

Office of the Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly

January 2019

Slavery and Human Trafficking compliance statement

The Police and Crime Commissioner (PCC) and the Office of the Police and Crime Commissioner (OPCC) are committed to eliminating discrimination and exploitation in all its forms from the workplace.

Slavery, servitude, forced or compulsory labour, including child labour and human trafficking and other human rights offences must be identified, tackled and prevented for the future.

The PCC and OPCC embraces the obligations placed on organisations under section 54(1) of the Modern Slavery Act 2015 and understands they are vital in tackling and preventing modern slavery and human trafficking. This statement demonstrates the commitment of the PCC and OPCC to not knowingly or otherwise be complicit in human rights infringements.

This statement sets out our current practice and constitutes the PCC's Slavery and Human Trafficking statement.

PURPOSE

This Modern Slavery statement sets out OPCC's actions to understand potential modern slavery risks related to its business and outlines the actions focused on ensuring there is no modern slavery or human trafficking, forced labour or exploitation in its own organisation, commissioned services, investments or its supply chain.

ROLE OF THE POLICE AND CRIME COMMISSIONER

The PCC's role:

- To publish a Slavery and Human Trafficking compliance statement for the OPCC
- To hold the Chief Constable to account for the exercise of his/her functions and his/her duties under the Modern Slavery Act.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the business activities of the PCC and OPCC. It covers direct employees of the OPCC, agency workers, supply chains that the OPCC utilises, services commissioned and treasury management.

The OPCC governance structure chart is available on the PCC's website at www.devonandcornwall-pcc.gov.uk/information-hub/key-documents/.

The Chief Executive and Monitoring Officer is responsible for the day to day operations of the OPCC and to ensure that its staff maintain the highest standard of conduct in all they do.

The Monitoring Officer is responsible for reporting on matters she believes are, or are likely to be, illegal or amount to maladministration; The Monitoring Officer is also responsible for matters relating to the conduct of the PCC and OPCC staff officers.

The Chief Executive and Monitoring officer is accountable to the Police and Crime Commissioner.

COUNTRIES OF OPERATION AND SUPPLY

The OPCC operates solely in the United Kingdom. Whilst the risk of slavery and human trafficking is considered low, the team remains vigilant and will take all steps available to manage the risks presented.

HIGH-RISK ACTIVITIES

The OPCC has determined there are no areas of its business considered at high risk of modern slavery or human trafficking.

RESPONSIBILITY

Policies: The Chief Executive and Monitoring Officer ensures that appropriate Policies and Procedures are in place for daily OPCC operational activities. These are reviewed regularly and updated where necessary.

Risk assessments: Are undertaken by the relevant service area where there is deemed a risk of modern slavery or human trafficking.

Investigations/duo diligence: Any concerns regarding modern slavery or human trafficking will be raised with the Chief Executive and Monitoring Officer in the first instance. Advice will be sought from Devon and Cornwall Police where necessary.

TRAINING AND AWARENESS RAISING:

Awareness of the issue of human trafficking and modern slavery has been raised by the PCC in the exercise of her duties and by the OPCC staff in the course of their work and engagement activity with the public and partners.

The PCC and OPCC staff undertake slavery and human trafficking awareness training and this is refreshed when necessary.

The Chief Constable of Devon and Cornwall Police is the national policing lead for modern slavery with the National Modern Slavery Transformation Unit located in the Devon and Cornwall Police Force area. The Chief Constable has been working with the government, police forces, other law enforcement agencies and wider partnerships in order to improve the response to modern slavery. He has identified training, awareness and guidance as a key priority in his role going forward and is working closely with the College of Policing to suitably raise awareness and provide the necessary training for Police officers, staff and partners.

In addition, Devon and Cornwall Police has a named Modern Slavery Force Lead and a number of champions across the Force.

RELEVANT POLICIES

Whistleblowing policy: The organisation encourages all workers, customers and other business partners to report any concerns related to the direct activities or supply chains of the organisation. *This includes any circumstances that may relate to risk modern slavery or human trafficking.* The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

[https://devonandcornwall.s3.amazonaws.com/Documents/Our%20information/Policies%20of%20the%20OPCC/HRO_POL_OPCC-Protective%20Disclosure%20policy%20131219%20v.2%20\(final\).pdf](https://devonandcornwall.s3.amazonaws.com/Documents/Our%20information/Policies%20of%20the%20OPCC/HRO_POL_OPCC-Protective%20Disclosure%20policy%20131219%20v.2%20(final).pdf)

Safeguarding: The OPCC embraces its responsibility to develop, implement and monitor policies and procedures to safeguard the welfare of children and vulnerable adults throughout Devon and Cornwall. *The OPCC has a comprehensive Safeguarding Policy which all staff are expected to read and comply with.*

Employee code of conduct: OPCC staff adhere to the code of conduct which makes it clear to all employees the actions and behaviour expected of them both inside and outside of their working hours. This is clearly documented on the OPCC website:

https://devonandcornwall.s3.amazonaws.com/Documents/Our%20information/Policies%20of%20the%20OPCC/GOV_POL_Governance-Framework-appendix-staff-code-of-conduct_140903.pdf

Expectations of Suppliers: The OPCC does not use a large amount of suppliers but is committed to ensuring its suppliers adhere to the highest ethical standards. The most common services accessed by the team are from public transport providers, accommodation providers or office equipment, technology and stationery providers.

Procurement by The OPCC is managed by the Southwest Police Procurement Department (SwPPD). The SwPPD carry out a range of activities on behalf of the 4 regional Forces (Devon & Cornwall, Dorset, Gloucestershire and Wiltshire), with the primary responsibility of ensuring that the goods, services or works procured on behalf of the Chief Constable or Crime Commissioner is undertaken in strict accordance with legislation and Force Standing Orders.

Information relating to the SwPPD for public access can be found here: <https://www.devon-cornwall.police.uk/your-right-to-information/procurement/>

Agency workers: The OPCC uses a specified reputable employment agency to source temporary staffing. A full vetting process is undertaken by Devon and Cornwall Police and the agency before any employment with the OPCC team commences.

Practical guidance

Advice and information relating to Modern Slavery and what to do if you suspect someone is at risk is on Devon and Cornwall Police website:

<https://www.devon-cornwall.police.uk/advice/threat-assault-abuse/modern-slavery/>

COMMISSIONED SERVICES

The PCC supported by the OPCC commissions a range of services to support the delivery of the Police and Crime Plan. The strategy for commissioning services is set out in the Commissioning Intentions Plan. The Plan is subject to scrutiny by the Police and Crime Panel.

<https://www.devonandcornwall-pcc.gov.uk/information-hub/key-documents/>

Service providers are required to have safeguarding policies, procedures and training in place and provide confirmation of compliance. These activities should consider modern slavery and human trafficking.

The OPCC requires regular reports to be submitted by commissioned service providers. These require the providers to declare any exceptions to their conditions of service.

Commissioning arrangements are subject to internal audit and routine financial management scrutiny.

GRANT FUNDING

From time to time, the PCC issues grants to organisations and community groups to support the delivery of the Police and Crime Plan. The PCC's grant-funding principles are set out in the Commissioning Intentions Plan.

Grant recipients are required to declare that they consider the prevention of slavery and human trafficking in their activities.

The OPCC requires regular reports to be submitted by grant recipients. These require the providers to declare any exceptions to their conditions of service.

Grant funding arrangements are subject to internal audit and routine financial management scrutiny.

TREASURY MANAGEMENT

The PCC operates a treasury management strategy of investments operated and managed by a third party investment partner. The PCC's Chief Financial Officer (Treasurer) has responsibility to ensure investments are made prudently and in accordance with financial regulations. The Treasurer provides financial advice and oversight to the PCC to ensure funds are invested ethically and legally.

Treasury Management arrangements are subject to internal audit and routine financial management scrutiny.

ANNUAL GOVERNANCE STATEMENT

The PCC and Chief Constable set out the responsibilities and the governance arrangements within and between the two organisations in the Joint Annual Governance Statement.

This reports on the structures and mechanisms in place to effectively manage the organisation and its activities.

It is signed by the PCC and Chief Constable and the two Chief Finance Officers and is in line with the Chartered Institute of Public Finance and Accountability (CIPFA) Standards. Both organisations are responsible for ensuring that public money is used effectively and have proper governance arrangements in place.

HOLDING THE CHIEF CONSTABLE TO ACCOUNT

The PCC holds the Chief Constable to account for the exercise of the functions of Chief Constable and his/her duty to have regard to the Police and Crime Plan. To find out more about how the PCC holds the Chief Constable to account please refer to our scrutiny framework on our website at www.devonandcornwall-pcc.gov.uk.

POLICE AND CRIME PANEL

The Devon and Cornwall Police and Crime Panel scrutinise the work and decisions of the PCC. The Police and Crime Panel may issue recommendations to the PCC to which the PCC must respond.