



Human Trafficking and Modern-Slavery Policy
City of Birmingham Foundation



City of Birmingham Foundation

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1. Introduction

About City of Birmingham Foundation

City of Birmingham Foundation is a foundation working with BYSA for the good of our young people. Our standard is excellence with a strong focus on our learners acquiring the qualifications and enterprising qualities which prepare them for the opportunities that lie ahead of them.

Modern Slavery

Modern slavery is a criminal offence under the Modern Slavery Act 2015 and encompasses slavery, servitude, human trafficking and forced labour 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. This document sets out CoBF's policy and statement in relation to modern slavery with the aim of preventing opportunities for modern slavery to occur within its business or supply chain and safeguarding any customers who may be at risk.

Commitment and Remit of Policy

This policy applies to all individuals working for or with CoBF in any form, including our supply chain, contractors, employees and all other business partners. We are committed to ensuring there is transparency within CoBF and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors and other business partners. Our staff members are encouraged to raise concerns about any issue or suspicion of modern slavery or child labour in any parts of our organisation or supply chain or associated supply chains; at the earliest possible stage. As an educational establishment, safeguarding is at the core of our work and ethos, where awareness of the importance of this matter is emphasised at every opportunity.



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Reporting breaches

If it is believed or suspected a breach of this policy or policy statement has been made or that it may occur, our staff must notify this to their line manager, the Principal or other appropriate officer in accordance with our whistle-blowing policy, as soon as possible. In cases where staff are unsure about a particular act, treatment of workers or working conditions within any tier of our supply chain that may constitute any form of modern slavery, they are asked to raise concerns, as appropriate.

2. Background

The Modern Slavery Act 2015 was introduced to specifically address slavery and trafficking in the 21st century. The new legislation was introduced to significantly enhance support and protection for victims, gives law enforcement the tools they need to target today's slave drivers, ensures perpetrators can be severely punished, and includes a world leading provision to encourage business to act to help ensure their end-to-end supply chains are slavery free.

An overview of the Modern Slavery Act 2015:

The Act includes provisions to:

- Enable the Secretary of State to make regulations relating to the identification of and support for victims
- Make provision for independent child trafficking advocates
- Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Close gaps in the law to enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply



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- An additional clause (clause 6) was added retrospectively to the act and requires organisations to report on the processes and due diligence taken to ensure that their supply chains are slavery free. The Transparency in Supply Chains clause came into force in Oct 2015 and requires organisations with a turnover of £36 million or more to produce and publish a slavery and human trafficking statement each financial year

3. Our Approach

Areas of our work

Our principle activities are the provision of secondary, sixth form and adult education. This policy applies to all schools within the trust:

- City of Birmingham Foundation
- Birmingham Youth Sports Academy

Our commitment

CoBF has a zero-tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

Policies, Due Diligence and Training

We have a number of related policies, processes and strategies which will support us in ensuring compliance with the Modern Slavery Act found in the links to other policies section in this document. CoBF policies and procedures form part of staff induction and staff refresher training for all employees. We are therefore well placed to make a positive contribution to preventing opportunities for modern slavery to occur within our business and our supply chain.



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4. Ensuring compliance with the Modern Slavery Act.

Procurement, risk management and supply chain. We are committed to ensuring that there is transparency in our business and our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and. Our procurement and contracting processes include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards. The biggest risk to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act, we will endeavour to eliminate the risks as much as possible. We have identified that some of our procurement takes place within sectors where modern slavery offences could occur such as catering, cleaning, construction, uniform and IT supply chains. In response, we ensure that contractors are required to check an individual's right to work on the UK and DBS checks prior to hiring staff to work in or for any of our schools or adult learning provision. Tenders for goods or services include a requirement for suppliers to report on their ethical trading policies and practices, as well as compliance with the Modern Slavery Act 2015. As standard practice, we ensure that those involved in procurement of services are aware of these requirements. We do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act.

Responding to modern slavery and trafficking within our supply chain.

If an CoBF employee suspects that modern slavery and/or trafficking may be occurring within our supply chain, in the first instance concerns should immediately be raised with the Principal of the school or the Chief People Officer (CPO) if it is a national team matter rather than a local matter.



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The Principal/CPO should then:

- Call the police on 999 in an emergency and;
- Contact the Gangmasters Licensing Authority (GLA) on 0845 602 5020 or email: intelligence@gla.gsi.gov.uk . When contacting the authorities, the reporting manager will need to be clear about the circumstances and why it is considered that it is a case of modern slavery/human
- Immediately inform the Chief Operating Officer of the Trust who will then determine the appropriate action to take depending on circumstances/advice given by the authorities.

Education services

Many of our employees come into contact with members of the public. In doing so there is the possibility that they could encounter somebody believed to be at risk of modern slavery and/or trafficking. Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities or socially excluded groups.

Responding to modern slavery and trafficking:

Safeguarding is everyone's responsibility. Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures must be followed whenever an employee suspects that someone is at risk. In accordance with our safeguarding policies, the Police should always be called in an emergency on 999. All frontline employees receive multi-agency Safeguarding Children training which incorporates modern slavery. These employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our Safeguarding policies and procedures so that they are able to respond appropriately. Line managers must ensure that safeguarding training is kept up to date.

Signs and Indicators of Modern Slavery and Trafficking

Accommodation



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- victims may live in multiple occupancy accommodation within groups who may not necessarily speak the same language, and with persons they do not know or have a clear relationship with.
- accommodation may be poor, degrading or substandard and may be the same place where they work.
- sleeping quarters may be shared or in inappropriate places – sheds, outbuildings, squats etc.
- victims may not be able to provide or know their home or work address.
- neighbours might notice that the occupants leave the accommodation infrequently, if at all.
- inhabitants may have limited or no social interaction either in the workplace or at their accommodation and appear to be in fear of a more dominant person within the group.
- for sexual exploitation, you might expect to see numerous male visitors to an address, arriving or leaving at strange hours, staying for short periods of time. Eagle eyed neighbours may notice different women at the venue in a small timeframe.

Working Conditions

- victims might be found at a type of location associated with exploitation – brothels, factories, car washes, nail bars, construction sites.
- they may be forced to work excessively long hours, under demeaning conditions with no days off.
- be in high risk jobs and face hazardous working conditions, may not be dressed adequately or have the correct safety equipment or protective clothing be living 'on site'.
- no contract will exist between the victim and the 'employer', the former will almost certainly not be paying the full tax or national insurance contributions for the worker.



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- victims may receive little or no payment. Many will believe they have no choice but to work without pay to pay off their bonded debt, which may include the provision of accommodation.
- victims may talk of fines as a punishment, unwarranted and unexplained deductions from wages or charges for services they didn't want or need.
- they may be unable to leave their work environment.
- victims will lack any basic training or professional qualifications.
- victims will have no information about the law and UK employment rights.
- you might find that victims have bank accounts, credit/debit cards, loans and credit agreements that they are completely unaware of or no control over. Victims may talk of having signed documentation that they never saw again.
- benefits might be claimed by the victim but collected/taken by the abuser.
- wages might be paid into an account used by other people.

Behaviour

- victims may be unfamiliar with the local language and allow others to speak for them when addressed directly.
- may be unclear about the location of their passports or other travel or identity documents.
- be subservient and act as if they are under the control or instruction of another.
- show fear, anxiety and distrustful of the authorities, having been misled and lied to about the role of the authorities.
- avoid eye contact, are evasive and give conflicting stories about their immigration status.
- may have been forced into or be involved in criminality.
- those being sexually exploited may dress inappropriately for their age and wear excessive makeup.

Appearance & History



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- appear to have injuries consistent with having been assaulted including old or untreated injuries they cannot explain.
- appear unkempt, malnourished, dress routinely in the same clothes and have poor hygiene.
- show signs of self-harm, alcohol or drug misuse.
- have a pattern of street homelessness or be caught stealing food.
- have false identity documentation.
- have no phone, few personal effects or items of luggage.
- come from a place known to be a source of modern slavery.
- provide accounts or a 'legend' that lack credibility which perpetrators have forced them to learn when approached by authorities.
- provide a history that contains unexplained gaps.

5. Breaches of this policy

CoBF employees:

- All employees are expected to act in accordance with this policy to minimise the risk of modern slavery and trafficking. Any member of staff found to be wilfully neglectful in responding to concerns may face disciplinary action.

Suppliers, contractors and external partners:

- In addition to reporting breaches to the appropriate authorities as outlined in section 4.2, CoBF Education reserves the right to terminate the contract/partnership where a supplier, contractor or external partner has been found to be in breach of the Modern Slavery Act 9.

If any employee feels CoBF is not meeting its obligations under the Modern Slavery Act:

If an employee is concerned that either CoBF or an individual is not meeting their obligations in relation to this policy, in the first instance they should raise the concern with their line manager, or Principal. If this is not appropriate -for



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example if the concern involves your line manager or Principal - then concerns can be raised via our Whistleblowing Policy.

6. Communication and awareness of this policy

Our zero-tolerance to modern slavery will be communicated:

- To all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate
- We will also launch this policy through team briefings

7. Review

This Modern Slavery and Human Trafficking Policy will be monitored through our Finance & Resources Committee, including any reports of breaches that may have occurred. This will allow us to measure the effectiveness of our policy, practices and procedures in place to tackle and respond to any modern slavery practices that have taken place within or connected to our organisation that we are aware of. Our policy also informs our statement of Slavery and Human Trafficking which will be published on an annual basis.

8. Further information and advice:

- Trust Central Team 0207 297 0340
- Home Office website <https://www.gov.uk/government/collections/modern-slavery>
- Modern Slavery website <https://www.modernslaveryhelpline.org/report>
- Modern Slavery helpline 0800 0127 700