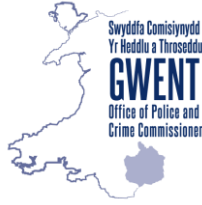




**HEDDLU
GWENT
POLICE**



MODERN SLAVERY STATEMENT

2021 | 2022



MODERN SLAVERY STATEMENT 2021-2022

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 2021 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 the issues is broken down into four key areas:

Enforcement – improving Intelligence gathering through compliance with the Code of Practice

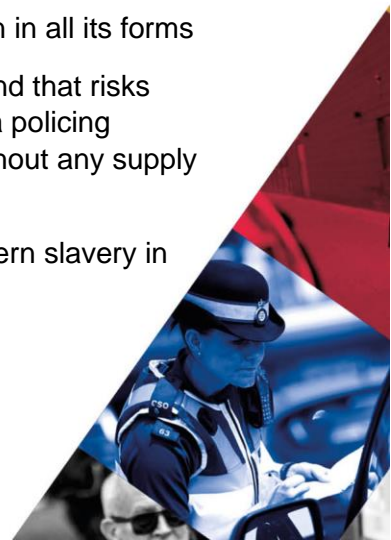
Ethical procurement – promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales

Employment – all Wales working to a common policy with buy-in across the organisations impacting mainstream and day to day business

Environment – the public in Wales is not a bystander and reports 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 chains 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**

Fully investigating supply chains is a complicated task with the current resources available. We have already reviewed 18 contracts identified deemed to be higher risk. This is 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.

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, victims 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.

DUE DILIGENCE AND RISK ASSESSMENT

Significant 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

- **appointment of an 'anti-slavery and ethical champion'**
- **established a clear process for how breaches will be dealt with**
- **the development of a guidance handbook, focusing on tackling modern slavery in supply chains**



Procurement procedures

- development of modern slavery questions to be included in appropriate tenders
- 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 will expect our suppliers to take responsibility to seek similar assurances from their own supply chains
- consideration of a fair work practices question where appropriate and proportionate
- the addition into contract terms and conditions the right to investigate and establish accountability
- publishing our payment performance
- sharing of best practice with the Welsh forces

Assessing existing suppliers and supply chains

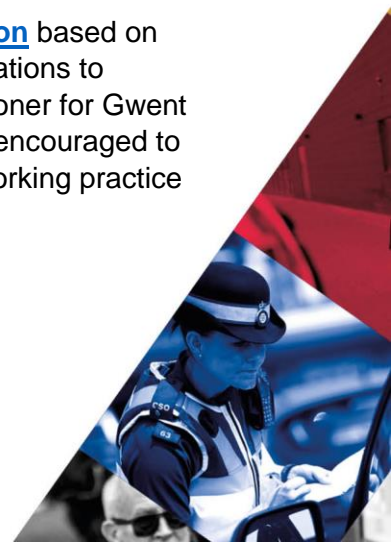
- creation of a supplier assessment questionnaire tool
- a due diligence project to risk assess our 18 highest risk suppliers in conjunction with a modern slavery expert
- spend analysis to identify higher risk suppliers and applying the risk assessment tool
- commenced work with Bluelight Commercial to consider how work relating to investigating ethical supply chains with common suppliers can be shared

Training and raising awareness

- completion of annual Chartered Institute of Procurement and Supply (CIPS) refresher training by strategic procurement staff
- external contract management training well received and interactive
- Welsh Government short video and more in-depth National Health Service eLearning about the Code of Practice available for all staff to access.

Living Wage

The Living Wage is a voluntary hourly rate set by the [Living Wage Foundation](#) based on the cost of living in the UK. The Living Wage Foundation encourages organisations to become accredited Living Wage employers. The Police and Crime Commissioner for Gwent and the Chief Constable apply this rate to all officers and staff. Suppliers are encouraged to adopt the Living Wage and are able to evidence this in response to the fair working practice question in relevant tenders.



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 2021-2022 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)

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

