

ETHICAL PROCUREMENT STRAND ACTION PLAN 2022-2023

Promoting the development of ethical supply chains in the delivery of contracts for the police service in Wales

Ethical Procurement	Why	When
1. Refresh the Modern Slavery Statement, summarise work completed during previous period and produce an updated Action Plan for 2022-23; publish on Police and Crime Commissioner's website.	This meets the Statutory Requirement to publish an annual Statement	Annually
2. Strategic Procurement staff to complete the annual CIPS Ethical Procurement Training refresher	Ensures Strategic Procurement staff keep abreast of ethical supply chain considerations	Annually
3. Assess the top 100 suppliers across South Wales Police and Gwent Police by 2025	Supports Ethical Employment in Supply Chains Code of Practice Commitment 7 - Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice.	We are on track to achieve this before 2025. 59 suppliers were assessed by September 2022.
4. Welsh Forces to follow up higher risk suppliers identified by mapping our supply chains. Through effective contract management we will seek delivery of improvements in response to gaps highlighted in the Supplier Assessment Questionnaires (SAQs). Offer support to smaller suppliers to progress the work, especially where suppliers have been classed as 'Meeting Basic Expectations' or Barely Achieving Compliance'.	Risk Assessment of suppliers identified as higher risk. We cannot assess all suppliers so this approach allows us to risk manage appropriately within our supply chain	As part of the commercial lifecycle, we will clarify minimum standards in the tender process. Where relevant, new providers will complete an SAQ following contract award and high risk assessments will be followed up as part of contract management. This is now business as usual.
5. Incorporate the Supplier Risk Assessment Tool into contract mobilisation and ongoing contract management activity, to identify, evaluate and estimate the level of risk.	Facilitates proportionate and appropriate identification and risk management of supply chain risks	Within 12 months
6. Finance to report payment performance statistics and publish annually on external website	Meets statutory requirement	Annually.
7. Work with Police Digital Service to map supply chains of national ICT suppliers	Makes best use of resources and shares the work across policing, providing benefit to all police forces in England and Wales	Within 12 months
8. Work with Bluelight Commercial to roll out the Welsh forces' approach to adopt a standard and shared approach to ethical supply chains across the police service.	Makes best use of resources and shares the work across policing	Within 12 months
9. The Welsh Forces will consider social value priorities in our tenders where this is relevant to the subject matter of the contract and proportionate.	This ensures our supply chains support and assist us in the delivery of our Sustainability Strategy and social value priorities	First phase within 12 months.

EMPLOYMENT STRAND ACTION PLAN 2022-2023

All Wales working to a common policy with buy-in across the organisations impacting mainstream and day to day business

Employment Action	Why	When
1. Develop a Tri Force Whistleblowing policy with specific reference to the Welsh Government Ethical Employment in Supply Chains Code of Practice in conjunction with Regional Federation and Trade Unions. A collaborative approach has been agreed to provide and deliver online training for the Forces of Gwent Police, Dyfed-Powys Police and South Wales Police.	Support the Code of Practice commitment to empower staff to raise suspicions of unlawful and unethical employment practices	Within 12 months
2. Continue to mandate that all new employees watch the 4 minute Welsh Government video on Modern Day Slavery and be monitored through the Probationary Reviews	To continue to increase awareness of officers and staff	This action has been completed but will be monitored as part of business as usual activity
3. Periodically remind colleagues, particularly those involved in expenditure to procure goods & services from ethical suppliers	To continue to remind officers and staff of our policies and procedures	This action has been completed but will be monitored as part of business as usual activity
4. Obtain agreement to share ethical dilemma scenarios across forces and with Welsh Government to promote good practice. Confirm establishment of Ethical Board in each force.	Improve awareness of ethical matters across the Force	Within 12 months
5.. Recruitment policy to be updated to reference the Code of Practice and specify ethical employment.	Supports commitment to ethical employment within the Force	Within 12 months
6. Employment contract to confirm that employees are expected to comply with the Code of Practice.	Supports commitment to ethical employment within the Force	Within 12 months
7. Action Plan and its success factors to be confirmed at All Wales HR & L&D Joint Assurance Group	Supports commitment to ethical employment within the Force	End of 2022
8. Ensure compliance with the statutory living wage is consistently applied by the organisation	Supports commitment to ethical employment within the Force	Action complete and business as usual in line with any changes

ENVIRONMENT STRAND 2022 - 2023

Create a hostile environment for modern slavery

Environment Action	Measure	Why
1. Ensure that Modern Slavery continues to be suitably positioned in Policing priorities as part of the Strategic Planning process.	Emphasis of Modern Slavery's position in the Police & Crime Plan and Force Delivery Plan.	Strategically pursue the creation of a more hostile environment for Modern Slavery.
2. Reflect Ethical Procurement as a specific objective and deliverable with the Modern Slavery element of the Strategic Planning process.	Ethical Procurement is specifically referenced as part of the Force delivery plan.	Deliberately recognise Ethical Procurement as a tool in the creation of a more hostile environment for Modern Slavery.
3. Ensure that due consideration to creating a hostile environment for Modern Slavery is given when commissioning OPCC services. e.g. Modern Day Slavery Victim Help Centre	Commissioned services target Modern Slavery specifically.	OPCC can have a direct impact on the local environment via its commissioned services.
4. Embed a culture of wider responsibility within the Force for all those involved in the procurement of goods and services rather than seeing ethical procurement as an issue for purely the core procurement team.	Strategic planning recognises that ethical procurement in the supply chain is one strand of a wider work stream.	Ensure wider awareness of Ethical Procurement issues within the local Supply Chain Environment.
5. Consider deliberate engagement with the local business community with a view to ensuring awareness and profile of the issues are involved.	Local events have been held and engaged with to increase the local awareness and profile of modern slavery.	Regional awareness of Modern Slavery issues is increased in the local environment.
6. Ensure strong partnership working internally across the various stakeholders including PVPU; OPCC; Procurement; Vetting & the wider organisation.	Strong working relationship across the organisations create a proactive environment against modern slavery within the organisation.	A joined up internal culture / environment focused on tackling modern slavery is created internally.
7. Ensure wider partnership working is considered beyond just policing including working with Welsh Government / Sell2 Wales / Bluelight commercial and beyond.	Welsh Policing's approach is collaborative in Policing and with wider partners.	Ensure a joined-up approach across partner agencies to ensure an increased regional awareness of Modern Slavery issues is increased in the local environment.
8. Ensure all staff are aware of roles and responsibilities and the internal referral routes where modern slavery concerns are involved.	Modern Slavery e-learning and reporting mechanisms thread throughout all our training.	Staff are aware of the appropriate routes for highlighting Modern Slavery concerns where they emerge.
9. Ensure a robust communication strategy and plan targeting Modern Slavery is in place.	A Modern Slavery Communication plan has been made and implemented.	A deliberate communication approach is needed to create an increased awareness and profile around modern slavery.
10. To encourage victims of modern slavery to come forward without fear of their right to remain in the UK	Publicity/messaging relating to victim support in Wales/nationally	Demonstrates our priority is to treat individuals as victims of crime regardless of their status

ENFORCEMENT STRAND ACTION PLAN 2022 - 2023

Improving intelligence gathering through compliance with the Code of Practice

Enforcement Action	Why	When
1. The training for all new officers to include training on Modern Slavery,	Increases officers and staff awareness of modern slavery issues	This is now business as usual.
2. PSD to ensure officers are aware of the Code of Practice when submitting a business Interest form. This will be published by the Policy Unit.	Raises awareness of ethical employment practices in the businesses where our staff have influence	Within 12 months
3.To ensure that our neighbourhood policing model fully incorporates an awareness of modern slavery and human exploitation. The PEQF (Police Education Qualification Framework) includes specific Modern Slavery and CSE (Child Sexual Exploitation) lessons. PCSOs and Specials complete a Modern Slavery e-Learning package.	Enables officers and PCSOs to be aware and look for signs of modern slavery and human exploitation in our communities	Within 12 months