



2023-2024

Modern slavery statement



west midlands
police and crime
commissioner

West Midlands
POLICE



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 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.



Police and Crime Commissioner; Simon Foster



Chief Constable Craig Guildford QPM VR DL
West Midlands Police

Modern slavery statement

In line with the updated Tackling Modern Slavery in Government Supply Chains - Guidance our activity will fall into the following key areas of activity;

- 1 Identifying and managing risks in new procurements** – the Modern Slavery Act 2015 forms part of the Procurement Terms and Conditions which is a mandatory requirement. Compliance to the Modern Slavery Act 2015 is also requested as part of the Diversity Tender Questionnaire. An annual check is undertaken to ensure there have not been any changes that we need to be made aware of, this forms part of an annual procurement compliance Survey.
- 2 Social Value**- social Value forms part of all tenders over £100k. We request a social value submission from the supplier via the Social Value Portal which forms 10% of the evaluation. We have incorporated the following theme for the supplier to elect if they choose to; Growth: Supporting Growth of Responsible Regional Business which measures initiatives taken throughout the local and global supply chain to strengthen the identification, monitoring and reduction of risks of modern slavery and unethical work practices occurring in relation to the contract (such as supply chain mapping, staff training, contract management).
- 3 Assess existing contracts** - we have committed to carry out a high-level mapping exercise to identify the level either low, medium or high of modern slavery risk within the supply chain for our most strategic contracts over the last 12 months and will continue to do so.
- 4 Acting when victims of modern slavery are identified** – this would need to be reviewed and discussed on a case by case basis, ultimately this would be deemed as a breach of contract.
- 5 Training** – the procurement team have completed the college of policing Modern Slavery E learning. We are working closely with Blue light Commercial for further training courses over the next 12 months.
Introduction

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. In the UK context Procurement Regulations have been amended to make certain modern slavery offences under the Act as grounds for the mandatory exclusion of bidders from public procurements.

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 2024. 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

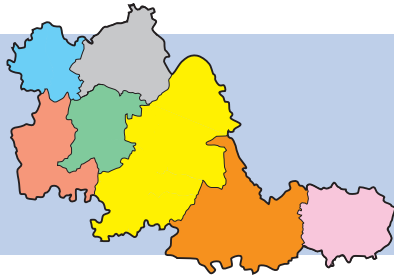
Modern Slavery and Human Trafficking are abhorrent crimes which see adults and children cruelly exploited for financial gain. Modern slavery is all around us, but is often hidden in plain sight. The impact of the Covid-19 pandemic and the national cost of living crisis has been significant and we have 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 has been reviewed and updated to reflect the commitment to identifying the risk in supply chains and therefore it sets out the ways in which we are working to ensure that our supply chain is free from Modern Slavery.

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 at 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 -

covers an area of
348
square miles



is the second
largest police
force in
England



serves a population
of almost
3 million
people

deals with over
2000
emergency calls
everyday



has a budget of over
£680
million
pounds



employs over
11,000
people



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.

Supporting SMEs and VCSEs

Modern slavery risks can be found in contracts and suppliers of all sizes. We are aware the risk of modern slavery in a contract is not linked to its value, even when a contract is below threshold/low value, the modern slavery risk can be high. We therefore ask questions about modern slavery risks through our grant/contract commissioning processes ensuring they are relevant and proportionate.

The government is committed to working closely with organisations who uphold the strong social values that are vital to the country's well-being and economy. This remains a priority and we are doing more than ever to make public contracts more accessible to encourage SMEs and VCSEs and ensure supplier diversity in supply chains.

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 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.

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 undertake 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.

Training and awareness raising

We understand that as a region we will only be able to tackle modern slavery if there is a universal understanding of modern slavery and workforces across our systems are able to appropriately identify and respond. In collaboration with the West Midlands Violence Reduction Partnership and the regional Modern Slavery Human Trafficking Strategic Board, the Exploitation and Missing strategic Board, the Domestic Abuse Strategic Board and the Sexual Assault and Abuse Strategic Board the OPCC has co-designed the Competency Training and Development Framework for Tackling Exploitation and Abuse. This is a good practice guidance framework for individuals, organisations and senior leaders to support their response to tackling exploitation and abuse. This framework can be integrated into organisational and partnership systems and training standards to ensure a consistent approach to knowledge and skills required by the workforce when working in the exploitation and abuse field. The four main aims of the framework are:

- To highlight and recommend best practice to upskill the workforce when identifying and responding to exploitation and abuse.
- To establish tiered levels of training in line with competencies needed when identifying and responding to exploitation and abuse.
- For organisations to use as a guide to review their existing training arrangements for their workforce.
- For organisations to supplement their policies and procedures for Safer recruitment

Modern slavery statement

Using the above framework, a range of training packages for police officers including the new intake of student officers is being developed. This will seek to increase levels of understanding of 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.

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. Actions specifically for WMP Procurement 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.