

# **Modern Slavery Statement 2019/20**

April 2020

## **Period Covered by this statement**

This is the first Modern Slavery Statement of the London Fire Brigade (LFB) and its authority, the London Fire Commissioner. It covers the period of 2019-20 (one year) and is designed in line with 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**

This statement covers the London Fire Brigade (LFB) and the London Fire Commissioner (LFC) as a corporation sole and the fire and rescue authority for London. London Fire Brigade is a functional body of the Greater London Authority. The [Mayor of London](#) sets the LFB's budget, approves the London Safety Plan, can direct it to act in certain circumstances, and is supported by a Deputy Mayor for Fire and Resilience.

The London Fire Commissioner is responsible for providing London's fire and rescue service, ensuring that it is effective and efficient. All formal decisions about London Fire Brigade are approved by the London Fire Commissioner, though some decisions may need to be consulted or have prior approval from the Deputy Mayor for Fire and Resilience or the Mayor of London.

Andy Roe is the office-holder of the London Fire Commissioner at the time of publication.

## **Introduction**

The London Fire Brigade is one of the largest fire and rescue services in the world. London Fire Brigade provides fire and rescue 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 support other fire and rescue 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 £112million across some 550 suppliers in 2018/19.

As the LFB is a public body, it is not required by law to produce and publish a Modern Slavery Statement and is doing so voluntarily 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. 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**

In 2012 LFB was appointed to represent 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 entered into a Memorandum of Understanding 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.

The LFB have successfully served prohibition notices on buildings that were being used inappropriately for 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 to reduce risk and worked with partners towards long-term risk reduction.

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

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 Commissioner 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.

London Fire Brigade is a signatory to the Greater London Authority (GLA) Group Responsible Procurement Policy<sup>1</sup>, which was published in 2017. This is a strategic policy sets out the GLA'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 and requirements set out in the Modern Slavery Act 2015.

The LFB 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. The LFB will seek to improve transparency within the supply chain, and work with suppliers to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

The LFB also has in place Ethical Sourcing Guidelines, that set out the minimum standards which the Commissioner expects to be addressed within its contracts with suppliers and the procedures to assess and mitigate risks. This builds upon existing 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 2015.

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

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

The Guidelines 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 2015, Modern Slavery Act 2015 and International Labour Organisation conventions.

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

Due to 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.

LFB is not the primary authority in relation to safeguarding those at risk, 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 is recognised. Training and 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) The policies and associated staff training outline the reporting procedure as well as how to store, process and share safeguarding information securely. The LFB has also entered an information sharing protocol, updated in 2019, as part of its commitment to the London Multi-Agency Adult Safeguarding policy and procedures.

## **Due Diligence and Risk management**

The Commissioner 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.<sup>3</sup>

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 suppliers 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 to enhance the monitoring and transparency of the supply chain and the Brigades actions to encourage compliance.

The LFC's Ethical Sourcing Guidelines promote 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

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

guidelines focus in particular upon those sectors which 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.

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 Guidelines.

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

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	Textiles (clothing, footwear, bags, carpets, upholstered furniture)	India, Bangladesh, 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
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: Ethical sourcing guidelines assess risks broader than the scope of the MSA, these are shown in grey

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.

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

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 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.

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. The contracts for the Hardware Maintenance Support (Break Fix) and Hosted Telephony have included Electronics Watch contractual requirements, the outcomes of which will be monitored. 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 breeches and remedying actual breeches and preventing their reoccurrence.

For the upcoming workwear contract, to be procured through the National Uniform Managed Service framework, the Supplier is expected to work with the Commissioner in order to appropriately risk assess the labour conditions within the supply chain providing workwear items. This can be through the use of the Commissioners SEDEX membership in partnership with the LFB or other appropriate mechanism that provides an equivalent 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.

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

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

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

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 an 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.

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 is recognised that more should be done to ensure that those working on developing our LFB's estate, often via subcontractors, are not at risk of exploitation.

Currently the Facilities Management contracts for LFB are managed 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. The management of these contracts is due to be brought back in-house, providing closer scrutiny of suppliers adherence to requirements to ensure the risk continues to be minimised.

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

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.

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 have reviewed over 20 of our key suppliers for compliance with Section 54 of the Modern Slavery Act 2015. As of September 2019, 100 per cent of LFB's key suppliers (that are in scope as per the Modern Slavery Act) have issued a statement compliant to Section 54 of the Act.

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**

During 2018/2019 27 staff from the Procurement department and key client departments received training in the principles of Responsible Procurement, including an overview of key issues and approach sourcing goods, services and works ethically. This training outlines how to apply a risk-based approach to managing ethical sourcing. Further information is included within LFB responsible

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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)

procurement guidance that further details this approach as well as signposting where to go for assistance where high risk areas are identified.

In 2019 the GLA group implemented further training to enhance the knowledge of key procurement staff to manage the risks of modern day slavery through a combination of e-learning and classroom based training, which has been completed by 19 Commercial Procurement staff and associated Client leads. The training focused on all aspects of responsible procurement including ensuring that ethical sourcing risks are considered in the early stages of procurement when developing business cases and category management strategies.

All LFB staff are also required to complete Safeguarding e-learning 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 individuals role; LFB's safeguarding training is currently under review.

## **Action Plan for 2020/21**

In 2020/21 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 sourcing risks are assessed throughout our contracts particularly those within the significant or high risk sectors of construction, electronics and uniforms.

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:

- Continuing to roll out Responsible Procurement training to key Commercial Procurement and client department staff to support implementation of our ethical sourcing approach. This will be formed of online and classroom based learning and will enable staff to make procurement decisions with an understanding of how to manage against the risk of human and labour rights abuses.
- Including the Electronics Watch contract terms in relevant ICT contracts and managing compliance of those upon contract award.
- Reviewing our risk assessment by sector to update our understanding of the degree of risk, production countries and regions, and specific risks of our key areas of spend;
- 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.
- Reviewing our approach to managing risks within high risk service sectors to identify gaps and further risk reduction actions.
- 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.



This Statement was approved by the LFC:

**Signature**

A handwritten signature in black ink, appearing to read 'Andy Roe', with a stylized, cursive script.

**Andy Roe**  
**London Fire Commissioner**

**Date 04 May 2020**