



# Anti-Slavery and Human Trafficking Statement 2024/2025



## **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 are 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 wholtime fire stations, 2 wholtime 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](http://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 subgroups), 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, e.g. 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 2024/2025 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 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 within 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 2024/2025, 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 for 2024.
  - Continue to ensure that 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 2024 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.
  - Reference checks covering 3 years.
  - Pre-employment Occupational Health Screening which includes drug and alcohol testing.
  - Basic Disclosure and Barring Service (DBS) check for all staff, other than specific roles which require an enhanced DBS Check
- 4.7 During financial year 2024/2025, 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.
  - We will also continue to ensure that any employment agency understands our requirement for all temporary staff and permanent staff to have as a minimum a Basic 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.

- Staff who work in a community contact role have completed the Level 1 Safeguarding training for Adults and Children in line with the required training cycle. Modern slavery and human trafficking are a part of this training.
- New employees into the organisation who have a community contact role have completed 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 continue to be dedicated premises under the 'Safe Places' scheme for vulnerable person assistance. The scheme encompasses those fleeing from modern slavery and human trafficking. A self-Audit completed in line with the national safe places guidance highlighted excellent practice with clear policies and procedures.

- Our referral mechanism continues through the scheme StreetLink which enables us to refer homeless people for support and encompass homeless caused by fleeing from modern slavery or human trafficking. This was highlighted as good practice in the Brigade's quality assurance framework submission to the local adult safeguarding board (TSAB).
- Brigade representation continues at the Cleveland Anti-Slavery Network Meetings which is a multi-agency forum.
- CFB have undertaken the Quality Assurance Framework Self-Audit process that requires all board partner agencies to complete an audit tool on a bi-annual basis, this is essential to provide assurance back to the safeguarding Board. Cleveland Fire Brigade received submission feedback from TSAB following a group evaluation of the documents submitted. The group agreed with the overall rating of "green" based on the evidence submitted.
- CFB have completed the NFCC operational guidance for fire standards within the safeguarding remit. The Self-Assessment Toolkit is designed to enable fire & rescue services to carry out a snapshot review of the safeguarding practices. It was identified CFB are compliant with all aspects of the guidance and in a number of areas go above the required standard.

4.9 During financial year 2024/2025, 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.

- Support and promote anti-slavery day on Wednesday 18<sup>th</sup> October 2024.
- Further enhance the accessibility of support documents for staff in the remit of modern slavery and human trafficking with ongoing development of the tablets
- Monitor all policies and procedures in line with their review cycles or changes in legislative and/or operating practices.
- Continue to support the local and national safeguarding boards in the remit of safeguarding, specifically focusing on implementing lessons learnt from safeguarding reviews where modern slavery was present.

## 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 2024.

**COUNCILLOR DAVID COUPE  
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](mailto:communications@clevelandfire.gov.uk)