ongoing dedication to combating slavery and human trafficking in its operations and supply chains is evident throughout this statement. By prioritising understanding, prevention, and mitigation of modern slavery risks, the council strives to create a society free from slavery and actively contributes to the wider eradication of modern slavery.



Our Commitment

Sandwell Council's strong commitment to combating slavery and human trafficking is reflected in the following measures:

- ✓ **Designated Modern Slavery Program Manager:** We have appointed a Modern Slavery Program Manager who oversees the council's efforts in combating modern slavery. This role ensures a coordinated and focused approach to addressing this issue.
- ✓ **Operational Leadership:** Our Community Safety Officer leads the operational approach to modern slavery, working closely with relevant stakeholders and agencies to identify, investigate, and respond to cases of modern slavery effectively.
- ✓ **Pledge to Become Slavery-Free:** We have pledged to become slavery-free, signifying our firm commitment to eliminating modern slavery in all its forms. This pledge encompasses our determination to eradicate slavery within our operations and supply chains.
- ✓ **Coordinated Response through SHOP:** Sandwell Council actively participates in the Slavery and Human Trafficking Operational Partnership (SHOP), which serves as a collaborative platform for coordinating the response to modern slavery throughout the borough.
- ✓ **Awareness and Training:** We prioritise raising awareness among staff members and the wider community about the signs of modern slavery and the appropriate actions to take.
- ✓ **Ethical Procurement:** Our Corporate Procurement Team undergoes training on modern slavery through the Chartered Institute of Procurement and Supplies (CIPS). This training ensures a thorough understanding of ethical procurement and supply practices to identify and mitigate modern slavery risks within the supply chains.
- ✓ **Partnership with Local Communities:** We actively collaborate with local communities, voluntary organisations, and statutory partners to create a united front against modern slavery.
- ✓ **Whistleblowing System:** We promote our whistleblowing system, encouraging staff to report any suspected instances of modern slavery. This system is publicised to ensure that potential cases are identified and addressed promptly.
- ✓ **Modern Slavery Maturity Matrix:** We commit to using the Local Government Association (LGA) maturity matrix to assess progress in various themes, including leadership, resources, capacity, identifying, referring, and supporting victims, disruption, prevention, and mitigating supply chain risk. The report will identify areas of strength and improvement, providing a solid foundation for the council to develop an action plan to address any gaps in modern slavery practices.



Section 1: Progress

This section highlights the significant progress made by Sandwell Council in its ongoing efforts to combat modern slavery. Through a comprehensive range of initiatives, the council have focused on enhancing governance processes, strengthening accountability, improving training frameworks, and fostering effective communication strategies. These proactive measures aim to raise awareness, prevent modern slavery, and respond effectively to any instances identified. By leading collaborative partnerships and leveraging data insights, the council is taking substantial strides towards creating a slavery-free Sandwell.

- ✓ **Review and Refresh Key Corporate Governance Documents:** The council have completed a review of key corporate governance documents, ensuring robust decision-making, audit, and scrutiny processes. This has fostered a culture of change, and an improvement plan is now in place.
- ✓ **Strengthen the Role of Scrutiny and Audit:** The council have established a clear and strong role for scrutiny and audit, successfully embedding it into practice to enhance accountability and transparency.
- ✓ **Document Lessons Learned in Procurement, Commercial, and Contract Issues:** The council have documented lessons learned in procurement, commercial, and contract issues. This effort aims to improve procurement processes and prevent modern slavery in supply chain.
- ✓ **Develop Modern Slavery Strategic Needs Assessment:** The council have developed a modern slavery strategic needs assessment as part of its commitment to the Serious Violence Duty. This assessment helps identify areas of focus and inform targeted actions.
- ✓ **Implement Best Practice in Training and Training Framework:** The council have implemented best practices in training and embedded a modern slavery training framework. This ensures that all staff are equipped to recognise and report relevant concerns. A total of 464 individuals have received training on modern slavery awareness.
- ✓ **Raise Awareness within Sandwell Council and Local Communities:** The council have continued its efforts to raise awareness of modern slavery within Sandwell Council, businesses, supply chains, partners, and local communities. These awareness-raising activities aim to foster a "Slavery-Free Sandwell."
- ✓ **Establish an Internal Response for Modern Slavery Concerns:** The council have developed an internal response system to address modern slavery concerns. This includes providing effective victim pathways and responding to 175 reports related to modern slavery during the year.
- ✓ **Lead the Modern Slavery Response through the Strategic Anti-Slavery Partnership:** The council continues to lead the modern slavery response through the Strategic Anti-Slavery Partnership. This collaborative effort engages supply chains and various stakeholders to address modern slavery effectively.
- ✓ **Strengthen Operational Response through SHOP (Slavery and Human Trafficking Operational Partnership):** The council have further strengthened 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 and Effective Responses:** The council have developed an updated data set to better understand the prevalence and nature of modern slavery in Sandwell. This data informs the development of effective responses and targeted interventions.



Section 2: Structure, Business and Supply Chains

This section highlights the structure, business operations, and supply chain practices of Sandwell Council. As a significant employer and provider of services to the community, the council is committed to upholding high standards and addressing modern slavery risks in its procurement processes. Through a comprehensive improvement plan, training initiatives, transparency measures, and supplier engagement, the council strives to create an ethical and responsible supply chain. This page also emphasises the council's commitment to eradicating modern slavery and its role in leading the fight against it within the Sandwell community and beyond.

- ✓ **Procurement and Supply Chains:** Sandwell Council commission and manage contracts across all departments, ensuring robust practices to address modern slavery risks in larger contracts. Sandwell Council are strengthening efforts to address modern slavery in contracts of smaller financial value and emphasise transparency, accountability, and ethical standards.
- ✓ **Improvement Plan:** Sandwell Council have implemented a comprehensive improvement plan to enhance our commercial decisions, procurement, and contract management. The plan aims to cultivate a deeper understanding of these processes, ensure effective management of major contracts, and prioritise service quality and outcomes.
- ✓ **Training and Compliance:** Our procurement officers have undergone specialised training on Transparency in Supply Chain provided by the Home Office. They are equipped to identify and prevent modern slavery risks within our supply chains. Our procurement and contract procedure rules require contractors to confirm their compliance with the Modern Slavery Act.
- ✓ **Transparency and Standards:** Sandwell Council mandate commercial entities with an annual turnover of £36 million or more to report on their actions to identify, prevent, and mitigate modern slavery in their supply chains. As a public body, Sandwell Council uphold high standards of financial control and stewardship. Our risk-based approach to procurement effectively addresses exploitation.
- ✓ **Supplier Engagement:** Sandwell Council actively engage with our suppliers to promote ethical practices and raise awareness of modern slavery risks. Through dialogue and collaboration, Sandwell Council work towards creating a responsible and transparent supply chain.
- ✓ **Commitment and Vision:** Our commitment to eradicating modern slavery within our supply chains is integral to our vision for a just and inclusive Sandwell. Sandwell Council recognise the legal and moral obligation to address modern slavery and strive to set a benchmark for responsible procurement. Sandwell Council aim to contribute to the wider eradication of modern slavery and lead the fight against it at the local and regional levels.



Section 3: Policies in Relation to Slavery and Human Trafficking

This section focuses on the importance of incorporating policies and procedures that address modern slavery within Sandwell Council's framework. Recognising the significance of ethical practices and the prevention of slavery and human trafficking, the council conducts regular reviews to ensure compliance with the Modern Slavery Act and the effectiveness of its policies. The following key policies and procedures play a crucial role in meeting these requirements.

- ✓ **Safeguarding:** Sandwell Council places a strong emphasis on the welfare of children and vulnerable adults. Through comprehensive safeguarding policies and procedures, the council actively works to prevent slavery and human trafficking within its services and operations, prioritising the protection of those at the highest risk.
- ✓ **Confidential Reporting Code (Whistleblowing Policy):** The council actively encourages employees, customers, and business partners to report any concerns related to its activities or supply chains. The confidential reporting code, also known as the whistleblowing policy, provides a mechanism for individuals to come forward and raise their concerns, contributing to a proactive approach in identifying and addressing potential instances of modern slavery.
- ✓ **Officers and Members Codes of Conduct:** Sandwell Council holds its employees and members to the highest standards of conduct and ethical behaviour. The council's codes of conduct set clear expectations for responsible behaviour in all operations, including the management of supply chains. By adhering to these codes, the council demonstrates its commitment to preventing modern slavery and upholding ethical practices..
- ✓ **Procurement and Contract Procedure Rules:** Effective procurement, commercial decisions, and contract management are integral to the council's commitment to delivering value for money and positive outcomes for residents. The procurement and contract procedure rules establish a robust framework for procurement processes and require contractors to confirm their compliance with the Modern Slavery Act. This ensures that the council's supply chains remain free from modern slavery risks.
- ✓ **Sandwell Audit Services:** Sandwell Council's internal audit service, provided by Sandwell Audit Services, plays a vital role in ensuring governance, risk management, and internal control across all areas of the council's operations.
- ✓ **Financial Regulations:** Sound financial management policies are essential for the efficient operation of a local authority. Sandwell Council have established comprehensive financial regulations and procedures that govern the authority's financial affairs. These regulations set out the financial responsibilities of council members, officers, and anyone acting on behalf of the council.



Section 4: Risk Assessment and Due Diligence

This section highlights the comprehensive risk assessment conducted by Sandwell Council in collaboration with its professional, legal, risk, and procurement teams to evaluate its exposure to modern slavery and human trafficking risks. The council also conducts a thorough mapping and review of its supply chain to assess potential risks related to products or geographical locations, including the risk of modern slavery and human trafficking.

- ✓ **Due Diligence:** Sandwell Council employ robust due diligence procedures when selecting and monitoring suppliers. This includes a comprehensive assessment of their policies, practices, and adherence to ethical standards. Suppliers are carefully evaluated to minimise the risk of exploitation within the supply chain. Sandwell Council use the Crown Commercial Services Standard Selection Questionnaire, which includes a self-certification element, to assess suppliers' policies and practices regarding slavery and human trafficking.
- ✓ **Regular Supplier Assessments:** Sandwell Council conduct regular supplier assessments, focusing on financial stability, including insurance, and compliance with various employment policies, particularly those related to slavery and human trafficking. Contract monitoring is also carried out, and steps are taken to improve poor supplier performance and practices. Sandwell Council provide advice to suppliers and require them to implement action plans to demonstrate compliance with the contract, such as safer recruitment requirements.
- ✓ **Collaboration:** Sandwell Council actively collaborate with external stakeholders, industry partners, and organisations to share best practices, knowledge, and resources in the fight against modern slavery. By joining forces and leveraging collective expertise, Sandwell Council aim to make a greater impact in eradicating this crime from supply chains. In cases where suppliers fail to improve their performance or violate our expectations, Sandwell Council invoke sanctions, including the termination of the business relationship.
- ✓ **Engagement and Leadership:** As a public body, Sandwell Council actively collaborate with statutory and non-statutory agencies to address local and national concerns related to modern slavery. Sandwell Council engage with our partners at the local and regional levels to strengthen our collective understanding and combat modern slavery in all its forms. Our Strategic Leadership Team, led by the Chief Executive, ensures operational delivery of our commitments, while scrutiny is provided by the Council's Political Leadership through its Cabinet. Detailed scrutiny may be directed by the Chair of the relevant Select Commission.
- ✓ **Awareness, Policies, and Training:** Sandwell Council prioritise raising awareness, strengthening policies and procedures, and providing detailed training where necessary to enhance our diligence in addressing modern slavery in procurement, contract management, and beyond. These measures aim to ensure that modern slavery is effectively addressed throughout our supply chains.



Section 5: Training, Awareness and Capacity Building

This section emphasises the recognition by Sandwell Council that training, awareness, and capacity building are essential elements in effectively preventing and addressing modern slavery. The council have implemented a range of measures to ensure that its staff and stakeholders are equipped with the necessary knowledge and skills to tackle this issue effectively.

- ✓ **Training for Key Staff:** The council provides comprehensive training for key staff members to enhance their understanding of modern slavery risks and empower them to respond effectively. This includes bespoke e-learning modules developed by the Chartered Institute of Procurement and Supply (CIPS) specifically designed for procurement and contract management staff and Home Office training on how to tackle modern slavery in the supply chain. Additionally, HR professionals and recruiting managers receive specialised training on recruitment and selection processes.
- ✓ **Awareness Raising:** The council actively raises awareness of modern slavery issues through various channels. This includes disseminating information and resources via intranet links and messages, conducting briefings for operational staff, and running targeted awareness campaigns during Modern Slavery Awareness Week as part of the Safer 6 program. These initiatives ensure that employees at all levels of the organisation are well-informed about modern slavery and understand their role in identifying and reporting any concerns.
- ✓ **Mandatory Training for all Employees:** Sandwell Council mandates that all employees complete training on modern slavery. This training equips them with the knowledge and skills necessary to recognise signs of modern slavery and report any related concerns. By ensuring that every employee receives this training, the council creates a workforce that is vigilant and actively involved in the fight against modern slavery.
- ✓ **Member Briefing Sessions:** The council conducts dedicated briefing sessions with its members to raise awareness of modern slavery. These sessions provide important information and updates on modern slavery issues, enabling members to actively contribute to the council's efforts in combating modern slavery.
- ✓ **Engagement with the Business Community:** Sandwell Council actively engages with local businesses associated with the local authority to raise awareness of modern slavery risks and promote best practices in identifying and responding to concerns. Through these engagements, the council fosters a collaborative approach to tackling modern slavery, encouraging businesses to take proactive measures within their areas of operation.

This year Sandwell Council have successfully trained 464 individuals to recognise and respond to modern slavery risks. The council remains dedicated to ongoing awareness raising and capacity building efforts, striving to equip its staff, members, and stakeholders with the necessary tools and knowledge to prevent and address modern slavery effectively.

Section 6: Next Steps

This section outlines the key areas that Sandwell Council will prioritise over the next 12 months to combat modern slavery and human trafficking. These steps align with the community's reset and recovery from the impact of the Covid pandemic. The council aims to strengthen its approach, improve transparency, collaboration, and impact measurement in its efforts to eradicate modern slavery.

The following aspects will be the focus for the next 12 months:

Enhancing Transparency: Implement initiatives guided by the LGA modern slavery maturity matrix, such as awareness campaigns, improved reporting mechanisms, and transparent supply chain practices.

Collaboration and Partnerships: Foster collaborations with statutory partners, voluntary organisations, and local communities. Share best practices, knowledge, and resources to strengthen the collective response.

Measuring Impact: Strengthen efforts to measure the impact of actions, training, and support. Analyse data on positive outcomes from training programs, victim support, and referrals.

Continuous Improvement: Develop a comprehensive delivery plan with goals, targets, and timelines. Regularly assess progress and identify areas for improvement across various themes.

Robust Actions and Measures: Implement necessary measures to combat modern slavery. Ensure effective enforcement, prosecution, and disruption of perpetrators.

Collaboration and Vigilance: Work with stakeholders to create a "Slavery-Free Sandwell" and maintain vigilance through information sharing and coordinated efforts.

Stakeholder Engagement: Engage employees, contractors, and the community to raise awareness. Provide training, resources, and platforms for dialogue.

Modern Slavery Referrals: Increase referrals through the National Referral Mechanism. Improve identification processes and frontline professionals' awareness.

Modern Slavery Maturity Matrix: Implement an action plan derived from the maturity matrix to identify strengths and areas for improvement in enhancing the response.

Sandwell Council aims to strengthen its approach, improve transparency, collaboration, and impact measurement, and contribute to a slavery-free society. By focusing on these priorities, the council endeavours to effectively combat modern slavery and human trafficking.



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: 1/8/23

Signed: 

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Date: 26/07/2023

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