

## **Modern Slavery Act 2015**

### **Solihull MBC Modern Slavery statement 2018/19.**

In accordance with the Modern slavery Act 2015, Solihull council makes the following statement in relation to its financial year 2018/19 to ensure that modern slavery is not taking place in any or parts of its own business and of its supply chains.

Solihull council is absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

**Councillor Leader**

**and**

**Chief Executive**

### **Solihull Council's Transparency Statement**

This statement sets out Solihull Council's actions to understand and address all potential modern slavery risks related to its business. Detailed below are the steps Solihull Council has taken to ensure there is no slavery or human trafficking in its own business, and its supply chains.

As part of Local Government, the Council recognises that it has a responsibility to take a robust approach to slavery and human trafficking as an employer, commissioner and contractor of other bodies. The Council acknowledges its status, under the National Referral Mechanism, as a 'First Responder' and its duty to notify the Secretary of State of suspected victims of slavery or human trafficking. The relevant sections of the Modern Slavery Act 2015 are sections 43, 52 and 54.

The Council is committed to preventing and taking action against slavery and human trafficking in its corporate activities, supply chains and the wider community. This statement sets out the Council's existing policies, practices and specific actions in response to the Modern Slavery Act.

### **Organisational Structure**

Solihull Council is a Local Authority which provides a wide range of statutory and discretionary services for its residents, businesses, visitors and partners.

Solihull has a growing population and economy. The latest population estimate for the borough is 211,763 which show an increase of 6.1% since 2001. This population increase has led to a rise in diversity within Solihull, with a far larger proportion from an ethnic minority background than 10 years ago (14% in 2011 compared to 5% in 2001).

The Council's new strategic plan 2018-2025 outlines five key priority areas which are supported by 12 programmes. The Council Plan outlines the way in which the Council is organised to carry out its affairs. It outlines the structures in place, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people.

## **Policies**

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 vital to meet the requirements of the Modern Slavery Act.

- **Safeguarding**

The Council embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults. The Council has a comprehensive Safeguarding Policy which all staff and councillors are expected to read and work within. The Council works within multi-agency partnerships to protect and safeguard people.

- **Recruitment**

The Council's recruitment processes include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and are paid directly into an appropriate personal bank account. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

- **Pay**

The Council has a Pay Policy Statement which makes the Council's approach to setting the pay of its employees transparent. It operates a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably.

- **Whistleblowing**

The Council encourages all its employees, customers and other business partners to report any concerns related to the direct activities or the supply chains the Council. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Council's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via either their manager, a senior manager or via the Council's Head of Audit Services.

- **Officer and Members Code of Conduct**

The codes make it clear to employees and Members the actions and behaviour expected of them when representing the Council. The Council strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing our supply chains. Any breaches are investigated by the Council.

### **Rules for Contracts**

The Council requires its officers to consider all aspects of relevant law when spending Council money with third parties, including compliance with the Modern Slavery Act. Section 27 of the Rules for Contracts states:

#### **“Impact of other Legislation on Contracts and Quotations**

In addition to what has already been mentioned in these Rules, there is other legislation that may impact on the supplies, services or works required when following a contract or quotation procedure e.g. health and safety, safeguarding, modern slavery etc. The Corporate Procurement Service will be able to give you advice on the impact of this legislation and the considerations you will need when drawing up specifications or identifying appropriate suppliers/providers.”

### **Due diligence**

Any concerns regarding modern slavery or human trafficking will be investigated and will be raised with the relevant Service Director in the first instance.

The Council understands the important role that procurement plays in sourcing in a manner that enables and rewards good employment practices and discourages the use of modern slavery practices. We are committed to undertaking due diligence at all stages of the procurement cycle to mitigate the risk of modern slavery and human trafficking within the supply chain

Our measures include:

- Maintaining a central register of all Council contracts
- Working with partners to develop our understanding of the risks of modern slavery occurring and to review the supply chain to identify areas of vulnerability and risk
- Within the category management approach, considering appropriate steps to be taken through procurement to mitigate risks, particularly in those areas assessed to be at high risk of modern slavery
- Taking appropriate measures in the selection of suppliers to enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act
- Inclusion of appropriate clauses in contracts to require suppliers to comply with the requirements of the Modern Slavery Act; these will be applicable to sub-contractors in the supply chain

- Working collaboratively with suppliers in mitigating the risk of modern slavery; supporting providers who identify activities that fall below the required standards and agree to make improvements
- Monitoring the performance of suppliers against the requirements of the contract, particularly in areas of identified high risk. Invoking sanctions against suppliers that fail to address performance issues identified or seriously violate the conditions of contract

### **Supply Chains**

The Council is committed to ensuring that there is no modern slavery or human trafficking in our supply chains. Solihull Council will not support or deal with any business knowingly involved in slavery or human trafficking. The Crown Commercial Services Standard Selection Questionnaire is used which includes a requirement for suppliers to self-certify in regard to modern slavery. The responses received form part of the formal evaluation regarding suitability of the supplier to supply the Council.

### **Risk assessments**

Risk assessments are completed and documented initially on the Procurement Authorisation Document when it is approved by the Procurement Board. Where there is a potential risk for modern slavery or human trafficking to exist this will be highlighted as part of the assessment. The risks will be recorded on JCAD, the Council's risk recording system and reviewed in line with the corporate risk management strategy.

### **Partnership working**

The Council works in partnership with a wide range of agencies to prevent neglect and abuse, to detect and report occurrences and to support victims. Through the Safer Solihull Partnership (an alliance of organisations, including the West Midlands Police and West Midlands Fire Service) we are working to address crime, disorder and substance use. A key priority within the Council's work will be to extend our working together in localities and create aligned and streamlined services that can respond to local issues.

### **Training**

Solihull Council has taken a three tier approach to Modern Slavery training for its staff. This training is delivered in partnership with the West Midlands Regional Anti- Slavery network to ensure continuity of our messages on Slavery in the West Midlands.

The council will identify and prioritise its training and development needs in relation to modern slavery based on:

- The degree and nature of contact practitioners / professionals have with members of the public including children, young people, families and vulnerable adults; and

- The knowledge and understanding of modern slavery that they need to fulfil the requirements of their role, including whether or not they are required to report into the National Referral Mechanism.

Solihull Council supports the regional approach to a tiered level of training that groups staff into high, mid and low priority:

**High Priority:**

These staff will have roles which fit into one or more of the following descriptions: they work predominantly with the public including children, young people, families and vulnerable adults; they have specialist safeguarding responsibilities; they are operational managers for frontline staff; they have senior management responsibility for services to the public.

Staff in this category will receive training that provides them with a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer into the National Referral Mechanism.

**Mid Priority:**

These staff may have roles which bring them into contact with members of the public. They are not providing direct support to them, but they may be providing other services.

Staff in this category will be given training that provides a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer.

**Low Priority:**

These staff will have no contact with members of the public. Following training, staff will have a basic awareness of modern slavery to include recognition of vulnerabilities and knowledge of how / where to refer.