

Foreword

This modern slavery update report highlights progress we have made in delivering against the stated commitments and intended actions communicated in our first voluntary Modern Slavery Statement. These were made in October 2020, in accordance with Section 54(1) of the Modern Slavery Act 2015, with a commitment to this annual review of progress.

In terms of modern slavery and human trafficking, we are responsible for tackling the crimes, bringing offenders to justice, *and* safeguarding those at risk. We also recognise that we have large and complicated supply chains across the seven forces: we have non-pay expenditure of over £250 million and work with over 3,000 suppliers with each of whom we spend over £50,000 annually; and it is here that we need to build on good practice, show clear leadership, and demonstrate robust action.

We are committed to working in partnership with our suppliers to support *and* challenge them on their response to modern slavery, and we will ensure our progress is open and transparent, reporting where we have been successful and where we still have opportunities to improve.

We are sharing our progress on this critical issue acknowledging that there remains more to do.



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Yorkshire Police and
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West Yorkshire Police and
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Introduction

Since the launch of our voluntary Modern Slavery Statement, tackling the crime of modern slavery has been a priority for each force. Although each force purchases a range of goods, works and services individually, across a variety of categories, we believed it was important to work in close collaboration to ensure a collective learning experience. We are reporting our progress and learning as it creates an opportunity to share resources, tactics, and best practice. Our approach to this will be outlined in the governance and collaboration section.

To deliver against the commitments and targets outlined in our statement we have focused on three main areas:

1. Procurement process
2. Staff recruitment, development and support
3. Supplier engagement and development

We will explain our progress on each of these as part of this report.

Procurement Process	
Embedding modern slavery considerations within our procurement systems and processes is critical when taking a long-term perspective on the problem. Our procurement teams will carry out a review of current practices to ensure:	
Action	Evidence of progress includes
Modern slavery considerations are identified at the start of any contracting procedure	Modern slavery considerations are identified at start of the procurement process within the customer considerations and due diligence documents. This is completed by the customer and highlights high, medium, or low risk.
A more detailed risk analysis is carried out considering suppliers beyond Tier 1 for purchases in high-risk categories	An initial risk assessment is carried out at the start of the procurement process, following the completion of the customer considerations and due diligence documents. An action plan is developed in partnership with the procurement team and the internal customer, and more detailed questions are asked of Tier 1 suppliers within high-risk and medium risk categories.
Opportunities are taken to identify modern slavery risks and potential solutions throughout the procurement process	Following the development of the action plan on medium and high risks associated with modern slavery, consultation with stakeholders will be carried out and any requirements built into specifications. Suppliers are asked to complete a social value action plan, which contains specific actions related to modern slavery. The data from these plans is reviewed to understand the progress the suppliers are making.
Modern slavery is included in contract management discussions	Modern slavery has been added as an item on contract management agendas and is raised as a specific discussion topic. By using the data from the social value action plan we can identify gaps in progress and target any further engagement required through contract management.

Staff recruitment, development and support

We will ensure our own staff and employees across the whole organisation are aware of modern slavery and are able to spot where abuses are taking place. We will ensure:

Action	Evidence of progress
Our staff receive training on modern slavery considerations and how to spot the signs of abuse	Whilst the many members of staff across the 7 forces have received training on modern slavery this will be an on-going process. Each force has initiatives in place including: North Yorkshire Police is delivering training to frontline officers and has updated a Modern Slavery Tool Kit and the Criminal Exploitation Guide. Northumbria Police is working with Changing Lives to train OPCC staff. Humberside Police is working on Operation Wilberforce, which is rolling out training across the force and within the region.
Suppliers in high-risk categories will be asked to share their plans for engaging <i>their</i> staff on modern slavery	A free Social Value Action Planning Tool is being rolled out across high-risk suppliers. Included with the tool are a number of staff engagement and training actions for suppliers together with free resources. Progress on these actions is monitored and engagement opportunities identified.
All our staff and volunteers, irrespective of their role, will continue to be vetted to nationally recognised standards, ensuring the risk of modern slavery within the workforce is low.	All staff and volunteers undertake vetting – NPPV1, NPPV2, NPPV3 or SC vetting regardless of role. This is a force requirement. This also includes the majority of contracts where staff are coming onto police premises or have access to police information.
Extend our work on modern slavery and embedding across the whole breadth of policing.	Across the 7 forces there is an active programme of training and support for departments and individuals. This is an ongoing process.

Supplier engagement and development

As part of our broader commitment to ethical procurement, we are committed to working with our suppliers to ensure that we manage the risk of modern slavery within our supply chains. All suppliers will receive guidance on responding to modern slavery and all suppliers across the North East and Yorkshire and the Humber regions will be asked to complete a social value action plan, allowing us to:

Action	Evidence of progress
Assess supplier awareness of modern slavery and whether they have made a public commitment to addressing the problem	When completing their plan suppliers are asked to confirm they have made a public commitment to addressing the challenge of modern slavery. Across the users of the tool 91% of large or enterprise businesses have conformed a commitment and 59% of small and medium sized business.
Monitor supplier plans for evidence of supplier development within their supply chains (recognised as our Tier 2 and 3 suppliers)	As part of our commitment to getting beyond tier 1, suppliers are asked to engage on modern slavery throughout their supply chain. 66% of suppliers using the tool have made a public commitment to addressing modern slavery in the supply chain (91% of suppliers with an annual turnover above £36m).

Support suppliers to develop plans for disclosing modern slavery if issues appear in their supply chain	If modern slavery is found within the supply chain it is critical that we are informed. Suppliers are encouraged to develop plans to communicate the appearance of modern slavery as part of their overall response. 40% of suppliers have selected the action to develop a robust approach to removing modern slavery from their supply chains.
Report on the progress of our suppliers in responding to modern slavery.	A report on the progress of our suppliers on modern slavery can be found below.

Of the 364 suppliers registered:

Awareness of modern slavery:

SMEs – 99%

Businesses with a turnover over £36M – 100%

Made a public commitment to taking action against modern slavery:

SMEs – 59%

Businesses with a turnover over £36M – 91%

Suppliers considering modern slavery an issue for their business:

SME – 31%

Businesses with a turnover over £36M – 50%

Within high risk categories:

Catering 33%

Clothing 41%

ICT 36%

Construction 43%

Stationery 33%

Engagement with modern slavery actions:

Action	Not Started	In Progress	Completed	Evidence Provided
Publish a modern slavery statement	54%	12%	31%	17%
Develop a robust approach to removing modern slavery from your supply chains	51%	19%	25%	17%
Engage with your suppliers about modern slavery	56%	25%	14%	12%
Provide modern slavery training for staff	60%	23%	14%	10%
Develop opportunities to support the victims of modern slavery	72%	10%	5%	5%
Plan a response to the discovery of modern slavery in your business operations	65%	15%	10%	10%

Evidence of action in our suppliers' own words

"Although the legislation does not apply to us as an SME, when assessing a new supplier we send them a questionnaire as part of our ISO 9001, which asks the supplier to confirm their slavery and human trafficking policies. Also, as part of this process, we have an annual diary flag to check progress of our sub-contractors"

"Our zero-tolerance approach to modern slavery is communicated to all contractors, suppliers, support suppliers and business partners at the outset of the relationship. Breaches of this policy can face disciplinary action. We will terminate its relationship with organisations if they breach this policy."

"Respecting human rights plays an instrumental role in our corporate social responsibility, and we expect the same approach from our suppliers."

"We have our own Anti-Slavery policy, which is strictly followed. In terms of supply chain, we use third party approved agencies to ensure our supply chain is compliant in ensuring that there is no evidence of any form of slavery."

"All suppliers are required to sign our own policy and need to provide evidence that it is followed, both through sending through information, and through unannounced audits."

"All staff involved in the procurement of goods and services are required to establish that they are dealing with known and trusted Supply Chains and to discuss the potential risks relating to any new Supply Chains."

"As part of the induction process for new staff we present our modern slavery strategy. This was also rolled out to all existing staff in 2017. We have a compulsory eLearning module on Modern slavery and human trafficking which is accessed via our intranet portal."

"We have an Anti-slavery and Human tracking policy. All co-members receive mandatory training on this policy. Our zero-tolerance approach to modern slavery is communicated to all contractors, suppliers, support suppliers and business partners at the outset of the relationship. Breaches of this policy can face disciplinary action."

Making a Difference – Our Case Studies

Northumbria Police and Crime Commissioner

We have partnered with a local organisation (Changing Lives) on three strands of work:

- **Building Awareness** – focussing on issues around labour exploitation, particularly amongst 18-25 year olds who have lost work due to Covid-19 restrictions in the hospitality and building sectors. Posters and leaflets are aimed at employers and the public detailing support available and how to report a concern. These are displayed in key businesses and public settings
- **Risk Identification** – the creation of an interactive map using data from partners across Northumbria, which shows where the present ‘hot spots’ of modern slavery activity are. The map will allow operational staff across agencies to keep up-to-date with the local picture quickly and efficiently. The intelligence gathered allows a clearer, targeted, multi-agency response to tackling modern slavery.
- **Staff development** - training staff on how to spot the signs and how to report modern slavery across the statutory and commercial sectors in Northumbria.

South Yorkshire Police and Crime Commissioner

Over the last year we have successfully:

- Worked with partners to develop a brief on digital exclusion of victims of modern slavery, which was shared with Migration Yorkshire
- Delivered an online talk to the Sheffield Hallam University Policing and Criminology students in November 2021
- Continued to share policy updates, upcoming events and opportunities in a monthly newsletter to people who have signed up – currently 142 people
- Raised awareness of modern slavery and the work of SYMSP on our Twitter [@SouthYorksMSP](https://twitter.com/SouthYorksMSP) – currently 473 followers.

Despite the challenges posed by Covid-19, the Partnership focused on training those in ‘high-risk’ roles i.e. those more likely to encounter potential victims of modern slavery. 260 frontline workers have received training from the Partnership in Q4 of 2020

West Yorkshire Police and Crime Commissioner

West Yorkshire Police’s (WYP) dedicated Training and Partnerships Officer continues to provide training on all aspects of modern slavery to police, police staff, local authorities and partner agencies and has driven forward a significant uplift in the training of over 850 officers to recognise and respond to situations of domestic servitude. The MSOICP has delivered several bespoke national four-day courses to Senior Investigative Officers (SIOs) within West Yorkshire Police to increase and

improve investigations. There are now 54 officers trained in this capacity across the five districts of West Yorkshire Police.

In addition, WYP has invested in training and implementing the Victim Liaison Officer (VLO) model, which has been developed by the MSOICP. There are now 27 officers who have received training on modern slavery and best practice when working with any potential victim of modern slavery or human trafficking. There are plans to train an additional 50 in the near future. VLOs can be deployed to any potential modern slavery case and would be responsible for the care and support needs for an individual for the first 24 to 48 hours. This allows the investigating officers to concentrate on the investigative actions, confident the potential victim is receiving the support they require.

North Yorkshire Police and Crime Commissioner

North Yorkshire Police continues to run the North Yorkshire and York Modern Slavery Strategic Partnership

- We deliver training to frontline police officers, including student officer training and additional training by the Children's Society delivered to Specialist Operations officers, and by Hope for Justice to frontline officers and partner agencies including Adult and Children's Social Care, housing officers, probation, health, education and environmental health professionals.
- The Modern Slavery module of the Neighbourhood Policing Certificate is being resumed following a pause during COVID, and 24 CID officers have now been accredited via the College of Policing 4-day Modern slavery Investigators course. The Modern Slavery Tool Kit and reference guide and the Child Criminal Exploitation guide have been updated in 2021.
- Operational activity has continued with specific operations including Operation Aidant (NCA-led) targeting labour exploitation, child exploitation and high-sophistication sexual exploitation. Operation Double, a county lines/exploitation investigation is progressing to trial in December 2021; further investigations relating to cannabis production, shellfish picking, pop-up brothels and associated exploitation, as well as other labour exploitation are all ongoing.
- North Yorkshire Police is one of two North-East Region forces (the other being Humberside) who have been selected nationally to pilot devolved decision-making as part of the National Referral Mechanism (NRM) pilot. This commenced in July 2021 and is already meaning better quality referrals and more timely decisions on victim identification, intended to lead to better outcomes for victims.

Durham Police and Crime Commissioner

At Durham, this year, an impact assessment has been undertaken on all contracts identified as high risk. Provision has been included in the Force's invitation to tender documentation raising awareness of the modern slavery initiative and requesting the supplier registers on the tool. As part of the tenderer's suitability assessment, commercial organisations as defined within section 54 of the MSA must confirm compliance with the Act's statement and annual reporting requirements. All Procurement Officers have attended a training session on modern slavery facilitated

by Bluelight Commercial in January 2021. Two Procurement Officers have also completed online training by CIPS.

Cleveland Police and Crime Commissioner

- All suppliers have been contacted and asked to complete a social value action plan, including modern slavery considerations. The tender documents which are issued to suppliers also include the request for suppliers to register on the tool and further information is included on any award letters which are issued to suppliers.
- Modern slavery questions are included within the tender document within the pass/fail section of the tender.
- The team has included a standard question set on social value, which will be evaluated as part of the weighted score for all procurement activity. This forms 10% of the available quality score and includes modern slavery.
- All procurement team members have received advanced training on social value and will continue to develop their skills as part of continuous professional development.

Humberside Police and Crime Commissioner

In Humberside, our partnership approach has ensured the appointment of a new Modern Slavery Co-ordinator position for the Humber Modern Slavery Partnership (HMSP). The post is based at the Wilberforce Institute and funded by the OPCC for Humberside. The HMSP is a strategic partnership of front-line organisations, working with Humberside Police and other key partners, across the Humber area; dedicated to tackling all forms of modern slavery and human trafficking by disrupting identified organised crime, prosecuting perpetrators and supporting victims in or out of the National Referral Mechanism (NRM).

The Operation Wilberforce taskforce within Humberside Police has been established to tackle modern day slavery and human trafficking within the Humber area. The newly launched dedicated team provides specialist training, support and guidance to colleagues to help them understand this complex issue in more detail. They also take the lead in investigating and responding to any allegations of modern-day slavery and human trafficking.

The Humber Modern Slavery Partnership has led the way on defining training and development within the region. A model has been created with partners, which has significantly raised awareness of modern slavery as well as our own commitments and activities across the region.

Next Steps

Our initial delivery plans identified a 3-year programme of activity.

Year 1: Devise action plans and establish a baseline for benchmarking improvement

Year 2: Implement action plans, to take forward our commitments within the procurement process, staff recruitment development and support, supplier engagement and operational practice

Year 3: Assess progress and dig deeper into high-risk activities.

Excellent progress has been made and we have not only delivered our Year 1 targets but also substantially delivered our plans for Year 2.

Throughout the next year we will, amongst other activities, continue to:

- Embed modern slavery into procurement practice with a particular focus on contract management
- Increase supplier use of the Social Value Action Planning Tool to allow us to monitor awareness and action on modern slavery
- Utilise supplier data to further focus on high-risk categories and drive improvement beyond tier 1 within our supply chains