



AVON
FIRE & RESCUE

Avon Fire & Rescue Service

Modern Slavery and Human Trafficking Statement



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1. Introduction

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. To tackle these crimes, the Modern Slavery Act 2015 was introduced.
- 1.2 The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015:
 - 'slavery' is where ownership is exercised over a person
 - 'servitude' involves the obligation to provide services imposed by coercion
 - 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered them self voluntarily
 - 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.
- 1.3 This document sets out the Authority's zero-tolerance approach to modern slavery, human trafficking, and all forms of servitude, forced and compulsory labour in all our business activities, including any of our supply chains.
- 1.4 The Fire Authority (FA) is committed to acting ethically and with integrity in all our business dealings and relationships. Avon Fire & Rescue Service (AF&RS) will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our Service, work activities and our supply chains. AF&RS will ensure our staff are sufficiently trained to identify risks when performing our front-line services. This overarching commitment is supported at the highest level and is used to ensure a harmonised and effective approach.
- 1.5 **Our People** – AF&RS will help protect our own employees, volunteers, and job applicants from becoming victims of modern slavery through fair recruitment practise, pay and conditions, and having support mechanisms in place such as access to whistleblowing. We will also teach everyone that works for us to spot signals of possible modern slavery as they perform their roles.



2. Modern Slavery Act, 2015

2.1 AF&RS supports 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.

2.2 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.

2.3 AF&RS will support this Act through:

- Supporting victim identification through staff training and education and refer when necessary.
- Partnership Working in collaboration with relevant agencies and groups.
- Private Sector engagement and responsible procurement practices.

3. Overview of Practice

3.1 The organisational structure.

The Fire Authority (FA)

The FA is responsible for ensuring that it delivers its services in accordance with the prevailing legislation, regulations and Government guidance and that proper standards of stewardship, conduct, probity, and professional competence are set and adhered to by all those working for and with the Authority. This will ensure the services provided to the people of Avon are delivered efficiently, effectively, and fairly and that public money is used wisely, is properly accounted for, and achieves optimum Value for Money.

- 3.2 The FA is committed to continuously improving its services to meet the needs of the public, reviewing, and developing what it does and consulting with the public about its activities on a regular basis. In discharging these responsibilities, the Authority is required to ensure that appropriate arrangements are put in place for the control and management of its business affairs, service performance, finances and for the management of the key risks the organisation faces.

3.3 Avon Fire and Rescue Service (AF&S)

The Service is led by the Chief Fire Officer / Chief Executive with the support of the Service Leadership Board (SLB), which consists of the most senior executive officers of the Service. The SLB has overall responsibility for the organisation's strategic direction, leadership and decision making. The Board considers strategic issues, finance, and risk. It also has overall responsibility for management of the organisation, the establishment of strategy, and both capital and revenue requirements. The SLB monitors and oversees Service operations, ensuring competent and prudent management, good governance, sound planning and suitable procedures for the maintenance of adequate systems of internal control and for compliance with statutory and regulatory obligations.

- 3.4 The Service Leadership Team (SLT) provides day to day leadership and management for the Service, overseeing a working environment which supports the effective achievement of goals and priorities (both operational and non-operational), maintains all necessary standards of compliance and good practice, and ensures that the Service is a great place to work. The SLT has delegated responsibility for developing and delivering against the Service Plan, as well as other supporting Service strategies, action plans and budgets.



3.5 Supply Chain Due Diligence and Risk management

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.

- 3.6 AF&RS 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.
- 3.7 AF&RS seek to apply 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.
- 3.8 We are also committed to eliminating modern slavery in its supply chains and sub-contracting arrangements, both during the procurement and contract management phases.

3.9 Effectiveness of current process, measurement against KPIs (Key Performance Indicators)

Key highlights of the work we have undertaken so far in reducing the risk of any slavery and human trafficking within our supply chain are set out below:

- Our internal Contract Procedure Rules set clear guidance about complying with the Modern Slavery Act.
- 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.
- 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 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.
- All standard tender documentation includes a pass/fail section relating to complying with the Modern Slavery Act 2015.
- Attended a number of training and webinar sessions in relation to modern slavery in supply chains.

3.10 During each financial year, we will deliver the following objectives which will further enhance the systems and controls that are already in place to ensure that Modern Slavery is not taking place within our supply chain:

- Ensure that members of the procurement team continue to undertake specific training related to modern slavery and human trafficking in supply chains as well as complete the annual CIPS (Chartered Institute of Procurement & Supply) (Chartered Institute of Procurement & Supply) Ethical Procurement module and test.
- Review our standard terms and conditions to ensure appropriate clauses are present and use bespoke clauses in relation to Modern Slavery Act when our standard terms are not used.
- Ensure we continue to implement and maintain effective controls to ensure that Modern Slavery is not taking place in our supply chain.

4. Safeguarding

4.1 Policies in relation to slavery and human trafficking - Safeguarding

Due to their operational activities and public engagement role in respect to fire safety and prevention, AF&RS also support and implement safeguarding policies (Safeguarding Policy) 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.

4.2 AF&RS 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.

4.3 Training and Business Fire Safety (BFS) 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.

5. Partnership Working

- 5.1 AF&RS embraces partnership working as a key enabler to achieving our mission to improve public safety through prevention, protection, response, and resilience; and to help us maintain an excellent service which is effective, efficient and value for money.
- 5.2 We work in partnership with a wide range of organisations, emergency services partners, local authorities, and the voluntary sector to support our activities Service-wide; including how we work together at incidents, how we use our estates, and how we support businesses and the people in our communities.
- 5.3 Our Collaboration Strategy and underpinning Framework outline the guiding principles for consideration when deciding to enter a new partnership arrangement, and the importance of shared values and ethics when looking to engage a new partner. We recognise that not every potential partner will align to our values and ethics, and our systems and procedures provide for thorough due diligence partner checks before a decision to engage is made.

5.4 Avon & Somerset Anti-Slavery Partnership

AF&RS is a member of the Avon & Somerset Anti-Slavery Partnership (ASP), a multi-agency partnership dedicated to supporting and enabling the discovery of, and response to, incidents of modern slavery in a multi-agency and collaborative way. The partnership provides a range of resources to help victims and professionals working in this field.

6. Action Plan

- 6.1 We will continue to review our approach to managing the risk of modern slavery and human trafficking in our supply chain and procurement processes.
- 6.2 We will review our risk minimisation approach to ensure that the real risks of modern slavery within the Service's supply chain are understood, considered, and addressed throughout the procurement cycle by:
 - Providing training to staff on key identifying factors of modern slavery and how to recognise this in the workplace.
 - Ensuring partners and suppliers have appropriate policies and ethical working practices when working with AF&RS.
 - Supporting key staff, contractors, and suppliers to better understand the real risks of modern slavery in the workplace, utilising support from ethical trade and labour services.

- Provide training across the Service as well as reviewing procurement approaches and training for relevant all contract managers within the Service.
- Attending the South West Partners in Procurement group to share best practice and collaborate across the South West in relation to modern slavery due diligence.
- Implementing Modern Slavery assurance through our high-risk contracts, particularly in relation to redevelopment of our estate, such as Bath and Weston-Super-Mare Fire Stations.
- Working alongside other agencies to improve how we assess supply chain compliance to Section 54 of the Modern Slavery Act 2015.
- Once resources are in place, engage with our key suppliers to better understand their actions to mitigate risk by using tools such as the Cabinet Office Risk Assessment Template and UK Government's Modern Slavery Assessment Tool (MSAT).
- Continuing to engage on the collaborative approach to ensure contractors and suppliers appropriately risk assess the labour conditions within the supply chain.
- Working with the Service Leadership Team to ensure specification changes to key contracts are operating in line with the Transparency code and the Service's Modern Slavery Statement.

6.3 We will continue to ensure, through our processes and procedures, that appropriate checks and considerations are made when looking to engage a new partner in a collaborative venture; including, but not limited to, their values, ethics, culture, recruiting practices and policies.

7. Contacts

[Modern slavery - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Modern slavery statements evaluation framework | Ethical Trading Initiative \(ethicaltrade.org\)](https://ethicaltrade.org)

[Slavery and human trafficking in supply chains: guidance for businesses - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Modern Slavery Act 2015 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)