

ETHICAL PROCUREMENT STRAND ACTION PLAN 2021 – 2022

Promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales

Ethical Procurement	Why	When
1. Refresh the Modern Slavery Statement, summarise work completed during previous period and produce an updated Action Plan for 2021-22; publish on Police and Crime Commissioner's website.	This meets the Statutory Requirement to publish an annual Statement	Annually
2. Strategic Procurement staff to complete the annual CIPS Ethical Procurement Training refresher	Ensures Strategic Procurement staff keep abreast of ethical supply chain considerations	Annually
3. Welsh Forces to follow up with initial 18 high risk suppliers identified through the Due Diligence Project (Stop Slavery Now) through Contract Management to seek delivery of improvements in response to gaps highlighted in the Supplier Assessment Questionnaires (SAQs). Offer support to smaller suppliers to progress the work, especially where suppliers have been classed as 'Meeting Basic Expectations' or Barely Achieving Compliance'.	Risk Assessment of suppliers identified as higher risk. We cannot assess all suppliers so this approach allows us to risk manage appropriately within our supply chain	Ensure as part of our tender process. Clarify minimum standards pre-award. Where relevant, new providers will complete an SAQ following award and high risk assessments will be followed up as part of contract management. Aim to embed process within 12 months
4. Create a briefing on the Due Diligence project work for Strategic Procurement staff to increase their knowledge and understanding of ethical supply chains.	To upskill Procurement staff to allow appropriate risk management of suppliers	Within 12 months
5. Procurement staff to incorporate the Supplier Risk Assessment Tool into contract mobilisation and ongoing contract management activity, to identify, evaluate and estimate the level of risk.	Facilitates proportionate and appropriate identification and risk management of supply chain risks	Within 12 months
6. Finance to report payment performance statistics and publish quarterly on external website	Meets statutory requirement	Ongoing
7. Regular spend analysis to identify further suppliers to apply the Risk Assessment Tool and seek completion of SAQ. Allocate responsibility for specific suppliers across Welsh forces to make best use of resources. Aim to assess the top 100 suppliers across South Wales Police and Gwent Police by 2025	Supports Ethical Employment in Supply Chains Code of Practice Commitment 7 - Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice.	Embed process within 12 months Assess top 100 by 2025
8. Work with Bluelight Commercial to adopt a standard and shared approach to ethical supply chains across the police service.	Makes best use of resources and shares the work across policing	Within 12 months
9. Work with Bluelight Commercial to make Contract Management training available to client leads, to include ethical supply chain awareness	Increases skills and awareness of officers and staff involved in the management of contracts and drives consistent approach across policing in Wales and client departments	Roll out over 12 months with continuous cycles for wider client departments. Link to competency framework
	Meets Commitment 1 of the Code of Practice - Review the written policy on	Within 12 months

EMPLOYMENT STRAND ACTION PLAN 2021 – 2022

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

Employment Action	Why	When
1. Develop an All Wales Whistleblowing policy with specific reference to the Welsh Government Ethical Employment in Supply Chains Code of Practice in conjunction with Regional Federation and Trade Unions	Support the Code of Practice commitment to empower staff to raise suspicions of unlawful and unethical employment practices	Within 12 months
2. All staff to watch the 4 minute Welsh Government video on Modern Day Slavery by disseminating through the Force and through the induction plan for new starters	Increases awareness of officers and staff , particularly relevant to those involved in expenditure or recruitment of workers	Work has commenced but Head of HR to roll out within twelve months
3. Obtain agreement to share ethical dilemma scenarios across forces and with Welsh Government to promote good practice. Confirm establishment of Ethical Board in each force.	Improve awareness of ethical matters across the Force	Within 12 months
4. Recruitment policy to be updated to reference the Code of Practice and specify ethical employment.	Supports commitment to ethical employment within the Force	Within 12 months
5. Employment contract to confirm that employees are expected to comply with the Code of Practice.	Supports commitment to ethical employment within the Force	Within 12 months
6. Ensure the Code of Practice is on the agenda of our Trade Unions	Supports commitment to ethical employment within the Force	Within 12 months
7. Consider good practice to ensure transparency and fairness in recruitment, promotion and other related internal processes	Considers unconscious bias and encourage good practice in	Within 12 months
8. Action Plan and its success factors to be confirmed at All Wales HR & L&D Joint Assurance Group	Supports commitment to ethical employment within the Force	Q1 2021/22
9. Ensure compliance with the statutory living wage is consistently applied by the organisation	Supports commitment to ethical employment within the Force	In line with any changes made

ENVIRONMENT STRAND 2021 – 2022

Create a hostile environment for modern slavery

Environment Action	Measure	Why
1. Ensure that Modern Slavery continues to be suitably positioned in Policing priorities as part of the Strategic Planning process.	Emphasis of Modern Slavery's position in the Police & Crime Plan and Force Delivery Plan.	Strategically pursue the creation of a more hostile environment for Modern Slavery.
2. Reflect Ethical Procurement as a specific objective and deliverable with the Modern Slavery element of the Strategic Planning process.	Ethical Procurement is specifically referenced as part of the Force delivery plan.	Deliberately recognise Ethical Procurement as a tool in the creation of a more hostile environment for Modern Slavery.
3. Ensure that due consideration to creating a hostile environment for Modern Slavery is given when commissioning OPCC services. e.g. Modern Day Slavery Victim Help Centre	Commissioned services target Modern Slavery specifically.	OPCC can have a direct impact on the local environment via its commissioned services.
4. Embed a culture of wider responsibility within the Force for all those involved in the procurement of goods and services rather than seeing ethical procurement as an issue for purely the core procurement team.	Strategic planning recognises that ethical procurement in the supply chain is one strand of a wider work stream.	Ensure wider awareness of Ethical Procurement issues within the local Supply Chain Environment.
5. Consider deliberate engagement with the local business community with a view to ensuring awareness and profile of the issues are involved.	Local events have been held and engaged with to increase the local awareness and profile of modern slavery.	Regional awareness of Modern Slavery issues is increased in the local environment.
6. Ensure strong partnership working internally across the various stakeholders including PVPU; OPCC; Procurement; Vetting & the wider organisation.	Strong working relationship across the organisations create a proactive environment against modern slavery within the organisation.	A joined up internal culture / environment focused on tackling modern slavery is created internally.
7. Ensure wider partnership working is considered beyond just policing including working with Welsh Government / Sell2 Wales / Bluelight commercial and beyond.	Welsh Policing's approach is collaborative in Policing and with wider partners.	Ensure a joined-up approach across partner agencies to ensure an increased regional awareness of Modern Slavery issues is increased in the local environment.
8. Ensure all staff are aware of roles and responsibilities and the internal referral routes where modern slavery concerns are involved.	Staff are aware of and trained in the internal referral routes and these occur as appropriate.	Staff are aware of the appropriate routes for highlighting Modern Slavery concerns where they emerge.
9. Ensure a robust communication strategy and plan targeting Modern Slavery is in place.	A Modern Slavery Communication plan has been made and implemented.	A deliberate communication approach is needed to create an increased awareness and profile around modern slavery.

ENFORCEMENT STRAND ACTION PLAN 2021 – 2022

Improving intelligence gathering through compliance with the Code of Practice

Enforcement Action	Why	When
1. Develop an Action Plan for Officer and PSC Operator training on the Welsh Government Ethical Employment in Supply Chains Code of Practice	Increases officers and staff awareness of modern slavery issues	Within 12 months
2. Link with PSD to ensure officers are aware of the Code of Practice when submitting a business Interest form (DPP action)	Raises awareness of ethical employment practices in the businesses where our staff have influence	Within 12 months
3. To ensure that our neighbourhood policing model fully incorporates an awareness of modern slavery and human exploitation.	Enables PCSOs to be aware and look for signs of modern slavery and human exploitation in our communities	Within 12 months