

North Wales Police

Modern Slavery Statement 2022-2023

In accordance with Section 54 of the Modern Slavery Act 2015, the Police and Crime Commissioner for North Wales and the Chief Constable recognise their responsibility as an employer to be aware of the potential for instances of modern slavery and to report such instances or concerns to the relevant bodies. This statement is underpinned by a local Action Plan.

This statement sets out the work undertaken during the financial year ended 31st March 2022 to further identify, prevent and address modern slavery across the force and its supply chains.

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, sexual exploitation, forced and compulsory labour and human trafficking, 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.

The Police and Crime Commissioner for North Wales and the Chief Constable are committed to ensuring that there is no modern slavery or human trafficking in the force supply chains or in any part of the business. The force's policies, procedures and our work to tackle modern slavery through a working group, demonstrates our commitment to act ethically, with integrity and to identify risks that we can work to mitigate.

In 2017, the Police and Crime Commissioners and Chief Constables for the four police forces in Wales signed up to the Welsh Government Ethical Employment in Supply Chains Code of Practice. North Wales Police is fully committed to address unethical and illegal employment practices in supply chains and this statement is underpinned by an **Action Plan** to deliver the commitments within the Code.

Our approach to identifying and tackling ethical supply chain issues by implementing the Code across the force and supply chain focuses on four areas:

Enforcement – North Wales Police will play an active role in enforcement and will use our roles in employment and purchasing goods and services to improve intelligence gathering whilst ensuring full compliance with the Code of Practice as well as acting promptly on information received.

Ethical Procurement – North Wales Police will promote the development of ethical supply chains in the delivery of contracts for the police service in Wales generally and specifically in North Wales

Employment – North Wales Police will aim to follow best practice and demonstrate full commitment to constant improvement within its own systems and structures, as well as working with the other forces in Wales and with partners to identify and eradicate any form of exploitation.



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

gwneud Gogledd Cymru'r lle **mwyafr diogel** yn y DU
making North Wales the **safest** place in the UK

Environment – North Wales Police will aim to create a more hostile environment for perpetrators of modern day slavery. We will encourage the public to report any signs of exploitation in all its forms and work with partners, including local government, the BCUHB and voluntary and community groups to heighten awareness of – and reporting of – signs of exploitation. We will ensure that all our staff – particularly Police Community Support Officers and staff in our Public Service Centre – are fully aware of what to look out for and what to do when concerns are reported.

We recognise that modern slavery extends far beyond our national borders and that risks are increased with complex supply chains. Whilst tackling modern slavery is a policing priority for each force, the Welsh forces recognise that modern slavery can extend throughout our supply chains and that we also have a responsibility to address this through our procurement practices recognising that our supply chains are varied and complex.

An initial review of our supply chains has highlighted the potential risk of modern slavery in the following categories:

- Information communication and technology
- Construction
- Cleaning and waste disposal services
- Uniform manufacture

We acknowledge that fully investigating supply chains is a difficult task with the resources available, but we have started this work by incorporating modern slavery routinely into our supplier questionnaire considering higher risk areas due to their industry type, the nature of the workforce, supplier location, commodity type and the level of our expenditure.

We are committed to sharing information across forces to make the best use of our limited resources to investigate our supply chains based on where the greatest risk of human exploitation may be found. We will work to raise awareness of modern slavery issues across our supply chain and will adopt a risk-based action plan.

Policy and Guidance

The force's operational response to modern slavery is shared amongst the responsibilities of our Chief Superintendent's for Crime Services and Local Policing Services. The guidance issued by the force is in place with the aim to reduce the risk of serious harm to victims and improve their safety, health and wellbeing. The guidance outlines how modern slavery offences will be dealt with. By achieving successful prosecution of offenders, we aim to enhance the trust and confidence of victims. Training is provided to front line officers and Inspectors are responsible for co-ordinating attendance at incidents, reducing immediate risks and preserving available evidence.

North Wales Police's Procurement Strategy, incorporates a Responsible Procurement Policy.

Other relevant policies include the College of Policing Code of Ethics and our Counter Corruption policy. Work is ongoing to finalise an All-Wales Whistleblowing policy to support the Welsh Government Code of Practice and to empower staff to raise suspicions of any unlawful and unethical employment practice.



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Due Diligence and Risk Assessment

Progress was made during the previous period to address unethical and illegal employment practices in our supply chains and the work is summarised below:

Policy Development

- Inclusion of modern slavery within the Force Delivery plan for 2021-22 including making North Wales a more hostile environment for perpetrators.
- Appointment of a 'Ethical Procurement Champion' at Chief Officer level.
- Making the safeguarding of vulnerable people a clear priority in the Police and Crime Plan 2021-2024

Procurement Procedures

- Development of modern slavery questions to be included in appropriate tenders.
- Where appropriate, agreeing to seek assurances from suppliers and potential suppliers through our tendering processes, that they have no knowledge of any of the forms of modern slavery within their organisations or supply chains. We will expect our suppliers to take responsibility to seek similar assurances from their own supply chains.
- Inclusion of suitably robust terms and conditions around modern slavery in our supply chain contracts to clearly set expectations.
- Sharing of best practice with the other Welsh forces

Assessing existing suppliers and supply chains

- Initial spend analysis to identify higher risk suppliers with a view to applying a Risk Assessment Tool
- Commencing work with Bluelight Commercial to consider how work relating to investigating ethical supply chains with common suppliers can be shared.

Training and Raising Awareness

- Completion of annual CIPS (Chartered Institute of Procurement & Supply) refresher training by strategic procurement staff.
- Development of online Procurement Skills NCALT (National Centre for Applied Learning Technologies) training to upskill officers and staff.

Living Wage

- The Police and Crime Commissioner for North Wales and the Chief Constable agreed to apply the Living Wage Foundation living wage to all officers and staff.

Delivery / Action Plan

To further progress the delivery of our commitments to tackle modern slavery, representatives from a wide range of areas across the force have our agreed objectives for 2022-2023 which are captured in the Action Plan underpinning this Statement.



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

gwneud Gogledd Cymru'r lle **mwyafr diogel** yn y DU
making North Wales the **safest** place in the UK

Progress against the Action Plan will be monitored through a working group, chaired by the Chief Officer with responsibility for the Finance & Business Services Portfolio who is also the Anti-Ethical Procurement Champion for North Wales Police.

The force action plan can be accessed via the link below:

- [Link to action plan here](#)

Reporting Channels Available

The public and staff equally have a responsibility to be aware of potential instances of modern slavery or of a business using forced labour. If you have any such concerns, please contact any of the following bodies:-

North Wales Police: Telephone 101 (or 999 in an Emergency)

Modern Slavery Helpline: Telephone 0800 0121700

Crimestoppers: Telephone 0800 555 111

Confidential Integrity Line (North Wales Police internal only)

Download the Unseen App for free

This Statement has been approved by The Police and Crime Commissioner for North Wales and the Chief Constable. It will be reviewed and updated annually.



Andy Dunbobbin

Police and Crime Commissioner
for North Wales



Carl Foulkes

Chief Constable,
North Wales Police



08000 121 700



Originally signed on 15th March 2019

Reviewed and updated 1st August 2022