LONDON FIRE BRIGADE

Modern Slavery Statement 2022/23

Sept 2023

Period Covered by this statement

1. This is the fourth 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 2022 – 31st March 2023 (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 office-holder 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 £123million across some 740 active suppliers in 2022-23. In July 2022, LFB had one of it's busiest days since World War II, tackling wildfires and protecting properties and lives, amid the high temperatures and heatwave.

6. The LFB as a public body, it 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 2022/23 statement on the Government's online modern slavery statement registry.

7. This statement outlines the actions that the 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

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, LFB crews have highlighted the cases, taken immediate action and worked with colleagues in the Fire Safety 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 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 Policy[1], 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 Code[2], 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 and shapes the work outlined in this Modern Slavery Statement. It commits LFB, as a member of the GLA Group, to:

[1] http://www.london.gov.uk/rp-policy
[2] https://www.ethicaltrade.org/eti-base-code

- 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 and the Supply Chain Sustainability School's Modern Slavery Learning Pathway by April 2023.

- 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 Ethical Sourcing Policy in place that was updated in 2020/21, 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 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 Act 2015.

16. The Ethical Sourcing Policy sets 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 Act 2015, Modern Slavery Act 2015 and International Labour Organisation conventions.

Polices in relation to slavery and human trafficking - safeguarding

17. Due to both 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.

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 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. The Public Contract Regulations 2015 provide for mandatory exclusion of bidders who have been convicted of an offence under the Modern Slavery Act 2015.[3]

21. 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.

22. 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.

23. 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.

[3] Regulation 57(1)(ma) PCR, inserted by the Modern Slavery Act (Consequential Amendments) Regulations 2015.

24. 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; *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*
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:	UK	Low skilled labour; migrant labour; agency labour;

	cleaning, catering and security services		
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: The Ethical Sourcing Policy assesses risks broader than the scope of the Modern Slavery Act, these are shown in ***italics***

25. 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[4], incorporating the core International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.

26. In addition, for key contracts in high-risk sectors suppliers will be asked to complete the Sedex[5] 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

27. 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 considered prior to finalising production

[4] https://www.ethicaltrade.org/eti-base-code
[5] https://www.sedexglobal.com/

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.

Category specific examples

Electrical equipment - ICT

28. 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 two recent Information Communication Technology (ICT) contracts identified as higher risk and continue to do so 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 breeches and remedying actual breeches and preventing their reoccurrence. Electronics Watch provided a report at the end of March 2021 that highlighted issues raised in an audit of the suppliers' factory associated with the Hardware Maintenance Support contract and initiated the prescribed process with the Responsible Business Alliance (RBA) to collaborate to investigate and remedy issues in specific factories. Electronics Watch have continued to work with the RBA to investigate in the last year and following engagement from EW affiliates (buyers) regarding concerns, the affected supplier has more recently been cooperating. One audit is due to be conducted at the end of May 2023 to follow up on highlighted issues, and followed by a semi-announced audit focusing on the issue of student labour. This process though protracted highlights the influence of EW members (or affiliates) including the GLA group.

Uniforms/ PPE

29. 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 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. Modern Slavery 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.

30. 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

31. 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. In an effort to ensure that those working on the LFB's estate, often via subcontractors, are not at risk of exploitation, Modern Slavery Assurance guidance, was produced in consultation with LFB Procurement and Property leads. This was implemented to support individuals in understanding how to embed modern slavery assurance requirements into the procurement process and assess contractual performance.

32. 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 and the principal contract has attended Modern Slavery awareness training events in 2022/23. 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

33. 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.

34. 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.

Low emission vehicles

35. The LFC issued a specification for a Zero-Emission Pumping Appliance (fire engine) prototype via their Fleet Managed service providers after many months of market engagement. The 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 prioritises high-risk minerals in human rights and the environment, and conducts due diligence on their suppliers, with a third party to ensure efficiency and objective management – including the publishing of all due diligence reports. They are also a member of the Responsible Mineral Initiative and the Responsible Business Alliance. In order to reduce Modern slavery risk and impacts, there are a number of scored questions within the tender documentation which suppliers must populate and one of these questions requests examples of Responsible Business and Employee activities. This can cover Welfare of Employees, Equality Policy, Colleague Volunteering, Community Investment, Ethical Sourcing, Anti Bribery Policy and SME (Small and Medium Sized Enterprises) Providers Payment Policy. It is also dictated that responses must include details on how battery components are sourced ethically.

36. LFC is also participating in Electronic Watch's Low-Emission Vehicle 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. The three-year programme aims to improve working conditions and strengthen workers voices in the supply chains of low emission vehicle batteries by applying the successful worker-driven monitoring model of Electronics Watch to the electric vehicle market. The model goes beyond traditional audit programmes to put workers and rights holders at the centre of monitoring activity, helping to gain a true understanding of working conditions in the supply chain.

Effectiveness of current process, measurement against KPIs

37. 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 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.

38. 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 2022/23 50% 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.

39. All relevant LFB commercial and procurement staff are to complete modern slavery training, such as the Home Office developed e-learning module.

40. 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 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

41. Seven LFB staff completed Responsible procurement e-learning which covers ethical sourcing and modern-day slavery this year and nine 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.

42. 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 2022/23 LFB invited relevant suppliers to Modern Slavery workshops via the Supply Chain Sustainability School and the Cabinet Office. Feedback has been positive and LFB will build on this engagement as we continue to rollout the MSAT and support suppliers to develop their practices, policies and processes.

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

Action Plan for 2023/24

44. In 2023/24 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 Procurement Policy Note 02/23 guidance on tackling modern slavery in government supply chains and the LFB Ethical Sourcing Policy to embed learnings from it into future procurements and/or approaches.
    - Continuing to roll out 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 redevelopments.
    - Including the Electronics Watch contract terms in relevant ICT contracts and managing compliance of those upon contract award.
    - 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, by

using tools such as the Cabinet Office Risk Assessment Template and UK Government's Modern Slavery Assessment Tool (MSAT).

- 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.
- Consider emerging ethical sourcing risks linked to Photovoltaic panel production and build into future procurement approaches and relevant policies.
- Engaging with the proposed Clothing and Uniform Board to ensure a further level of risk assurance, and that any specification changes are operating in line with the aims of the Ethical Sourcing Policy and avoid any additional risk due to specification, i.e. too bespoke, short turnaround etc.

Signature



Andy Roe

London Fire Commissioner

Date **11/09/23**