



MODERN SLAVERY TRANSPARENCY STATEMENT

Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including human trafficking, sexual exploitation, domestic servitude, forced labour, criminal exploitation, child slavery, forced or bonded labour, financial exploitation and organ harvesting.

Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

The Modern Slavery Act 2015 came into force in July 2015 and consolidates offences relating to slavery and human trafficking. It also includes a provision for transparency in supply chains that requires all businesses (now including public sector organisations) with an annual turnover of £36 million or more to disclose, in an annual slavery and human trafficking statement published on their website, what steps they have taken during the financial year to ensure their business and supply chains are slavery free, and their future plans to eradicate slavery within supply chains.

Commitment

Cheshire Police and Crime Commissioner (PCC) and Cheshire Constabulary are committed to the prevention of modern slavery and human trafficking. This statement sets out the steps we have taken and are planning to take to address the risk of modern slavery and human trafficking occurring within our own organisation and those of our partners and supply chains. We commit to regularly reviewing this statement to ensure that it is compliant with up-to-date legislation, guidance, practice and trends.

Organisation Structure and Supply Chains

As of July 2022, Cheshire Constabulary has a workforce of approximately 4162 full time equivalents (including Police Officers, Police Community Support Officers, Police Staff and Volunteers including members of the Special Constabulary).

In order to support the demands of modern policing it is necessary to purchase a range of goods and services from external suppliers. We procure over £76m of goods and services per annum and work with over 1400 suppliers. We are committed to ensuring that those suppliers are aware of the relevant policies that the organisation adheres to, and the standards that are expected of our suppliers, and that these standards are met by all suppliers.

Relevant Policies and Due Diligence

We have the following policies and procedures in place which reflect our commitment to preventing and detecting modern slavery and human trafficking within our organisation and supply chains. They help us to ensure we are taking reasonable steps to address the risks of these occurring. These policies are available to all staff on the intranet.

Employee Codes of Conduct and Quality Standards – which also form part of the organisation’s induction process.

Recruitment Framework – the framework ensures there is a consistent and transparent approach to recruitment and includes a set of principles reflecting our commitment to promoting the welfare of children, young people and other vulnerable persons, including potential victims of modern slavery and human trafficking.

Procurement Strategy – Our procurement strategy includes ethical procurement and social value. It covers the standards we expect of our suppliers. A “code of ethics” document is issued with all Request for Quotes and Invitations to Tender, and suppliers are required to sign up to this code.

Our policies and strategies are transparent and are reviewed and updated regularly. Any new strategies or policy amendments are signed off at a senior level at the Joint Management Board meeting.

We have robust procedures in place for vetting new officers, staff and volunteers which ensures they are able to confirm their identities and qualifications. All employee payments are made directly into an appropriate, personal bank account. We have a process in place for employees to make declarations of outside interests where appropriate and this includes other paid employment. As part of our commitment to the welfare of our employees, managers regularly undertake 1-2-1 sessions with their staff and any concerns relating to health and safety or wellbeing can be raised at these meetings. Additionally the organisation provides work related, health and personal wellbeing advice and support covering a broad range of issues. Employees have access to 24-hour confidential support 365 days a year.

In terms of our supply chain, our standard contract terms and conditions include a clause which places an obligation on suppliers to abide by the law – this includes the Modern Slavery Act 2015. Additionally a code of ethics document is issued with all requests for quotes and invitations to tender and there is a section on Modern Slavery for all above threshold procurements. We challenge any abnormally low-cost tender returns and any non-compliance in bids to ensure the potential contractor or sub-contractors are not reliant upon modern slavery or human trafficking.

Performance Indicators

Performance indicators are currently under development, and we have an action to develop, monitor and report on the effectiveness of steps being taken in a future statement.

Draft indicators in development are;

- Increasing the % of our staff trained in ethical procurement practices;
- Increasing the number of high-risk suppliers aware of modern slavery;
- Increasing the number of our suppliers (with an annual turnover exceeding £36m) who have produced a modern slavery statement;
- Increasing the number of high-risk Tier 1 suppliers who have trained their staff in modern slavery;
- Increasing the number of high-risk Tier 1 suppliers who have engaged with their supply chains on modern slavery;

- Increasing the number of high-risk Tier 1 suppliers who have an agreed protocol for informing the Force if they discover modern slavery issues within the supply chain.

Training and Development

We have an induction programme that all employees must complete which includes familiarisation with relevant policies.

Our procurement team are currently undergoing the Chartered Institute of Procurement and Supply (CIPS) training on Ethical Procurement and Supply and are also trained in contract management. This training highlights the potential risk of modern slavery and human trafficking and the signs that officers should be aware of.

Once procurement team training is complete, we will consider the feasibility of rolling training out to our most at risk supply chain.