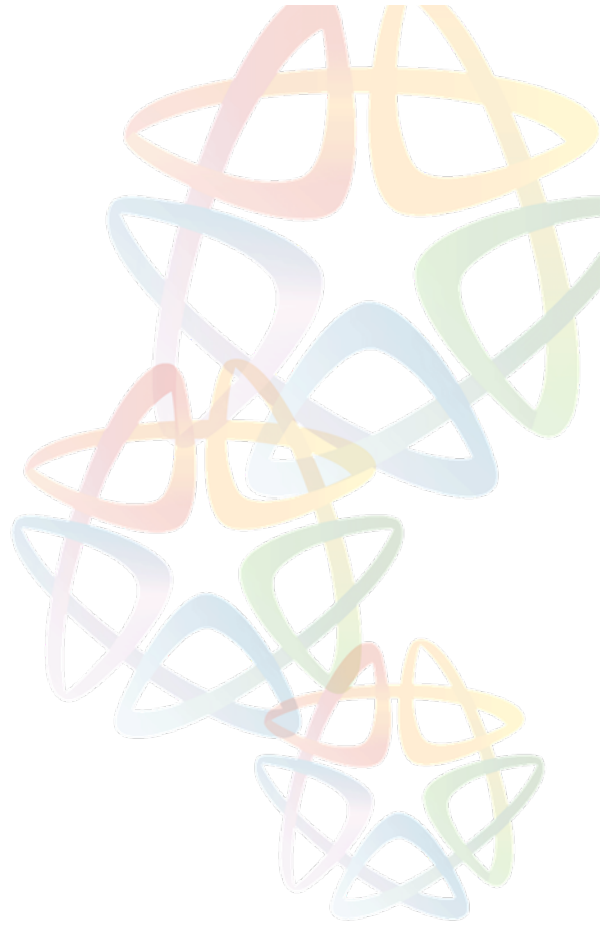




**Black Country
Women's Aid**

We listen, we support, we care



Document Name	Black Country Women's Aid Modern Slavery Statement
Document last updated	New document
Version Number	2
Signed by	CEO
Approved by	BCWA Board of Trustees
Date approved	July 2025
Date Policy review	February 2026

Black Country Women's Aid Modern Slavery Statement

About Black Country Women's Aid

Black Country Women's Aid (BCWA) is a registered charity and a company limited by guarantee. Our mission is to provide support, advice and guidance and a place of safety, to people who have experienced violence and abuse. BCWA is committed to helping to rebuild lives free from violence and abuse. All our services meet with national standards of good practice, are evidence led and are trauma and resilience focused.

BCWA is commissioned to deliver services across the Black Country and the wider West Midlands through a combination of commissioned contracts, different funding sources and community fundraising.

The voice of those that have experienced violence, and abuse is vital to influence and shape services. It is vital that BCWA creates spaces that enable their voice to be heard, use their experience and expertise to influence meaningful change at a local, regional and national level.

BCWA supports victims/survivors both male and female over the age of 16 who have experienced;

- domestic abuse
- rape and sexual violence
- stalking
- modern slavery and exploitation

in addition

- women who have offended and in the criminal justice system
- children as victims in their own right

Our services are delivered through a network of specialist centres called "Cedar Centres" where victims/survivors can "tell their experience once" and access all support services in one place. In addition, services can be accessed remotely with online support via text, WhatsApp and webchat.

BCWA also leads on the prevention of abuse through a variety of partnerships with public and private sector support.

Organisational Structure

BCWA is governed by a Board of Trustees who meet on an 8-week cycle. Supporting the Board is a subcommittee structure focusing on Finance and Facilities Management, Quality and Safeguarding and Workforce Development, these are scheduled throughout the year. BCWA is an inclusive organisation and promotes openness and transparency and to support the work of the sub committees. BCWA have a workstream structure with manager/worker membership that ensure that assurances are in place to meet BCWA obligations.

BCWA operates across the West Midlands and surrounding Shires depending upon the specific commission/contract. The delivery of the Modern Slavery Support Contract covers this geographical span however most services are commissioned locally e.g. via local authorities or regional bodies such as the Office of the Police Crime Commissioner (OPCC).

BCWA recognises that it cannot deliver all the requirements of its services on its own and has a supply chain management system that ensures that all 3rd parties delivering or supporting the work of the charity complete the appropriate due diligence criteria to be eligible to work with/for BCWA.

Within BCWA the key individuals responsible for identifying, assessing and responding to modern slavery are:

Position	Responsibility
Board of trustees	Overall responsibility of the quality, performance and budgets assigned to address modern slavery including supply chains
CEO	Lead responsibility for day to day strategic and operational responsibilities to modern slavery. Accountable for providing assurance to the Board of trustees that policy, procedure, standards and quality are being met.
DCEO/Director of Finance	Lead responsibility for the financial reporting, budget setting and facilities management including supply chain, due diligence and payments to victims/survivors in the MSVSS/TSA
Director of Accommodation	Lead responsibilities for victims identified through the NRM and referred into BCWA via TSA to receive a high-quality accommodation support service against the specification and legal obligations. This lead is supported by a team of managers and operational staff.
Head of Outreach	Lead responsibilities for victims identified through the NRM and referred into BCWA via TSA to receive a high-quality service against the specification and legal obligations. This lead is supported by a team of senior workers and operational staff
Executive Officer	Lead for compliance for BCWA and within the MSVSS/TSA. This lead is supported by a team of corporate staff.
All Employees	All BCWA are in contact with victims of abuse during their working day or have access to information regarding abuse. All employees need to be vigilant in their needs and risk assessments.

Reporting on Modern slavery occurs on an 8-weekly cycle via the Board meetings where leads for services are required to report service details, impact and performance.

BCWA is a part of several Modern slavery partnerships across the West Midlands that contribute to the regional strategic approach. BCWA contribution is essential in local areas understanding the issues facing victims of modern slavery, the impact and trauma and challenges to access local services.

BCWA has been delivering the MSVSS contract since 2011. Reflections on the impact, changes and a commitment of continuous improvement increase standards and understanding both internally and externally. There is however a significant amount still to do.

BCWA role in improving the lives of survivors of modern slavery and human trafficking.

- BCWA's modern slavery service aims to restore dignity and advocate for systemic change to end slavery. We work closely with The Salvation Army (TSA) to deliver support to victims referred to the National Referral Mechanism (NRM), a national framework ensuring victims of modern slavery are identified and receive appropriate support.
- BCWA's specialist research and practice centre the Centre of Analysis of Exploitation (CeAnEx) works across the region to identify and support victims.
- All services provided by BCWA are expected to understand the signs of human trafficking and modern slavery in all its forms and refer into the appropriate agencies
- BCWA is strategically linked with all local strategic partnerships where modern slavery is discussed.
- BCWA is a member of the West Midlands Anti-Slavery Network.

Assessing and managing Risk

Modern slavery risk assessments is part of BCWA wider approach to risk management and included in the general risk assessment.

Initially BCWA will undertake desk-based research as a first step to understand where the highest risks to assist in engaging which suppliers may be at higher risk.

Survivors of modern slavery face a long and often complicated journey to recovery. Services are available through working with TSA against a specification designed by the Home Office. BCWA is a sub-contractor of the national contract under the leadership and direction of the Salvation Army (contract ends 2027).

Interventions used within BCWA are evidence-based, focusing on understanding and managing trauma, adult and family support, community integration and creating opportunities such as volunteering, and employability.

- Support services
Throughout BCWA support services all advisers/advocates are trained and skilled to identify victims of modern slavery/human trafficking. Ongoing training is available to all BCWA employees to enable them to report to a First responder for the victims to access the NRM. BCWA is committed to ensuring that the victims are always safe.
- Specialist MDS service
The team responsible for delivering against the national contract awarded to TSA are responsible for receiving referrals via TSA and completing risk assessments. The services are externally assessed and audited against a quality assessment framework. The service adheres to a series of performance targets set out in the contract that are monitored and managed on a daily, weekly, monthly basis. BCWA report to TSA and the Board of trustees. Where there are risks or concerns these are reported via a risk register.

Due Diligence

Due diligence

- serves as a critical investigation tool with the primary purpose of this process is to minimise potential risks and maximise the assurance of making an informed decision.
- aids in risk mitigation and provides a thorough understanding of possible liabilities and associated risks, enabling BCWA to plan for contingencies, set realistic expectations, and negotiate terms confidently.
- serves as an essential strategy to circumvent legal complications and financial losses. By revealing potential legal issues, hidden liabilities, or even irregularities in financial statements, it promotes compliance with relevant laws and regulations. This prevents potential legal disputes and financial pitfalls, shielding businesses from unnecessary risks.
- paves the way for informed decision-making.

BCWA has a robust due diligence checklist that applies to everyone associated with fulfilling the responsibilities of the charity. This includes:

- Undertaking risk assessments including financial, operational, systems, reputational
- Factual verification - Cross checking information that has been made available for accuracy and authentication e.g. identifying partners, recruitment and employment, 3rd party service providers including volunteers, contractors/suppliers
- Research - cross checking against legal, environmental and business and strategic links e.g. market evaluation, company culture and leadership.
- Human rights – BCWA Employees – ensuring that as an employer BCWA is active in seeking confirmation of an individual's right to work, that the positions of employment are valued and paid in accordance with the market value, the conditions of employment are fair and reasonable and within the law and that BCWA publish and promote itself as a employer that values its employees
- Human Rights - Survivors/victims - ensuring that the supportive environment is trauma informed, that victims/survivors know their rights and can challenge the service and their voice will be heard. The service is delivered in a trauma informed way creating a space for victims/survivors to influence change for themselves and others.
- Supply chains and contractors - a new approval process will identify suppliers at highest risk and categorise them accordingly with an annual review as part of SLA/contracting arrangements. For new suppliers BCWA will interrogate suppliers' modern slavery policies and supply chains, the processing of invoices for payment can only occur where a supplier has successfully applied for approval. This approach will enable us to ensure best value for money, to set out clear expectations and have better oversight and management of risks in our supply chains.
- Reporting and recording - there are mechanisms to report and record due diligence to the Board of trustees and throughout the organisation.

Policies relating to Modern slavery

The following BCWA policies ensure that BCWA adheres to the conditions set out in the 2015 Modern Day Slavery Act and related legislation.

These policies will be supported through effective communications and where appropriate, training, resourcing and collaboration of effort by appropriately skilled personnel.

Policies will be clearly communicated so that anti-slavery activity within BCWA and its supply chains becomes embedded as standard practice, which all staff are aware of and incentivised to partner on and support.

BCWA policies are available on the BCWA intranet and updated in accordance with the policy review cycle.

Policies will be reviewed in accordance with the policy review cycle and approved by Trustees.

In particular

Home Office Guidance	Where in BCWA policies
Adherence to local and national laws	Employee Handbook
Freedom of workers to terminate employment	Contract/terms and conditions Employee Handbook
Freedom of movement	Job description Contract/terms and conditions Employee Handbook
Freedom of association	Employee Handbook
Prohibits any threat of violence, harassment and intimidation	Employee Handbook
Prohibits the use of worker-paid recruitment fees	Financial regulations - use of agencies to be developed
Prohibits compulsory overtime	Employee handbook
Prohibits child labour	Needs to be explicit in the Employee Handbook
Prohibits discrimination	Employee Handbook Safer recruitment Policy Recruitment and Selection Policy
Prohibits confiscation of workers original identification documents	Needs to be explicit in the Employee Handbook
Provides access to remedy, compensation and justice for victims of modern slavery	Needs to be more explicit in the Financial regulations and Employee Handbook

Training and development

BCWA also sees raising awareness to BCWA employees and partners across the West Midlands as a vital part of the support to others.

BCWA internal training and capacity building

BCWA will

- ensure that all employees complete modern slavery training on an annual basis to build knowledge and awareness.
- Ensure that specifically our HR colleagues and managers supporting the recruitment processes are specifically trained on safer recruitment and have regard to the potential candidates as victims of modern slavery
- Engage with people with lived experience of exploitation in BCWA services to assist in BCWA always understanding the risks posed to workers and conduct effective due diligence.

BCWA and External Stakeholders - training and capacity building

BCWA will

- Request that all major suppliers have evidence that they have received training on modern slavery and that this is a condition of any longer-term working relationship
- Offer to deliver training on Modern Slavery to build knowledge and awareness
- Explore their understanding of modern slavery and work with them to increase awareness and knowledge. This will include understanding the impact on them, discussions to work out how to address them, legal obligations and their interface with BCWA and any impact that this might have

BCWA develops training package on modern slavery for organisations and employers. The aim is to deliver training externally to raise awareness among community and corporate partners; to upskill BCWA people (staff, students, and volunteers); and upskill Local Authority and Commissioning teams who entrust BCWA to deliver their services.

Policy and Research

BCWA aims to share the experiences of supporting victims and their interface with statutory and other services with policy and change makers so that decisions and legislation can be informed and policies influenced and changed.

BCWA is part of a wider network of service providers who together share experiences, lobby for change and explore opportunities to challenge policy and politicians. An example of this can be found in the development of the Manifesto for change presented to representatives of both the houses of Commons and Lords on the impact of changes to the systems that protect victim/survivors of modern slavery and human trafficking. The calls that were made are split into those that can be delivered in the first 100 days of a new government and more significant, longer-term change.

In addition, as a collective we challenged the Illegal Migration Act in 2023 and its implementation as this was expected to bring significant changes to the sector. As a collective we could see that that victims of modern slavery and human trafficking who have entered the UK irregularly through no fault of their own – in many cases forced against their will, coerced, or deceived – would be detained or deported.

Engagement with stakeholders

BCWA will work with stakeholders to:

Communication is key to good stakeholder relationships, BCWA will ensure that meaningful and effective communication takes place on a regular basis to build trust, knowledge and confidence in all parties.

Evidence or suspicions of modern slavery

BCWA by the nature of its work may come across victims of modern slavery. This can be:

- Identified during needs and risk assessments

- Via specific services targeting victims of exploitation
-

All staff are trained to identify modern slavery as part of its mandatory training programme. Where there is evidence or suspicion BCWA will adhere to the following guidance.

- To assess the risk to the victim when identifying exploitation and their safety is always considered
- To ensure the victim is informed/communicated with at every stage of the process
- To contact appropriate agencies to report
 - Modern Slavery Helpline – call 08000 121 700 or fill out an online form.
 - Gangmasters and Labour Abuse Authority – for concerns about the mistreatment of workers call 0800 432 0804, or email intelligence@glaa.gsi.gov.uk
 - Crimestoppers – 0800 555 111
 - The Police – on 101 or if an emergency on 999
 - An anti-slavery organisation such as the Salvation Army, Unseen or Anti-Slavery International – see here for the contact details of other specialist anti-slavery organisations.

Monitoring and Evaluation

BCWA will monitor and evaluate the impact of the statement and activity on an annual basis providing reports to trustees, staff and stakeholders. This will be published on BCWA's website.

Continuous Improvement

BCWA will strive to improve its systems, processes and practice by continuous review, reflection and challenge. Analysis of data, impact, feedback and shared good practice reviewed on an annual basis will ensure that the response to modern slavery gets better each year.

Targets Set for 2025/26

Target	Aim	Objective	Lead
1	Agreeing the statement	To ensure that a review of the modern Slavery statement is included in the Board of trustee's business planning day during Q4 when setting priorities for the following year	CEO
2	Promoting the statement	To ensure that the statement and plans for the year are shared with all employees at the start of every financial year.	CEO
3	Increasing Awareness BCWA	To ensure all BCWA employees receive training and awareness on modern slavery, its impact and referral into services during the year	Head of training and learning
4	Increase Awareness Stakeholders	To develop and promote a Modern slavery training module for stakeholders in the MSVSC geographical area including commissioners/LA's	Head of Learning and development Director of Accommodation/Head of MDS Outreach
5	Increase Awareness Annual event	To host an annual event bringing together stakeholders in the area to an awareness, topical themes - linked to Antislavery day and annual remembrance	CEO Head of Learning and development
6	Supply chain review	BCWA will use the framework of the Supply Chain Sustainability School to ensure that due diligence is carried out on supply chains. Review Supply chains on an annual basis and report via Sub Committee structure	DCEO/Director of Finance
7	Supply Chain Risk	BCWA will ensure that there is a risk framework in place in line with the ETI's Human Rights Due Diligence Framework and Responsible Sourcing Tool	DCEO/Director of Finance
8	Procurement Procedures	To review financial procedures and more specifically procurement procedures to ensure that they work within the Ethical Procurement for Health Workbook	DCEO/Director of Finance
9	Review Financial Procedures	Review Financial Procedures in relation to Modern slavery in particular the purchasing practices to avoid pressure on suppliers and will reference Ethical trading Initiative Guide to buying responsibly	DCEO/Director of Finance
	Employee handbook	Review the Handbook on an annual basis or as new regulations emerge to ensure that it is reflective of good working practice. This will include reference to ETI's Freedom of Association in Company Supply Chains – A Practical guide.	DCEO/Director of Finance/ HR
10	Communication	Make available BCWA modern Slavery statement and develop a communication strategy to engage with stakeholders	CEO Director of Accommodation/Head of MDS Outreach

Target	Aim	Objective	Lead
			Head of Development and Communications
11	Communication	Target politicians and high-profile stakeholders in the areas about the work BCWA does to support victims/survivors of modern slavery	CEO Director of Accommodation/Head of MDS Outreach Head of Development and Communications
12	Providing comprehensive support to our survivors as early as possible	The Nationality and Borders Act 2022 and the new national specification reduces the time available for support, increases the threshold for people to access support, and introduces provisions to disqualify people from support. We will continue to closely monitor the impact on the number of people referred to services and deliver support to them as swiftly as possible by reviewing/re-designing our service delivery model. This will allow us to better respond to the increased complexity of need observed, whilst equipping survivors with tools for independence as quickly as possible.	CEO Director of Accommodation/Head of MDS Outreach
13	Developing a Community Integration service	We are committed to developing a wider network of support to victims/survivors via improving community integration including befriending volunteer programme, and activities aimed at increasing survivor's self-confidence, joy, confidence, and resilience and supporting their independence.	CEO Director of Accommodation/ Head of MDS Outreach
14	Exploring access to legal support	Legal advice and representation can play a pivotal role in supporting people to rebuild their lives after crisis - from getting compensation for criminal injuries, securing housing entitlement, or ensuring children are safe. We will explore the financial logistics of developing a legal resource to help more people access timely and free legal support.	CEO Director of Accommodation/ Head of MDS Outreach
15	Advocating for and championing the needs of modern slavery victims in the UK	Ensuring that we link with government as well as policy makers across all parties in both Houses, and the Independent Anti- Slavery Commissioner; working with the Home Office Modern Slavery Unit and relevant for a to ensure we are kept abreast of changes and trends observed in detention centres.	CEO Director of Accommodation/ Head of MDS Outreach
14	Create a connection with victims/survivors	Explore ways to maximise the Lived experience of victims/survivors including survivor groups, creative arts	Director of Accommodation/ Head of MDS Outreach
15	Research - influencing policy	Publish research on thematic areas of modern slavery. This will combine data, insight, and poignant human stories on where the crimes take place and	CEO CeAnEx

Target	Aim	Objective	Lead
		how they have evolved, alongside data which challenges public and political perceptions of this crime.	Director of Accommodation/ Head of MDS Outreach

Key Risk Areas

Risk	Detail	Mitigation
Illegal Migration Act 2023, the Nationality and Borders Act 2022, the new Returns and Enforcement programme	The Labour Government have stopped the returns to Rwanda programme but have moved civil servants previously working on this to a Returns and Enforcement programme with a focus on cracking down on illegal employment and deporting migrants illegally working in the UK. This includes sectors where modern slavery is common. We are monitoring the impact of this programme and are calling for the need to identify possible victims of modern slavery and ensure they are adequately supported.	Government have including putting modern slavery back under the Minister responsible for safeguarding - survivors still risk being prevented from accessing the support they need under current legislation. We are continuing to closely monitor the impact of the Nationality and Borders Act 2022 and the Illegal Migration Act 2023 on our services and are pushing for the change outlined in our manifestos which would significantly improve how this country protects victims of modern slavery and human trafficking, and how it punishes the perpetrators behind such crimes.
Supply Chains	Not all suppliers used by BCWA understand and/or know how to tackle modern slavery.	To address this, we are ensuring new suppliers complete the due diligence checklist and are screened before being approved. BCWA will also make available training for all our suppliers to ensure they can identify potential concerns of exploitation and take appropriate safeguarding action.
Vulnerability of clients linked to the cost-of-living crisis	BCWA is concerned about the financial vulnerability of many of the clients in services and their inability to access basic services such as safe housing and legal support. This creates a further opportunity for exploitation by criminal gangs and other perpetrators of modern slavery. In particular, there is potential for individuals to be targeted for labour exploitation and cuckooing.	We are reviewing all our stakeholder networks. Assessing the need for "in house" legal support and building our community networks, CRS partners in our services where we can so that they can assist with basic supplies. Across all our services we are starting to explore whether and how we can do anything to improve people's access to safe housing within the region.