



Anti-Slavery and Human Trafficking Statement 2022/2023

1 Introduction

- 1.1 Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015 such as slavery; servitude; forced or compulsory labour and human trafficking, all of which result in the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain. Modern slavery and human trafficking is a crime and a violation of fundamental human rights.
- 1.2 As part of its Safeguarding approach, Cleveland Fire Authority has a zero-tolerance to slavery and human trafficking and all forms of corruption and bribery and will not deal with any business knowingly involved in modern slavery practices in any part of its operations.
- 1.3 The Authority is committed to the highest level of ethical standards and governance. It will act with integrity in all its business relationships and take all reasonable and practical steps to ensure compliance with Section 54 of the Modern Slavery Act 2015 in ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

2 Organisation structure

- 2.1 Cleveland Fire Authority operates across the whole of the Cleveland area (Teesside) providing community safety services to over half a million residents as well as those who work in or visit the region.
- 2.2 As a business, we operate from 6 wholetime fire stations, 2 wholetime and retained fire stations, 6 retained only fire stations, a Training and Administration Hub and a Technical Workshop.
- 2.3 For further details of our structure please visit our website at www.clevelandfire.gov.uk
- 2.4 The organisation spends around £5 million each year on the procurement of goods, services and works from a diverse range of suppliers. It is our public duty to ensure this money is spent in the most effective way whilst delivering value for money as well as making a firm commitment to ensure that our ethical practices to combat slavery and human trafficking are followed throughout our supply chains.
- 2.5 Our workforce is mainly employed on a permanent or temporary contract basis. Our recruitment processes include direct advertising on our website and use of reputable agencies.
- 2.6 All employees are subject to checks, including the verification of identity, references and evidence of qualifications where appropriate.
- 2.7 We have a dedicated Safeguarding Officer who is fully committed to the development of our Safeguarding arrangements by attending the 'Cleveland Anti-Slavery Network Meeting' which is a multi-agency forum.

- 2.8 We also support and have dedicated staff attending the Teeswide Safeguarding Adults Board (and its sub groups), and the various Local Safeguarding Children's Boards which ensures our involvement, awareness and continued access to a range of external training and information.
- 2.9 Modern Slavery and Human Trafficking are both referenced within several of our partner's procedures, eg Teeswide Safeguarding Adults Board (TSAB) and Local Safeguarding Children's Board (LSCB). These procedures have been communicated and made available to all our staff.

3 Business ethics and policies that cover Modern Slavery/Human Trafficking

- 3.1 The Authority's Modern slavery and human trafficking statement reflects our commitment to acting ethically, vigilantly and with integrity in all business relationships; and implementing and enforcing systems and controls that seek to ensure slavery and human trafficking is not taking place in any areas of our business or supply chains.
- 3.2 The Authority will not support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.
- 3.3 Any instances of non-compliance will be assessed on a case-by-case basis and remedial action tailored appropriately.
- 3.4 The Authority's corporate governance framework ensures that the Modern Slavery Act and its implications are embedded within all relevant corporate governance and organisational documents to ensure compliance and reduce potential risk (e.g., Transparency, Procurement, Recruitment/ Selection, Code of Conduct, Anti-Fraud and Anti-Corruption, Whistleblowing, and the Corporate Risk Register).
- 3.5 Modern Slavery and Human Trafficking is embedded into the Authority's Safeguarding Policy and associated procedures and communicated and available to all our staff.
- 3.6 The Authority continually reviews and strengthens the effectiveness of the organisation document framework in identifying and tackling modern slavery issues by ensuring appropriate reporting/review procedures are in place which includes our non-compliance process.
- 3.7 All documents are monitored in line with their review cycles or changes in legislative and/or operating practices.

4 Business risk

- 4.1 The three main areas of risk in relation to human trafficking and slavery within Cleveland Fire Authority are:
1. Supply Chain.
 2. Employment/Recruitment.
 3. Training/Community Safety
- 4.2 Sections 4.4 to 4.9 below highlight the work that has already taken place within each of the business areas highlighted within 4.1 above.
- 4.3 There are also new objectives for financial year 2022/2023 within each of the three business areas which demonstrates our ongoing commitment to mitigating any business risk relating to Slavery and human trafficking

Supply Chain

- 4.4 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 Anti-Slavery and Human Trafficking laws, statutes and regulations.
 - Our new Procurement strategy 2022 – 2026 will build on the platform we already have in place ensuring that we continue to implement and maintain effective controls to make sure that Modern Slavery is not taking place in our supply chain.
 - Our standard terms and conditions include a clause that the incumbent contractor must comply with the Modern Slavery Act 2015, when our terms and conditions are not used, compliance with the Modern Slavery Act 2015 will be a bespoke clause added to these individual contracts.
 - For all non-contracted spend of low value, our purchase orders detail the standard terms and conditions of business which includes a clause that the incumbent contractor must comply with the Modern Slavery Act 2015.
 - All standard tender documentation includes a pass/fail section relating to complying with the Modern Slavery Act 2015.
- 4.5 During financial year 2022/2023, 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 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) Ethical Procurement module and test.

- Implement phase two of our contract management framework ensuring high-risk areas of our supply chain which may be at risk of Modern Slavery undertake the governments modern slavery assessment.
- In line with the above, evaluate the responses using the governments assessment tool and put in place suitable mitigation procedures.
- Support and promote anti-slavery day on 18th October 2022 both internally and with our external partners.

Employment/Recruitment

- 4.6 Key highlights of the work we have undertaken so far in reducing the risk of any slavery and human trafficking within our employment and recruitment procedures is set out below.

All potential employees must satisfy the following checks prior to being appointed:

- Proof of eligibility to work in the UK in accordance with the Asylum and Immigration Act 1996.
- Declaration of any unspent convictions.
- Reference checks covering 3 years (when specified by CFB).
- Pre-employment Occupational Health Screening which includes drug and alcohol testing (not contractual for agencies).
- Basic Disclosure and Barring Service (DBS) check for all staff, other than specific roles which require an Advanced DBS Check (when specified by CFB).

- 4.7 During financial year 2022/2023, we will deliver the following actions which will further enhance the systems and controls that are already in place to ensure that Modern Slavery is not taking place within any of our employment and recruitment procedures.

- Although the use of employment agencies to supply staff to Cleveland Fire Brigade is the exception rather than the rule, we will continue to work with the Procurement team to ensure that any supplier to the Brigade has all necessary due diligence measures in place to ensure their responsibilities and overall compliance to the Modern Slavery Act. All GRI audits include a review of Modern Slavery processes, with any shortcomings reviewed and process improvements suggested (Copy of survey extract provided). As part of our commitment to Modern Slavery, GRI sponsor the Stronger Together and Responsible Recruitment Toolkit programs, and all supplying agencies are able to access free training, gap analysis tools and document libraries on these platforms through our sponsorship.
- We will also ensure that any employment agency understands our new requirement for all temporary staff and permanent staff to have as a minimum a Standard DBS Check.

Training/Community safety

4.8 Key highlights of the work we have undertaken so far in reducing the risk of any slavery and human trafficking within our training and community safety procedures is set out below.

- All staff who directly engage with members of the community have completed Level 1 Safeguarding training which is refreshed on a 3 yearly cycle, with modern slavery and human trafficking being part of this training.
- A Modern Slavery and Human Trafficking reference workbook is also available for all staff.
- New employees into the organisation complete the Level 1 safeguarding training development as part of their induction process.
- Our Fire Safety Auditors have received role specific Gangmaster & Labour Abuse Authority training to recognise the signs of Human Trafficking in business/commercial premises.
- 8 of our stations (6 wholetime and 2 wholetime and retained) are dedicated premises under the 'Safe Places' scheme for vulnerable person assistance.
- This scheme also has the potential of encompassing those fleeing from modern slavery or human trafficking, who may attend these premises as their first place of safety seeking escape.
- We operate a referral scheme through StreetLink which enables us to refer homeless people for support and encompass homeless caused by fleeing from modern slavery or human trafficking.
- The Brigade's Safeguarding Officer attends the Cleveland Anti-Slavery Network Meetings which is a multi-agency forum.

4.9 During financial year 2022/2023, we will deliver the following actions which will further enhance the systems and controls that are already in place to ensure that Modern Slavery is not taking place within any of our training/community safety procedures.

- All CFB staff with a community contact role will undertake a tailored organisational eLearning course on Modern Slavery via PDRpro.
- Support and promote anti-slavery day on 18th October 2022.
- Undertake a Quality Assurance Framework (QAF) process that is hosted by Teeswide Safeguarding Adults Board (TSAB).
- Monitor all policies and procedures in line with their review cycles or changes in legislative and/or operating practices.

5 Whistleblowing

- 5.1 Our staff and suppliers are encouraged to report any concerns they may have in relation to fraud, corruption or any other wrongdoing. Our Anti-Fraud and Anti-Corruption Strategy (whistleblowing) details how people can make disclosures without fear of retaliation.
- 5.2 Anti-Fraud and Anti-Corruption Awareness Training is undertaken on an annual basis with heads of departments and managers.
- 5.3 If you have any concerns about Modern Slavery or Human Trafficking taking place within our business (or supply chain) please contact the Safeguarding Officer via Fire Control on 01429 874060.

<https://www.modernslaveryhelpline.org/>

HELPLINE
08000 121700

6 Corporate commitments

- 6.1 In addition to the three business areas identified, the below demonstrates our ongoing corporate commitments.
 - To ensure “compliance with the Modern Slavery Act 2015” through the Corporate Risk Register and relevant Policies and Procedures ensuring appropriate reporting procedures are in place to report non-compliance
 - To enforce and ensure that effective governance systems and controls are in place to minimise the risk of modern slavery taking place
 - To act ethically and with integrity in all our business relationships
 - To continue to encourage our staff, Partners and suppliers to report any malpractice or wrongdoing in line with our Anti-Fraud and Anti-Corruption Strategy (whistleblowing)

This Statement is made under Section 54(1) of the Modern Slavery Act 2015 and constitutes Cleveland Fire Authority’s Anti-Slavery and Human Trafficking Statement for the financial year ending 31 March 2023.

COUNCILLOR PAUL KIRTON
CHAIR OF CLEVELAND
FIRE AUTHORITY

IAN HAYTON
CHIEF FIRE OFFICER
CLEVELAND FIRE BRIGADE

If you would like this Statement in another language, large print or braille, please contact communications@clevelandfire.gov.uk