

# Modern Slavery Statement 2020/21

August 2021

## **Period Covered by this statement**

1. This is the second Modern Slavery Statement of the London Fire Brigade (LFB) and its authority, the London Fire Commissioner (LFC). It covers the period of financial year 1<sup>st</sup> April 2020 – 31<sup>st</sup> March 2021 (one year) and is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015 by informing those we serve, our suppliers, employees and the public.

## **Organisation covered by the statement**

2. This statement covers the LFB and the LFC as a corporation sole and the fire and rescue authority for London. LFB is a functional body of the Greater London Authority. The Mayor of London sets the LFC's budget, approves the London Safety Plan (see also Community Risk Management Plan), can direct it to act, and is supported by a Deputy Mayor for Fire and Resilience.
3. The LFC is responsible for providing London's fire and rescue service, ensuring that it is effective and efficient. All formal decisions about the LFB are approved by the LFC, though some decisions may need to be consulted on with the Deputy Mayor for Fire and Resilience or the Mayor of London.
4. Andy Roe is the office-holder of the LFC at the time of publication.

## **Introduction**

5. The LFB is one of the largest fire, rescue and community safety organisations in the world. LFB provides services across the whole of the Greater London area, serving London's 8.6 million residents as well as those who work in or visit the city. LFB also supports other fire services outside of London, as operationally required. LFB is comprised of some 4,800 operational staff and around 1,000 non-operational staff with a procurement spend of around £108million across some 680 suppliers in 2019-20.
6. The LFB as a public body, it is not currently required by law to produce and publish a Modern Slavery Statement and is doing so to demonstrate best practice as a responsible and transparent organisation and in line with the Mayor's Responsible Procurement policy to which it is a signatory. However, following independent review and Government consultation of the Modern Slavery Act, proposed changes to include public bodies within the legislative requirements were announced by the UK Government in September 2020. The proposed changes are yet to be incorporated into Legislation.
7. This statement outlines the steps that LFB are taking to prevent modern slavery, bonded and forced labour, labour rights violations within its supply chain and steps taken to identify, prevent and mitigate risks.

## **LFB's operational role in tackling Modern Slavery**

8. LFB represents the fire service on a national taskforce set up to address the issue of buildings being used inappropriately as dwellings, sometimes referred to as "beds in sheds" due to their fire safety risk and linked to their fire prevention and public engagement work. The purpose of the taskforce is to oversee work at a local level to ensure local authorities are supported by the relevant government departments and agencies to tackle rogue landlords and to encourage

them to make greater use of legal powers across planning, fire safety, housing and environment health. LFB also work with the Gangmasters Labour Abuse Authority and have signed a Memorandum of Understanding (16/10/2013) to encourage information sharing which will help identify premises being used inappropriately for sleeping accommodation. Certain inappropriate dwellings can be a sign of forced or bonded labour so Fire Officers are in a position to witness and report potential acts of Modern Slavery in London.

9. The LFB have successfully taken enforcement action under fire safety legislation in respect of buildings that were being used inappropriately for work and residential use. Moreover, where people are discovered living and/or working in inappropriate premises during an incident, LFB crews have highlighted the cases, taken immediate action and worked with colleagues in the Fire Safety Department and external partners to reduce risk and move towards long-term risk reduction.

### **Polices in relation to slavery and human trafficking – procurement**

10. Like any large organisation, LFB has supply chains which stretch across the globe and could encompass countries where safe and ethical working practices are lacking. In many sectors and regions workers are often subjected to health and safety risks and the use of forced and child labour is also not uncommon. Not all suppliers in these regions will have poor practices, but the risk remains. The LFC takes its responsibilities as a purchaser seriously and has acted to ensure that its suppliers meet rigorous ethical standards, in particular in high-risk sectors such as clothing production and electronics.
11. The LFC is a signatory to the Greater London Authority (GLA) Group Responsible Procurement Policy<sup>1</sup>, which was first published in 2006 and has subsequently been updated periodically, most recently in 2021. This is a strategic policy setting out the GLA Group's commitment and ambitions for ensuring socially, environmentally and economically responsible procurement to deliver improved quality of life and better value for money. It reflects best practice and conforms to procurement legislative requirements including the Modern Slavery Act 2015
12. The LFC is committed to the promotion of ethical sourcing, as outlined within the Responsible Procurement Policy, by:
  - Adopting the nine provisions of the ETI Base Code<sup>2</sup>, or equivalent, as the standard we expect of our suppliers to support working conditions that are legal, fair and safe; and
  - Adopting a risk and opportunity-based approach to identify contracts and areas of spend where there may be a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. Seeking to improve transparency within the supply chain by working with suppliers and in partnership with the ETI and Electronics Watch to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

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<sup>1</sup> <http://www.london.gov.uk/rp-policy>

<sup>2</sup> <https://www.ethicaltrade.org/eti-base-code>

13. The LFB has its own Ethical Sourcing Policy in place that set out the minimum requirements which the Commissioner expects to be addressed within its contracts with suppliers and the procedures to assess and mitigate risks. This builds upon existing guidelines and requirements used in contracts for workwear and IT/electronics, by setting procedures to cover high-risk sectors. It also sets out the expected approach to comply with the Modern Slavery Act 2015 through procurement and notes the possibilities for conditions of trade to be taken into account under the Public Contracts Regulations Act 2015.
14. The Policy set out the actions which LFB will take to ensure transparency in its supply chain, and that ethical sourcing standards are met by its suppliers and their sub-contractors. This includes meeting new and established legal standards under the Public Contracts Regulations Act 2015, Modern Slavery Act 2015 and International Labour Organisation conventions.

### **Policies in relation to slavery and human trafficking - safeguarding**

15. Due to both their operational activities and public engagement role in respect to fire safety and prevention, LFB also support and implement safeguarding policies (Safeguarding Adults at Risk and Safeguarding Children) to promote welfare and protect from harm. The policies cover the roles and responsibilities of all staff in relation to the safeguarding of adults and children who are suffering from, or are at risk of abuse, neglect or self-neglect including modern slavery and human trafficking.
16. LFB is not the primary authority in relation to safeguarding those at risk, but acts as a referral agent to the 33 London Local Authority Social Service departments. However its responsibility to ensure that its staff, many of whom come into contact with members of the public as part of their normal duties, are aware of the issues associated with safeguarding those at risk and how to make a referral is recognised. The LFB Safeguarding policies and associated staff training outline the reporting procedure as well as how to store, process and share safeguarding information securely. The LFB is also part of an information sharing protocol, updated in 2019, as part of its commitment to the London Multi-Agency Adult Safeguarding policy and procedures.
17. Fire safety training information and guidance notes are also used to inform staff of what they should do if any public safety issues are identified (criminal/illegal acts, illegal house of multiple occupancy inappropriate sleeping accommodation, potential modern slavery/abuse/ poor working conditions).
18. During the COVID-19 pandemic, other services including the LFB, collaborated to fill any potential voids in child protection and adult safeguarding during social isolation. The National Fire Chief's Council's gave guidance that Fire and Rescue Services needed to be even more vigilant and aware of changing behaviours when attending incidents and to fill the void in child protection and adult safeguarding left with schools being shut, a possible increase in domestic violence and anticipated money worries/pressures for families at home, and adults with care and support needs prone to scams and abuse whilst socially isolating, etc. It was acknowledged that there was an increased risk for those they may be more vulnerable to abuse and neglect, as others may seek to exploit disadvantages due to age, disability, mental, physical or financial impairment as well as illness.

## Due Diligence and Risk management

19. The LFC is committed to ensuring contracts are compliant with the Modern Slavery Act 2015. The Act requires suppliers with a turnover in excess of £36 million to give a Statement on Slavery and Human Trafficking in their supply chain and provide an annual update on their Slavery and Human Trafficking statement. For all contracts with organisations, to whom the requirements of Part 6 of the Modern Slavery Act apply, the organisation's Slavery and Human Trafficking Statement must be reviewed as part of the tender process to ensure that any risks are suitably addressed. This Statement must be kept up to date for the duration of the contract and reviewed annually. The Public Contract Regulations 2015 provide for mandatory exclusion of bidders who have been convicted of an offence under the Modern Slavery Act 2015.<sup>3</sup>
20. LFB actively encourages its key suppliers to produce a compliant Modern Slavery Statement, via the supplier selection questionnaire and ongoing contract management as well as reviewing key supplier statements on an annual basis. As part of the Responsible Procurement Implementation Plan a key supplier modern slavery register was developed, with compliance reported annually through the Sustainable Development Annual Report and to the GLA Group Collaborative Procurement Board to enhance the monitoring and transparency of the supply chain and the LFB's actions to encourage compliance. Monitoring is now being supported by tiscreport.org (as managed by the GLA Responsible Procurement team) in order to standardise how suppliers are assessed and compared across the GLA group.
21. The LFC's Ethical Sourcing Policy promotes the use of recognised third-party certification and risk assessment tools, including those used by LFB. It sets a standard approach which can be adapted to individual contracts based on their sector, value and the nature of supplier relationships. The Policy focus on those sectors that have been identified as posing the highest risk of poor working conditions. It sets out procedures to be followed both during the tender process and contract delivery.
22. LFB review contracts to identify new areas of potential risk related to ethical sourcing and work with the relevant suppliers to increase the transparency of supply chains. Good practice is encouraged and in high risk sectors required of suppliers to support improvements to manage and address issues of non-compliance. More stringent actions are expected to be taken where suppliers are not prepared to address non-compliance. High and medium risk sectors are deemed as those set out in Table 1 below within the Ethical Sourcing Policy.

**Table 1:** High and medium risk sectors within LFB's Ethical Sourcing Policy

Risk for Sector	Sector/Product	Typical Production Countries/Regions	Specific Risks
High	Electronics	Southeast Asia, United States, Latin America and Europe, with	Low pay; excessive working hours; use of

<sup>3</sup> Regulation 57(1)(ma) PCR, inserted by the Modern Slavery Act (Consequential Amendments) Regulations 2015.

		components sourced globally	conflict minerals; child and forced labour
High	Electric Vehicle Batteries	Cobalt – Democratic Republic of Congo (DRC); Lithium - Australia, Chile, China; Nickel – Canada, Indonesia, Philippines and Copper – Chile	Use of conflict minerals; child and forced labour; low pay, unsafe working conditions; excessive working hours
High	Textiles (clothing, footwear, bags, carpets, upholstered furniture), PPE	India, Bangladesh, China, Malaysia Eastern Europe, Middle East	Low pay; excessive working hours; health risks to workers (e.g. exposure to adhesives, fire hazards); child and forced labour
High	Construction materials (natural stone, brick, concrete, metals)	China, India, Turkey, Iran, Italy	Unsafe working practices; low pay; environmental risks
High	Construction sites	UK	Multi-tiered supply chains, agency labour - can result in poor labour practices.  Unethical practices inc. unlawful or excessive recruitment fees, unfair/incorrect terms of employment, withholding of passports, etc.
Medium	Facilities Management: cleaning, catering and security services	UK	Low skilled labour; migrant labour; agency labour;
Medium	Food and drink (especially tea and coffee, fish and poultry, cocoa, palm oil)	UK, Ireland, continental Europe, Africa, Asia, Middle East, Latin America	Low wages; bonded labour; slave labour in fishing; unsustainable production methods; health risks to workers (e.g. pesticide exposure); health risks to consumers (food safety); animal welfare

Medium	Cleaning products and chemicals	Europe	Environmental risks in production; health and safety in production and for users; animal testing
Medium	Timber products (furniture, flooring, construction)	Southeast Asia, Africa, Latin America, Eastern Europe	Illegal/unsustainable forestry; unsafe working practices.

NB: The Ethical Sourcing Policy assesses risks broader than the scope of the MSA, these are shown in grey

23. For key contracts in High and Medium Risk sectors, LFB will seek to purchase products with relevant third-party certifications addressing ethical issues within the supply chain. Where third-party product certification is unavailable, unsuitable or does not fully address ethical supply concerns, suppliers must disclose the production sites to be used for a contract and demonstrate compliance with the Ethical Trade Initiative's (ETI) base code<sup>4</sup>, incorporating the core International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.

24. In addition, for key contracts in High Risk sectors suppliers will be asked to complete the Sedex<sup>5</sup> Self-Assessment Questionnaire (SAQ). This covers the following aspects:

- Production countries
- Compliance with local laws
- Working hours and conditions
- Health and safety, including compliance with building codes
- Terms of employment and rates of pay
- Minimum age of employment

25. Suppliers may either be asked to carry out the risk assessment as part of the tender process or upon contract award. If the assessment is to be carried out during the tender procedure, the effect on the evaluation of tenders must be specified in the procurement documents. The guidelines recommend that for contracts involving bespoke products the assessment is carried out as part of the tender process, to ensure risks are considered prior to finalising production arrangements. If the assessment is carried out upon contract award, the effect on key performance indicators, payment or other provisions must be specified in the contract.

26. The LFB is also a member of Electronics Watch, an independent monitoring organisation that assists public sector buyers to meet their responsibility to protect the human rights of electronics workers in their global supply. We have included Electronics Watch contractual clauses in a number of key Information Communication Technology (ICT) contracts identified as higher risk and continue to do so where relevant, including the contracts for the Hardware Maintenance Support (Break Fix). They require our suppliers to comply with the Electronics Watch Code of labour standards (or similar) and exercise due diligence by identifying and

<sup>4</sup> <https://www.ethicaltrade.org/eti-base-code>

<sup>5</sup> <https://www.sedexglobal.com/>

mitigating risk of breaches and remedying actual breaches and preventing their reoccurrence. Electronics Watch provided a report by at the end of March 2021 that highlighted issues raised in an audit of the suppliers factory associated with the Break Fix contract and have initiated the prescribed process with the Responsible Business Alliance to collaborate to investigate and remedy issues in specific factories. Following progress and corrective actions to be completed in 2021/22 an subsequent audit report will be shared and the option to participate in an alignment meeting offered.

27. For the upcoming workwear contract, procured through the National Uniform Managed Service framework, the Supplier is required to work with the LFC in order to appropriately risk assess the labour conditions within the supply chain providing workwear items. As part of the proposed approach the supplier has outlined the use of their SEDEX membership as well as a requirement for the supply chain, plus completing internally managed and third party global production audits at the point of sourcing new items and on an ongoing basis to provide the required level of assurance. Once implemented the ongoing visibility of the supply chain will form part of the contract management arrangements as per contractual the requirements of the managed service.
28. The LFB's current Personal Protective Equipment (PPE) contract is procured through a framework managed by Kent and Medway Fire Service. The current supplier is also a SEDEX member and utilises membership and their own assurance processes to audit all direct key suppliers. They have an Ethical Sourcing Policy in place that requires suppliers and stitching subcontractors to adopt the requirements of the ETI Base code. Due to the high technical performance quality of the items (including textiles) all suppliers are required to be part of their approved suppliers list and their supply chain is well-established in order to safeguard standards. The majority of their key suppliers are within Europe and are audited annually by their Compliance Manager to ensure that technical specification and working/ labour condition are up to required standards. The supplier was acquired in January 2021 by another company and are currently undergoing an integration process for the two businesses. They will now fall under threshold requirements with the Modern Slavery Act and have already completed the government's modern Slavery Assessment Tool, 12 key staff have also received training on Modern Slavery issues in March 2021, including:
- Identifying ethical and corporate responsibility issues in the global supply chain
  - How to deal with channel partners, customers or suppliers if they are offered or seek to engage in slavery or bribery concerns.
29. During the response to the Covid-19 pandemic LFB have continued to operate an emergency response service. In order to keep their staff and the public safe this included increased PPE requirements (outside of their firefighting operational PPE) such as reusable and single use masks and gloves to decrease their risk of catching/ transmitting COVID-19. These were initially sourced during the initial height of the pandemic from a range of suppliers via Kent Fire Service. As part early engagement all potential suppliers were required to provide details of their due diligence within their supply chain and their organisations Modern Slavery Policy. In conjunction with reviewing the technical due diligence, the procurement team also conducted financial checks and confirmed that the modern slavery policies on the websites of suppliers. In September 2020 a framework was awarded for suppliers of the COVID19 PPE



consumables and again technical and commercial Due Diligence of suppliers entering the framework was undertaken by the framework managers. Suppliers were reviewed against the Home Office Good Practice Guidelines for compliance with the Modern Slavery Act and additional questions were issued where required, to understand how the supply chain operated, dealt with Modern Slavery and the communication and comprehension of these processes to their workers.

30. Construction labour sourcing is recognised as a significant risk for poor employment practices through the use of agency workers and multi-tiered supply chains. Whilst requirements around modern slavery and human trafficking are included within LFB's standard terms and conditions, it was recognised that more should be done to ensure that those working on the LFB's estate, often via subcontractors, are not at risk of exploitation. In November 2020 LFB Procurement and Property leads participated in a series of workshops with a Modern Slavery subject matter expert to develop Modern Slavery Assurance guidance. The workshops covered baseline understanding, risks in construction, legislation, drivers impacts on victims, role of LFB Procurement and Property, due diligence and assurance. The resulting guidance aims to support individuals to understand how to embed modern slavery assurance requirements into the procurement process and assess contractual performance. Subsequent stakeholder engagement on the use of the guidance has resulted in the development of a series of approaches for future contracts that can be embedded through the procurement process and managed via contract management. These approaches will be implemented on an upcoming large fire station redevelopment that includes requirements for contracts and contractors, including hired project managers and consultants, on site guidance and practical checklists and resources that can be embedded in the procurement process.
31. Performance management of Facilities Management contracts for LFB has recently been brought back in-house following previous management via a third-party Integrator contractor. The contracts for the individual services include payment of the London Living Wage, and other requirements around fair pay, training and modern slavery. Bringing the management of these contracts back in-house will provide closer scrutiny of supplier's adherence to requirements to ensure the risk continues to be minimised.
32. In the last year the LFC issued a specification for a Zero-Emission Pumping Appliance (fire engine) prototype via their Fleet Managed service providers after many months of market engagement. The specification highlighted requirements to provide explicit detail on the ethical risks associated with the procurement of raw materials for the vehicle batteries and to ensure that slavery and human trafficking do not occur in the operations and supply chain.

## **Effectiveness of current process, measurement against KPIs**

33. LFB has developed category specific Responsible Procurement guidance for procurers, with categories covered including domestic white goods and workwear/textiles. The guidance highlights the need to approach the LFB's Sustainable Development team for specific guidance on KPI's for significant areas of spend and risk. This guidance mandates that certain information is to be submitted as part of the tender return to demonstrate that suppliers and subcontractors meet the ETI Base Code for key contract in High Risk sectors.
34. The GLA Group Responsible Procurement Implementation Plan<sup>6</sup> commits the GLA group including LFB to actively encourage its key suppliers to produce a compliant Modern Slavery Statement via supplier selection questionnaire and ongoing contract management. As part of this work, we are working with Transparency in the Supply Chain (TISCreport.org) to review our key suppliers for compliance with Section 54 of the Modern Slavery Act 2015. Utilising their new reporting tool (in April 2021) will allow LFB to gain more granularity and independent assurance to verify compliance of our key suppliers Modern Slavery Statements.
35. The LFC Ethical Sourcing Guidelines also promotes the use of third-party certification and auditing for high risk sectors including the SEDEX self-assessment questionnaire for key contracts, as part of the tender process, to ensure risks are taken into account prior to finalising production arrangements. If the assessment is carried out upon contract award, the effect on key performance indicators, payment or other provisions must be specified in the contract.

## **Training and capacity building**

36. Seven Property and five Procurement Department staff completed Modern slavery e-learning and participated in a Modern Slavery workshop to support the production of the Assurance guidance for Construction and Procurement. This increased awareness of the risks of Modern Slavery and improved understanding of how assurance measures could be built into upcoming contracts.
37. Safeguarding e-learning is made available to all staff which includes relevant definitions, legislation, roles and responsibilities, procedures and real-life case studies, that makes reference to both modern slavery and human trafficking. This training directs staff to reporting procedures in line with LFB safeguarding policies. Further training (including refresher training) is available depending on the individual's role; A refresh of LFB's safeguarding training for Senior Officers is due to be developed next financial year having been procured in 2020/21 which will review requirements for Modern Slavery risks.

## **Action Plan for 2021/22**

38. In 2021/22 we will continue to review our approach to managing the risk of slavery and human trafficking in our supply chain. Ongoing work will be completed to ensure that ethical

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<sup>6</sup> [https://www.london.gov.uk/sites/default/files/gla\\_group\\_rp\\_ip\\_final\\_for\\_publishing.pdf](https://www.london.gov.uk/sites/default/files/gla_group_rp_ip_final_for_publishing.pdf)

sourcing risks are assessed throughout our contracts particularly those within the significant or high-risk sectors of construction, electronics and workwear/uniforms.

39. We will review our risk minimisation approach to ensure that the real risks of modern slavery within the Brigade's supply chain are understood, considered and addressed throughout the procurement cycle by:
- Supporting key staff to better understand the real risks of high-risk sectors, utilising support from SEDEX, Electronics Watch and other relevant ethical trade and labour services. Rolling out modern slavery e-learning across procurement category teams as well as reviewing other procurement approaches and training for relevant updates.
  - Implementing Modern Slavery assurance through our high-risk contracts, developing and trialling tools to support LFB staff and contractors with a focus on Major Works projects.
  - Including the Electronics Watch contract terms in relevant ICT contracts and managing compliance of those upon contract award.
  - Working alongside the other GLA Group functional bodies with Transparency in the Supply Chain (TISC) to improve how we assess supply chain compliance to Section 54 of the Modern Slavery Act 2015. This new approach is expected to provide us with independent assurance to the quality and validity of the data.
  - Engaging our key suppliers to better understand their actions to mitigate risk and using our influence to encourage those suppliers who fall short of their obligations to take action, by using tools such as the Cabinet Office Risk Assessment Template and UK Government's Modern Slavery Assessment Tool (MSAT).
  - Working with key suppliers of our electric fleet and collaborating with partner organisations (as part of the GLA group), such as the Ethical Trading Initiative and Electronics Watch, to improve supply chain transparency of the mining and manufacturing of minerals used in the provision of batteries for electric vehicles.
  - On award of the uniform contract, working with the Uniform Governance Board to ensure a further level of risk assurance, so that any specification changes are operating in line with the aims of the Ethical Sourcing Policy and avoid any additional risk due to specification, i.e. too bespoke, short turnaround etc.

**Signature**



**Andy Roe**

**London Fire Commissioner**

**Date 20<sup>th</sup> July 2021**