

Modern Slavery Statement 2023/24

September 2024

Period Covered by this statement

1. This is the fifth 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 2023 – 31st March 2024 (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 officeholder 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 8.9 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 employs approximately 5,700 people, with a procurement spend of around £178million across over 900 active suppliers in 2023-24.
6. The LFB as a public body 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. As per previous years, LFB plan to publish their 2023/24 statement on the Government's online modern slavery statement registry.
7. This statement outlines the actions that the LFB are taking to identify, prevent and mitigate risks of modern slavery, bonded and forced labour, labour rights violations within its supply chain.

LFB's operational role in tackling Modern Slavery

8. 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 includes an awareness of Modern Slavery.
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 or a fire safety check, LFB crews have highlighted the cases, taken immediate action and worked with

colleagues in the Prevention and Protection Department and external partners to reduce risk and move towards long-term risk reduction.

Policies 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. Some of our suppliers also have complex supply chains with multiple tiers of sub-contracting and, in some cases, such as construction or electronic equipment, there is little visibility over where products are made. Therefore, LFB are using a risk-based approach, receiving expert advice from the Ethical Trading Initiative (ETI) and Electronics Watch where relevant, prioritising steps to achieve greater supply chain visibility where our risks are highest, recognising that workers in the lowest tiers of supply chains are often the most vulnerable. 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 RP Policy is supported by the Responsible Procurement Implementation Plan (RPIP) 2022-24 which sets out the key actions proposed to deliver on the commitments of the RP Policy

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

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

and shapes the work outlined in this Modern Slavery Statement. It commits LFB, as a member of the GLA Group, to:

- Improve performance of key suppliers, and those assessed to be medium and high risk, in eradicating the risks of modern slavery in their organisations and their supply chains by using a risk-based approach via the Cabinet Office Modern Slavery Assessment Tool (MSAT);
- Increase internal awareness and capability to address modern slavery risks for staff through training and learning including the Home Office developed e-learning module;
- Structure commercial development arrangements to ensure relevant GLA Group best practice modern slavery due diligence provisions are undertaken by property development companies, consortia and suppliers;
- Collaborate with partner organisations, such as the Ethical Trading Initiative and Electronics Watch, to improve supply-chain transparency of the mining and manufacturing of minerals used in batteries for electric vehicles and state-sponsored forced labour risks, such as the treatment of Uyghur Muslims in China, in our supply chains.

14. The GLA Group's Central Responsible Procurement Team (CRPT) works across the GLA group to support the organisation in implementing the RP Policy and Implementation Plan. The CRPT works with members including LFB, to prioritise and deliver on the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery. The CRPT chairs and co-ordinates a practitioner learning group to share best practice, emerging risks and ensure delivery of the RP Policy.

15. The LFB has its own internal Ethical Sourcing Policy in place that was updated in March 2023, 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 guidelines and requirements used in contracts for workwear and ICT/electronics, by setting procedures to cover high-risk sectors. It also sets out the expected approach to comply with the Modern Slavery Act 2015, the Public Contracts Regulations Act 2015 and International Labour Organisation Conventions.

16. 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.

Polices in relation to slavery and human trafficking - safeguarding

17. Due to both their operational activities and public engagement role in respect to prevention and protection, 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.
18. 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.
19. Fire safety information and guidance notes are also used to inform protection 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).

Due Diligence and Risk management

20. 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. LFB actively requires relevant suppliers to produce a compliant Modern Slavery Statement, at the supplier selection stage and via ongoing contract management, where significant risk has been identified.
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 also held to encourage completion of the MSAT, and suppliers were also invited to attend one of two due diligence workshops via the Supply Chain Sustainability School to support suppliers in improving their policies, practices, and processes in preventing modern slavery in our supply chains.
22. LFB reviews contract opportunities via robust procurement processes including procurement category-specific RP guidance 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
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; <i>health risks to workers (e.g. exposure to adhesives, fire hazards)</i> ; child and forced labour
High	Construction materials (natural stone, brick, concrete, metals)	China, India, Turkey, Iran, Italy	Unsafe working practices; low pay; <i>environmental risks</i>
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; <i>unsustainable production methods; health risks to workers (e.g. pesticide exposure); health risks to consumers (food safety); animal welfare</i>
Medium	Cleaning products and chemicals	Europe	<i>Environmental risks in production; health and safety in production and for users; animal testing</i>
Medium	Timber products (furniture, flooring, construction)	Southeast Asia, Africa, Latin America, Eastern Europe	<i>Illegal/unsustainable forestry; unsafe working practices.</i>

NB: The Ethical Sourcing Policy assesses risks broader than the scope of the Modern Slavery Act, these are shown in ***italics***

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 code¹, incorporating the core International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.

24. As part of the tendering process LFB obtains assurances from our supply chain directly through our suppliers. High risk suppliers are asked to complete the Sedex² Self-Assessment Questionnaire (SAQ) and can be required to provide independently verified audit reports and remedial action plans.

¹ <https://www.ethicaltrade.org/eti-base-code>

² SEDEX (Supplier Ethical Data Exchange) is an online reporting platform that provides access to data and insights about suppliers’ ethical and responsible practices. Ethical data is collected through self-assessments or audits.

Category specific examples

Electrical equipment - ICT

25. 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 continue to include Electronics Watch contractual clauses in Information Communication Technology (ICT) contracts identified as higher risk 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 provides members with quarterly monitoring reports on factories associated with its contracts and recommends action with suppliers where needed.

Uniforms/ PPE

26. The LFB's current Personal Protective Equipment (PPE) contract is procured through a framework managed by Kent and Medway Fire Service. Recognising the risks related to the contract, LFB has sought assurances from the supplier about its ethical sourcing standards:

- 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 has completed the Government's Modern Slavery Assessment Tool and rolled out Modern Slavery training for a targeted group of associates who directly or indirectly interface on this topic, with a completion rate of 96% for relevant departments plus an automatic enrolment for all new employees in relevant roles.
- Employees as well as distributors and suppliers, also have access to the Ethics Guideline, a third-party service that provides an anonymous online form or phone line to report potential human rights violations, policy breaches, or to respond to questions and ethical concerns.
- They also supply further resources that their external business partners can leverage to report concerns as reflected in their published codes of conducts. On top of ethical sourcing questionnaires for their supply chain, the supplier is also in the process of vetting third party applications, to perform due diligence screenings automatically to identify any deficiencies for our suppliers in this area.

27. The procurement of a future 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.

Construction

28. Construction labour sourcing is recognised as a significant risk for poor employment practices due to the use of agency workers and multi-tiered supply chains. Requirements around modern slavery and human trafficking are included within LFB's standard terms and conditions.
29. For the Plumstead fire station redevelopment, the contract tender included modern Slavery due diligence requirements for contracts and contractors, including hired project managers and consultants. On site guidance and practical checklists and resources were also embedded into the procurement process and further shared with the principal contractor on commencement. Posters to raise awareness of exploitation and support for victims (in multiple languages) were erected on site. This supplier conducts Modern slavery awareness training for all employees within their first 14 days, ensures fair and transparent payment processes and policies (to reduce risk of exploitation and report wrongdoing) and requires that all suppliers and sub-contractors comply with their online pre-qualification system. This has been adapted to incorporate information to ensure their supply chain upholds their same standards, principals and business ethics including Modern Slavery Act and assurance requirements.

Facilities management

30. The soft services Facilities Management contract (cleaning, catering, and security) includes 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. The supplier ensures all management complete an e-learning on Modern Day Slavery including how to spot the signs and what to do next, three further employees have completed this training in 23/24.
31. Other high risk FM contracts includes Waste and Recycling, and the current supplier has a range of policies and procedures in place to reduce and mitigate risk within their supply chain, including compulsory modern slavery training for all staff (and suppliers if they wish), due diligence reviews, supply chain mapping, vetting plus auditing following annual risk assessments for subcontractors. They also have a contract for agency staff that complies with relevant requirements on Rights to work, direct payment etc and are members of the Waste and Recycling Modern Slavery Working Group chaired by the Slave-Free Alliance. They have introduced key performance indicators within their departments in relation to training, raising awareness, and reporting Modern Slavery, that is monitored at Management Board level, alongside any audit reports and outcomes.
32. The hard service Facilities Management services includes two mechanical and engineering suppliers, that due to the skilled nature of the contract has a lower risk for modern slavery in their direct workforce on the LFB contract. Both suppliers acknowledge risk in their supply chain given the breadth of their supplier chains and mandate training on Modern Slavery for all staff, with one supplier repeating this training twice a year and both having high completion rates. Whilst there are differences in the approaches for due diligence both suppliers, both

have codes of ethics, Tier 1 audits and significant policies on whistleblowing, recruitment and health and safety to protect workers and implement labour laws.

33. In May 2023, LFB held a Property supplier event whereby Modern slavery risks and the utilisation of the Modern Slavery Assessment Tool for high and medium risk suppliers were highlighted in a session on Responsible procurement. LFB suppliers were also invited to a further Modern Slavery Due Diligence training event in July that was attended by two suppliers including across the Facilities management sector.

Low emission vehicles

34. LFC has also been engaging in Electronic Watch's Low-Emission Vehicle (LEV) 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, often driven via Original Equipment Manufacturer engagement. The LFC's procurement route for operational vehicles, often reflects a one-off procurement via the Fleet Managed Service provider rather than long-term engagement with the vehicle manufacturers, which is often necessary to achieve the objectives of the LEV programme. To overcome this, LFC's supplier is keen to understand market best practice for ethical sourcing and reflect this in future tender opportunities.

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 KPIs 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. 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 2023/24 48% of invited suppliers have completed the assessment with an average score of 68%. In the year ahead, we will be working to increase completions, as well as supporting 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.
37. All relevant LFB commercial and procurement staff are to complete modern slavery training, such as the Home Office developed e-learning module.

38. 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 considered prior to finalising production arrangements.

Training and capacity building

39. This year 25 LFB procurement staff completed in-person Responsible procurement training which covers ethical sourcing and modern-day slavery and ten staff have completed Modern slavery e-learning from the Home Office (to date). 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.

40. Upskilling the supply chain to help manage shared risks is a key priority and recognises that some suppliers are further on their journey than others. In 2023/24 LFB invited relevant suppliers to two Modern Slavery workshops via the Supply Chain Sustainability School to assist them in completing the MSAT and at least two key suppliers were in attendance, as highlighted in the construction section above. GLA and LFB RP leads attended a 'Property' suppliers engagement event and held a responsible procurement awareness session, that covered Modern Slavery due diligence and ethical sourcing to reflect LFB requirements and standards.

41. 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 refers to both modern slavery and human trafficking. This training directs staff to reporting procedures in line with LFB safeguarding policies.

Action Plan for 2024/25

42. In 2024/25 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:

- Reviewing the LFB Ethical Sourcing Policy to reflect risk and opportunities for guidance materials for future procurements and/or approaches;
- Continuing to roll out targeted modern slavery e-learning across procurement category teams as well as reviewing other procurement approaches and training for relevant updates to reflect recent staff changes;
- 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;
- 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;
- Reassessing LFB suppliers for high and medium risk to reflect MSAT campaigns and also Ensuring suppliers who have been assessed to be high and medium risk, to complete the tool and achieve an MSAT score of a minimum 70 per cent by March 2025. We will work with lower scoring suppliers to support improvements to their scores and encourage more suppliers to complete the assessment.
- 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;
- Continue to consider ethical sourcing risks linked to Photovoltaic panel production and build into future procurement approaches and relevant policies including estate decarbonisation.

Signature

A handwritten signature in black ink, appearing to read 'Andy Roe', written in a cursive style.

Andy Roe KFSM

London Fire Commissioner

Date 14 October 2024