

Modern Slavery Statement 2021/22

September 2022

Period Covered by this statement

1. This is the third Modern Slavery Statement of the London Fire Brigade (LFB) and its authority, the London Fire Commissioner (LFC). It covers the period of financial year 1st April 2021 – 31st March 2022 (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. LFC 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 and during the COVID pandemic 450 firefighters drove ambulances to support the London Ambulance Service, as operationally required. LFB is comprised of some 4,600 operational staff and around 1,000 non-operational staff with a procurement spend of around £124million across some 220 suppliers in 2021-22.
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 Government has now proposed the [Modern Slavery Bill](#) (as referenced in the Queen's Speech), the purpose of which is to strengthen the protection and support for victims of human trafficking and modern slavery and increase the accountability of companies and other organisations to drive out modern slavery from their supply chains. The proposed changes are yet to be incorporated into legislation.
7. In March 2021, the government launched its online modern slavery statement registry and, whilst not currently mandatory, it encourages all organisations to publish their annual modern slavery statements on the registry. LFB have published their previous statement for 2020/21 onto the registry to demonstrate best practice, and plan to publish their 2021/22 statement.
8. 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

9. Buildings being used inappropriately as 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. All LFB staff are required to complete Safeguarding training which include an awareness of Modern Slavery.
10. 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 Policy¹, which was first published in 2006 and has subsequently been updated periodically, most recently in March 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 Ethical Trading Initiative (ETI) Base Code², or equivalent, as the standard we expect of our suppliers to support working conditions that are legal, fair and safe;
 - 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; and
 - 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.
13. The LFB has its own Ethical Sourcing Policy in place that was updated in 2020/21, that sets 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

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

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

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 Ethical Sourcing Policy sets 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 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 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 who 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

actions within the 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 2015.³

20. LFB actively encourages its key suppliers to produce a compliant Modern Slavery Statement, via the supplier selection and ongoing contract management as well as reviewing key supplier statements on an annual basis. As part of the Responsible Procurement programmes, 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 implements LFB's actions to encourage compliance. Monitoring is now being supported by Transparency in the Supply Chain (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. In 2020/21 LFB have undertaken a risk assessment of the supply chain and invited medium and high-risk suppliers to complete the Cabinet Office Modern Slavery Assessment Tool (MSAT). A supply chain engagement event was held to encourage completion of the MSAT and the results will be used to work with our suppliers to improve their policies, practices and processes in preventing modern slavery in our supply chains.

23. 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 components sourced globally	Low pay; excessive working hours; use of conflict minerals; child and forced labour

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

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 Modern Slavery Act, these are shown in grey

24. 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 code⁴, incorporating the core International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.
25. In addition, for key contracts in high-risk sectors suppliers will be asked to complete the Sedex⁵ 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
26. 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.
27. 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 Information Communication Technology (ICT) contracts identified as higher risk and continue to do so where relevant. They require our suppliers to comply with the Electronics Watch Code of labour standards (or similar) and exercise due diligence by identifying and mitigating risk of breaches and remedying actual breaches and preventing their reoccurrence. Electronics Watch provided a report at the end of March 2021 that highlighted issues raised in an audit of the suppliers' factory associated with the Hardware Maintenance Support contract and initiated the prescribed process with the Responsible Business Alliance (RBA) to collaborate to investigate and remedy issues in specific factories. Electronics Watch have continued to work with the RBA to investigate in the last year following third party and RBA audit requests with a formal statement anticipated in 2022/23.
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

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

⁵ <https://www.sedexglobal.com/>

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 2021 by another company and now fall under threshold requirements with the Modern Slavery Act and have already completed the government's modern Slavery Assessment Tool. Procurement staff receive training on Modern Slavery issues and employees as well as distributors and suppliers, also have access to the Ethics Guideline. The Ethics Guideline is run by a third party and provides an anonymous online form or phone line to report potential human rights violations, policy breaches, or to respond to questions and ethical concerns.

29. The procurement of the upcoming workwear provision is being assessed via other collaborative options with the National Fire Chiefs Council. The LFC will ensure that all incoming suppliers will work with the Brigade to appropriately risk assess the labour conditions within the supply chain providing these items. This approach will allow for increased standardisation nationally across all participating Fire and Rescue Services.
30. 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 and Medway Fire Service. As part of the 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. The framework managers completed technical and commercial due diligence of suppliers entering the framework for COVID 19 PPE consumables. 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.
31. 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. Modern Slavery Assurance guidance, produced in consultation with LFB Procurement and Property leads, was implemented to support individuals to understand how to embed modern slavery assurance requirements into the procurement process and assess contractual performance. This has been followed for the procurement of an upcoming redevelopment of a large fire station. This approach includes requirements for contracts and contractors, including hired project managers and consultants, on site guidance and practical checklists and resources, embedded into the procurement process.
32. Performance management of Facilities Management contracts for LFB was brought back in-house last year, following previous management via a third-party Integrator contractor. The contracts for the individual services include payment of the London Living Wage for all those

directly employed and agency staff working on the LFB estate, 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. The supplier ensures all management complete an e-learning on Modern Day Slavery including how to spot the signs and what to do next.

33. 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. Subsequently suppliers of the batteries for both the prototype fire engine and the new electric support vehicles being procured as part of LFB's fleet strategy to reach Net Zero, have been able to demonstrate adoption of a strict supply chain management system, including relevant policies, a supplier code of conduct, training and specific actions to secure traceability and transparency and minimise risks. The battery supplier prioritises high-risk minerals in human rights and the environment, and conducts due diligence on their suppliers, with a third party to ensure efficiency and objective management – including the publishing of all due diligence reports. They are also a member of the Responsible Mineral Initiative and the Responsible Business Alliance.
34. LFC has also participated in initial discussions with Electronic Watch to participate in their future Low-Emission Vehicle programme, encouraging vehicle manufacturers and fleet providers to work collaboratively to improve supply chain transparency and working conditions in the mining and manufacturing of minerals used in the production of batteries for electric vehicles.

Effectiveness of current process, measurement against KPIs

35. 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 requires adherence to the Ethical Sourcing policy and 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.
36. LFB actively encourages its key suppliers to produce a compliant Modern Slavery Statement via supplier selection and ongoing contract management. We continue to work with Transparency in the Supply Chain (TISCreport.org) to review our key suppliers for compliance with Section 54 of the Modern Slavery Act 2015.
37. All suppliers deemed Medium and High-Risk for modern slavery within their supply chain were encouraged to complete the Cabinet Office Modern Slavery Assessment Tool (MSAT). A Key Performance Indicator has been set for all invited suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status. In the year ahead, we will be working with those suppliers who have scored below 70 per cent, providing access to training resources and supporting their development actions which are provided by the MSAT following completion. More suppliers will be encouraged to complete their assessments and contractual mechanisms to require completion in upcoming medium to high-risk tenders will be included within future relevant tenders.

38. All relevant LFB commercial and procurement staff are to complete modern slavery training, such as the Home Office developed e-learning module by April 2023.
39. The LFC Ethical Sourcing Policy 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

40. Four LFB staff completed Responsible procurement e-learning which covers ethical sourcing and modern-day slavery and nine staff completed Modern slavery e-learning from the Home Office. LFB staff from Property and Sustainable Development functions have participated in a pan-GLA Group practitioner learning group to share best practice and collaborate across the Group in relation to modern slavery due diligence. The group meets on a quarterly basis and has assisted with the roll out of the MSAT campaigns and sharing best practice from the GLA group including via links to both the Rail Safety and Standards Board (RSSB) and the Department for Transport modern slavery groups.
41. A workshop on the Modern Slavery Assessment Tool has been conducted with relevant LFB suppliers to support them in using the tool, alongside members of the LFB Sustainable Development team.
42. Annual mandatory 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. A refresh of LFB's safeguarding training for Senior Officers was developed and rolled out in 2020/21 which was completed by station base Senior Officers and selected operational staff.

Action Plan for 2022/23

43. In 2022/23 we will continue to review our approach to managing the risk of slavery and human trafficking in our supply chain.
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 and suppliers to better understand the real risks of high-risk sectors, utilising support from SEDEX, Electronics Watch and other relevant ethical trade and labour services.
 - Continuing to roll out modern slavery e-learning across procurement category teams as well as reviewing other procurement approaches and training for relevant updates.
 - Attending the pan-GLA Group practitioner learning group to share best practice and collaborate across the GLA Group in relation to modern slavery due diligence. I
 - Implementing Modern Slavery assurance through our high-risk contracts, implementing tools to support LFB staff and contractors with a focus on an upcoming fire station redevelopment.
 - 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 (TISCreport.org) to improve how we assess supply chain compliance to Section 54 of the Modern Slavery Act 2015.
- 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.
- Continuing to engage on the collaborative approach for a future workwear procurement to ensure suppliers align to appropriately risk assess the labour conditions within the supply chain.
- On award of the uniform contract, working with the proposed Board for uniforms 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 21 September 2022