



POLICY DOCUMENT

Modern Slavery Statement

ABSTRACT:

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

ISSUED	18 November 2023
PLANNED REVIEW DATE	18 November 2024
DISTRIBUTION	All employees
POLICY VALIDITY STATEMENT <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 users should ensure that they are consulting the currently valid version of the documentation.</p>	

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Modern Slavery and Human Trafficking Statement 2023

Modern slavery is a crime and a violation of fundamental human rights. It deprives someone's liberty to exploit them for personal or commercial gain. It is a real problem for millions of people around the world, including many in developed countries, who are being exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and supply chain.

We have a zero-tolerance approach to modern slavery and human trafficking in our business, including making sure there is no modern slavery or human trafficking in our direct and indirect supply chains. Respect for human rights and the ethical treatment of every single person who interacts with Police Digital Service (PDS) – colleagues, customers, partners and suppliers – is fundamental to what we stand for.

Our company structure, business and supply chains

This statement has been prepared for Police Digital Service, a private limited company incorporated and registered in England and Wales.

PDS operates in the United Kingdom. More than 320 people work for the company which aims to harness the power of digital, data and technology to enable UK policing to better protect the communities it serves.

Our supply chain is made up of small and large multinational organisations mostly in the IT, cyber and technology sectors. The technologies considered are designed and manufactured at locations across the globe.

The procurement of goods and services undertaken by PDS is in accordance with the Public Contract Regulations 2015. As part of the process PDS 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.

We operate with the highest level of integrity in all our business relationships and treat third parties in a way which reflects our own values. Most of our third parties are based in the UK, many of whom have their own supply chains which indirectly connects PDS to other businesses and employees worldwide.

We are committed to ensuring that 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. We work with suppliers to ensure that they meet these standards and improve their employees' working conditions. If a supplier commits serious violations of these standards, we will terminate the business relationship.

To the best of our knowledge, there have been no incidents of modern slavery or human trafficking associated with businesses we work with.

Policies

We have embedded measures into our processes and policies to combat modern slavery and human trafficking. The following policies support the identification of modern slavery risks and steps to be taken to prevent it.

Our **Whistleblowing Policy** provides a framework for anyone at PDS to raise concerns about a danger, risk of wrongdoing or criminal activity (such as Modern Slavery) which affects others or impacts our reputation. The process gives all employees a way to raise concerns and be sure they will be investigated independently. We do our best to create an environment where people feel safe and empowered to raise concerns without fear of reprisal. Our Whistleblowing policy is approved by the Board.

Our **Anti-Corruption and Bribery Policy** provides guidance on how to recognise bribery and corruption issues and our approach to dealing with it. We will work with relevant authorities to take action where we identify instances of modern slavery or human trafficking.

Policies are reviewed regularly by the policy owner and the Governance Officer to ensure that they continue to reflect the changing requirements of PDS, our employees, and the wider community.

Our **Third Party Assurance for Policing (TPAP) Process** documents the process for suppliers going through the TPAP process to maintain sufficient assurance with suppliers ensuring they understand the restrictions, data handling and vetting expected of them. TPAP ensures that all third parties are examined fully to understand their overall security posture.

Risk assessments and due diligence

When we recruit people we make sure everyone is legally entitled to work and has applicable background checks. Written employment contracts and our suite of policies clearly lay out people's rights and responsibilities. When using agency workers, the modern slavery statements and policies of the agency are reviewed to ensure they are reputable.

When contracting for services with limited companies, checks are carried out on Companies House to ensure PDS engages with legitimate entities with directors listed.

All employees are required to complete Human Trafficking and Modern-Day Slavery training to better identify instances of slavery or forced labour.

Assessing third parties

In line with the TPAP process, third parties are required to undergo a structured security assessment to ascertain their general security posture.

We use the Risk Ledger™ tool for this purpose. Risk Ledger™ serves third parties with a number of questions, producing a compliance score. The questions cover the following areas:

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Classification: OFFICAL

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- Security Governance
- Security Certifications
- HR Security
- IT Operations
- Software Development
- Network & Cloud Security
- Physical Security
- Business Resilience
- Supply Chain Management
- Data Protection
- Financial Risk
- Environmental, Social and Governance
- Compliance regime

On completion of the Risk Ledger™ question set, the response is analysed by a PDS Cyber Compliance Specialist (CCS). Depending on the tier, questions are weighted in terms of compliance.

The TPAP team will not issue a blanket approval without consulting the originating CCS or service manager. They will need to satisfy themselves that any third party is fully or sufficiently compliant, and all required evidence is present. Only then, the TPAP team will accept the third party on Risk Ledger™.

Measuring effectiveness


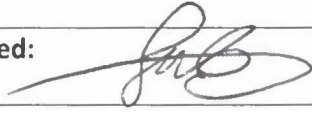
We recognise that modern slavery and human trafficking are often hidden risks. We track the following metrics to help us understand if our approach is working and to spot opportunities to improve.

% of employees who have completed their modern slavery and human trafficking training: 100%

Number of issues raised related to modern slavery or human trafficking: 0

Approval

This statement will be approved by the Chair of the Board and the Chief Executive of Police Digital Service, who will review and update it annually.

Signed: 	Signed: 
Ian Bell, Chief Executive	Stephen Mold, Police, Fire & Crime Commissioner for Northamptonshire and Chair of Police Digital Services Board
Date: 14.11.2023	Date: 18.11.2023

The legal basis

Public Contract Regulations 2015

Modern Slavery Act 2015

Review

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

This policy has been equality impact assessed to identify opportunities to promote equality and mitigate any negative or adverse impacts on particular groups.

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Document information

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Document Owner

Document Owner	Owner Title
Ian Bell	Chief Executive Officer

Revision History

Version	Author	Description	Date
1.0	Lynne Spiers	Document created	17/07/2020
1.1		Document moved to the new PDS format and all references to Police ICT Company changed to Police Digital Services. Amendments made to the key priorities for the financial year	
2.0	Natalie Moore	Review and update	28/06/2023

Approvals

Version	Name	Role	Date
1.1	Ian Bell and Stephen Mold	Chief Executive and Chair of Police Digital Services Board	June 2023
2.0	Ian Bell & Stephen Mold	Chief Executive and Chair of Police Digital Services Board	05/07/2023

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