



## **Modern Slavery and Human Trafficking Statement 2019**

### **Introduction**

Warwickshire Office of the Police and Crime Commissioner (OPCC) has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within the business or our supply chain.

Warwickshire OPCC considers the obligations placed on commercial organisations under section 54(1) of the Modern Slavery Act 2015 vital in combating modern slavery and human trafficking.

Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

The OPCC makes this statement to set out the steps it will take to safeguard against modern slavery and human trafficking in our organisation or in our supply chains.

### **About the organisation**

The Office of the Police and Crime Commissioner (OPCC) supports the Police and Crime Commissioner in the delivery of his Police and Crime plan.

The OPCC operates in the United Kingdom, whilst the risk of slavery and human trafficking is considered low, staff within the OPCC remain vigilant and will take steps available to manage the risks presented.

The job of the Police and Crime Commissioner (PCC) is to ensure the policing needs of their communities are met as effectively as possible, bringing communities closer to the police, building confidence in the system and restoring trust. PCCs give the public a voice at the highest level and the ability to ensure their police are accountable.

Key aspects of the role of PCCs include:

- holding the chief constable to account for the delivery of the force
- setting and updating a Police and Crime plan
- setting the force budget and precept
- regularly engaging with the public and communities
- appointing, and where necessary dismissing, the chief constable

## What is Modern Slavery?

Modern Slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour. Slavery is where someone is forced to work through a level of threat, owned or controlled, dehumanised, or who has restrictions placed on their freedom. Servitude is similar to slavery, but there is no element of ownership. Human trafficking is the movement of people who are then forced into exploitation, the movement can be international but also within a country, from city to city or within a few streets.

There are a number of different types of exploitation that victims of modern slavery may be subjected to, and victims may experience more than one type of exploitation at the same time.

The most common forms of exploitation are:

- Sexual exploitation
- Labour exploitation
- Forced criminality
- Organ harvesting
- Domestic servitude

## Our policies

We operate a number of internal policies directly, alongside policies held by Warwickshire Police to ensure that we are conducting business in an ethical and transparent manner. These reflect our commitment to implementing and enforcing effective systems and controls to safeguard against slavery and human trafficking taking place in our supply chains. These include:

1. Code of Conduct for Staff and Representatives, The OPCC is publicly accountable and frequently works in partnership with other organisations, both in the public and private sector. It is therefore vital that all staff and representatives of the PCC conduct themselves in an exemplary manner in all aspects of their work and show no bias whatever their personal or political views might be.

<https://www.warwickshire-pcc.gov.uk/your-pcc/codes-of-conduct/>

2. Whistleblowing policy. This whistleblowing policy is intended to provide a vehicle for individual employees to raise issues of concern where they reasonably believe, in good faith, that an act or acts of malpractice have occurred in the OPCC.

<https://www.warwickshire-pcc.gov.uk/wp-content/uploads/2017/07/Whistle-blowing-policy-May-2016.pdf?x94727>

3. Safeguarding Policy. This policy recognises that safeguarding is everyone's business and seeks to ensure that OPCC staff and volunteers undertake their responsibilities with regard to the protection of children and adults at risk, and respond to concerns appropriately, even though they are not in roles where they are responsible for diagnosing, investigating or providing a therapeutic response to abuse.

<https://www.warwickshire-pcc.gov.uk/wp-content/uploads/2017/07/Safeguarding-Policy-November-2017.pdf?x94727>

A number of policies are shared with Warwickshire Police, these include but are not limited to:

- 1 Fairness at work. Warwickshire Police and the OPCC, are committed to ensuring that all individuals are treated with respect and the Fairness at Work Policy provides an avenue for individuals to raise concerns and to seek resolution.
- 2 Welfare Services. The service aims to assist in maintaining the emotional well-being and resilience of the workforce and to protect, as far as possible, all personnel from psychological harm.

The above policies are regularly reviewed to ensure they continue to be relevant.

### **Employee training**

The OPCC is committed to ensuring relevant training is available to all members of staff, and awareness raising and links to relevant legislation and information is shared. This includes but is not limited to:

<https://www.gov.uk/government/collections/modern-slavery>

An e-learning package entitled "See Past the Obvious – Vulnerability and Serious Crime" has been developed in partnership with Warwickshire Police and Warwickshire County Council.

<https://www.safeguardingwarwickshire.co.uk/news/safeguarding-children-news/209-protecting-children-from-criminal-exploitation-human-trafficking-and-modern-slavery-an-addendum-by-ofsted>

### **Supply Chain and Due diligence**

The OPCC has limited resources to monitor and manage the supply chains of direct suppliers of services. The OPCC considers that, due to the nature of its business, there are no areas of its business that are considered high risk of slavery or human trafficking. However, to help identify and monitor the risk of slavery and human trafficking, the OPCC does undertake due diligence when considering new suppliers and regularly reviews its existing suppliers, working in partnership with colleagues in the procurement teams of Warwickshire Police and West Mercia Police and Warwickshire County Council - <https://i.warwickshire.gov.uk/book/export/html/17003>

(links to Police statements will be provided when statements are in place).

To vet suppliers and to ensure they are committed to ethical labour practices, the OPCC have amended the current Terms and Conditions of grant funded, donated or commissioned service contracts to include the following wording:

The Customer is committed to ensuring that workers employed or engaged in its supply chains throughout the world are treated fairly, humanely and equitably and to this end the Contractor shall comply, and shall ensure that its Sub-contractors comply, in relation to all workers employed or engaged by it directly or indirectly in connection with the supply of the Goods and/or performance of the Services, with the Modern Slavery Act 2015 and with the policies, procedures and requirements of the International Labour

Organisation the United Nations Universal Declaration of Human Rights and the Ethical Trading Initiative ("ETI") Base Code or an equivalent code of conduct (the "Ethical Sourcing Principles").

Within the OPCC's procurement process the selection questionnaire also requires the below to be answered:

#### Section 7 - Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015

7.1 - Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?

Yes/No

7.2 - If you have answered yes to question 1 are you compliant with the annual reporting requirements contained within section 54 of the Act 2015? Please provide the relevant url in the response box. If No - Please provide an explanation in the response box.

#### Investigation

Any concerns regarding modern slavery or human trafficking should be raised with The Chief Executive, Office of the Police and Crime Commissioner, telephone 01926 412322 in the first instance.

#### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

The Office of the Police and Crime Commissioner will provide information to Warwickshire Police and Warwickshire County Council on request to enable them to satisfy any further performance measures.

#### Approval for this Statement

This Statement relates to the financial year 2019 -2020 and has been approved by the Police and Crime Commissioner, Philip Seccombe. This Statement will be renewed annually.

Signature



Date

8<sup>th</sup> April 2019.