

Modern Slavery Statement

Abstract

This policy provides all Company employees with guidance on potential modern slavery risks related to its business.

Appendix A: Confidential form

Issued	July 2020
Planned Review Date	June 2021
Distribution	All employees
<p>Policy Validity Statement</p> <p>This policy is due for review on the date shown above. After this date, policy and process documents may become invalid.</p> <p>Policy user should ensure that they are consulting the currently valid version of the documentation.</p>	

Contents

Overview	2
Organisational structure and supply chains	2
Responsibility	2
Relevant policies	3
Due diligence.....	3
Performance indicators	4
Training	4
Board/Member approval	4
Document Information	8
Document Location	8
Version Control	8
Approvals	8

Overview

1. This statement sets out the Police ICT Company's ('the Company') actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business, and its supply chains. Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.
2. The Company is committed to preventing slavery and human trafficking in its activities. It will endeavour to ensure that its supply chains are free from slavery and human trafficking.
3. This policy applies to permanent members of staff, managers, officers, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, interns, secondees, casual and agency workers (employee).

Organisational structure and supply chains

4. This statement covers the activities of the Company:
 - The Company operates in the United Kingdom to help policing and law enforcement organisations in the UK to select, scale and deploy technology so that they can deliver the most efficient and effective service to the public. It has approximately 30 employees and engages a number of contractors on specific projects to further its aims.
 - The technologies that it considers deploying are designed and manufactured at locations across the globe.
5. The procurement of goods and services undertaken by the Company is in accordance with the Public Contract Regulations 2015. As part of the process the Company uses to assess whether particular activities or countries are high risk in relation to slavery or human trafficking, suppliers are required to certify that appropriate due diligence in their supply chain is actively monitored as part of their tender submission.

Responsibility

6. Responsibility for the Company's anti-slavery initiatives is as follows:
 - **Policies:** Company policies are reviewed regularly by the policy owner, the Governance Officer and the Head of Corporate Strategy and Policy to ensure that they continue to

reflect the changing requirements of the Company and the communities which it serves.

- **Risk assessments:** in relation to Company employees, the Company uses pre-employment checks, including right to work checks. Any agency workers are supplied by reputable agencies and their modern slavery statements and policies are reviewed when engaging with them, and this is reviewed on a regular basis. When contracting for services with limited companies, checks are carried out on Companies House to ensure the partner the Company engages with is a legitimate entity with directors listed.
- **Investigations/due diligence:** the HR and Commercial functions are responsible for carrying out due diligence in relation to their respective areas.
- **Training:** all employees are required to complete training to better identify instances of slavery or forced labour.

Relevant policies

7. The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** The Company encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete the Company's confidential disclosure form (appendix A).
- **Supplier/Procurement code of conduct** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat employees with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet these standards and improve their employees' working conditions. If a Company supplier commits serious violations of these standards the Company will terminate the business relationship.

Due diligence

8. The Company undertakes due diligence when recruiting employees and when considering taking on new suppliers and reviews existing suppliers as part of its contract management strategy.

Performance indicators

9. Key priorities for the financial year 2020/21 are as follows:

- the Company will require all employees to have completed training on modern slavery by 30 September 2020;
- the Company will write to all existing contracted suppliers/framework providers by 30 September 2020 to seek confirmation that their supply chain is actively monitored and to ensure that all forms of modern slavery are eliminated. This includes taking positive action to promote ethical business practices and policies that protect employees from being abused and exploited; and,
- the Company will draft and implement a Code of Conduct for Suppliers to formally set out the ethical standards required from Suppliers.

Training

10. The Company requires all employees to complete training on modern slavery. This training will cover:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

Approval

This statement was approved on [date] by the Chair of the Board and the Chief Executive of the Police ICT Company, who will review and update it annually.

Signed:

Signed:

Ian Bell, Chief Executive

**Stephen Mold, Police, Fire & Crime
Commissioner for Northamptonshire and Chair
of the Police ICT Company Board**

Date:

The Legal Basis

Public Contract Regulations 2015

Modern Slavery Act 2015

Appendices

Appendix A: Confidential disclosure form

Review

This Policy will be reviewed annually as part of the corporate governance review.

Appendix A

Form to report suspected human trafficking/slavery offences	
<p>This form is intended for use by any individual (including employees, contractors, agency workers, customers and suppliers) who wishes to report a suspicion that modern slavery is being used, within the Company or its supply chain.</p> <p>If you are an employee, you may wish to report such suspicions under the Whistleblowing Policy. If you are unsure about whether your concerns are best dealt with under the Whistleblowing Policy, please read the Whistleblowing Policy, which provides examples of the issues that should be reported using it. If, having read the Whistleblowing Policy, you remain unsure about which procedure to use, please consult the Company Secretary for further advice.</p> <p>Once you have submitted this form, the matter will be investigated.</p> <p>In certain circumstances, you can request that your concerns be kept anonymous. Where possible, we will respect a request for anonymity, but cannot guarantee that we will be able to do so.</p> <p>This form should be completed and delivered to the Company Secretary (Lynne Spiers) in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line to hr@ict.police.uk.</p>	
Reporting Modern Slavery / Human Trafficking Form	
Your Name:	
What is your relationship to the Company (i.e. are you an employee, a contractor, a supplier etc.)	
Summarise your concern	
<p>Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.</p>	

Individuals involved:	
Please provide the names and contact details of any people involved in your concerns, including witnesses.	
Declaration:	
I confirm that the above statements are true to the best of my knowledge, information and belief.	
Please note: If you are an employee of the Company and you knowingly make false allegations, this may result in disciplinary action being taken against you.	
Form completed by:	
Signature:	
For completion by the organisation:	
Date form received by the organisation:	
Name of recipient and job role:	
Signature:	

Document Information

Document Location

SharePoint – Corporate Strategy & Policy – [Policy Library](#)

Version Control

Version	Author	Description	Date
V0.1	Anke Folchert	Drafted initial policy	
V0.1	Dave Edwards	Reviewed policy	
V0.1	Lynne Spiers	Reviewed policy	14/07/20
V0.1	Marie Perry	Review and reformatted	15/07/20
V0.2	Lynne Spiers	Reviewed policy	15/07/20
V0.3	Anke Folchert	Reviewed policy	16/07/20
V0.4	Lynne Spiers	Reviewed statement	16/07/20
V1			

Approvals

Version	Name	Role	Date

Signature: 
Ian Bell (Jul 17, 2020 10:35 GMT+1)

Email: ian.bell@ict.police.uk

Signature: 
Stephen Mold (Jul 20, 2020 16:59 GMT+1)

Email: stephen.mold@northantspfcc.pnn.gov.uk

Modern Slavery Statement - PICT 170720

Final Audit Report

2020-07-20

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