

Modern Day Slavery and Human Trafficking Statement; Norfolk Constabulary

This statement sets out The Office of the Police and Crime Commissioner Norfolk and Norfolk Constabulary's commitment to combating Modern Slavery and Human Trafficking. It details the actions taken to ensure that there is no Modern Slavery and Human Trafficking, forced labour or exploitation in its own business or supply chains as per section 54(1) of the Modern Slavery Act 2015.

When considering Modern Slavery and Human Trafficking, the Constabulary are responsible for tackling the crimes, bringing offenders to justice and safeguarding those at risk but it is recognised that in a large and varied supply chain there is also risk. Here we will build on good practise, show clear leadership and demonstrate robust action.

Our objectives are;

- The transparency of our supply chain.
- The protection of vulnerable people within and outside our organisation.
- To use our position of influence within the County to encourage awareness and adopt a proactive approach with our statutory partners, business partners, their supply chain and the community.
- To place the same scrutiny on ourselves under Section 54 of The Modern Slavery Act as our private sector suppliers must abide by and thus comply with the Act.
- To develop and implement a Modern Slavery and Human Trafficking continuous improvement strategy and action plan.

We are committed to working in partnership with suppliers to support and challenge them on their response to Modern Slavery and Human Trafficking and will ensure that our progress is open and transparent.

1. Organisational structure and supply chains

This statement covers the business activities of Norfolk Constabulary. You can find out more about the Force's organisational structure from the Force website 'about us' section:

<https://www.norfolk.police.uk/police-forces/norfolk-constabulary/areas/about-us/about-us/>

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.

The responsibility for each area of business is as follows:

- **Policies:** The Director of People will ensure appropriate recruitment and employment policies are in place and reviewed annually.
- **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 Procurement. The risk assessment will be signed by the appropriate service director and held centrally on the Corporate Risk Register.
- **Investigations/due diligence:** Any concerns regarding Modern Slavery or Human Trafficking within the organisational structure and/or supply chains will be raised initially with the relevant senior manager and will be ultimately escalated to the Director of People.
- **Training:** Structured training inputs for specific cohorts of staff will be overseen by the Head of Learning and Development. A range of internal communication channels

(for example the Force intranet) will be used to raise awareness of Modern Slavery and Human Trafficking within the wider workforce. This will be coordinated by the Head of Corporate Communications.

2. Policies in relation to Modern Slavery and Human Trafficking

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 and Human Trafficking:

- **Professional Standards Department (PSD) Reporting Concerns Procedure (Whistleblowing)** - The organisation encourages police officers, police staff, contractors or others acting on behalf of Norfolk 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.
- **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.
- **Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales** - This was agreed with the National Police Staff Council.

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

Our supply chain has a core spend with a few multi-nationals and a considerable number of small spend organisations. We are committed to the premise of ensuring scrutiny on public money spending with the right checks and balances to address Modern Slavery and Human Trafficking.

The Constabulary is therefore committed to ensuring its suppliers adhere to the highest ethical standards. This is demonstrated through:

- The use of the Crown Commercial Services Standard Selection Questionnaire which includes a self- certification element to the tendering processes. This is used to assess suppliers' policies and practices on Modern Slavery and Human Trafficking.
- 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.
- 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.
- Regular review of high-risk contracts where the potential for Modern Slavery and Human Trafficking is high.
- The use of central government purchasing arrangements.
- Responding swiftly to any concerns raised about suppliers or supply chains. This can include the use of contractual remedies.
- Only putting in place co-commissioning arrangements with other public authority organisations with similar checks and balances.

- All staff with responsibility for sourcing low value goods and services are made of aware of the Force's commitment to ensuring Modern Slavery or Human Trafficking is eliminated from its supply chain.
- All suppliers sign up to the 7F terms and conditions which sets out a number of clauses relating to Modern Slavery and Human Trafficking.

Supplier Charter

Norfolk's procurement function is delivered through a Seven-Force (7F) strategic collaboration. A single 'Supplier Charter' has been drafted which transparently commits to the following:

"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)" It also sets out the following commitment:

"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."

This Charter will be made available on the Force website.

<https://www.norfolk.police.uk/police-forces/norfolk-constabulary/areas/about-us/about-us/supplier-charter/>

All procurement staff are required to complete the CIPS Ethical Training module to allow them to competently assess the risk of Modern Slavery and Human Trafficking within all supplier relationships. This is an annual requirement.

4. Risk assessment and management

Norfolk Constabulary operates in the United Kingdom. Whilst the risk of Modern Slavery and Human Trafficking is considered low, the Force remains vigilant and will take all steps available to manage the risks presented.

The Constabulary has determined there are no areas of its business considered at high risk of Modern Slavery and Human Trafficking:

5. Key future actions

Over the next year the Constabulary will:

- Continue to raise awareness of the issues within the wider workforce. Due diligence checks mentioned previously in the document ensure that MDS is eradicated when tendering contracts. Our supplier Charter is also available on all Force intranets for staff to view.
- Publish its Supplier Charter on Force website and intranet.
- Continue to ensure that all procurement staff undergo the CIPS Ethical training module both initially and annually.
- Develop, agree, review and monitor appropriate 'key performance indicators of success of the actions taken' across a number of managed contracts.

6. Training and awareness raising of Modern Slavery and Human Trafficking

The Constabulary has comprehensive information on its website on how to spot the signs of Modern Slavery or Human Trafficking, how to report to the police and details of national support organisations.

<https://www.norfolk.police.uk/advice/assault-abuse-threats/modern-slavery-human-trafficking>

Modern Slavery and Human Trafficking features as a priority within the Police and Crime Commissioner's Police and Crime Plan for Norfolk Constabulary where it sets out how it will tackle the issue:

Pillar 5: Support Victims

- Improving the provision of entitlements set out in the Victims' Code of Practice.
- Deliver high quality investigations to support the right outcomes for victims.
- Work in partnership to commission effective services that support victims of high harm crime.
- Implement and develop the Norfolk integrated Domestic Abuse Service (NiDAS) and review the provision of services for sexual violence victims.
- Improving victim's experience of the criminal justice system and raise confidence to report crimes.
- Safeguarding vulnerable victims of crime and ASB.

Pillar 6: Safer and Stronger Communities

- Supporting road users to be safer on our roads.
- Working with partners and communities to prevent crime and harm.
- Early identification and diversion to the appropriate agencies for those suffering with Mental Health issues.
- Promote crime prevention initiatives.
- Increasing volunteering opportunities within the community to help policing.

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.

The Police and Crime Plan sets core objectives including to "support victims and reduce vulnerability". Strategic objectives in this priority area include;

- Working to improve the overall experience and outcomes for victims and witnesses.
- Working in partnership to make those at risk less vulnerable to victimisation.
- Working in partnership to deliver the most appropriate response to those in mental health crisis.
- Working in partnership to reduce the impact of drugs and alcohol; on communities, families and people at risk.
- Supporting and encouraging victims and witnesses to come forward to disclose traditionally under-reported crimes including Modern Slavery, Human Trafficking, stalking and hate crime.

Training across the core workforce

All relevant staff are required to undergo a Modern Slavery and Human Trafficking E-learning package and to view a bespoke video regarding the same.

All new probationary constables receive an input on Modern Slavery and Human Trafficking as part of their initial training. Trainee Detective Constables similarly receive training as part of their investigative training (called PIP Level 2). All Central Control Room staff are trained on recruitment.

The training aims are:

- To provide front-line practitioners with knowledge and understanding of Modern Slavery and Human Trafficking so they can:
- Identify potential victims of Modern Slavery and Human Trafficking.
- Help and protect potential victims of Modern Slavery and Human Trafficking.
- Gather evidence and information to support investigations.
- Ensure potential victims are referred for support and advice.

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

Training within 7F Procurement

The Constabulary has a training and awareness package for all 7F procurement team staff. This training covers:

- Our 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;
- how to assess the risk of Modern Slavery and Human Trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of Modern Slavery and Human Trafficking;
- what initial steps should be taken if Modern Slavery and Human Trafficking is suspected;
- how to escalate potential Modern Slavery and Human Trafficking issues to the relevant parties within each of the Seven Forces covered by 7F Procurement;
- what external help is available in each Force area for example in Cambridgeshire through local multi-agency partnerships and bespoke support for victims;
- what influence can be exerted over suppliers and business partners to implement anti-slavery policies; and
- 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.

This statement was approved by the Police and Crime Commissioner and the Chief Constable of Norfolk Constabulary.

SIGNED BY:

Police and Crime Commissioner

Office of the Police and Crime Commissioner for Norfolk

A handwritten signature in black ink, appearing to read 'Paul Sanford', written in a cursive style.

Paul Sanford
Chief Constable