Modern Slavery Act Transparency Statement 2023/2024

Introduction

In line with our Modern Slavery Policy, Warwickshire Police (WP) are committed to preventing slavery and human trafficking.

Warwickshire Police, as a UK police service, occupy a unique position in relation to Modern Slavery.

- As a police service we have an obligation to prevent and detect crime, including those crimes related to Modern Slavery, and also an obligation to protect vulnerable people, including those who are at risk of or affected by Modern Slavery.
- As a police service we are a statutory First Responder for the National Referral Mechanism (NRM); the frameworks for identifying & referring potential victims of modern slavery and ensuring they receive the appropriate support (National referral mechanism guidance: adult (England and Wales) - GOV.UK (www.gov.uk))
- As an organisation we are primarily a direct employer, however we also utilise contractors or agencies to provide staff for specific roles
- As an organisation we are a consumer of commercial goods and services
- As an organisation we are, in limited circumstances, a provider of commercial services

This statement considers the obligations placed on commercial organisations under section 54 (1) of the Modern Slavery Act 2015 and sets out Warwickshire Police's actions to understand potential modern slavery risks related to our organisation as an employer & as a consumer; identifying tactics intended to remove any modern slavery present in our organisation or supply chain.

The Modern Slavery Act 2015 defines Modern Slavery (Sec 1), Human Trafficking (Sec 2) & Exploitation (Sec 3). For the purposes of this statement Warwickshire Police will adopt these definitions.

> *Any reference within this policy to 'Modern Slavery', unless specified otherwise, will be a reference to Modern Slavery, Human Trafficking and associated exploitation in all its forms, either detailed above or subsequently identified.*

Organisational Structure and Supply Chains

This statement covers the activities of Warwickshire Police and includes direct employees of WP, agency workers and services delivered on behalf of WP by third party organisations and their supply chains.

Operating Location & Risks

Warwickshire Police operate within the United Kingdom. The risk of modern slavery in the UK is currently considered low, however the volumes of Modern Slavery identified through police incident recording and NRM data continue to increase annually.

Warwickshire Police operate primarily within the county of Warwickshire or the wider West Midlands region. The risk of Modern Slavery within Warwickshire is assessed as low, however in line with national trends volumes of Modern Slavery identified continue to increase.

The current reporting trends within Warwickshire indicate increasing levels of criminal exploitation, predominantly linked to 'county lines' involving children & young people, with consistent levels of labour exploitation involving adults and consistent levels of sexual exploitation involving adults.

The greatest risk to Warwickshire Police as an organisation is recognised as labour exploitation within our formal supply chains.

Recent Warwickshire Police investigations into labour exploitation have identified offence locations within agriculture, logistics and car valeting, whilst investigations by other local police forces have identified additional offence locations including within manufacturing.

It is recognised that Warwickshire Police employees or contractors may become victims of Modern Slavery and may report these matters to the organisation.

High risk activities

WP have determined there are no specific business activities or areas of business which are considered at high risk of modern slavery.

Responsibilities

The strategic policing response to Modern Slavery is the responsibility of the Detective Superintendent, Vulnerability & Safeguarding. The strategic policing lead will be responsible for ensuring that organisational policies & procedures relating to the policing response to Modern Slavery are maintained.

The tactical policing response to Modern Slavery is the responsibility of their appointed deputy at the rank of Detective Inspector or above. The tactical policing lead will be responsible for ensuring relevant training on Modern Slavery remains available across the organisation and that sufficient officers & staff are trained to provide an affective response to Modern Slavery if identified

Warwickshire Police recruitment & employment processes are the responsibility of the Head of Human Resources

Warwickshire Police Contracts and procurement process are the responsibility of the Head of Contracts & Procurement

Relevant Policies and Procedures

The following policies & procedures set out our response to Modern Slavery within our own organisation:

- **College of Policing Code of Ethics** – The Code of Ethics provides principles and standards of behaviour expected from everyone who works in policing, supported by our professional body the College of Policing. The 9 policing principles covered by the Code of Ethics are: Accountability; Fairness; Honesty; Integrity; Leadership; Objectivity; Openness; Respect; Selflessness.
- **Warwickshire Police Modern Slavery Policy** – details the organisational response to policing Modern Slavery in all its forms

- **Professional Standards Reporting Procedure** – details the mechanisms through which individuals can report breaches of professional standards, including the opportunity to report in confidence or through other organisations.
- **Business Interests Policy & Procedure** – sets out the framework for the application and approval of business interests outside Warwickshire Police, undertaken by police officers, special constables and police staff or applying to such a role.
- **Recruitment & Selection Policy** – details the organisational recruitment processes including pre-employment checks & vetting for new employees
- **Vetting Policy** – details the organisational decision to adopt the College of Policing Authorised Professional Practice (APP) in relation to vetting activities
- **PCC Financial & Contract Regulations** - details the requirement to comply with Public Contracts Regulations, procurement thresholds, tendering and contract management processes.
- **Procurement Strategy** – sets out the strategic objectives of the Contracts & Procurement Team including a commitment to Sustainable, Ethical & Compliant Procurement.
- **Social Value Procurement Policy** – sets out an effective, workable and proportionate set of arrangements for the delivery of ethical and sustainable procurement practices in order to deliver social, economic or environmental benefits both internally and to the wider community.

Due Diligence

In line with the Public Contract Regulations, Financial & Contract Regulations, and procurement strategy, Warwickshire Police undertake due diligence when tendering or considering new suppliers and contracts with existing suppliers are subject to periodic due diligence review as an element of effective contract management.

Due diligence activities include but are not limited to:

- Supplier Assurance Questionnaires
- Tender Evaluation
- Application of Terms & Conditions

In line with Recruitment & Selection policy Warwickshire Police undertake due diligence when recruiting new members of staff including but not limited to:

- completing ‘right to work’ checks,
- interviews or other selection processes
- role appropriate vetting

All Warwickshire Police employees are subject to ongoing vetting review.

Training and Awareness Raising

Warwickshire Police have a number of detectives trained as Modern Slavery specialist investigators, who have received specific training to a national standard to enable them to effectively investigate Modern Slavery Offences. In 2023 Warwickshire Police had 39 special investigators.

Warwickshire Police have a number of frontline officers trained as Modern Slavery Victim Liaison Officers (VLO), who have received specific training to a national standard to enable them to act a single point of contact for potential victims of Modern Slavery, facilitating appropriate support for their individual needs. In 2023 Warwickshire Police had 11 victim liaison officers.

Details of and contact details for special investigators & VLO are available on the force intranet.

Warwickshire Police contribute to the Warwickshire Children & Families Front Door (CFFD) where officers, staff & partner agencies are available to receive & assess any referrals relating to adult or child safeguarding concerns.

Warwickshire Police have worked with Warwickshire County Council, the 5 District & Borough councils within the county, Warwickshire CSP and other strategic partners to develop a consistent countywide response to Modern Slavery including referrals into the National Referral Mechanism.

All new police officers & PCSO are provided with Modern Slavery awareness training.

The Warwickshire Police intranet provides information on Modern Slavery, including a national guide to Modern Slavery Initial Responses and local reporting pathways. This is available to all officers & staff.

Officers transferring to investigative roles through the ICIDP, DDP or equivalent programme receive additional training in Modern Slavery within these programmes.

Modern Slavery CPD training opportunities are communicated to officers & staff when available, including training opportunities provided through partner agencies or in support of local/national operational activity. In late 2022 Warwickshire Police hosted a Modern Slavery partnership CPD day, to launch the county pathway, attended by over 50 delegates from across the county.

Investigation

Any Modern Slavery concerns identified by a member of Warwickshire Police staff should be reported immediately, however it is recognised that concerns may arise for a variety of reasons.

Police officers & operational staff including PCSO, Enquiry Officers or OCC staff should record concerns in line with incident & crime recording policies relevant to their role.

Non-operational staff, including those involved within recruitment & procurement activities, should report any concerns to their line manager; where this is not possible or where there are immediate concerns for the safety of any person these concerns should be reported to the force control room immediately.

The strategic & tactical modern slavery leads or officers trained as modern slavery specialist investigators are available to provide advice in relation to modern slavery concerns which do not require an immediate response. Their details are available on the force intranet.

Staff who are not trained to undertake Modern Slavery investigations should not do so without seeking advice from an appropriately trained officers. This does not prevent officers & staff taking immediate action to prevent & detect crime, preserve life of protect vulnerable people.

Declaration

This statement constitutes Warwickshire Police's Modern Slavery and Human Trafficking Transparency Statement for the financial year ending 31 March 2024

Pete Hill – Detective Superintendent, Vulnerability & Safeguarding	**Caroline Plane – Head of Contracts & Procurement**	**Alison Hall – Head of Human Resources**	**Mike Kaine – Head of Accounting & Financial Control**	**Dave Andrews – Detective Chief Inspector, Vulnerability & Safeguarding**