



West  
Yorkshire  
Combined  
Authority

Tracy  
Brabin  
Mayor of  
West Yorkshire



# **West Yorkshire Combined Authority**

## **Modern Slavery and Human Trafficking Statement**

**2024 - 2025**

**July 2024**

This statement is made with reference to Section 54 (1) of the Modern Slavery Act 2015 and constitutes the Anti-Slavery and Human Trafficking statement for the West Yorkshire Combined Authority for the financial year ending 31 March 2024.

*“West Yorkshire Combined Authority is committed to developing robust strategies and approaches to ensure that slavery and human trafficking do not exist within our supply chains or at home in our communities. We believe that through collaborative action we can reduce the likelihood, mitigate the impact and support the survivors of modern slavery. The Combined Authority takes our responsibilities seriously to model the behaviours we expect to see, to challenge practises where they need to be challenged, and to proactively increase awareness of slavery and trafficking to better allow others to recognise the signs of exploitation and take steps to intervene. We will continue to publish our statement annually, reviewing the content at regular intervals to ensure it remains fit for purpose.”*

**West Yorkshire Combined Authorities Annual Modern Slavery statement was approved by the Mayoral Office and Chief Executive on 3<sup>rd</sup> July 2024.**

## Organisation Structure and Supply Chains

The West Yorkshire Combined Authority brings together the local authorities of Bradford, Calderdale, Kirklees, Leeds and Wakefield. Working in partnership, across West Yorkshire, we develop and deliver policies, programmes and services which directly benefit the people of West Yorkshire.

The Combined Authority is split into five directorates, alongside our Corporate Centre, they include:

- Transport Policy and Delivery
- Transport Ops & Passenger Experience
- Mass Transit
- Inclusive Economy, Skills, and Culture
- Policing, Environment and Place

Our work is focused on seven Corporate objectives

- Empowering our communities, towns and cities to thrive
- Building a sustainable, nature rich and carbon neutral region
- Creating an accessible, clean and customer focused transport system
- Supporting community safety and accountable, proactive policing
- Championing culture, sport and creativity
- Driving economic growth and innovation to enable good jobs
- Enabling a diverse, skilled workforce and accessible learning for all.

This means we:

- Prioritise initiatives which drive inclusive and sustainable economic growth and prosperity
- Promote innovation, internally and across the region
- Give focus to tackling the climate and environment emergency through every initiative
- Drive towards an efficient, world class transport system

- Continue our focus on delivering world class policing and enhanced community safety
- Provide a consistent and unified 'voice of the region', enabling West Yorkshire and the Mayor to proactively influence in government.

Equality, Diversity and Inclusion (EDI) runs through all that we do. We adopted our EDI vision in 2021, with a drive to lead on and be recognised nationally for our focus and commitment to EDI. As a key priority, we developed the Combined Authority's EDI Plan 2022 – 2025 to support this vision, which encompasses on how we will embed the Local Government Equality Framework in the work we do.

In addition to our corporate objectives, The West Yorkshire Plan sets out an ambitious vision and five missions for 2040 that will drive our work to transform lives and communities across the region. The Plan has been developed and will be driven forward by the West Yorkshire Combined Authority and the five local authorities, in consultation and partnership with a range of private, public, voluntary, and community sector partners.

Our suppliers are chosen on a basis of cost and quality, selected, and chosen objectively, and we take our responsibilities to influence transparency within our supply chains seriously while promoting good employment practice. The fair work charter is a tool used to assess employers in the region on five themes, opportunity, security, wellbeing, employee voice, and fulfilment. Once employers are certified members of the West Yorkshire Fair Work Charter, they are provided ongoing support to further develop and embed fair work across their organisation.

## Policies in Relation to Slavery and Human Trafficking

The key policies which pertain to modern slavery and transparency within our supply chains at West Yorkshire Combined Authority are our Procurement Strategy (which provides an overview approach to our procurement and buying decisions), and Contract Standing Orders (which consider individual procurement activities in more granular detail). Individual Procurement Strategy documents are developed for each major procurement activity undertaken, which identify specific risks pertaining to modern slavery and guide our approach to mitigating risk and maximising opportunities.

Our Human Resources and Audit functions maintain policies on Whistleblowing and safe ways of working, providing mechanisms to raise concerns and escalate or investigate issues both internally and those within our supply chains. The Combined Authority Recruitment, Selection and Induction Policy ensures all recruitment activities including the vetting and onboarding of new staff is conducted in a compliant manner and necessary steps are taken to authenticate identification. Temporary staff recruitment is undertaken through our chosen agency partner and the process of appointing a candidate is conducted in accordance with our vetting and onboarding requirements.

It is our intention to develop proactive ways of working with our suppliers to ensure they also support their employees through the adoption of similar policies, protections and mechanisms to develop a joined-up approach across our supply chain.

The Combined Authority works closely with West Yorkshire Police, ensuring our policy approach to Modern Slavery works in partnership with those utilised by the police force within our region. Following the enactment of transparency in supply chain guidance under the Modern Slavery Act, the Combined Authority (under the then Office of the Police and Crime Commissioner) collaborated with regional PCCs and Chief Constables to establish a joint policy and statement on Transparency in Supply Chains across the Northeast region.

The Combined Authority was officially recognised as a Living Wage Employer. This means that all colleagues across our organisation continue to receive at least the real living wage. The commitment also means that future contracts for regularly outsourced workers for the Combined Authority also require at least the real living wage to be paid.

## Due Diligence Processes

All suppliers seeking to bid for open tenders must complete a mandatory supplier selection stage which disbars further participation for those organisations that have been found guilty of committing illegal acts, in keeping with the Public Contract Regulations 2015. The Procurement Act 2023 is set to transform Procurement Law and includes mandatory and discretionary exclusion grounds which include modern slavery and labour market offences.

All frameworks used by the Combined Authority are vetted and considered ahead of use, ensuring they are compliant with the ethos, ethics and culture of the Combined Authority, and guidance is made available to contract managers to improve their capacity to prevent and respond to modern slavery.

The Combined Authority makes use of the TOMs framework provided by the Social Value Portal to capture and monitor social value within our supply chains, with the prevention of modern slavery being a focal point for suppliers seeking to work with the Combined Authority or our district partners.

Work will continue to strengthen due diligence undertaken as part of contract management including regular supplier reviews. Our due diligence framework will be further enhanced to include modern slavery risks from potential and prospective suppliers.

## Risk Assessment and Management

The Combined Authority ensures its procurements are conducted in compliance with the provisions set out in the Modern Slavery Act 2015 and is committed to combatting modern slavery. The Combined Authority takes steps to reduce the risk of modern slavery and human trafficking in our supply chains when buying goods and procuring services from external organisations and providers through transparent, auditable procurement processes and legally robust and compliant terms and conditions.

We believe through establishing a joined-up approach to modern slavery we are better able to mitigate the risk of modern slavery in our supply chains and better placed to remove the environment where modern slavery may exist within the communities we serve. We are members of the Regional Strategic Procurement Group and use this forum as an opportunity to collaborate with local partners by discussing common risks and sharing lessons learnt.

## Measuring Effectiveness

The Combined Authority is committed to eliminating modern slavery. To support this ongoing commitment the Combined Authority will review and update this statement on an annual basis, will work with our delivery partners and providers to raise awareness and increase reporting of concerns as well as to support people in understanding the help which is available for victims.

The risk of modern slavery will be assessed in all new procurement activities and risk assessments will be continuously monitored. A review will be undertaken to evaluate high risk supply chains, this will include sharing best practice when an issue arises with suppliers and partners.

The Combined Authority works in partnership with West Yorkshire Police and collaborates with local government authorities to ensure a joined-up approach, maximising the impact of our actions across the region. Where possible best practise will be shared and successes built upon, delivering a continual process of improvement and incremental progress year on year. The Combined Authority supports (through the Deputy Mayor for Policing & Crime), active engagement with key partners on this topic through the West Yorkshire Anti-Slavery Partnership. The West Yorkshire Anti-Slavery Partnership brings together representatives from local authorities, West Yorkshire Police, VCSES and the private sector.

## Training Provided

The Combined Authority supports our staff in training and development as part of our ongoing commitment to Continuing Professional Development. Alongside essential mandatory training we also provide an allowance for staff to request training on other core matters to support their continued development and run a regular programme of training delivered internally by experts in the respective topics.

Modern Slavery e-learning has been rolled out across the organisation for all staff to access and complete, to further develop awareness of the topic. The e-learning has been shared with all colleagues and Commercial colleagues will be required to complete and pass the training; uptake of the training will be monitored. Awareness is raised through internal communication channels such as a dedicated intranet page and external messaging for awareness days such as Anti-Slavery Day.

A substantial proportion of our Commercial staff have completed or are in the process of completing Chartered Institute of Procurement and Supply (CIPS) qualifications. As part of the course colleagues have undertaken modules in Ethical Procurement and Supply, which includes anti-slavery and human trafficking information.



**Find out more**  
**[westyorks-ca.gov.uk](https://westyorks-ca.gov.uk)**

**West Yorkshire Combined Authority**

Wellington House  
40-50 Wellington Street  
Leeds  
LS1 2DE



**West  
Yorkshire  
Combined  
Authority**

**Tracy  
Brabin  
Mayor of  
West Yorkshire**

All information correct at time of writing