



University of
Nottingham
Rights Lab

The Rights Lab University of Nottingham

**Analysis of Bradford
Council's Procurement
Portfolio for Modern Slavery
Risk**

Acknowledgements

We would like to thank City of Bradford Metropolitan District Council for their full cooperation. The analysis presented in this report is largely based on procurement data provided by Bradford Council.

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Executive Summary

City of Bradford Metropolitan District Council ('The Council' or 'Bradford Council') commissioned the University of Nottingham's Rights Lab to undertake a preliminary, independent analysis of modern slavery risks the Council may be exposed to in its tier 1 suppliers. This report presents that analysis based on an evaluation of the procurement portfolio of the Council's spend from April-December 2019 and provides subsequent next steps and recommendations for managing modern slavery risks in supply chains.

This report represents a preliminary step to what we advise any purchasing organisation needs to do to understand and address the risk of modern slavery in its business and supply chains. The data provided for this stage of the analysis was very high level and therefore it is recommended that further analysis is undertaken with more detailed spend data when available. Recommendations for a comprehensive step by step guide to managing modern slavery in procurement are provided throughout the report, with this preliminary analysis representing a positive first step.

States and businesses have a responsibility to ensure their supply chains are modern slavery-freeⁱ, and local governments' (LGs) spend in the local community mean they have significant leverage to monitor and minimise the risk of modern slavery to individuals in their operations and supply chains. Councils have the opportunity to provide guidance to local businesses about modern slavery and how they might manage it, and should also take responsibility for eliminating modern slavery in its own supply chains. Accordingly, this report presents an initial modern slavery risk assessment to Bradford Council, to support them in meeting such goals.

The Council procures a wide range of products and services that differ markedly in terms of the level of modern slavery risk. Based on our analysis of the Council's spend from April-December 2019, we found that the top three spend categories are Technology & Communication, Construction, and Services – accounting for 89% of total spend. This report explains the anticipated risk each of these categories poses and demonstrates why Construction and Services are considered high-risk with regards to modern slavery. Based on these findings, a number of recommendations are made which the Council is encouraged to consider as the next steps in their journey to address the risk of modern slavery in their supply chains. These include:

- consolidation of suppliers in high-risk categories to build fewer, stronger relationships;
- establishment of long-term relationships with consolidated high-risk category suppliers;
- increasing supply chain transparency and visibility;
- increasing granularity of purchasing data for more detailed risk identification;

- increasing leverage over suppliers by establishing procurement collaboration of local governments;
- organising meetings and round tables with suppliers in high risk categories, and educate procurement officers across the Council on the implementation of modern slavery risk prevention;
- conducting further research to identify leverage points with suppliers and to share and implement best practices across the Council.

The following report looks at the spend categories in more detail, breaks down and explains key modern slavery risks based on Rights Lab expertise, and finally expands on the recommendations listed above, to illustrate how Bradford Council might move forwards in their journey to manage and tackle the modern slavery risks they face.

Authors: Dr Selim Cakir (selim.cakir@nottingham.ac.uk)
 Dr Alexander Trautrimms (alexander.trautrimms@nottingham.ac.uk)
 Hannah Lerigo-Stephens (Hannah.lerigo-stephens@nottingham.ac.uk)
 Rights Lab, University of Nottingham
 United Kingdom

Prevalence of modern slavery in the UK and case studies of West Yorkshire

The UK has been described as “a source, transit, and destination country for men, women, and children subjected to sex trafficking and forced labour”ⁱⁱ. The most recent estimates of the scale of modern slavery in the UK from the Home Office suggested there were between 10,000 and 13,000 potential victims in the country in 2013ⁱⁱⁱ, although other more recent indices have placed it much higher with the Global Slavery Index estimating that the figure stands at 136,000^{iv}. However, recent reports from the National Referral Mechanism or ‘NRM’ (the UK’s domestic system for the identification and support of victims of modern slavery) show 10,627 people were referred to the NRM as potential victims in 2019, an increase of 52% from the year before^v. Of these potential victims, 332 were referred through the West Yorkshire Police Force meaning the region had the eighth highest numbers of referrals last year^{vi}, out of the 46 UK Police Forces where data was available.

Cases of modern slavery identified in and around West Yorkshire:

Case Study One: Kozee Beds, Dewsbury

In 2015, up to 42 men were found living in squalid conditions in a two bedroom house, surviving on scraps of food, while working up to 20 hour days at ‘Kozee Beds’, a bed factory supplying high street brands in Dewsbury, West Yorkshire.

The men were mainly vulnerable Hungarians who were brought to Bradford under promise of decent work and accommodation but were forced to pay back inflated travel expenses and received only £10 a week for their work.

Ethical audits of the site, commissioned by customers such as John Lewis, Next and Dunelm, failed to identify any issues and the situation only came to light when a homeless charity referred one of the victims to anti-trafficking organisation Hope for Justice.

Factory owner Mohammed Rafiq had built the highly successful business over 33 years but it transpired had been knowingly using a Hungarian gangmaster to source him cheap labour for his workforce. He was found guilty of human trafficking and sentenced to 27 months.

Case Study Two: Bradford construction

In 2013, families with young children were found to be among those trafficked into the country to work on construction sites in West Yorkshire, by a Slovakian family gang. Those who could work had their wages confiscated by their traffickers and were given allowances of £5 a day or less.

The gang used fear of violence to control victims as well as ensuring that they were completely dependent on them by controlling their bank account, taking their personal documents and withholding their benefits.

Some of the victims had been in the UK for up to five years when in 2013 West Yorkshire Police raided addresses in Bradford and Leeds and discovered 37 people between the ages of one and 57 living within the control of this one gang.

In 2018, eight individuals from the gang were jailed for trafficking offences, having built a business from recruiting and trafficking victims in Slovakia and exploiting them in the UK. Landlords who were found to be complicit in the exploitation, also saw convictions.

Modern slavery legislation in the UK

The UK has made significant progress to eradicate modern slavery by introducing one of the leading pieces of legislation specifically tackling modern slavery in supply chains, the 2015 Modern Slavery Act^{vii}. Section 54 of the Act requires businesses with an annual turnover of more than £36m to report annually on what steps they are taking to prevent modern slavery occurring in their business and supply chains. Statements should be approved by a Board, signed by a Director and made publicly available on the homepage of the organisation's website.

Currently, the public sector is not in scope of the Act's requirements, however, an independent review of the Act in 2019 recommended that, "Local government, agencies and other public authorities should publish a statement if their annual budget exceeds £36 million"^{viii}. Following this review, the government launched a public consultation on proposed changes to the Act which took place from July-September 2019^{ix}. The results of this consultation are still pending but based on steps that countries such as Australia have since taken to include the public sector in similar legislation^x, it is likely that the next iteration will include provision for LGs and authorities to also produce an annual statement.

Subsequently, it is critical that local authorities begin to consider the impact of their purchasing on labour exploitation in the supply chains of the goods and services they procure; this report demonstrates the initial steps such an organisation might take.

Methodology

Limitations of scope

The scope of this report is to evaluate the high level modern slavery risks associated with the categories of tier 1 suppliers providing goods and services to Bradford Council. Individual supplier data was not available for analysis. Risk is assessed solely on the type and volume of the service or goods being procured. In addition, it does not take into consideration risk mitigation mechanisms the Council may have already implemented and is therefore based on the Council's procurement data only without assessment of contextual factors which may change the level of modern slavery risks.

Approach

The risk assessment was undertaken in three main steps: i) categorisation of purchases, ii) prioritisation of purchase categories based on high level modern slavery risk, and iii) recommendations for managing high-risk categories and the supply chain in general.

The procurement portfolio of the Council was evaluated against industry-level modern slavery risks identified by existing supply chain research and analysis^{xi}. Accordingly, Rights Lab examined purchase categories based on modern slavery risks they carry due to the industries which they represent. Key factors considered which can indicate an industry is high risk include, recruitment of workers through agents, low wage employment, and use of seasonal or temporary workers; all of which are likely to affect the vulnerability of workers to become victims of labour abuse and in worst cases, modern slavery.

As a result of this categorisation and analysis, recommendations of next step priorities were drawn up, based on the insight of the report alongside Rights Lab expertise and research. The recommendations provided are intended as a starting point in the Council's journey to tackle modern slavery and focus on increasing their understanding and awareness of the issue, alongside the next steps the council could take to strengthen their systems' resilience to modern slavery occurring in their supply chains.

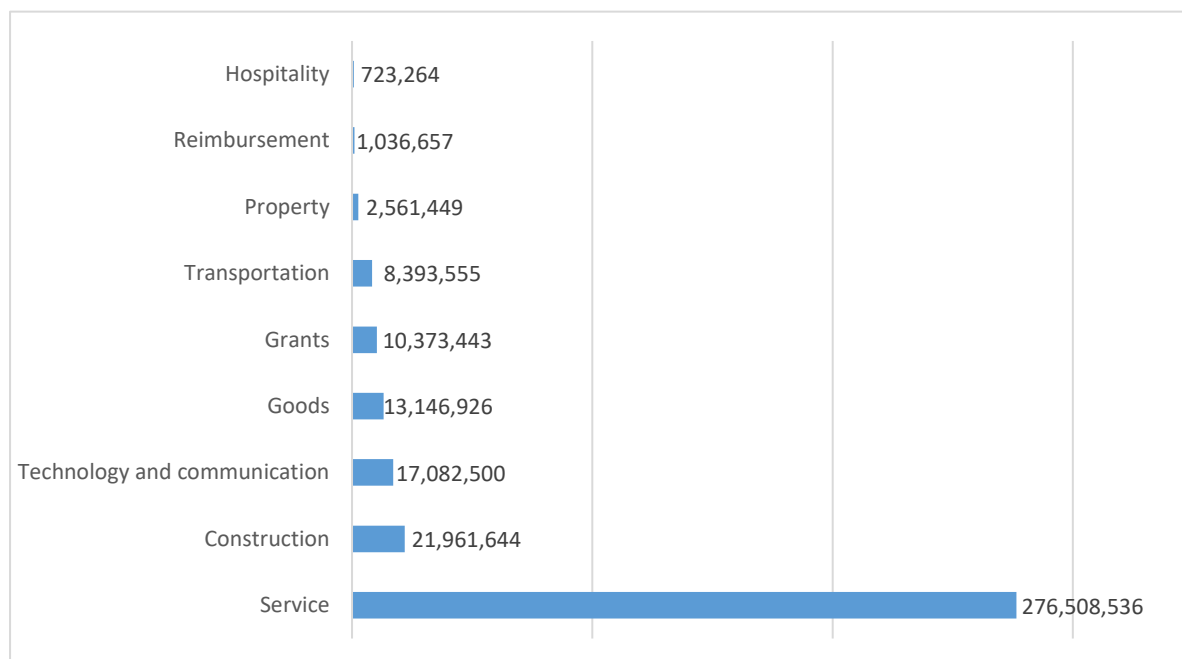
Analysis

1. Categorisation of purchase

Modern slavery risks vary greatly between different products and services. Classification of procurement data enables organisations to focus managerial resources on suppliers providing high-risk category products and services.

In order to identify suppliers providing high-risk products and services to the Council, we took the Council's spend data from April-December 2019 which categorised spending into Goods, Services and Other, and then 58 sub categories. Using this data, we clustered the Council's procurement portfolio into nine main categories: **hospitality, reimbursement, property, transportation, grants, goods, technology & communication, construction, and service**. Table 1 summarises the distribution of procurement by the amount spent. Service, construction, and technology & communication are the three largest purchase categories, accounting for 89% of the total spend^{xii}.

Figure 1: Distribution of procurement (£)

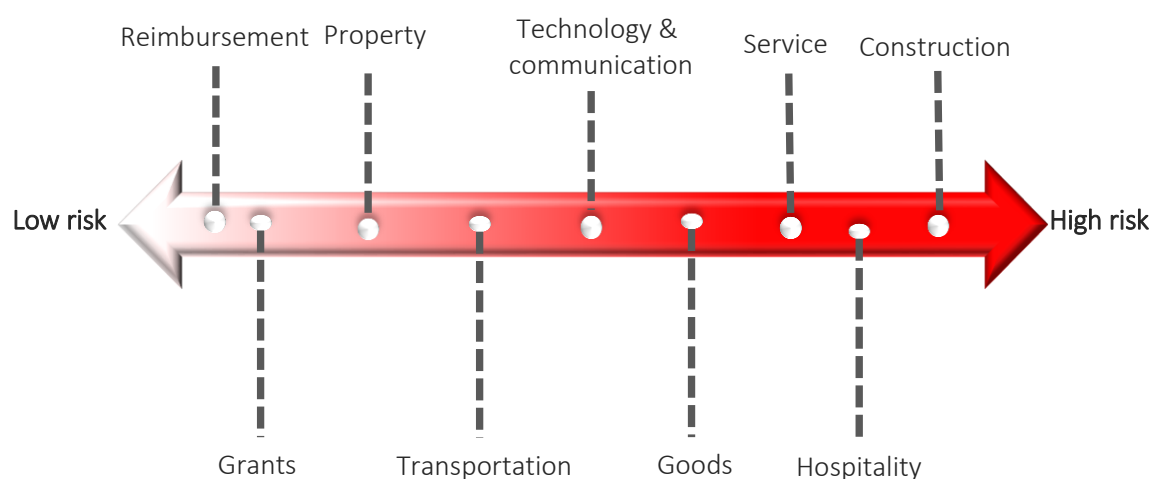


2. Prioritisation of purchase categories

In this step, we evaluated the modern slavery risks of each category in order to identify which types of suppliers should receive more managerial attention to address this issue. The indicators used for the prioritisation of purchase categories include characteristics such as low-wage employment, use of temporary or seasonal workers, and reliance on outsourcing and agent-based recruitment of workers, in addition to existing research and insight^{xiii,xiv}. Each of these factors increases the vulnerability of the workers to modern slavery and labour exploitation risks.

Based on this analysis, Figure 2 (below) positions the purchase categories on a modern slavery risk scale, with Reimbursement representing the lowest risk, and Construction – the highest.

Figure 2: Relative risk of modern slavery associated to purchase categories



A brief description of each purchase category is given below, alongside their relative risk level:

LOW RISK

Reimbursement consists of payments made to employees for their work-related expenses.

Grants - funding provided by the Council to citizens for community activities.

Property - lease and rent which may contain a service component for the maintenance of the facilities which poses a risk of modern slavery.^{xv}

MEDIUM RISK

Transportation - payments for contracted transport, vehicle purchase and rentals.

Technology & communication - subscriptions, bills (e.g., telephone, internet, electricity), and technology-related products; whilst some of these products and services pose a high risk of modern slavery at upstream stages of the supply chain (e.g. electronics), the risk of modern slavery to occur at tier 1 suppliers is low.¹

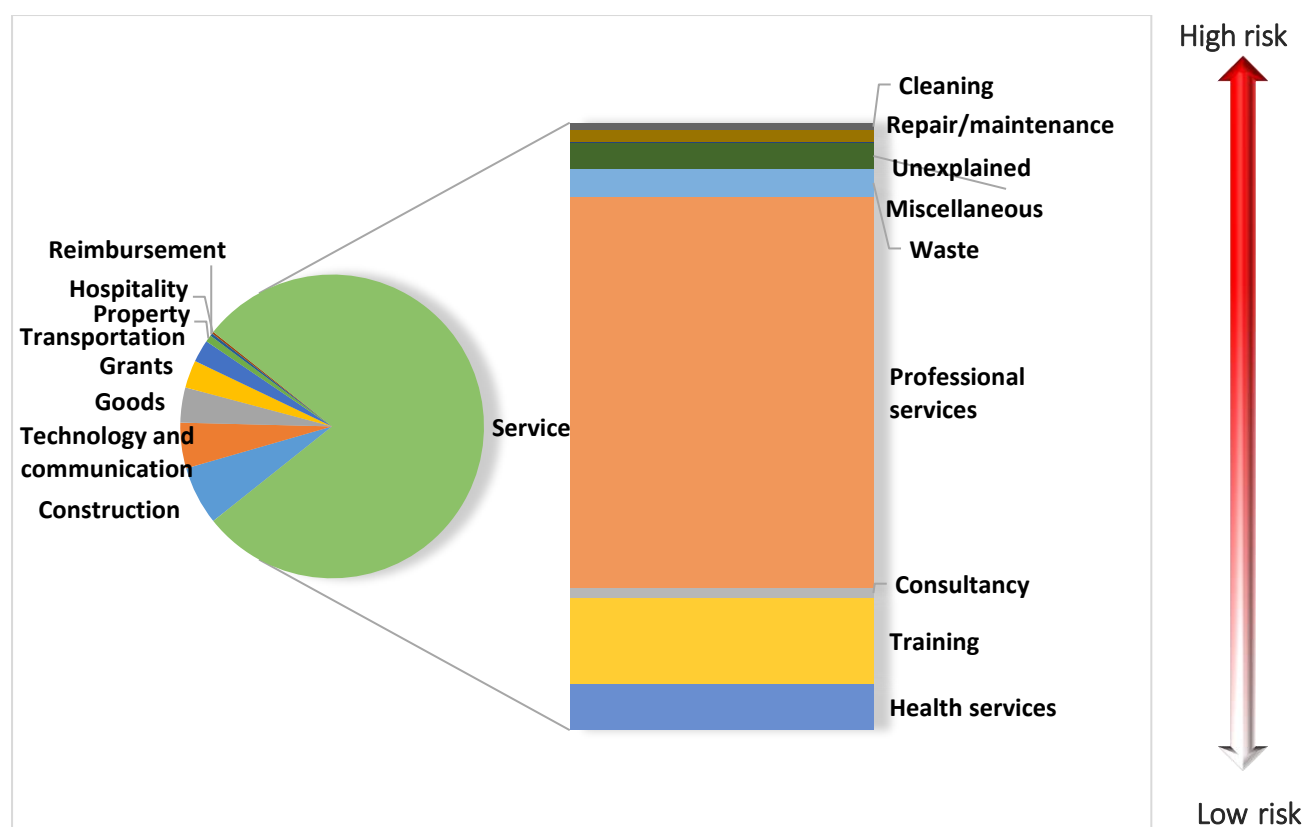
Goods - office supplies, clothing, food and beverages, and building material. Similar to electronics, many of these goods have global supply chains where the modern slavery risk increases substantially towards the raw materials stage corresponding to upstream suppliers.

HIGH RISK

¹ Addressing risk further upstream would be an appropriate next stage in the Council's plan to address modern slavery in their supply chains.

Services - includes maintenance, training, consultancy, and cleaning. The Council procures a wide range of services and so Figure 3 (below) breaks down the service category into subcategories for a more nuanced view on modern slavery risks in this high-risk category. Even though they all belong to the service category, suppliers providing cleaning and maintenance pose substantially higher modern slavery risks compared to consultancy and training. This is due to the prevalence of low wage work, precarious contracts and the use of recruitment agencies. By examining subcategories independently for a better understanding, we can see that of the £276m spent on services, a minority is spent on high risk subcategories. However this still equates to £33.7m of spend and subsequently should be considered a key risk of modern slavery in the Council's supply chains.

Figure 3: Modern slavery risk levels of service subcategories



Hospitality – accommodation services from hotels. While hospitality could be considered as a subcategory of service, it was separated further in the analysis due to its considerable spend and high risk of exposure to modern slavery^{xvi}. It relies largely on low-wage employment for many tasks, such as cleaning and housekeeping and since these low-skill tasks are mostly part of the 'back-office' operations, which customers rarely engage with, spotting labour exploitation is difficult. Many hospitality workers in the UK are migrant workers, and those without strong language skills may be unaware of their workplace rights, or less able to communicate a concern about their conditions or treatment^{xvii}. In addition, the outsourced

recruitment model at hotels increases the risk further^{xviii}. Tier 1 suppliers (i.e. hotel operators) may be unaware of the recruitment processes used by their contractors and labour providers, who - without scrutiny - may be inclined to cut corners and use unscrupulous, unregulated and informal labour supply channel – particularly if they are under pressure to deliver worker quotas to clients. In addition, this arrangement means that the employee is often disconnected from their direct employer (the recruitment agency) as well as the indirect employer (the hotel), and the lack of accountability for the workers welfare can leave them vulnerable if an issue did arise.

Construction - the building of houses. This is considered a high-risk sector for modern slavery in developed countries including the UK with the seasonal nature of the work resulting in high employee turnover^{xix}. Companies often use external recruitment agencies to adjust their workforce for the peaks and troughs, and without doing their own due diligence on recruitment practices, they provide an easy environment for exploitative gangmasters to operate. Additionally, low wage, migrant workers account for a relatively large share (14%) of the UK construction workforce and as already noted, this profile of worker is more vulnerable to becoming a victim of modern slavery^{xx}.

In this section we analysed high level spend data from the Council's procurement portfolio and assessed the relative modern slavery risks by category. While there is a varying degree of modern slavery risk in each category, especially at the upstream tiers of supply chains, a relatively high risk of modern slavery in tier 1 suppliers exists in the service, hospitality, and construction categories. The next section provides recommendations for steps the Council might take to understand their modern slavery risk further and how to manage these risks in their supply chains.

Recommendations

As a result of the risk assessment and prioritisation above, the authors make the following recommendations to the Council as next steps.

i) **Consolidate suppliers in high-risk categories**

Supplier consolidation *per se* does not change the Council's modern slavery risk in its supply chain. However, having a smaller number of high-risk category suppliers makes it more feasible for the Council to invest in engagement with individual suppliers to mitigate modern slavery risks.

The Council should review the areas identified as high risk, and work towards having fewer suppliers, with larger more significant contracts, where strategically possible. Once

consolidation as happened, it should more manageable for the Council to bring together groups of suppliers, to explain the risks and work through expectations of how they will manage them together.

ii) Strengthen relationships with suppliers in high-risk categories

One-off orders and transactional short-term relationships with suppliers increase the risk of modern slavery in supply chains because of reduced due diligence checks for ad-hoc and small volume suppliers. Whilst short term, transactional contracts are necessary for some products and services, the Council might consider shifting towards longer-term relationships with suppliers in high-risk categories that it procures from regularly. Not only will this allow the Council to deepen their understanding of how the supplier manages modern slavery risk in their business and supply chain but longer term contracts often also give the supplier more confidence, and the security they need, to invest in activity which mitigates modern slavery risk.

When moving to longer term contracts, the Council could also consider adding in clauses to the new contracts, which refer to an obligation to manage the risk of modern slavery and report to the Council annually on how they are actioning this. If Bradford Council is a signatory to the Co-op Party Modern Slavery Charter, they may also wish to note this in the standard terms and conditions as a policy framework that the Council is working to, and which it expects its suppliers to also support.

iii) Increase supply chain transparency and visibility

In its early communication and engagement with high-risk category suppliers, the Council might consider increasing supply chain visibility and encouraging suppliers to be more transparent. Transparency is a crucial enabler for understanding modern slavery risks and mitigation intervention. Supply chain transparency and reporting is already legally demanded in some jurisdictions and for certain high-risk materials, conflict minerals for example^{xxi}. It is also increasingly applied in private and public organisations on a voluntary basis. The Council could request information from its suppliers about their modern slavery risk measures, which could help the Council identify different dimensions of modern slavery risks and evaluate its suppliers' preparedness to act against modern slavery risks.

For example, the Council might ask a supplier in a high-risk category:

- *Do you have a modern slavery policy, or alternative similar policy you can share with us?*

- *Do you have an employee whistleblowing hotline, or an alternative way employees can seek help or raise a grievance anonymously?*
- *What employment checks do you have in place when colleagues are recruited directly?*
- *If you work with labour providers, how do you ensure they are recruiting responsibly, and are you aware of the measures they take to ensure their temporary workers aren't under coercion of a trafficker?*
- *Who has overall responsibility for anti-slavery activity and risk management in your organisation?*

iv) Increase granularity of purchasing data for more detailed risk identification

In many categories, the risk of modern slavery is likely to increase towards upstream stages of supply chains. To expand the scope of risk assessment beyond tier 1 suppliers, the Council might consider engaging with tier 1 suppliers to gather information about the upstream tiers of their supply chains and the sources of their workers.

Hidden risks may be discovered by a more nuanced understanding of the purchasing activities and individual purchase orders in discussion with procurement officers and suppliers. Furthermore, procurement data is traditionally recorded with a commercial focus. Adding modern slavery risk-relevant information to purchase orders will make the risk-based categorisation of suppliers and categories more accurate and straightforward.

For example, the Council might start to request information from suppliers such as:

- *How many suppliers their direct suppliers work with*
- *Where those suppliers are situated (e.g. country mapping of Tier 1 and 2 from product related supply chains) – there are lots of online resources which explain which products and countries are high risk for modern slavery.*
- *What proportion of their suppliers' workforce relies on temporary/informal/3rd party labour*
- *What proportion of their supply base does the Council supplier visit regularly*

v) Increase leverage over suppliers

The Council would benefit from collaborating with other LGs which procure similar products and services. Merging procurement needs among LGs would increase their leverage on suppliers who would be more willing to accept terms and conditions in order to secure a large contract.

The UK higher education sector constitute a good example for LG collaboration for procurement. The majority of universities in the UK are affiliated to one of six regional Higher

Educational Purchasing Consortia^{xxii} which are dedicated to improving both the quality of procurement and the level of collaborative procurement across the higher education sector. By combining their purchasing power and developing joint policies for sustainable procurement through these consortia, they have been able to maximise their influence on suppliers.

The Local Government Association (LGA) currently has the following information on their webpages about tackling modern slavery in local councils:
<https://www.local.gov.uk/topics/community-safety/modern-slavery>

The Council could speak to the LGA about collaborative purchasing opportunities, raise it with the signatories of the Co-op Charter, or simply reach out to geographically or demographically similar councils it has an existing relationship with.

vi) Organise annual meetings and round tables with suppliers in high-risk categories to raise awareness about the Council's expectations against modern slavery

Suppliers often do not have existing capabilities to detect and mitigate risks in their labour or product supply chains. Building on its expertise in organising events with a wide range of stakeholders, the Council could establish meetings and round tables for knowledge transfer and capacity building in suppliers operating in high-risk categories.

For example, the Council could start with a workshop for key construction suppliers, providing an overview of the Council's expectations around responsible recruitment practices; work through an example of a construction product supply chain, and a labour supply chain and identify the risks; invite stakeholders from industry bodies such as the Gangmasters and Labour Abuse Authority (GLAA) who can share tools such as the [Construction Protocol](#) on modern slavery and generally encourage collaboration and transparency, to tackle the issue together.

vii) Widening and deepening supply chain insight

This pilot risk assessment focuses solely on the Council's high level procurement activity and analysis undertaken was only at category level. A deepening of supply chain insights into the areas below, will equip the Council to better understand their modern slavery risks and mitigation opportunities:

- Analysis of modern slavery risk by supplier

- Mapping and analysis of upstream tiers of the supply chain
- Engagement with tier 1 suppliers
- Mapping of and engagement with the Council's own labour providers and their supply chains

This should be done on a prioritisation basis and the Council may wish to look at membership of, or use of, a third party supply chain mapping system at this point. To do this strategically it may also be worth the procurement team undergoing training on setting up a responsible procurement programme, and/or designated responsibilities for managing labour standards being assigned to colleagues per procurement category area.

Summary

This report analysed Bradford Council's spend from April-December 2019. It reviewed the Council's procurement spend and categorised the purchases into nine groups. Communication and Technology, Construction, and Services were the top 3 categories which accounted for 89% of total spend in the data set (c. £315m). These categories were then analysed for risk to modern slavery, with three defined as lower risk, three medium risk, and three high risk, the latter being Construction, Hospitality and Services (which was broken down into sub-categories for clarity).

These industries were identified as of particular concern because they often use temporary labour, employ people through recruitment agencies into roles which are often hard to monitor and spot signs of exploitation occurring, and may be fulfilled by people with little or no English language. It was established that if the Council was using these services without scrutiny of the suppliers providing them, there is a significant risk that some form of labour exploitation is occurring along the supply chain.

To mitigate these identified risks, seven key recommendations were made. The recommendations pertain to supply chain risk management through the adoption of better processes and enhanced activity towards addressing modern slavery risk, based on this first preliminary analysis of high level spend data by category. It is recommended that the Council considers and implements these recommendations, to take a significant step forwards in managing modern slavery risk in their operations and supply chains.

Glossary

Low wage work: A job that pays less than what is considered socially acceptable.^{xxiii}

Modern slavery: An umbrella term encompassing slavery, servitude, forced or compulsory labour and human trafficking. Victims of modern slavery are unable to leave their situation of exploitation, controlled by threats, punishment, violence, coercion and deception.^{xxiv}

Supply chain: The movement of goods and services, through a logistical process, from raw materials to delivery of finished products to the end user. All vendors, service providers and customers are links in the supply chain.

Tier 1 suppliers: Companies which provide finished products and/or services directly to an organisation (e.g., Bradford Council) without dealing with an intermediary or other manufacturers.

Tiers in supply chain: Tiers indicate suppliers' distance to an organisation (e.g., Bradford Council) in the supply chain. While tier 1 corresponds to direct suppliers, tier 2 corresponds to indirect suppliers (supplier of suppliers) and tier 3, 4, etc. correspond to further upstream suppliers.

Upstream: Refers to the supply side of the supply chain. Upstream partners are the suppliers who provide goods and services to the organisation needed to satisfy demands which originate from the point of demand or use, as well as other flows such as return product movements, payments for purchases, etc.

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rightslab@nottingham.ac.uk



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