

MODERN SLAVERY STATEMENT



west midlands
police and crime
commissioner

West Midlands
POLICE



MODERN SLAVERY STATEMENT



Foreword

This statement outlines the commitment and intended actions of West Midlands Police (WMP) and the West Midlands Police and Crime Commissioner (PCC) to address modern slavery in its business activities and its supply chains. This is a voluntary statement made in accordance with Section 54(1) of the Modern Slavery Act 2015.

This statement acknowledges our legal and ethical duty to be aware of the potential for modern slavery within our business and our supply chains including the duty to identify and report such instances to the relevant bodies. Finding and acting on modern slavery is a huge challenge which requires sustained effort over time and we have been making progress towards understanding the threat within our business. This statement describes the steps we have taken and will be taking over the coming 12 months to assess where the risks are highest across our business, where we have greatest leverage, and where we want to prioritise action.

Over the last year, we have increased the capability of procurement and commissioning teams across WMP and the OPCC to prevent modern slavery. We have included evaluation criteria relating to the Modern Slavery and Human Trafficking Act within our procurement documents and will be reviewing the modern slavery risk at each stage of the procurement process. With regards to existing suppliers, we have committed to carry out a high-level risk assessment mapping exercise and as part of our contract management processes we are introducing annual compliance checks against managing modern slavery risks.

We are committed to working in partnership with our suppliers to support and challenge them on their response to modern slavery, and we will ensure our progress is open and transparent, reporting where we have been successful and where we still have opportunities to improve. We welcome and endorse the commitments made in this statement and will closely monitor the progress.

A handwritten signature in blue ink that reads "D. Thompson".

David Thompson
Chief Constable,
West Midlands Police

A handwritten signature in blue ink that reads "Simon Foster".

Simon Foster
West Midlands Police
and Crime Commissioner

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Introduction

The Modern Slavery Act 2015 has transformed the UK's response to the exploitation and abuse of many thousands of victims. As the first legislation of its kind in the world more victims are now being identified and supported; more offenders are being prosecuted; and thousands of companies are publishing their commitment to tackling modern slavery in their supply chains. As a force we recognise our responsibility to take a robust approach to tackling modern slavery and human trafficking, not only through policing but also as employers, and procurers of services.

This voluntary statement has been made pursuant to S54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery & Human Trafficking Statement for the year ending 31st March 2023. The statement has been considered by the Office of the Police and Crime Commissioner and the Force Executive Team and will be reviewed annually.

This statement should be seen as the approach taken by the PCC and WMP in ensuring there is transparency in our supply chains, responsible procurement of new suppliers and steps being taken to prevent modern slavery from our business.

As public bodies, the PCC and WMP will work in partnership with our suppliers to ensure that there is no Modern Slavery or Human Trafficking in our supply chain and encourage our suppliers to achieve high ethical standards and practices including fair and right working conditions across the supply chain.



What is modern slavery

Modern Slavery and Human Trafficking are abhorrent crimes which see adults and children cruelly exploited for financial gain. Modern slavery is all around us, but is often hidden in plain sight. The impact of the Covid-19 pandemic has been significant and we have seen how quickly the modern slavery threat has evolved as ruthless criminals have looked for new opportunities to exploit those who have become vulnerable as a result of shifts in demand across the labour market.

The PCC and WMP Joint Procurement Strategy which sets out our vision, priorities, guiding principles, commercial and procurement structure and delivery elements will be reviewed and updated to reflect the commitment to identifying the risk in supply chains. To this degree, it sets out the ways in which we are working to ensure that our supply chain is free from Modern Slavery.

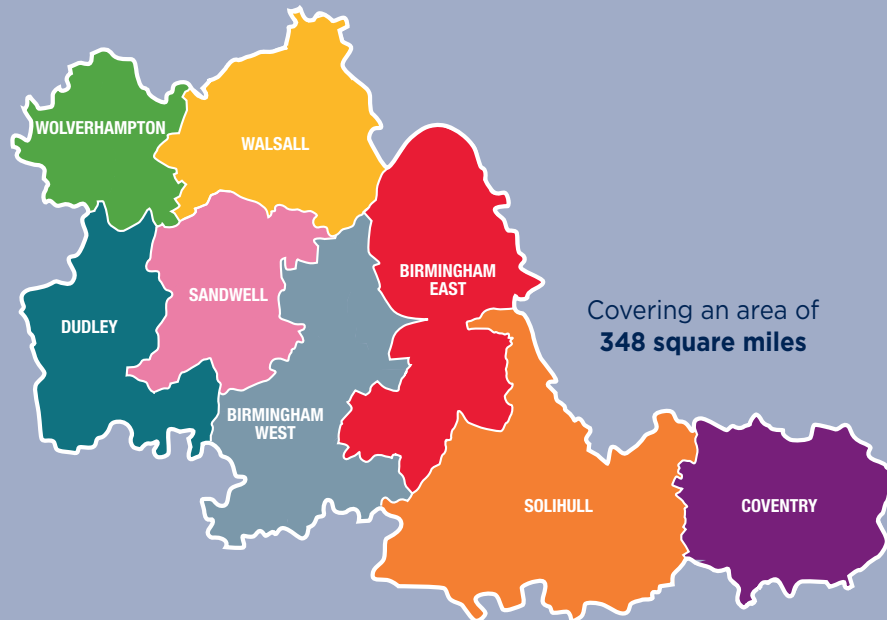
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Organisational structure

WMP is headed by a Chief Constable who is appointed by the West Midlands Police and Crime Commissioner. The actions of the force are scrutinised by the PCC and the Strategic Policing and Crime Board.

In considering our response to addressing modern slavery it is important to understand the size and shape of the West Midlands. WMP employs over 11,000 staff consisting of Police Officers, civilian staff and Police Community Support Officers and covers an area with nearly 3 million inhabitants, including the local authority areas of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton.



West Midlands Police is the **second largest force** in England



Serving a population of almost **3 million people**



Deals with over **2,000 emergency calls** everyday



A budget of over **£680 million**



Over **11,000 people** employed by West Midlands Police

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Our business and our supply chains

In its operations, the force procures a wide range of goods and services. Such purchases are to the cumulative value of circa £80 million per annum, covering areas such as operational uniform and equipment, IT and technology, professional services etc.

With such significant sums of public money being spent on the provision of goods and services, it is our responsibility to ensure that this expenditure is made in the most cost-effective and efficient way possible. WMP has a commitment to ensure that our wider supply chain is aware of and complies with the high ethical standards that we operate against and demand. WMP operates solely within the UK and considers that its activities are low risk in terms of modern slavery or human trafficking.



Risk assessment and due diligence

It is important to understand the risk within our supply chains and we understand that embedding modern slavery considerations within our procurement systems and processes is critical when taking a long-term perspective on the problem.

Large procurement exercises are carried out by the internal WMP Procurement Team. When seeking new contractors, we are committed to ensuring the suppliers with whom we do business understand the risks of modern slavery.

Our procurement documentation, namely the Terms and Conditions schedule, which is issued as part of WMP tender documentation, seeks confirmation of compliance with the Modern Slavery Act 2015. Furthermore, it seeks assurance that due diligence procedures are in place for sub-contractors and suppliers of the contractor.

WMP is subject to the Public Contract Regulations 2020. We are governed by directives to ensure that the principles of non-discrimination and transparency are upheld with the aim of fostering a common internal market. In order to cultivate an internal market, all public procurement policies must comply with these principles. To meet these regulations and transparency requirements we ensure our procurement opportunities and contract awards above certain thresholds are published on Contracts Finder and Find A Tender service. WMP also procure via various national framework agreements and other collaborative procurement processes. As such, the commitments made in this Statement extend to contracts that WMP directly tenders for. We source our supplies, services and works from third party suppliers principally within Great Britain.

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We include evaluation criteria relating to the Modern Slavery Act 2015 within our procurement documents and robust clauses within all forms of contracts. WMP uses only specified, reputable employment agencies to source labour and always verifies the practices of new agencies before accepting workers from that agency.

It is important we develop our understanding further of our supply chains including labour providers and recruiters to supply chains and services including sub-contractors, distribution, equipment and services. For each of these categories we will:

- Roll out awareness training for the procurement team
- As part of our review of procurement documentation, include the consideration of modern slavery risks at each stage of the procurement process
- With regards to existing suppliers, we will carry out a high-level risk assessment mapping exercise
- As part of our contract management processes we will look to introduce annual compliance checks against managing modern slavery risks



Policies

This section is about our policies to prevent modern slavery in our operations and supply chains. WMP corporate policies are reviewed at least every 3 years and are approved by the Executive Team or the Board.

The main corporate policies which include the identification and approach to modern slavery and human trafficking are the Whistleblowing Policy, Safeguarding Policy, Code of Conduct, Code of Ethics, Grievance Policy and Diversity Policies.

WMP policies and procedures demonstrate our commitment to acting ethically and with integrity in all its business relationships. The PCC and WMP are fully committed to addressing unethical and illegal employment practices in our supply chains.

WMP and the PCC meet or exceeds all statutory requirements relating to staff employment. Both are committed to dignity at work and to the fair treatment of all staff. All employees are paid to recognise their roles and responsibilities at or in excess of the Real Living Wage. In addition, WMP and the OPCC are Real Living Wage employers and providers.

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Training and awareness raising

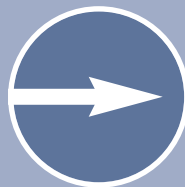
1. Training for police officers and police staff

All employees understand the signs of modern slavery or human trafficking, and understand what action they as individuals can take. A training course covering understanding and identifying modern slavery and human trafficking has been introduced and is completed by officers as well as OPCC personnel.

Both the existing Specialist Investigator and General Awareness courses have been updated to reflect the latest NRM statistics, to increase awareness around the definition of Exploitation. All updated course materials are available via the College of Policing NCALT system. Nationally over 900 officers have been trained including officers from the West Midlands.

2. Training for procurement personnel

This section describes the training we have delivered to our own procurement and commercial staff and suppliers to build their capability to identify and address modern slavery risks. Over the course of the coming 12 months we will develop and deliver training to procurement and commissioning staff to raise their awareness of modern slavery, building their capability to prevent it at each stage of the commercial life cycle.



Governance

In order to deliver against the commitments made in this statement we will identify modern slavery leads to report on the commitments made in this statement. The West Midlands Exploitation and Abuse Framework will enable effective oversight of these actions which will sit primarily in the Contract and Procurement Delivery Plan overseen by the Assistant Director of Finance. We seek a sector-leading approach to Modern Slavery, core to our approach is a robust governance structure.



Conclusion

This statement demonstrates our commitment to ensure that both now and, in the future, our approach to the procurement and on-boarding of new critical suppliers is robust, transparent and risk-based. The statement shall be continually reviewed and updated annually.