

MODERN SLAVERY

Statement **2019**

Making Derbyshire Safer **Together**



Foreword

Derbyshire Constabulary is committed to tackling modern slavery. This has been demonstrated by recent cases including Operation Doubrava; a large-scale investigation which stretched into Europe. This safeguarded many victims and saw nine offenders jailed. This investigation highlights the extent of this type of criminality and the footprint modern slavery has in our towns and cities.

We have a dedicated team of specialist officers who work in partnership to tackle this abhorrent criminality, bringing offenders to justice and safeguarding those at risk of harm.

This is just one element of how we are dealing with modern slavery. This statement details our commitment to not only bring offenders to justice and protect victims, but also our pledge to ensure our supply chain is free of modern slavery. As an organisation that employs more than 3,000 people, it's vitally important to ensure our business contracts, supplies and workforce are free from modern slavery.

Although there is no requirement for the police service to comply with section 54 of the Modern Slavery Act and produce a statement, I feel very strongly that policing should operate with transparency and lead by example. I know the people of Derbyshire would expect this from their police service.



Peter Goodman

Derbyshire Constabulary Chief Constable

November 2019

This is Derbyshire Constabulary's first Modern Slavery Statement.

This statement is made in accordance with the Modern Slavery Act 2015 and describes the initial steps we have taken to prevent acts of modern slavery and human trafficking from occurring in our operations, business and supply chain.

In completing this statement, we seek to raise awareness of this serious issue within our own business processes as well as with the community and our peers in policing.

The key areas that the force will focus on over the next reporting period will be:-

- The development of an overarching modern slavery strategy and responsible sourcing programme
- Increased collaboration with statutory stakeholders, the community and our suppliers in respect of business engagement and modern slavery "influence"
- Continue training and carrying out other awareness-raising activities in high-risk sectors of operation

- Create a cross-functional modern slavery working group to oversee the modern slavery program, implementation and development
- Work within the policing sector to share best practices
- Develop our modern slavery action plan and a qualitative performance framework
- Develop more sophisticated key risk indicators for modern slavery as part of our ongoing organisation-wide risk management analysis

In developing this statement we are aware of the recent independent review of the Modern Slavery Act and make note of the following recommendations;

- Section 54 should be extended to the public sector. Government departments should publish a [modern slavery] statement at the end of the financial year, approved by the Department's board and signed by the Permanent Secretary as Accounting Officer
- Local government, agencies and other public authorities should publish a statement if their annual budget exceeds £36 million
- The Government should strengthen its public procurement processes to make sure that non-compliant companies in scope of Section 54 are not eligible for public contracts
- The Crown Commercial Service should keep a database of public contractors and details of compliance checks and due diligence carried out by public authorities. The database should be easily accessible to public authorities for use during the procurement process
- The Independent Anti-Slavery Commissioner should commission research into how consumer attitudes to modern slavery can be influenced. The aim of this should be for business, in partnership with civil society, to leverage purchasing power to eradicate modern slavery in supply chains. The research should feed into the Commissioner's annual report, with recommendations for Government action as appropriate

While we have made progress towards improving our ability as a force to identify victims of modern slavery, and pro-actively pursue organised crime gangs who are involved, we recognise that the next stage of our journey is to review our organisation internally.

We also seek to use our position in Derbyshire, along our supply chain and through our business engagement, to “influence” as many people and organisations as possible.

The statement applies to Derbyshire Constabulary employees, agency workers and sub-contractors, including those who deliver services on behalf of the force. The reporting period is up to and including the financial year ending March 2020, from when the reporting period will run annually from April 2020.

In recognition of the fact that our policies, procedures and response to modern slavery are dynamic, it is our intention to publish updates every six months following cross-functional team meetings.

In line with our principles of doing the right thing, making a difference and shaping the future, and our priority of “delivering an excellent public service” we wanted to understand the gaps in our response to modern slavery.

We commissioned an independent review of our modern slavery response by a modern slavery consultancy with policing and commercial experience. The information gathered has been used to populate this modern slavery statement and the action plan for continuous improvement.

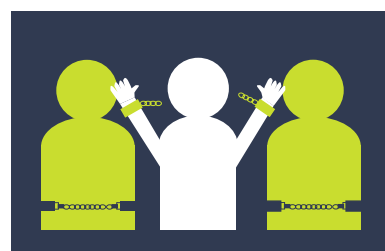
We recognise the developing opportunities created by the review of the Modern Slavery Act, changes in public procurement procedures and the responsibility the force has to protect all members of the community, including our own supply chain.

While police forces do not currently have to report under the Modern Slavery Act, as the lead force for the Regional Modern Slavery Strategic Group, chaired by Assistant Chief Constable Kem Mehmet, we wanted to lead the regional response.

This is the start of our journey and our objectives for completing this work are;

- The protection of vulnerable people within and outside our organisation
- Transparency of our supply chain
- To use our position of “influence” within the county to encourage awareness and a pro-active approach with our statutory partners, business partners, their supply chains and the community
- To place the same scrutiny on ourselves that our private sector suppliers have under Section 54 of the act
- To develop and implement a modern slavery continuous improvement strategy and action plan

To comply with the Modern Slavery Act.

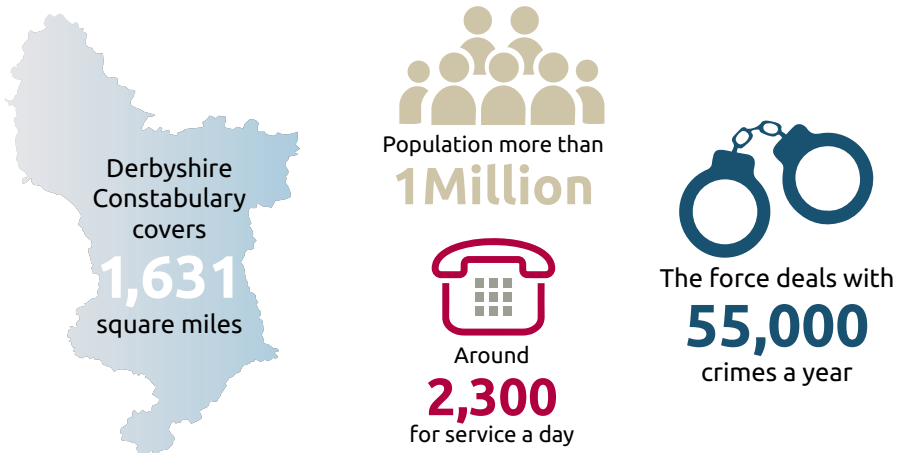


About Derbyshire Constabulary

Derbyshire Constabulary is committed to the prevention and detection of crime and the protection of life and property. We have been at the forefront of local, regional and national policing in respect of organised crime and have been assessed by the HMICFS for several consecutive years as outstanding at dealing with organised crime (modern slavery, human trafficking and organised immigration crime is “organised crime”)

In recent years we have been a leading force on the modern slavery agenda, introducing;

- Operation Advenus in respect of organised immigration crime and intelligence gathering <https://www.derbytelegraph.co.uk/news/derby-news/police-squad-gets-44-foreign-1090578>
- Operation Bruno – a pro-active initiative throughout the county, where a dedicated team visited all of our risk areas, such as nail bars , car washes and distribution centres, to conduct a series of activities aimed at identifying victims, promoting better intelligence and raising awareness of modern slavery.
- Creation of a Modern Slavery Community Safety partnership with statutory partners which is led by the local authorities ([link below](#))
- Pro-active operations like Operation Atwood, the nationally-recognised Operation Doubrava and associated best practice dissemination to peers, the College of Policing and the community.
- Introduction of a specialist modern slavery investigation team, specifically for victim engagement and the identification of victims.



[CLICK Here](#)

<https://www.theclewerinitiative.org/derby-and-derbyshire-modern-slavery-partnership>

Operation Doubrava

This the largest modern slavery and human trafficking case the force has ever investigated.

The gang involved trafficked vulnerable people from Latvia to Derby and forced them to work to fund their own lavish lifestyles.

The group, many of whom are related to each other, recruited their victims on the promise of well-paid work and a better life in the UK.

But when those victims arrived in Derby, they were put in poor accommodation, slept on mattresses infested with bed bugs, and were made to work long hours for little or no pay.

Nine members of the gang admitted offences linked to human trafficking and exploitation, and were sentenced for their crimes at Nottingham Crown Court in November 2018. They were jailed for a total of 33 years, with the ringleaders receiving sentences as high as six years.

A slavery and trafficking prevention order was imposed upon all nine, preventing them from committing similar crimes in future.

The case saw Derbyshire officers working closely with the State Police of Latvia, the Latvian Ministry of Justice, the National Crime Agency, Gangmasters and Labour Abuse Authority and the Crown Prosecution Service (CPS).



The vulnerable victims were squatting in abandoned buildings in Latvia



One victim was found living in a freezing wooden shack in the offender's garden in Latvia



The investigation started with a single phone call - a taxi firm in the city called police to report that a man had assaulted a woman in their offices. When police arrived, the man had gone but the woman gave officers her home address in Derby.

When our officers visited the house, we found a group of vulnerable Latvian men living inside. The pieces started to fall into place. We were clearly looking at a case of modern slavery.

After months of investigating, detectives were in a position to execute six warrants at houses in Derby. They arrested six gang members that day and found ten victims.

The team then worked with Europol, Eurojust and the State Police of Latvia to identify and arrest those gang members in Riga, who were responsible for recruiting the victims in the first place.

Thanks to that joint effort, 28 victims of the gang were identified, with 15 travelling to the UK to tell of their ordeals in court.



When the victims were brought to Derby, they were put in cramped, dirty rooms in shared houses



Detectives from Derbyshire and Latvia worked together to solve the case

The force has produced a documentary series about the case to raise awareness of modern slavery and human trafficking and to highlight the partnership working that brought this gang to justice. You can view the series here:

[CLICK Here](#)

https://www.youtube.com/watch?v=GxwSELxZIII&list=PL8EU_1n444i6ZkwXVh5E9kVEaCQ2Cqt7-

Our priorities are

Providing an excellent public service

Putting victims at the heart of what we do, preventing harm, delivering a high-quality service, engaging with communities and making our partnership with Derbyshire Fire and Rescue Service the best in the country

Looking after our people

Being an inclusive employer of choice for everyone and caring for them in good times and bad

Using technology in all aspects of our work

We want to employ new and emerging technology to modernise our services, develop tools to analyse data intelligently so that we can make better decisions, use drones to support everyday business, and provide Taser training to every frontline officer who wants it

As a major employer in Derbyshire, we play a significant role with our statutory partners, in improving people's lives, strengthening communities and protecting the vulnerable.

This means ensuring that slavery, servitude, forced labour and human trafficking is not tolerated in our operations or those of our suppliers and is a responsibility we take very seriously.

There are more than 3,700 staff comprising of police officers, police staff, PCSOs and special constables in Derbyshire, governed by the management board, which is chaired by the Chief Constable Peter Goodman.

We provide policing services to the public of Derbyshire, which is our core location of business. In addition, we also service members of the East Midlands and national community through collaborative police services, particularly in the specialist work of organised crime.

The workforce in our operations are predominantly permanently employed staff. We also have a team of dedicated volunteers and Special Constables who support our officers. Our ambition is to not

have any agency staff at all, however, due to the nature of some specialist positions we do use a minimal amount of staff from one dedicated agency.

Some of the HR function (recruitment work) is split between different constabularies via the shared HR centre at Leicester.

Derbyshire does conduct some recruitment "in house". The Derbyshire team governs policy and procedure but outsources to a recruitment centre where the vetting procedure is carried out in the same way.

All staff, irrespective of role and including volunteers are vetted to nationally recognised standards, as a consequence, the risk of modern slavery within the workforce is low.

Most roles are of a professional and qualified nature such as police officers, support staff, lab technicians or accountancy staff.

They cover police officer and police staff recruitment, laboratory technicians, accountants, investigators - skilled staff who traditionally are less likely to have been exploited.

We procure more than

 **30
Million**

of goods and services from
approximately

**2,500
suppliers**

The suppliers have been mapped to Tier 1 and categorised on spend (top 250).

A formal review of the top 250 suppliers has been completed by means of the standard Home Office questionnaire, which does have questions about modern slavery.

In addition, there are a set of terms and conditions which reinforce how suppliers should behave.

We do not feel confident that we fully understand the extent of the supply chain beyond our Tier 1 suppliers, including countries, regions and operating models of companies supplying Tier 1.

We procure a range of goods and services that traditionally have a higher risk of exploitation such as; construction, clothing, food, facilities management, property maintenance, and laundry alongside information services (IT systems), fleet equipment and office requirements which have higher risks further along the supply chain in Tiers 2, 3 and beyond.

We acknowledge that we have influence over the way in which our suppliers manage the supply chain and this will form part of our action plan.

One of the reasons that we have conducted recent analysis of our overall modern slavery strategy was to identify areas for improvement. Procurement and a responsible sourcing programme will be a priority piece of our modern slavery action plan.

We have very structured working relationships with staff associations within our own workforce, and due to enhanced anti-corruption procedures, known as Bad Apple, the statutory requirements of safeguarding and Section 52 of the Modern Slavery Act (designated reporting authority), we feel confident that our own staff have a facility for appropriate reporting and “whistle-blowing” in the event of any labour abuses.

We do not have exposure of the policies, procedures and access to trade unions, worker organisations or remediation along our supply chain and this too will form part of our continuous improvement plan.

The executive team comprises of the Chief Constable, Deputy Chief Constable, two Assistant Chief Constables and the Director of Finance and Business Services.

Chief Constable Peter Goodman is the signing officer for the modern slavery statement and has allocated ACC Kem Mehmet as the executive lead for modern slavery and the responsible officer for the modern slavery statement. This statement has also been agreed by the board.

The Policing Plan is agreed by the Police and Crime Commissioner, Hardyal Dhindsa and delivered by the Chief Constable

[CLICK Here](#)

<https://www.derbyshire-pcc.gov.uk/Your-PCC/Police-and-Crime-Plan.aspx>

The strategic priorities for the force are set annually as part of our assessment of “Threat, Risk and Harm.”

Modern slavery (including human trafficking and immigration crime) are included as a priority for the force.

We are part of the Derby and Derbyshire Modern Slavery Partnership and we pro-actively support the priorities for stakeholders on that forum. This statement and the associated plan will incorporate agreed tasks from that group in addition to our own specific activity, identified through our continuous improvement action plan.

Our response to modern slavery is co-ordinated alongside the Home Office Organised Crime Strategy called the 4Ps ([link below](#)) and is delivered with cross-departmental senior leadership via the Force Tasking and Co-ordination group by a combination of:-

- ▮ Frontline officers (patrol, response and operations division)
- ▮ PCSOs and the special constabulary
- ▮ Ground cover detectives
- ▮ Specialist Modern Slavery Team
- ▮ Regional Organised Crime Unit (ROCU) - which coordinates the region’s response to modern slavery and human trafficking, and ‘county lines’ and feeds into national policing working with the National Crime Agency (NCA)

In addition, the force has Senior Investigation Officers with specialist crime investigation training, who lead investigations into organised criminality, including modern slavery.

During our internal review, we identified that several departments, such as procurement, and HR, are not represented in respect of modern slavery. A cross-functional modern slavery working group

to address internal continuous improvement, will form part of the action plan.

We have reviewed our modern slavery response and believe that there are four aspects that a police force needs to address in order to review its exposure to modern slavery, influence stakeholders and ensure modern slavery due diligence.

These are:-	
ONE	Force capability; victims, offenders and crime management, stakeholder engagement.
TWO	Internal capability/ HR and infrastructure (vetting, on boarding, recruitment and agencies)
THREE	External capability, procurement and the supply chain
FOUR	Business Engagement Strategy

Traditionally we have focused on the first aspect of our response “Force capability” and have recognised that to ensure a holistic approach we need to review and change our practices, operations, policies and procedures in respect of 2), 3) and 4).

[CLICK Here](#)

<https://www.gov.uk/government/publications/serious-and-organised-crime-strategy-2018>

Policies and Procedures

We do not have a stand-alone modern slavery policy (in respect of Section 54 of the Modern Slavery Act). Modern slavery is covered under our Public Protection Procedures.

This and the coverage of modern slavery within all of our policies will form part of our continuous improvement action plan, and we are also in the process of mapping all of our policies and procedures.

Risk Assessment Prevention and Mitigation

The responsibility for risk management within the force is managed on a “threat and risk” basis.

Modern slavery is managed at an operational level through local to regional and national risk assessment, and the tasking and co-ordination process.

Internally we acknowledge that this is an area for development. The risk of modern slavery within our workforce is deemed to be low. The risk is higher along the supply chain.

We use the Government Modern Slavery Strategy called the 4Ps -

Pursue

Prevent

Protect

Prepare

As we develop our action plan to include the internal processes described, we will be developing the 4Ps strategy to include plans for HR, procurement and Business Engagement.

Currently there is a risk assessment process whereby we inform our suppliers of our terms and conditions. Once the suppliers have accepted these terms and conditions, we do a risk assessment of the most high-risk companies.

These are then categorised by spend and risk, ranked using a variety of methods including the audits done and stored in SEDEX and other organisations.

From this, we prioritise them into a smaller group of suppliers, which may need further investigating.

This review of our modern slavery activity has provided the opportunity to conduct a modern slavery risk assessment across all our procurement functions, and will form part of our continuous improvement action plan. We would like to have full understanding of the risks in our own operations as well as an understanding of the risks in our supply chain.

As with all policing activity we intend to take a proportionate response to this action, so that we are able to focus on priority risk, which will depend on a range of factors such as spend, geographical location, type of workforce, business sector and the enduring relationship that exists with each supplier.

In completing this piece of work, we intend to engage with internal and external stakeholders as well as worker organisations and trade associations to ensure that we understand all the modern slavery risks.

Due Diligence

At present we do not have an overarching Modern Slavery Strategy or standalone policy in respect of Section 54 of the Modern Slavery Act. As part of our continuous improvement action plan, the area of a modern slavery due diligence strategy will be developed and reviewed according to risk.

There is an enhanced vetting procedure in Derbyshire Constabulary which has the natural consequence of reducing the risk of employing a person vulnerable to modern slavery within our organisation.

Every member of staff, temporary, permanent voluntary or sub-contracted, has to be vetted to "Recruitment Vetting" (RV standard)

The right to work and national vetting policy applies to everyone hired by the force, and other checks may be applied depending on the role under consideration.

The degree of vetting depends on the type and the level of the role, but all staff are vetted to the same standards as a police recruit. Vetting is still applied for people hired through recruitment agencies.

The lowest level of vetting is RV vetting for police officers, with character references from previous employers for the past three years, medical and drugs testing, biometrics e.g. DNA and fingerprints.

Pre-join induction packs are sent out electronically to candidates before joining. It includes a code of ethics, the values of employer and information they need before they join.

Procurement and estates team requirements have to go through a similar and recognised process of vetting during the tendering process. The process does review the sub-contractors used as well as the principal contractor.

The vetting process is applied to all sub-contracted staff and agency staff used by sub-contractors, which again reduces the risk.

There has been no due diligence on the recruitment agency in respect of modern slavery specifically, which will now be included in the continuous improvement action plan.

Our supply chain has a core spend with a few multi-nationals and a large number of small spend organisations. We are committed to the premise of ensuring scrutiny on public money spending with the right checks and balances to address modern slavery.

We have completed a formal review of 250 suppliers by means of a standard questionnaire (at least eight questions) which includes the Home Office questions on modern day slavery.

There is a set of terms and conditions reinforcing how suppliers should and should not act.

We do not currently know what due diligence suppliers themselves do relating to modern slavery.

No checks are made against a company under £25,000 if they have no employees going on site.

There are four people in the procurement team, looking after the principle contracts, anything over £25k, but at present there is not a modern slavery due diligence programme and we acknowledge that operational practices need to be reviewed and changed to minimise modern slavery risks.

We do engage with suppliers and utilise their audit information and we will review their modern slavery audit programme and work together to establish better modern slavery engagement.

We are now looking to improve our understanding of the grievance mechanisms and methods of accessing remediation along our supply chains for victims of modern slavery. We also want to help businesses to ensure that they have incident response plans to support victims in the event of the discovery of modern slavery.

As a policing organisation with resources, networks, collaborations and victim care services, we feel that this an area that we can improve on and offer guidance to assist businesses.

Effectiveness, measured against appropriate Key Performance Indicators (KPIs)

The force does not currently have a performance framework for monitoring against Section 54 of the Modern Slavery Act and this will form part of our action plan. We intend to develop a proportionate framework which will focus on qualitative outcomes with a view to providing performance information using:-

A completed HMICFRS self-assessment in respect of the policing response to modern slavery ([link below](#)) and we are aware of the national findings and recommendations.

Partnership working is essential in tackling modern slavery and human trafficking (MSHT) and much of the partnership work is driven through the Derby and Derbyshire Modern Slavery Partnership. Membership to the partnership is open to all agencies in the public, private and voluntary sectors and individuals who make a commitment to work together to fight slavery and support victims of slavery in Derby and Derbyshire.

We will endeavour to enhance opportunities to continue cross-departmental and agency liaison and will seek to measure the success of these relationships. We have reviewed the range of roles that are invited and consequently will be ensuring that a broader range of roles such as procurement and HR are included to assist with Section 54 issues.

We are committed to ensuring that all victims carrying out criminal acts under compulsion attributable to slavery or exploitation are afforded the protection of early and continuing consideration of the applicability of the Section 45 defence. In 2019, the team developed a training video which has been disseminated to law enforcement agencies throughout the UK.

[CLICK Here](#)

<https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/stolen-freedom-the-policing-response-to-modern-slavery-and-human-trafficking.pdf>

We strive to improve our ability to identify victims of modern slavery and will be developing our programme of engagement with strategic partners. Our specialist team has developed a new First Responders' Victim Pack, which provides essential guidance to those dealing with some of the most vulnerable victims within society.

We have been using the preventative powers under the Modern Slavery Act 2015 to restrict the activities of those deemed to pose a clear threat to others, and during 2018/19 the force successfully imposed 11 slavery and trafficking prevention orders. Our intention is to further promote and enhance the quality of these and encourage use by other forces and to track our success.

In our procurement and HR teams, we have identified areas for improvement such as training, due diligence and a business engagement strategy. These have been raised and our action plan populated with measures to mitigate against this with activities such as the development of a supplier awareness and engagement strategy. Performance against these will be tracked and reported on during the next period of modern slavery activity and will include measures such as:-

ONE

Risk assessment of our supply chain beyond Tier 1

TWO

Development of our codes of conduct and evaluation of suppliers communicated with

THREE

Number and quality of responses from suppliers

FOUR

Business engagement and community "influence" strategy – review of how these have been enhanced and improved

FIVE

Actions taken to strengthen the supply chain due diligence, auditing and verification

Training

There is a modern slavery training strategy which is managed regionally through the crime training department.

All new recruits are taught how to “spot the signs” during their initial training.

An e-learning course has been developed and all staff are required to complete this, however there are currently no details available about the compliance rate.

Detectives complete a specific training module on modern slavery investigations during their training.

The force modern slavery team also ensures that up-to-date, relevant training packages are available to the detectives course, which they will deliver. This has been shown to improve knowledge and also the commitment by reinforcing our values and priority to deal effectively with modern slavery.

Our force runs a specialist four-day modern slavery and human trafficking investigators course for the East Midlands region, enabling and guiding our workforce and key partners to deal with this criminality as we grow in confidence, streamline and embed it into daily business.

To promote greater awareness of modern slavery, we regularly speak on the topic and deliver internal and external training including:

The Medaille Trust International Criminal Justice Conference

The Latvian CBSS Presidency

The Modern Slavery Police Transformation Units “Enhancing Modern Slavery International Engagement Conference” in London

In March 2019, we deployed an officer to work in collaboration with the Joint International Policing Hub in Hanoi Vietnam to assist the Peoples’ Police Academy (PPA) in developing modern slavery training.

Our review has identified the potential needs assessment internally for HR, procurement and Contact Management, and externally for suppliers and their supply chain and plans over the next reporting period will begin to understand and address those needs.

Report it

Communities have an important role to play in recognising abuse. If you suspect someone may be a victim of modern slavery, tell someone. You will always be taken seriously and protection and support is available.

To report a suspicion or seek advice

Modern Slavery Helpline
08000 121 700

Open 24 hours a day, 365 days a year