



## **Modern Slavery and Human Trafficking Statement**

Lancashire Fire and Rescue Service (LFRS) support the implementation of the Modern Slavery Act 2015. The Act consolidates slavery and trafficking offences, introduces tougher penalties and sentencing rules and provides more support for victims.

Modern slavery includes:

- Forced labour - Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence.
- Debt bondage - Victims are forced to work to pay off debts that realistically they never will be able to.
- Sexual exploitation; Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Adults are coerced often under the threat of force, or another penalty.
- Criminal exploitation - Often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick-pocketing against their will.
- Domestic servitude - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

LFRS will support this Act through:

- Staff training and education to support victim identification through
- Partnership Working in collaboration with relevant agencies and groups
- Adopting responsible procurement practices

### **Staff training and education**

The Service has developed an on-line training module for safeguarding, which incorporates Modern Slavery, and completion of the module is compulsory for all staff.

In the past we have commissioned training on modern slavery and exploitation for Community Safety and Fire Safety Enforcement teams.

## **Partnership Working**

The Service's Protection Strategy 2022-27 recognises the importance of developing partnerships to drive effective targeting. Modern Slavery is recognised in this context and identified as an area for further development.

LFRS fully supports and implements safeguarding policies 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.

LFRS 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 vulnerable members of the public as part of their normal duties, are aware of the issues associated with safeguarding those at risk is fully recognised.

Policies and associated training outline reporting procedures as well as how to store, process and share safeguarding information securely. All safeguarding referrals are quality assured by the Prevention Support Team to ensure consistency and high standards.

LFRS Protection Officers work closely with the fourteen District Council Authorities who have responsibility for Housing Standards, as well as other enforcing agencies such as Police and Border Force. This has led to LFRS participation in multi-agency operations where poor housing standards and links to modern slavery are suspected. Within the legal powers available to LFRS this has allowed Inspectors to take immediate action to reduce risk including the serving of enforcement and prohibition notices. LFRS operates a Risk Based Inspection programme which includes the facility for inspection activity to be based on intelligence provided by other agencies.

## **Adopting responsible procurement practices**

The Service takes responsibility to enhance its procurement practices with the aim to encourage fair pay and working conditions in our supply chain and to assist in the identification and elimination of modern slavery and human trafficking. The Service expects its suppliers to be aware of and comply with the requirements of the Act. The Service is committed to applying risk-based analysis principles that are proportionate to the subject-matter and size of the contract for new procurements, as well as the size of the supplier when assessing existing contracts, for the purpose of identifying and tackling modern slavery breaches.

The Service is also committed to eliminating modern slavery in its supply chains and sub-contracting arrangements, both during the procurement and contract management phases.

In applying this overall proportionate approach, we aim to ensure that barriers to participating in new procurements are not created and unnecessary burdens are not placed on organisations when assessing risks in existing contracts.

The Service will discharge its duties by undertaking the following activities:

- Informal review of the market and the supplier base as part of the pre-procurement process for the purpose of determining whether the subject-matter of the contract could give rise to modern slavery risks;
- Procurement strategies take into consideration modern slavery risks for the purpose of ensuring that the award criteria can be used to determine the winning supplier are capable of addressing modern slavery issues;
- Have in place appropriate procurement procedures set out within our Contract Standing Orders;
- All standard Contract Terms and Conditions have appropriate clauses that clearly set out the requirements of all Contractors, including sub-contractors / Supply Chain levels to enable Modern Slavery to be monitored as required during the lifecycle of the contract. Contractors are expected to commit to our Terms and Conditions, confirming that in performing their obligations to LFRS under the terms of their engagement they shall:
  - I. comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the U.K. Modern Slavery Act 2015 and ensure that each of its sub-contractors shall comply with the same.
  - II. Where the Modern Slavery Act 2015 does not strictly apply to the Contractor, the Contractor shall in any event take reasonable steps to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.
  - III. The Contractor shall, at the Authority's request, provide the Authority with a statement of such steps it has taken, together with such other information as the Authority may reasonably require in order to enable it to prepare a slavery and human trafficking statement.
- Ensure compliance with the Modern Slavery Act as a pass/fail on the Supplier/Selection Questionnaire (SQ) as part of Mandatory Exclusions;
- Require all Bidders as part of all tender processes to self-certify that they meet the requirements and confirm, where applicable, that their Organisation has a current Modern Slavery Statement in place that is published in line with the Government's requirements. Where not applicable, Bidders are required to confirm they have practices and processes in place within their organisation to prevent and manage risks associated with Modern Slavery and that these are managed and monitored throughout their supply chain;
- Require all bidders to commit to LFRS Supplier Code of Ethics in which we request that all Suppliers pledge to this Code of Ethics and sign to demonstrate their commitment in adhering to the 4 areas covered:-
  - I. Instil a culture of fairness, teamwork, engagement, accountability and enjoyment;
  - II. Have a written plan to work towards paying the Voluntary Living Wage. Promote fair contracts of employment, deploy recruitment and employment practices that identify and support talent, value diversity and promote aspiration, social mobility and supporting the elimination of Modern Slavery;

- III. Commit to the delivery of excellent working conditions, high ethical standards, positive health and wellbeing, training, development and reward opportunities for all;
- IV. Acting with integrity and transparency.

- During the contract management phase, the appointed Contract Manager will be responsible for recording, reporting and responding to suspected incidents of modern slavery in consultation with the Procurement Department and protecting, where required, Whistle Blowers;
- The Service, where feasible, will engage with suppliers to encourage the adoption and promotion of policies that ensure supply chains are free from slavery;
- The Service will ensure that its Procurement Professionals are either MCIPS qualified or working towards MCIPS ensuring that they are suitably qualified in relation to Procurement and Supply.

### **Action Plan**

In order to further enhance our approach in this area we will undertake the following:-

- Redesign LFRS' On-Line Safeguarding package;
- Provide additional training packages relevant to specific roles;
- Continue to develop targeting and delivery of prevention and protection activities through closer working with Gangmasters and Labour Abuse Authority, Police and Local Authorities.