



West Yorkshire
Fire & Rescue Service

Modern Slavery Policy



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Reviewers

Name	Version Approved	Position	Organisation	Date
Alison Wood	1	Director of Finance and Procurement	West Yorkshire Fire and Rescue Authority	20/09/24

Equality Impact Assessment

Are the recommendations within this report subject to Equality Impact Assessment as outlined in the EIA guidance?: No

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Date EIA Approved: 4th September 2024

The EIA is available on request from the report author or from diversity.inclusion@westyorkshire.gov.uk

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Introduction

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. The Modern Slavery Act 2015 was introduced to tackle these crimes.

The definitions within the term 'Modern Slavery' for the purposes of the Modern Slavery Act 2015 are encompassed within the West Yorkshire Fire and Rescue Authority (WYFRA) [Modern Slavery Statement](#).

This document sets out the policy on the Authority's zero-tolerance approach to Modern Slavery, human trafficking and all forms of servitude and forced and compulsory labour in all its own business and relationships, and in any of its supply chain.

Scope

This Policy applies to all staff, volunteers and Members of WYFRA.

Supporting data

[Crown Commercial Service Procurement Policy Notice \(PPN\) 05/19](#)
[Section 54 of the Modern Slavery Act 2015](#)
[Nolan Principles - Principles of Public Life](#)
[Statutory Guidance regarding Modern Slavery](#)

Policy

The Authority is committed to acting ethically, with integrity and to implementing and enforcing effective systems, controls and procedures to ensure Modern Slavery is not occurring in its business, in any of its supply chain and ensuring sufficient training to identify risks is undertaken. This overarching commitment is supported at the highest level.

Our Customers – working with charitable organisations and our wider business partners to facilitate positive action on modern slavery.

Our Supply Chain – ensuring our contractors and suppliers adhere to Modern Slavery legislation to facilitate positive action on modern slavery.

Our People - Helping to protect our employees, volunteers, Members and job applicants (staff) from becoming victims of Modern Slavery through fair recruitment processes, pay and conditions, and having support mechanisms in place such as access to whistleblowing and an employee

assistance programme. All our staff will be provided with training to identify potential Modern Slavery issues.

The Code of Conduct, for our staff, is an endorsement of the Nolan Principles which outlines the ethical standards those working in the public sector are expected to adhere to. The Authority will, from the date of this policy, publish annually a Modern Slavery Statement, in accordance with section 54(1) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Legal consequences

This policy is in accordance with the [Procurement Policy Notice 05/19](#).

Section 54 of the Modern Slavery Act 2015 requires companies with an annual turnover above £36m, and carrying out a business, or part of a business in the UK, to develop a Modern Slavery statement, also known as a Transparency in Supply Chains statement, which is updated and published annually.

WYFRA, as a public sector authority, publishes their annual Modern Slavery statement on their website and includes actions taken in the previous financial year. The statement sets out the organisation structure and supply chain, evidences the Authority's policies, preventative and monitoring measures, set out how risks are identified and addressed within its supply chains as well as plans for continuous improvement.

The requirements of the statement are set out as six discretionary areas of reporting in sections 54(5) (a) to (f) of the Act and are mandatory inclusions;

- a. the organisation's structure, its business and its supply chains;
- b. its policies in relation to slavery and human trafficking;
- c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- f. the training about slavery and human trafficking available to its staff.

Training

Mandatory online safeguarding training is provided for all staff, which includes a section on Modern Slavery.

The training develops knowledge of how to identify the signs of exploitation providing scenario based questions to improve understanding of what it looks like in real life as well as the law in

regard to Modern Slavery. The training also provides information and learning on what to do if staff come into contact with a potential victim and explains the internal safeguarding process of how to escalate to a central point for making onward referrals. The training explores the risks to individuals who have been trafficked and enslaved and provides guidance as to what support is available through a multi-agency approach and different pathways for referral.

Records of who completes training is held in the Authority's learning management system and retained in accordance with the privacy notice on learning and development. The Authority aims to achieve completion of the training by 85% of staff within three months of the training being made available, taking into account new starters and leavers, and staff on long term sick leave.

Specific training is provided for members of the Procurement Team to further develop their skills and knowledge of how modern slavery risks can be addressed during the pre-procurement/specification, selection, award stages of a procurement process and throughout the contract management phase to ensure that all suppliers we engage with are fully compliant with the Modern Slavery Act 2015.

The Authority's zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Compliance with this Policy

The prevention, detection and reporting of Modern Slavery is the responsibility of everyone within the Authority. Individuals are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

The Authority encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken.

Individuals are encouraged to raise concerns about any issue relating to or in suspicion of Modern Slavery in any parts of our business or supply chain of any supplier tier at the earliest possible stage.

If it is suspected that a breach of this Policy has occurred or that it may occur, the individual must report to either their Line Manager or their Human Resources Business Partner.

If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they must raise it with the Head of Procurement as soon as they become aware.

Monitoring and review

The Authority's annual [Modern Slavery Statement](#) shall be approved by the Director of Finance and Procurement prior to publication each year. Publication of the statement must be no later than six months after the end of the financial year.

Each Modern Slavery statement must be dated with the financial year it refers to and be made public on the Authority's website including a link to the statement in a prominent place on the website's home page.

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