

# North Wales Police

## Modern Slavery Statement 2024-2025

In accordance with Section 54 of the Modern Slavery Act 2015, the Police and Crime Commissioner for North Wales and the Chief Constable recognise their responsibility as an employer to be aware of the potential for instances of modern slavery and to report such instances or concerns to the relevant bodies.

This statement sets out the work undertaken during the financial year ended 31st March 2024 to further identify, prevent and address modern slavery across the force and its supply chains. This statement is also underpinned by a local Action Plan to be progressed during 2024-25.

### What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, sexual exploitation, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Police and Crime Commissioner for North Wales and the Chief Constable are committed to ensuring that there is no modern slavery or human trafficking in the force supply chains or in any part of the business. The force's policies, procedures and our work to tackle modern slavery through a working group, demonstrates our commitment to act ethically, with integrity and to identify risks that we can work to mitigate.

In 2017, the Police and Crime Commissioners and Chief Constables for the four police forces in Wales signed up to the Welsh Government Ethical Employment in Supply Chains Code of Practice. North Wales Police is fully committed to address unethical and illegal employment practices in supply chains and this statement is underpinned by an Action Plan to deliver the commitments within the Code.

Our approach to identifying and tackling ethical supply chain issues by implementing the Code across the force and supply chain focuses on four areas:

**Enforcement** – North Wales Police will play an active role in enforcement and will use our roles in employment and purchasing goods and services to improve intelligence gathering whilst ensuring full compliance with the Code of Practice as well as acting promptly on information received.

**Ethical Procurement** – North Wales Police will promote the development of ethical supply chains in the delivery of contracts for the police service in Wales generally and specifically in North Wales.

**Employment** – North Wales Police will aim to follow best practice and demonstrate full commitment to constant improvement within its own systems and structures, as well as working with the other forces in Wales and with partners to identify and eradicate any form of exploitation.



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OFFICE OF THE POLICE & CRIME  
COMMISSIONER NORTH WALES



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NORTH WALES  
POLICE**

**Environment** – North Wales Police will aim to create a more hostile environment for perpetrators of Modern Day Slavery. We will encourage the public to report any signs of exploitation in all its forms and work with partners, including local government, the NHS and voluntary and community groups to heighten awareness of – and reporting of – signs of exploitation. We will ensure that all our staff – particularly PCSOs and staff in our Public Service Centre – are fully aware of what to look out for and what to do when concerns are reported.

We recognise that modern slavery extends far beyond our national borders and that risks are increased with complex supply chains. Whilst tackling modern slavery is a policing priority for each force, the Welsh forces recognise that modern slavery can extend throughout our supply chains and that we also have a responsibility to address this through our procurement practices recognising that our supply chains are varied and complex.

An initial review of our supply chains has highlighted the potential risk of modern slavery in the following categories:

- Information communication and technology
- Construction
- Cleaning and Waste Disposal Services
- Uniform manufacture

We acknowledge that fully investigating supply chains is a difficult task with the resources available but we have started this work by incorporating modern slavery routinely into our market scoping documentation and supplier questionnaires considering higher risk areas due to their industry type, the nature of the workforce, supplier location, commodity type and the level of our expenditure.

We are committed to sharing information across forces to make the best use of our limited resources to investigate our supply chains based on where the greatest risk of human exploitation may be found. We have taken advantage of the work undertaken by SWP and Gwent in reviewing their supply chain and have benefited from this activity where it relates to common suppliers. Furthermore we engage with Bluelight Commercial in relation to their remit around ethical supply chains.

We will continue to work to raise awareness of modern slavery issues across our supply chain and will adopt a risk-based action plan.

The force's operational response to modern slavery falls within the responsibilities of our Chief Superintendent Crime Services. The guidance issued by the force is in place with the aim to reduce the risk of serious harm to victims and improve their safety, health and wellbeing. The guidance outlines how modern slavery offences will be dealt with. By achieving successful prosecution of offenders, we aim to enhance the trust and confidence of victims. Ongoing training is provided to front line officers and Inspectors are responsible for co-ordinating attendance at incidents, reducing immediate risks and preserving available evidence.

### **Due Diligence and Risk Assessment**

Progress was made during the previous period in several areas to address unethical and illegal employment practices in our supply chains.

The majority of this work was progressed as a result of the action plan established in 2023-24 to underpin our response. The work that was completed between 01.04.2023 and 31.03.2024 is summarised below:

### **Policy Development**

- Our updated Business Interest Policy that now reflects the Welsh Government Ethical Employment in Supply Chains Code of Practice remained in effect with officers and staff required to confirm their awareness of the Code when submitting a business interest approval request.

- The Force Counter Corruption Policy was reviewed and updated during the year with Whistleblowing a feature of the current policy. The Joint Audit Committee was provided with further assurance around how the Force's Whistleblowing policy works in practice.
- The All Wales Whistleblowing policy was developed and issued.
- Other relevant policies that remained in effect including the College of Policing Code of Ethics which received a re-launch nationally during the year.

### **Payment Performance Statistics**

- Invoice payment performance statistics continue to be published on the Police and Crime Commissioner's website. A link to the current and historical statistics is available.

### **Procurement & Commissioning Procedures**

- Market scoping assessments for Modern Slavery continue to be routinely incorporated into our Procurement processes. The Market scoping document is required for procurements exceeding £20k in value, which continues to build on the awareness of modern slavery in the supply chain beyond the core procurement team.
- Where deemed appropriate and necessary further assurance continues to be sought from suppliers and potential suppliers through our tendering processes. This is to ensure that they have no knowledge of any forms of modern slavery within their organisations or supply chains.
- Our contracts continued to include suitably robust terms and conditions around Modern Slavery in our supply chain contracts to clearly set expectations.
- Due consideration to creating a hostile environment for Modern Slavery was considered when commissioning OPCC services during the year.

### **Assessing existing suppliers and supply chains**

- Suppliers reviewed by the Southern Welsh forces have now been cross checked against North Wales Police's supplier listing.
- We have continued to share and draw on best practice with the other Welsh forces.
- We have continued to engage with Bluelight Commercial given their National role to help ensure ethical procurement is occurring across policing.
- Modern Slavery assessments have continued to feature in our market assessments to aid in the identification of risk.

### **Training and Raising Awareness**

- Annual CIPS refresher training has been completed by our strategic procurement staff and is being broadened out to incorporate key members of our Technology team.
- NCALT training for Officers in relation to Modern Slavery has continued to be available as a training module for the relevant staff. Completion statistics showed that over 1,000 staff had completed the training at the end of the relevant period.
- A local Modern Slavery event hosted by the Deputy PCC was organised engaging with local Partners and businesses to raise awareness around the issue. A number of National and Force speakers attended.
- The Director of Finance & Resources spoke at a Welsh Government organised event focussed on Modern Slavery in an attempt to increase awareness on practical steps that can be taken across Wales.

### **Living Wage**

- The Police and Crime Commissioner for North Wales and the Chief Constable continued to apply the Living Wage Foundation living wage to all officers and staff with the changes in rate occurring during the period being implemented. [The Living Wage is a voluntary hourly rate set by the Living Wage Foundation based on the cost of living in the UK].

## Delivery / Action Plan

To further progress the delivery of our commitments to tackle modern slavery, representatives from a wide range of areas have looked to support a Force action plan for 2024-25. Much of the action plan now reflects the 'Business as Usual' aspect of the Ethical Procurement work that is taking place.

The force action plan can be accessed via the link below:

- [Link to action plan here](#)

## Reporting Channels Available

The public and staff equally have a responsibility to be aware of potential instances of modern slavery or of a business using forced labour. If you have any such concerns, please contact any of the following bodies:-

- North Wales Police: Telephone 101 (or 999 in an Emergency)
- Modern Slavery Helpline: Telephone 0800 0121700
- Crimestoppers: Telephone 0800 555 111
- Confidential Integrity Line (North Wales Police internal only)
- Download the Unseen App for free

This Statement has been approved by The Police and Crime Commissioner for North Wales and the Chief Constable. It will be reviewed and updated annually.



**Andy Dunbobbin**

Police and Crime Commissioner  
for North Wales



**Amanda Blakeman KPM**

Chief Constable,  
North Wales Police



08000 121 700



Originally signed on 15<sup>th</sup> March 2019

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