



# MODERN SLAVERY STATEMENT

2022 | 2023



## MODERN SLAVERY STATEMENT 2022-2023

In accordance with Section 54 of the Modern Slavery Act 2015, the Police and Crime Commissioner for Gwent and the Chief Constable recognises 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 31 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 Gwent 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 from the four Welsh police forces signed up to the Welsh Government Ethical Employment in Supply Chains Code of Practice.

Gwent Police is fully committed to combating unethical or illegal employment practices in supply chains. This commitment is underpinned by an action plan to deliver the commitments within the Code.

Our approach to identifying and tackling modern slavery is broken down into four key areas:

**Enforcement** - we 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** – promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales and specifically in Gwent

**Employment** – following best practice and demonstrating full commitment to constant improvement within the systems and structures of Gwent Police, as well as working with the other forces in Wales and with partners to identify and eradicate any form of exploitation.

**Environment** – we will create an environment where the public in Wales have confidence and understanding of how to report any signs of exploitation in all its forms.

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, it is recognised that modern slavery can extend throughout any supply chain and that we have a responsibility to address this.

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 appreciate that modern slavery can and does occur in many other supply chain categories and we are mapping our supply chains using a risk tool to identify the areas we should prioritise as part of our practical response to modern slavery risks.

Fully investigating supply chains is a complicated task but we have now issued supplier assessment questionnaires to 60 suppliers and reviewed 50 contracts identified as higher risk due to their industry type, nature of the workforce, supplier location, commodity type or the level of our expenditure.

We are committed to sharing information to make the best use of our resources. By working with other forces, we can better investigate supply chains based on the greatest risk of human exploitation.

We will continue to work to raise awareness of modern slavery issues across our supply chain. Our action plan includes a target to assess the top 100 suppliers across South Wales Police and Gwent Police by 2025 and we are on track to achieve this.

## **POLICIES**

The force's Modern Slavery policy, set by the Chief Officer team, is in place to reduce the risk of serious harm to victims and improve safety, health and wellbeing.

The policy outlines how modern slavery offences will be dealt with and offenders held to justice. Working with the Crown Prosecution Service or other body, we endeavour to successfully prosecute offenders, with the aim to enhance the trust and confidence of victims.

Robust training is provided to all officers, highlighting signs, process, victim care and support services.

The Joint Collaborative Commercial and Procurement Strategy, 2020-2025 incorporates a responsible procurement policy. The policy includes our commitment and activity to implement the Welsh Government Ethical Employment in Supply Chains Code of Practice and ethical purchasing principles. Other relevant policies include the College of Policing Code of Ethics and our Whistleblowing policy



## DUE DILIGENCE AND RISK ASSESSMENT

Important progress was made during the period April 2021-March 2022 to address unethical and illegal employment practices in our supply chains and the work is summarised below:

### Policy development

- our Business Interest Policy has been amended to reflect the Welsh Government Code of Practice. Officer and staff must be aware of the Code when submitting a business interest approval request
- a new recruitment policy is being developed to include reference to the Welsh Government Code of Practice and a specific reference to ethical employment.
- our Business Interest Policy has been amended to reflect the Welsh Government Code of Practice. Officer and staff must be aware of the Code when submitting a business interest approval request.

### Procurement procedures

- where appropriate, agreed 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 expect our suppliers to take responsibility to seek similar assurances from their own supply chains.
- inclusion of a fair work practices question where appropriate and proportionate
- the addition into contract terms and conditions the right to investigate and establish accountability and a commitment that the winning bidder will complete an assessment questionnaire to establish a baseline where required.
- sharing of best practice with the Welsh forces and issuing ethical supply chain questionnaires as part of our collaboration agreements.

### Payment Performance Statistics

- Invoice payment performance statistics are published annually on the Police and Crime Commissioner's website in line with the statutory requirement.

### Assessing existing suppliers and supply chains

- further development of Supplier Assessment Questionnaire (SAQ) tool
- regular spend analysis to identify higher risk suppliers and apply the risk assessment tool
- mapping of our supply chains - 60 of our higher risk suppliers contacted with 50 suppliers completing an SAQ to date and attributed an ethical supply chains rating. This rating is used as the baseline to monitor improvements by the supplier as part of regular contract management activity.



- work with Police Digital Service to understand the support they can offer with investigating supply chains of national police suppliers. This will bring a benefit to all police forces in England and Wales.
- Dialogue with Bluelight Commercial and the Metropolitan Police to consider how work relating to investigating ethical supply chains with common suppliers can be shared

## Training and raising awareness

- completion of annual CIPS refresher training by strategic procurement staff
- South Wales Police and Gwent Police were the pilot forces for contract management training provided by Bluelight Commercial. The training was well received and available to other police forces. The plan is that more SWP officers and staff will attend future sessions as part of business as usual.
- 'Developing Procurement Skills' training delivered internally to budget holders and managers, including the importance of procuring ethically and responsibly
- Welsh Government short video and more in-depth National Health Service eLearning about the Code of Practice available for all staff to access.
- Ethical dilemma scenarios to be shared across the Welsh forces to improve awareness of ethical matters across the forces.
- The reporting profile has been raised to a strategic level as the Task & Finish Groups report progress to the Welsh Forces' Finance Joint Assurance Group and the All Wales Collaboration Board.
- Recruitment, promotion, interview and other related internal processes consider unconscious bias and encourage Equality, Diversity and Inclusion good practice.
- Communications plan developed to ensure staff are aware of and trained in the internal referral routes for highlighting modern slavery concerns where they emerge.

## Delivery plan

To further progress the delivery of our commitments to tackle modern slavery, representatives from a wide range of areas across the force have agreed objectives for 2022-2023 which are captured in the [action plan](#) underpinning this statement.

Progress against the action plan will be monitored through a working group, chaired by the Assistant Chief Officer – Resources who is the Anti-Slavery and Ethical Champion for Gwent Police.

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:

**Gwent Police: Telephone 101 (or 999 in an Emergency)**

[Report a crime | Gwent Police](#)



**Modern Slavery Helpline: Telephone 0800 0121700**

**Crimestoppers: Telephone 0800 555 111**

**Confidential Concerns Line, Safecall 0800 9151571 (Gwent Police employees only)**

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



**Jeff Cuthbert**

Police and Crime  
Commissioner for Gwent



**Pam Kelly**

Chief Constable  
Gwent Police

