Police and Crime Commissioner
CAMBRIDGESHIRE AND PETERBOROUGH

Creating a safer Cambridgeshire

To: Business Coordination Board

Sponsor:

Author:

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MODERN DAY SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Purpose

1.1 This statement, made February 2024, sets out Cambridgeshire Constabulary's commitment to combating modern slavery and human trafficking. It details the actions taken to ensure there is no modern slavery or human trafficking, forced labour or exploitation in its own business or its supply chain. It is made under section 54(1) of the Modern Slavery Act 2015.

2. Organisational structure and supply chains

2.1 This statement covers the business activities of Cambridgeshire Constabulary. You can find out more about the force's organisational structure from the force website 'about us' section.

2.2 It covers direct employees of the Constabulary, agency workers engaged through the Constabulary's managed service contract and services delivered on behalf of the Constabulary by third-party organisations and their supply chains.

2.3 The responsibility for each area of business is as follows:

a. Policies: The Director of Human Resources will ensure appropriate recruitment and employment policies are in place and are reviewed in line with the agreed HR policy schedule.

b. Risk assessments: These will be undertaken by the relevant service area where there is deemed a risk of modern slavery or human trafficking. This work will be supported by colleagues in HR and 7F Commercial Services. The risk assessment will be signed by the appropriate service director and held centrally on the Corporate Risk Register.

c. Investigations/due diligence: Any concerns regarding modern slavery or human trafficking will be raised initially with the relevant senior manager and will be ultimately escalated to the Director of Human Resources.

d. Training: Structured training inputs for specific cohorts of staff will be overseen by the Head of Operational Learning. A range of internal communication channels (for example the force intranet) will be used to raise awareness of human trafficking and modern slavery within the wider workforce. This will be co-ordinated by the Head of Corporate Communications.

3. Policies in relation to modern slavery and human trafficking

3.1 The following policies set out the standards of behaviour expected of all Constabulary staff and provide a framework for staff to report any concerns about the identification of modern slavery.

a. Professional Standards Department (PSD) Reporting Concerns Procedure (Whistleblowing). The organisation encourages police officers, police staff, contractors or others acting on behalf of Cambridgeshire Constabulary, whether full-time or part-time, fixed term or permanent staff, seconded staff, volunteers (including the Special Constabulary), temporary and agency staff, contractors, self-employed consultants and associate tutors to report wrong doing in the workplace.

b. Code of Ethics– The Code of Ethics has been produced by the College of Policing in its role as the professional body for policing. It sets and

defines the exemplary standards of behaviour for everyone who works in policing.

c. Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales. This was agreed with the National Police Staff Council.

d. Due diligence processes – this means checking that what a supplier says in their bid for a contract is backed up by policies and actions

3.2 The Constabulary is committed to ensuring its suppliers adhere to the highest ethical standards.

3.3 This is demonstrated through:

a. The use of the Cabinet Office Standard Selection Questionnaire which includes a self-certification. This is used to assess suppliers' policies and practices on modern slavery.

b. Robust procurement procedures and the use of enhanced due diligence with preferred suppliers prior to award of contract. This includes the use of a due diligence checklist.

c. Tender processes which require suppliers to demonstrate they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

d. Regular review of high-risk contracts where the potential for modern slavery is high.

e. The use of central government framework agreements (where suppliers have already been checked that they meet agreed policies and practices).

f. Responding swiftly to any concerns raised about suppliers or supply chains. This can include the use of contractual remedies.

g. Only putting in place co-commissioning arrangements with other public authority organisations with similar checks and balances.

h. All staff with responsibility for sourcing low value goods and services are made of aware of the force's commitment to ensuring modern slavery is eliminated from its supply chain.

i. All suppliers sign up to the 7F terms and conditions which sets out a number of clauses relating to modern slavery.

4. Supplier Charter

4.1 Cambridgeshire's procurement function is delivered through a seven-force (7F) strategic collaboration. A single 'Supplier Charter' is in place which transparently commits to the following:

a. "7 Force Procurement promotes fairness and diversity in its supply chains and welcomes the opportunity to work with a broad range of suppliers who align with our values which are (in addition to wider Police service values and behaviours)"

4.2 It also sets out the following commitment:

a. "7 Force suppliers must ensure their supply chains including manufacturers and producers are free from slavery and human trafficking. They must be absolutely committed to preventing Modern Slavery, human trafficking and exploitation throughout their workforce and business operations and within their own policies and procedures ensuring that their supply chains are free from any misconduct or malpractice associated with slavery and human trafficking."

4.3 All 7F Commercial Services (previously called procurement staff) complete a CIPS Code of Ethics assessment on an annual basis.

5. Risk assessment and management

5.1 Cambridgeshire Constabulary operates in the United Kingdom. Whilst the risk of slavery and human trafficking is considered low, the Force remains vigilant and will take all steps available to manage the risks presented.

5.2 The Constabulary has determined there are no areas of its business considered at high risk of slavery or human trafficking.

6. Key future actions

6.1 Over the next year the Constabulary will:

a. continue to raise awareness of the issues within the wider workforce

b. ensure newly recruited 7F commercial services staff complete the bespoke training and awareness package and all staff complete refresher training

c. finalise and monitor an appropriate number of 'key performance indicators of success of the actions taken'.

7. Training and awareness raising of modern slavery and trafficking

7.1 The Constabulary has comprehensive information on its Modern slavery and trafficking webpage on how to spot the signs of modern slavery, how to report to the police and details of national support organisations.

7.2 The Police and Crime Commissioner's Police and Crime Plan sets out the importance of 'protecting vulnerable people' and ensuring 'officers and staff are using the tools available to them to keep victims and witnesses safe'. It also says "we will ensure the police act with integrity and social responsibility"

7.3 Cambridgeshire Constabulary has set 'modern slavery' as one of its strategic crime priorities. It has developed a 'plan on a page' document setting out how it will tackle the issue.

7.4 This plan, and the associated key messages for staff, are socialised through a range of internal communication channels including the force intranet and staff briefings. Clear policies are also available on the intranet.

7.5 External media campaigns and content on the Constabulary website ensures members of the local community know how to:

a. spot the signs of modern slavery

b. report potential incidents of modern slavery

c. access support for victims

7.6 The Police and Crime Commissioner funds two dedicated Specialist Victim and Witness Care Co-ordinators to provide bespoke support to migrant victims of modern slavery (including those with insecure immigration status who are treated first as victims). These staff are based in the Constabulary-run Victim and Witness Hub and are a key part of the wider model of support services.

8. Training across the core workforce

8.1 All new probationary constables receive an input on modern slavery as part of their initial training. The training aims are:

a. To provide front-line practitioners with knowledge and understanding of modern slavery and human trafficking so they can:

b. Identify victims of modern slavery/human trafficking

c. Help and protect victims

d. Gather evidence and information to support investigations

e. Ensure victims are referred for support and advice

8.2 Trainee Detective Constables also receive additional training as part of their investigative training (called PIP2).

9. Training within 7F Commercial Services (previously 7F Procurement)

9.1 A training and awareness package has been rolled out for all 7F commercial services staff. This training covers:

a. business purchasing practices, which influence supply chain conditions and which should, therefore, be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low

wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

b. how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;

c. how to identify the signs of slavery and human trafficking;

d. what initial steps should be taken if slavery or human trafficking is suspected;

e. how to escalate potential slavery or human trafficking issues to the relevant parties within each of the seven forces covered by 7F department;

f. what external help is available in each force area for example in Cambridgeshire through local multi-agency partnerships and bespoke support for victims;

g. what influence can be exerted over suppliers and business partners to implement anti-slavery policies; and

h. the steps we take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation supply chains.

9.2 This statement was approved by the Police and Crime Commissioner Darryl Preston on 22nd February 2024 at the Business Co-ordination Board attended by the Chief Constable of Cambridgeshire Constabulary.

Darryl Preston, Police and Crime Commissioner, Office of the Police and Crime Commissioner for Cambridgeshire and Peterborough
Chief Constable Nick Dean, Cambridgeshire Constabulary



