

Modern Day Slavery and Human Trafficking Statement

This statement, made November 2020, 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.

1. Organisational structure and supply chains

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: <https://www.cambs.police.uk/information-and-services/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 Human Resources 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 will be raised initially with the relevant senior manager and will be ultimately escalated to the Director of Human Resources.
- **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.

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.

- **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.

- **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

The Constabulary is 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.
- 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 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 aware of the force's commitment to ensuring modern day slavery 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.

Supplier Charter

Cambridgeshire'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 in early 2021.

In 2021 the 7F Procurement has committed to develop a training and awareness package for procurement staff to allow them to competently assess the risk of modern slavery and human trafficking within all supplier relationships. See Training section.

4. Risk assessment and management

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.

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

5. Key future actions

Over the next year the Constabulary will:

- continue to raise awareness of the issues within the wider workforce
- publish its Supplier Charter
- roll out the bespoke training of all 7F Procurement staff
- develop, agree and monitor an appropriate number of ‘key performance indicators of success of the actions taken’.

6. Training and awareness raising of modern slavery and trafficking

The Constabulary has comprehensive information on its website on how to spot the signs of modern slavery, how to report to the police and details of national support organisations. <https://www.cambs.police.uk/information-and-services/Modern-slavery/Modern-slavery-and-trafficking>

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 via the four themes set in the Police and Crime Plan of victim, offender, communities and transformation.

Victims – the plan looks to develop a countywide response to identifying, safeguarding and supporting victims. The force is commissioned by the Police and Crime Commissioner to employ two dedicated Victim and Witness Care Co-ordinators to provide bespoke support to migrant victims of modern slavery.

Offenders – identifying and disrupting offenders through effective partnership working and swift justice has been highlighted as key to tackling organised crime driven modern slavery in the county.

Communities – the Constabulary has led work to raise awareness of modern slavery within local businesses and the wider workforce and community. The Police and Crime

Commissioner supported a free event in January 2020 for local businesses to give them the knowledge and confidence to spot the signs of slavery.

Transformation – developing the partnership support and data sharing tools to improve the multi-agency response to reports of modern slavery has been local priority driven by the Constabulary.

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.

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

- spot the signs of modern slavery
- report potential incidents of modern slavery
- access support for victims

The force has employed two dedicated Victim and Witness Care Co-ordinators to provide bespoke support to migrant victims of modern slavery.

The Police and Crime Plan sets shared outcomes, agreed by partners, ‘to deliver a victim-first approach’ and a priority to ‘develop a countywide partnership response to reduce the harm, risks and costs of domestic abuse, child abuse and exploitation (including child sexual exploitation), serious sexual offences, trafficking and modern-day slavery and ‘VAWG’.

Training across the core workforce

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

- To provide front-line practitioners with knowledge and understanding of modern slavery and human trafficking so they can:
- Identify victims of modern slavery/human trafficking
- Help and protect victims
- Gather evidence and information to support investigations
- Ensure 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 is currently developing a new training and awareness package for all 7F procurement team staff. This training will cover:

- 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 slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;

- how to escalate potential slavery or 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 Acting Police and Crime Commissioner Ray Bisby on 26th November 2020 at the Business Co-ordination Board attended by the Chief Constable of Cambridgeshire Constabulary.