

Modern Slavery Statement 2024/25

September 2025

Period Covered by this statement

1. This is the sixth 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 2024 – 31st March 2025 (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 LFB'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 the Fire Service.
3. The LFB 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 the Fire Service or the Mayor of London.
4. Jonathan Smith 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 £173million across over 739 active suppliers in 2024-25.
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. LFB has produced this statement in line with the 2025 Home office Transparency in supply chain statutory guidance. As per previous years, LFB plan to publish their 2024/25 statement on the Government's online modern slavery statement registry for increased transparency.
7. Our commitment is enshrined at GLA Group level through the Responsible Procurement (RP) Policy¹ and Implementation Plan (RPIP)², under the themes of Fair and inclusive employment practices, as well as Ethical sourcing.
8. This statement outlines the actions that the LFB is 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

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 includes an awareness of Modern Slavery.

¹ https://www.london.gov.uk/sites/default/files/gla_group_responsible_procurement_policy_2021.pdf

² https://www.london.gov.uk/sites/default/files/gla_group_rpip_2022-24.pdf

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 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.

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. 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 is 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 LFB 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 LFB is a signatory to the Greater London Authority (GLA) Group Responsible Procurement (RP) and Social Value (SV) Policy³, which was first published in 2006 and has subsequently been updated periodically, most recently in July 2025. 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 LFB 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 Code⁴, 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.

³ <https://www.london.gov.uk/media/109651/download?attachment>

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

13. The RP and SV Policy is supported by the GLA Group Responsible Procurement Delivery plan⁵, data from which will be seen in next year's report. For the purpose of the 2024-25 statement the governing legislation for that period was the GLA Responsible Procurement Implementation Plan (RPIP) 2022-24. This set out the key actions proposed to deliver on the commitments of the RP Policy and shaped the work outlined in this Modern Slavery Statement. It committed 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;
- Integrate the Mayor's Good Work Standard⁶ in relevant procurement where possible; and
- Require, where possible, that all suppliers pay the London Living Wage.

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 LFB'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 focuses on those sectors that have been identified as posing the highest risk of poor working conditions. It sets out standard procedures and templates to be followed both during the tender process and contract delivery.

⁵ <https://www.london.gov.uk/media/109650/download?attachment>

⁶ The Good Work Standard (GWS) is a free accreditation programme developed by the GLA in collaboration with London's employers, trade unions, professional bodies and experts. It is organised into four Pillars, which set the benchmark for good work.

Policies 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 LFB 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 has 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 relevant suppliers were invited to attend a due diligence workshop 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</i>

			<i>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. LFB's risk prioritisation and mitigation are shaped by our procurement process, timelines, and contract value. Our approach for new procurements is the following:

- 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, LFB's ethical sourcing policy and incorporating the core International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.
- 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.
- Contracts above £15m follow the standardised process to identify and mitigate risks.

Category specific examples

Electrical equipment - ICT

24. 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 Terms and Conditions in Information Communication Technology (ICT) hardware contracts. Electronics Watch 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.

25. The LFB is working with Electronics watch to provide quarterly data on all purchased within scope items so that full risk assessments and mapping of our supply chain can be completed in order to receive bespoke reports moving forwards into 25/26.

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, which are summarised below:

- The current supplier is an enhanced SEDEX¹ member. This enables them to link with and audit the key suppliers in their supply chain, alongside their own assurance processes. This adds a further level of due diligence within their monitoring and tracking of suppliers, ensuring that Ethical Sourcing practices continue to be a key focus within their business. The suppliers both 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;
- One of our suppliers, MSA Safety Incorporated, has the majority of their key suppliers within Europe and are audited annually to ensure that technical specification and working/labour conditions are up to required standards;
- The supplier has completed the Government's Modern Slavery Assessment Tool, achieving a score of 83%. This represents a 13% improvement versus the previous assessment and with a reduction in recommended improvement actions from 12 to 5. This shows demonstrable progress as a result of additional training and assurance;
- The Suppliers training programme includes:
 - i. Modern Slavery training 'Recognising and Combatting Modern Slavery & Human Trafficking' for all associates, face to face, across all 3 sites.
 - ii. MSA 'Preventing Human Trafficking' online training issued to all Indirect Associates with mandatory completion dates.
 - iii. Senior leaders within the organisation engage with and attend GLA workshops, such as the Due Diligence in Combatting Modern Slavery workshop held on 5th February.
- Employees as well as distributors and suppliers, have access to the MSA Ethics Guideline, a 24/7 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;
- The supplier has a Modern Slavery statement that is updated annually and published on their website where further information can be found²;
- 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 LFB will ensure that all incoming suppliers will work with the Brigade to appropriately risk assess the labour conditions within the supply chain providing

¹ 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.

²[https://msa.webdamdb.com/directdownload.php?ti=547931192&tok=5Bv1Dw8ldad2HNPNfyQoMgRR&token=\\$2y\\$10\\$iOzHewGtvAJJQTS7iniXQe5mf/LG1nDh0SHEh3BPMTcx6mVHA/0Le](https://msa.webdamdb.com/directdownload.php?ti=547931192&tok=5Bv1Dw8ldad2HNPNfyQoMgRR&token=$2y$10$iOzHewGtvAJJQTS7iniXQe5mf/LG1nDh0SHEh3BPMTcx6mVHA/0Le)

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, eight further employees have completed this training in 24/25.
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 and have a modern slavery statement published on their website and internal portal for all staff access. There is compulsory modern slavery training for all staff which comprises of:
 - Toolbox talks for operations staff;
 - iHasco online training for Office-based staff (and suppliers if they wish).

Other measures include due diligence reviews for all suppliers via the company SHEQ questionnaire, supply chain mapping, vetting plus auditing following annual risk assessments for subcontractors and an enforced zero tolerance policy. This is supplemented by an escalation and remedial policy for Modern slavery which is published on the company website. 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 supply 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 have codes of ethics, Tier 1 supplier audits, and significant policies on whistleblowing, recruitment, health, and safety to protect workers and implement labour laws.

33. One of the Hard FM suppliers requires all key supply chain partners to pass an annual assessment of the policies, conducted by an independent third party. In addition, their suppliers are required to provide evidence of Slavery and Human Trafficking Statement before they are added to their approved supplier list. The supplier also has agreed key measures to track progress, ensure that the current processes in place are effective and to identify opportunities to improve further.

Low emission vehicles

34. The LFB has been developing a Zero-Emission Pumping Appliance (ZEPA) (fire engine) prototype via their Fleet Managed service providers. The original contract 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. 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 is a member of the Responsible Mineral Initiative and the Responsible Business Alliance and subsequent changes and replacements of battery during development of ZEPA have all fallen under the same contract requirements.
35. LFB 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 LFB'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, LFB's supplier is keen to understand market best practice for ethical sourcing and reflect this in future tender opportunities.

Training and measurement against KPIs

36. 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.
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 2024/25 45% of invited suppliers have completed the

assessment with an average score of 57.4%. In the year ahead, we will be working to launch a new MSAT campaign to re-evaluate supplier risk profiles, 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.

38. In order to assist with upskilling the supply chain to help manage shared risks, LFB invited relevant suppliers to Modern Slavery workshops run by the Supply Chain Sustainability School to assist them in completing the MSAT.
39. The LFB 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.
40. All relevant LFB commercial and procurement staff are to complete modern slavery training, such as the Home Office developed e-learning module. This year 30 LFB procurement staff completed in-person Responsible procurement training which covers ethical sourcing and modern-day slavery, and twelve staff have completed Modern slavery e-learning from the Home Office (to date). LFB staff from Sustainable Development participate in a pan-GLA Modern Slavery Working 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. 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. In the year 2024/25 2,507 employees completed the training. This training directs staff to reporting procedures in line with LFB safeguarding policies.

Action Plan for 2025/26

42. In 2025/26 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;

- Re-assessment of key suppliers using the UK Home Office Modern Slavery Prioritisation Tool (HOPT);
- Re-launching a new MSAT Campaign with those identified medium and high-risk suppliers identified through the HOPT. Inviting them to complete the MSAT and to achieve an MSAT score of a minimum 70 per cent by September 2026. Those suppliers that are lower scoring will be supported to obtain the necessary improvements to their scores, as well as aiming for 100% completion of the assessment by all relevant identified suppliers;
- 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.
- Identifying high priority areas for in-depth engagement with our suppliers;
- Action to enable full reporting to align with the GLA Group RP Delivery Plan (2025)
 - Specifically clause 2c – Promoting ethical sourcing practises
 - Developing a process for effective Human Rights Due Diligence (HRDD)
 - Use the Open Supply Hub ³

Signature - Jonathan Smith



London Fire Commissioner

Date 15/10/2025

³ Open Supply Hub is a free, open and accessible global supply chain map - <https://opensupplyhub.org/>