



# Modern Slavery

## Statement 2020

Section 54 (1) Transparency in Supply Chains (TISC)

Police and Crime Commissioner's for West Yorkshire, South Yorkshire, North Yorkshire, Humberside, Northumbria, Cleveland and Durham in partnership with the Chief Constable's of West Yorkshire Police, South Yorkshire Police, North Yorkshire Police, Humberside Police, Northumbria Police, Cleveland Police and Durham Police.



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**Police & Crime  
Commissioner**  
West Yorkshire



**South  
Yorkshire  
Police and Crime  
Commissioner**  
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**North Yorkshire  
Police, Fire & Crime  
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KIM MCGUINNESS  
NORTHUMBRIA  
**POLICE & CRIME  
COMMISSIONER**



**POLICE AND CRIME  
COMMISSIONER  
FOR CLEVELAND**



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COMMISSIONER



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## Foreword

This statement articulates the commitment and intended actions of the seven Police and Crime Commissioners (PCCs) and seven Chief Constables across the North East and Yorkshire and the Humber regions, to address modern slavery through their business activities and supply chains. This voluntary statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015<sup>1</sup>.

When considering 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 will build on the good practice that has already been developed, 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.

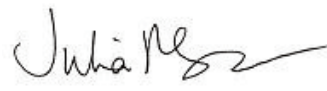
We welcome and endorse the commitments made in this statement and will closely monitor the progress.



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West Yorkshire Police and  
Crime Commissioner



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South Yorkshire Police and  
Crime Commissioner



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North Yorkshire Police, Fire and  
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<sup>1</sup> Modern Slavery Act 2015: <http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>

### Introduction

The enactment of the UK's modern slavery law in 2015 represented a pioneering step in transforming the UK's response to the exploitation of the most vulnerable and at-risk people. The Modern Slavery Act 2015 was the first legislation of its kind in the world and now more victims are being identified and supported; more offenders are being prosecuted; and thousands of companies are publishing their commitment to tackling modern slavery in their supply chains.

In developing and publishing our statement, the PCCs and Chief Constables of the seven forces of the North East and Yorkshire and the Humber regions are cognisant of the 2018/19 Independent Review of the Modern Slavery Act 2015. In particular, we are mindful of section 54 of the Act and the recommendations to strengthen its provision by extending transparency in supply chains across the public sector. Irrespective of the Review's findings, each Force recognises its responsibility to take a robust approach to tackling slavery and human trafficking, not only through policing but also as employers, and procurers of services and support from other entities. We must do this not only to match the response of our public and

private sector partners but demonstrate a clear commitment to lead.

The 7 police forces and OPCCs are jointly committed to their responsibilities in community safety, the protection of life and property, preservation of the peace, and prevention and detection of criminal offences. These commitments equally apply in the abuse and exploitation of people through modern slavery and human trafficking. We are committed to preventing harm, safeguarding those at risk and pursuing and bringing to justice those who would seek to abuse, harm and exploit victims. This will be achieved through making best use of legislation and working in partnership with communities, statutory authorities, business and the third sector.

We have voluntarily published this joint strategic statement which will be underpinned by local delivery plans for examining and updating our organisational supply chains. Our intention is to exemplify the national response to modern slavery for Police and Crime Commissioners and police forces in England and Wales.

### How we understand modern slavery

Modern slavery is present in every single area of the UK. You probably see people trapped in slavery on a regular basis but do not recognise it. It might be someone working in a private home on your street, the man working in the car wash in town, or the cleaner who empties your office bin every night. It can be difficult to spot the signs because in the UK modern slavery takes many forms, including sexual exploitation, domestic servitude, forced labour (which can occur in any sector but is often more prevalent in low skilled occupations), criminal exploitation and even organ harvesting.

Forced labour is the most common form of slavery in the UK, fuelled by society's demands for cheap products and services. A growing form of slavery is trafficking into crime and in the UK, this is driven by the trafficking of primarily British children, forced into 'county lines' drug trafficking and trafficking of overseas nationals forced to work in cannabis production<sup>2</sup>.

## Supply chain

We recognise that the crime of modern slavery extends far beyond our regional boundaries and national borders. Mobile phones, clothing, shoes, technology and food: many of the products we buy and use every day are produced by people trapped in modern slavery<sup>3</sup>, with as many as 40.3 million people experiencing modern slavery, including 24.9 million in forced labour across the globe. 16 million of these people are exploited in the private sector, linked to the supply chains of the international, national and

local businesses which supply our goods and services<sup>4</sup>. Slavery exists in all stages of the supply chain, from the picking of raw materials such as cocoa or cotton<sup>5</sup>, to the manufacturing of goods such as mobile phones or garments<sup>6</sup>, food and fishing production and supply<sup>7</sup>, and at later stages of shipping and delivery to consumers<sup>8</sup>.

## About the Seven Forces

This strategic statement applies to the Police and Crime Commissioners for West Yorkshire, South Yorkshire, North Yorkshire, Humberside, Northumbria, Cleveland and Durham. In considering our response to addressing modern slavery it is

important to understand the size and shape of the area we collectively cover as well as the scale of the challenge we face.



We employ over **28,000** people



We support a population of over **8 million**



We receive **3 million** calls per year

We have a non-pay spend of over **£250 million**



We cover an area of **9,254 square miles**



We operate a fleet of **2,941** vehicles

We work with over **3,000** suppliers where we spend over **£50k** annually



We will actively collaborate to refine both our collective response to modern slavery alongside bespoke action plans for each force and PCC that reflect specific regional challenges and opportunities to address modern slavery.

<sup>2</sup> <https://www.antislavery.org/slavery-today/slavery-uk/>

<sup>3</sup> <https://www.antislavery.org/slavery-today/slavery-in-global-supply-chains/>

<sup>4</sup> <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

<sup>5</sup> [https://www.nsf.org/newsroom\\_pdf/fs\\_modern\\_slavery.pdf](https://www.nsf.org/newsroom_pdf/fs_modern_slavery.pdf)

<sup>6</sup> <https://www.antislavery.org/slavery-today/slavery-in-global-supply-chains/>

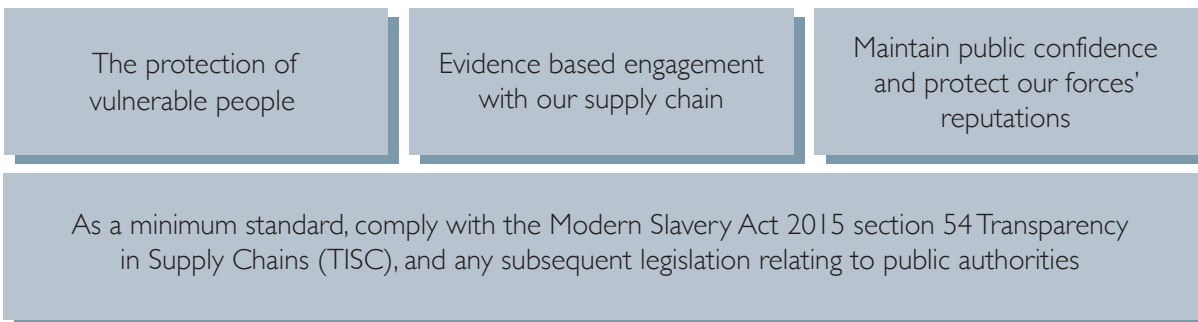
<sup>7</sup> <https://www.globalslaveryindex.org/2018/findings/importing-risk/fishing/>

<sup>8</sup> <https://www.nortonrosefulbright.com/en/knowledge/publications/9cb18e6c/food-for-thought-the-modern-slavery-acts-impact-in-fresh-food-retail-wholesale-and-agriculture>

## Our shared principles

To inform delivery of this work across the seven police forces, we have agreed our shared principles. These directly reflect the values and standards of the

policing Code of Ethics<sup>9</sup> and will guide our commitments and actions throughout all of our efforts.



## Our collaborative approach

Whilst tackling the crime of modern slavery is a policing priority for each force, we recognise also that the scourge of modern slavery can extend throughout our supply chains and that we have a responsibility for addressing the problems through enhanced procurement practices. Each of the forces purchases a range of goods, works and services across a variety of categories and therefore we have identified the high-risk categories that we will target for engagement. We are of course committed to

raising awareness of modern slavery issues across our whole supply chain, and throughout the services we commission and so our targeted approach will be complemented by broader engagement across the wider supplier base. As part of our collaborative approach all PCCs and Forces participate in the national Modern slavery Transformation collaboration agreement.

## A risk-based approach

The challenge of modern slavery can be embedded deep in a supply chain and as part of our robust approach we need to understand and manage the risk at a category level. The risks associated with a

particular category can be determined by a number of factors, including but not limited to:

The prevalence of a low paid and seasonal workforce	Supply chains operating in countries with a weak rule of law
A heavy reliance on extracted materials or agriculture	High volume, low cost manufactured goods

<sup>9</sup> 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. See [www.college.police.uk/What-we-do/Ethics/Pages/archive\\_DO\\_NOT\\_DELETE/Code-of-Ethics.aspx](http://www.college.police.uk/What-we-do/Ethics/Pages/archive_DO_NOT_DELETE/Code-of-Ethics.aspx) for more details.



Following an initial review of our supply chains, we recognise the potential risk of modern slavery abuses in the following categories:

- Hospitality and catering;
- Information communication and technology equipment and services;
- Cleaning;
- Construction; and
- The production of uniforms.

We understand that modern slavery can and does occur in many supply chains however we believe this is an appropriate place to start as part of a targeted response<sup>10</sup>.

### Due diligence

It is important we develop our understanding further our supply chains including labour providers and recruiters to supply chains and services including sub-contractors, distribution, equipment and services. For each of these categories we will:

- Quantify our expenditure;
- Identify current contracted suppliers;
- Undertake a detailed modern slavery risk assessment; and
- Put in place an appropriate risk reduction plan to identify, remove and prevent the occurrence of modern slavery

### Making a Difference - Our Case Studies

#### West Yorkshire Police & Crime Commissioner

Funding for the West Yorkshire Anti-Slavery Partnership was secured by PCC Mark Burns-Williamson and is now in its sixth year of operation. It provides a strategic meeting framework for the statutory, non-statutory and third sector organisations in West Yorkshire that work to tackle human trafficking and modern slavery in all its forms. The responsibility to deliver and coordinate the Partnership has recently been brought in to the OPCC, with the PCC in the role as Chair, to building its membership, leadership, and influence in the collective response to modern slavery and human trafficking going forward. PCC Mark Burns-Williamson is the national APCC lead for modern slavery and human trafficking and Chair of the National Anti-Trafficking and Modern Slavery Network. He has led on the development of this statement and its adoption more widely.

West Yorkshire Police's pioneering initiative tackling county lines was launched as part of Programme Precision, expanding the reach and proactive arm of the Force Precision Human Trafficking & Modern Slavery Team. This now incorporates the newly formed REDIVE County Lines Intensification & Co-ordination Hub, which is embedded within Protective Services Crime. This brings together a team of specialists with a range of skills, knowledge and expertise and combines them with the other areas of policing including serious organised crime, safeguarding and training and partnerships. The REDIVE Hub targets modern slavery and the widespread threat of county lines drugs markets operating locally and across force boundaries.

West Yorkshire Police is also leading the way in the use of Slavery and Trafficking Risk and Prevention orders. All forces from the region attended the Regional Coordinators specialist training event focused on the use and management of the orders, which are a key tool in the prevention of offending and protection of vulnerable victims.

West Yorkshire Police and Yorkshire and the Humber CPS created the first Regional Modern Slavery Prosecution Working Group in 2019 and this has provided the blueprint for other regions to follow. This is a critical mechanism in improving the number of successful Modern Slavery prosecutions.

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819014/UK\\_Labour\\_Market\\_Enforcement\\_Strategy\\_2019\\_to\\_2020-full\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819014/UK_Labour_Market_Enforcement_Strategy_2019_to_2020-full_report.pdf)

### South Yorkshire Police & Crime Commissioner

The South Yorkshire Modern Slavery Partnership (SYMSP) was established in 2019 to offer a strategic, joined up approach to tackling modern slavery across the county. The overarching vision of the SYMSP is to work in partnership, to ensure South Yorkshire is a place of safety for survivors, a hostile region for those who exploit others, and a leading influence on national priorities relating to modern slavery.

One of the more innovative successes of the partnership has been the 'Bags of Hope' project. This initiative provides victims and survivors of modern slavery with essential everyday items including cosmetics, hygiene products, snacks, underwear, and toys. These emergency supplies have been invaluable in assisting the Modern Slavery Team to provide immediate care to survivors of modern slavery.

The partnership has trained 514 frontline professionals on what modern slavery is, the National Referral Mechanism and good practice for supporting victims of modern slavery. The training has been delivered to key roles including social workers, housing officers, probation officers, health workers and charity partners.

Operation Dragonfly is an ongoing South Yorkshire Police investigation into human trafficking for the purpose of sexual exploitation facilitated by a Romanian Organised Crime Group. A Joint Investigation Team was agreed by the UK and Romania to address the criminal activities of the OCG. It was established that the nominals were connected to other criminal gangs across Europe, who were also involved in organised criminal activities.

Intelligence was received which suggested that the OCG had continued to expand and were criminally active across numerous locations throughout the UK. Multiple warrants were executed across national and international LEA's namely; London, Norfolk, Northumbria and Staffordshire. Romanian authorities simultaneously executed multiple warrants. Eleven nominals were arrested on suspicion of Human Trafficking and Money Laundering, with eight women being the subject of safeguarding measures.

### North Yorkshire Police & Crime Commissioner

North Yorkshire Police has created the North Yorkshire and York Modern Slavery Strategic Partnership, Chaired by the Head of Safeguarding. This strategic partnership combines with a Modern Slavery and Illegal Exploitative Working Group, which in turn, drives operational activity across North Yorkshire. Partners include North Yorkshire Police, Gangmasters & Labour Abuse Authority, Home Office Immigration, DWP, HMRC, North Yorkshire Fire and Rescue Service, City of York Council's Housing, Trading Standards and Community Safety Partnerships.

North Yorkshire Police has delivered training to all frontline police officers, incorporated key modern slavery considerations into all student officer training, and has included modern slavery as a module in the Neighbourhood Policing Certificate. Over 20 CID officers have been accredited via the College of Policing 4-day Modern Slavery Investigators course. A Modern Slavery Tool Kit and reference guide has been developed and a Child Criminal Exploitation guide written. Training and awareness sessions are regularly delivered to partners including Adult and Children's Social Care, housing officers, and probation, health, education and environmental health professionals.

A number of successful operations have been carried out across the County including: Oasis, Double, Goa and Alligator. Op Oasis led to the identification of up to 21 potential victims, resulting in the arrests and subsequent prosecution of a number of Romanian nationals by EU counterparts in May 2019. Op Goa was a proactive intelligence operation that identified a significant number of Chinese nationals that were potential victims of sexual exploitation right across the UK. Collaboration with the Regional Organised Crime Units and the National Crime Agency resulted in the gathering of evidence that directly led to the arrest and successful prosecution of the principle subject in Birmingham.



### Humberside Police & Crime Commissioner

In Humberside, our partnership approach has ensured the appointment of a new Modern Slavery Coordinator 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.

Our approach

These workshops have been developed by the Wilberforce Institute with funding from the Modern Slavery and Human Rights Policy and Evidence Centre, based on a model established by the Humber Modern Slavery Partnership. Each workshop is based on a different scenario that is relevant to each audience. Partners work through the scenario together, looking at how they could and would respond, identifying gaps in knowledge and provision, enhancing understanding, and thus improving identification and response. The workshops encourage open conversation where attendees can share experiences, best practice, and seek advice from other partners. For further information see [www.modernslaverypec.org/interactive-workshops](http://www.modernslaverypec.org/interactive-workshops)

### Northumbria Police & Crime Commissioner

#### Improving lives by working in partnership – The Liberty Project

The Northumbria PCC commissioned Changing Lives (a voluntary sector partner) to develop a trauma-informed response to victims of modern slavery. The 'Liberty Project' was a response to an identified pattern of victimisation in Northumbria where people with a criminal history combined with current complex needs, including homelessness and substance addiction, were being exploited by landlords of the houses of multiple occupation (HMOs) they were residing in. Landlords would 'waive' residents' housing benefit top-up (around £30 week) in exchange for 'work', often involving criminal elements, which could total over 70 hours/week. The Liberty Project utilises assertive outreach to engage these and other hidden victims of exploitation. Working closely with Northumbria Police Designated Liaison Officers (DLOs), and multiple stakeholders across the region, the project engages in proactive outreach with potential/known victims, shares intelligence and works to provide trauma-responsive support to increase victims' independence.

#### Operational good practice: Victims Hubs

Unique to Northumbria's Complex Abuse Investigation Team (CAIT) are two Victim Team Hubs in the North and South of the region. These Hubs facilitate a multi-agency approach to supporting victims and witnesses of sexual/criminal exploitation, human trafficking and modern slavery. The Victims Teams works with statutory and non-statutory partner agencies, some of whom are co-located within the Hubs, designed to provide specialist support to children and adults both in terms of safeguarding and obtaining evidential accounts to support investigations. Both Hubs have dedicated ABE suites and are a key asset

when there is a need for a Victim Reception Centre. The CAIT successfully investigated a family targeting victims in Slovakia to be trafficked to Newcastle under the guise of good work and income between 2010 and 2017. The Victims Team Hub was integral to the investigation, providing victims with a centralised safe space to access all required support.

### Cleveland Police & Crime Commissioner

The Cleveland Anti-Slavery Network was established in 2017 to tackle modern slavery and human trafficking collectively and collaboratively across our area. Made up of a wide variety of partners including police, local authority safeguarding and community safety, health, criminal justice agencies, GLAA and the voluntary community sector.

In October 2019, the network launched a Victim Care Pathway to ensure identified victims receive the necessary care and support within hours of their rescue. This has proved successful to-date in safeguarding and supporting vulnerable people. The Pathway remains a live document and is updated on a regular basis based on experience of learning from its use. One of the biggest challenges identified from use of the Pathway is in relation to suitable accommodation. The network has therefore created a task and finish group to create positive solutions to this issue moving forward.

### Durham Constabulary Police & Crime Commissioner

Since the introduction of The Modern Slavery Act in 2015 Durham Constabulary has continued to work in the spirit of the National Crime Agency's Prepare, Protect, Prevent and Pursue Strategy.

The scale of modern slavery and human trafficking (MSHT) in the UK is not fully understood, but as communities and partners improve their understanding, it is likely that increased crimes will be reported to the Constabulary hence the importance of multi-agency awareness raising, regular up to date officer training and robust processes in place to ensure our most vulnerable are identified.

MSHT features in the Constabulary's Partnership Boards.

Within the force there are a number of highly qualified MSHT SPOCS (single points of contact) should an officer require any assistance when dealing with any investigation. All officers have received Safeguarding training including MSHT, with up-to-date accessible information on the force intranet.

In March 2019 the Constabulary delivered a multi-agency conference to enhance community intelligence sources and raise awareness with front line practitioners. Since November 2019, having developed the Child Exploitation Vulnerability tracker, the force has triaged relevant cases in a multi-agency format to ensure both victims and perpetrators are identified, supported and managed.

The Partnership Disruption and Intervention Panel for Organised Criminal Groups provides a forum for MSHT to be tackled and Durham continues to have strong links with NERSOU (North East Regional Specialist Operations Unit). The force is also linked in to GAIN (Government Agency Intelligence Network) who assist in tackling MSHT.

Durham Constabulary works closely with the Crown Prosecution Service. This has assisted in a recent policing Operation that resulted in over 40 foreign nationals being charged and remanded in to custody for their links to criminal exploitation. Another Operation was highlighted as good practice and adopted by the national team.

### Our commitments

Whilst each of the PCCs and forces are at different stages in responding to the challenge of modern slavery, we have agreed a set of collective commitments, including an obligation to share our learning, methods and results with each other and to use our shared intelligence to continuously shape the respective action plans for each force and PCC. Where one force is particularly advanced in an area of interest, their experience and expertise will be shared across all seven forces, ensuring our collective

understanding of the issues and maintaining a consistency of approach for tackling the heinous crimes of entrapment, exploitation and enslavement. As well as our specific focus on high-risk categories, we have identified a broader set of priorities for significantly reducing the risk and impact of modern slavery across our supply chains, and for supporting our suppliers in responding appropriately to this shared challenge.

### 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:

1. Modern slavery risks are identified at the start of any contracting procedure and potential solutions considered throughout the procurement process;
2. Purchases in high-risk categories, a more detailed risk analysis is carried out considering suppliers beyond Tier 1;
3. Suppliers in high-risk categories will be asked to share their plans on engaging their staff on modern slavery;
4. Modern slavery is included in contract management discussions.

### 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:

1. Our staff receive training on modern slavery considerations and how to spot the signs of abuses;
2. All of 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; and
3. That we will extend our work on Modern Slavery and embed it across the whole breadth of Policing.

### Supplier engagement

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 North East and Yorkshire and the Humber regions will be asked to complete a Social Value Action Plan, allowing us to:

1. Assess supplier awareness of modern slavery and whether they have made a public commitment to addressing the problem;

2. Monitor supplier plans for evidence of supplier development within their supply chains (what we recognise as our Tier 2 and 3 suppliers);
3. Support suppliers to develop plans for disclosing modern slavery if issues appear in their supply chain; and
4. Report on the progress of our suppliers in responding to modern slavery.

### Delivery plans

To inform delivery of our commitments, each of the seven forces will develop and implement a 3-year programme of activity, progress of which will be reviewed annually and reported publicly:

**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; and

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

### Key performance indicators

To support implementation and to drive continuous improvement we have identified a set of key performance indicators (KPIs) of our progress. These KPIs are initially focussed on supply chain activity, however further KPIs will be developed across our commitments to staff recruitment development and support. Our initial focus will be on engaging with contracted suppliers with whom we spend over £50k per annum. KPIs include:

- Increasing the number of high-risk suppliers aware of modern slavery;
- Increasing the number of our suppliers (with an annual turnover exceeding £36m) who have produced a modern slavery statement;
- Increasing the number of our suppliers (with an annual turnover below £36m) who have produced a modern slavery statement;
- Increasing the number of high-risk Tier 1 suppliers who have trained their staff on modern slavery;
- Increasing the number of high-risk Tier 1 suppliers who have engaged with their supply chains on modern slavery (our Tier 2 suppliers); and
- Increasing the number of high-risk Tier 1 suppliers who have an agreed protocol for informing the force if they discover modern slavery issues within the supply chain.

These KPIs will inform our targeted engagement, resource development, and/or the support we can provide suppliers, whilst understanding and addressing any risks in our supply chain. These KPIs will be reviewed on an annual basis.

### Governance

To deliver against our commitments we will review and update our governance systems to ensure a robust response to managing modern slavery. We will ensure that a Modern Slavery Lead (MSL) is appointed for each of the seven forces and PCCs who will report on progress against the stated commitments and KPIs.

We seek a sector-leading approach to Modern Slavery, core to our approach is a robust governance structure. The Modern Slavery steering group chaired by West Yorkshire OPCC, will drive and lead the

North East collaboration with national organisations and colleagues ensuring appropriate and well communicated policies, the sharing of good practice, appropriate levels of supplier and employee training, and a strong emphasis on collaborative partnerships, stakeholder dialogue and transparency.

See **Appendix A** for details of the governance structure.

### Appendix A: Governance Structure

