

Modern slavery statement 2022/23

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This statement sets out the steps taken during 2022/23 by West Yorkshire Fire and Rescue Authority (WYFRA), published in accordance with section 54(1) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including:

- Slavery - ownership of another person as personal property.
- Servitude - complete control over a person short of owning them.
- Forced and compulsory labour - work performed involuntarily due to the threat of punishment.
- Child labour illegal or exploitative - work performed by a child.
- Human trafficking - movement of people without their consent for the purpose of exploiting them.
- Bonded labour - forced work to repay a debt.

Our ambition

Sadly, modern slavery exists and is often hidden from sight and difficult to spot. The [2021 UK annual report on modern slavery](#) reports that since the Modern Slavery Act became law, in 2022, there were 10,454 offences of modern slavery recorded by the police in England and Wales. The COVID-19 pandemic played a part in increasing and creating new opportunities for human trafficking and, as the report sets out, is believed to have negatively impacted referral numbers as a result of the restrictions. Measuring the impact is difficult, so this number is probably much higher and increasing.

The conflict between Russia and Ukraine has forced many people from their homes, fleeing their war-torn country. Whilst there has been a huge global effort to support the innocent victims of the conflict, the reality is that many join the vulnerable people in society who are at risk.

Protection and prevention are vitally important to WYFRA. Together with our partners and suppliers, we take our responsibility to drive change seriously, empowering every member of staff

to act on any concerns they might identify working together towards freedom from slavery, persecution and exploitation.

This statement shares the actions WYFRA has taken so far and our commitment and intention to help combat modern slavery.

Who are we?

[West Yorkshire Fire and Rescue Authority](#) is the 4th largest Metropolitan Fire and Rescue Authority in the country serving a population of over 2.2m residents covering an area of 800 square miles, made up of the metropolitan areas of Bradford, Calderdale, Kirklees, Leeds and Wakefield, providing emergency cover 24-hours a day, 365 days a year. The area is diverse both in terms of topography and culture, providing cover for the major cities of Leeds and Bradford as well as the valleys in the Holme and Calder Valley, each providing differing challenges. WYFRA is traditionally a low-cost organisation having the fourth lowest precept at band D of all fire and rescue authorities in England and Wales and is proud of its record as a high performing service.

The Authority's activities are governed by the Home Office, legislative responsibilities as set out in the Fire and Rescue Services Act 2004, the Fire and Rescue Framework for England and by the WYFRA which has 22 elected Members from across the five above named local authorities.

The ambition of WYFRA is 'Making West Yorkshire Safer' and our priorities to achieve this ambition are;

- Plan and deploy our resources based on risk.
- Improve the safety and effectiveness of our firefighters.
- Promote the health, safety and wellbeing of all our people .
- Encourage a learning environment in which we support, develop, and enable all our people to be at their best.
- Focus our prevention and protection activities on reducing risk and vulnerability.
- Provide ethical governance and value for money.
- Collaborate with partners to improve all of our services.
- Work in a sustainable and environmentally friendly way.
- Achieve a more inclusive workforce, which reflects the diverse communities we serve.
- Continuously improve using digital and data platforms to innovate and work smarter.

WYFRA delivers the following services;

- Prevention - Raising awareness about the risks people face to prevent emergencies and reduce vulnerability.
- Protection - Promoting and enforcing the fire safety measures required by law to ensure buildings and occupants are protected.
- Response - Preparing for and responding to emergencies.
- Resilience - Being able to deal with major emergencies and disruptions locally and nationally whilst continuing to deliver our critical services.

WYFRA is committed to acting in a socially responsible way and to influencing others with whom we work to do the same. In accordance with the Social Value Act 2012, WYFRA considers social value in our decisions about how we spend our resources and in addition, we want to ensure that suppliers we work with have the potential to make a major contribution to delivering social value.

WYFRA is a National Living Wage employer which means:

- We are committed to paying all employees at least the National Living Wage and ensure that casual workers engaged directly by WYFRA are paid at least the National Living Wage;
- We ensure that we engage with suppliers encouraging them, as far as possible, to pay at least the National Living Wage to people delivering WYFRA contracts.

WYFRA employs approximately 1,400 staff working in our 40 fire stations, Headquarters and Service Delivery Centre locations, all playing their part in promoting safety and wellbeing across all the communities in West Yorkshire.

Due to our comprehensive Human Resources policies and processes for employing staff, WYFRA considers the risk of slavery, including forced labour, to be very low in our directly employed workforce. WYFRA's safeguarding policy and procedures are established to make sure the service helps to protect the safety and welfare of children and adults at risk. WYFRA has a safeguarding policy and guidance which includes activities that are undertaken to protect specific children, young people and adults who are suffering, or likely to suffer, abuse harm or neglect.

Staff are also mandated to undertake a DBS (Disclosure and Barring) check during onboarding and every three years thereafter.

Procurement

WYFRA's annual third party spend is circa £18m - £20m and may source a variety of goods and services from numerous countries worldwide (excluding Russia or Belarus) via our contracts. WYFRA considers issues such as equality, human rights, labour standards, environmental management and bribery and corruption seriously and remains clear regarding our expectations of Suppliers prior to entering into and throughout our contractual relationships.

WYFRA's Procurement Strategy reiterates our commitment to acting ethically, with integrity and to implementing and maintaining effective systems and controls to ensure that Modern Slavery is not taking place within our supply chain.

As part of its approach to risk, WYFRA uses the current standard selection questionnaire for managing relevant procurements. This enables an assessment of prospective bidders' credentials and the ability to determine whether they have breached their obligations in the field of social and labour law. Bidders convicted of certain modern slavery offences under the Modern Slavery Act 2015 within the last five years risk being excluded from public procurements, unless they can demonstrate that they have taken measures to remedy these failures and prevent their recurrence.

Our progress

WYFRA utilises an extensive supply chain to navigate the challenging landscape in terms of continuity of critical supply of goods and services required for our front-line. WYFRA provides greater transparency in our supply chains working closely with our Suppliers and our risk-based approach to due diligence is crucial. As a publicly funded organisation, WYFRA ensures absolute transparency in all of our purchasing decisions and practices.

We continue to work with our Suppliers to ensure that they are committed to providing training to their staff and their sub-contracted Suppliers on modern slavery risks and compliance.

Policies and controls

WYFRA is committed to the highest standards of openness, honesty and accountability. As such, the following policies and processes are in place:

- Modern Slavery Policy.
- SaySo reporting tool.
- Safeguarding Policy.
- Safeguarding Procedure.
- Whistleblowing Policy.

In the event that a modern slavery risk is identified, our Modern Slavery Policy provides links to comprehensive statutory guidance to ensure the appropriate action is swiftly taken.

Process and risk

WYFRA signposts staff to the process of raising a concern through guidance published on our internal systems, mandatory safeguarding training and posters that are on show in all of our buildings.

WYFRA includes obligations on our Suppliers by introducing modern slavery compliance clauses in contracts and relevant procurement projects. As a result our Suppliers are obligated to take steps to investigate and identify issues relating to the Modern Slavery Act and to notify WYFRA immediately if they become aware of any issues within their supply chains.

Training and awareness

All frontline staff, including control operators, complete a mandatory e-learning package. Completion is recorded in the internal Competency Dashboard system for operational staff and in the Learning Management System for support staff. Staff repeat the e-learning package every three years.

All other staff with advisory and decision-making responsibilities in the process receive face-to-face training every three years.

Collaboration and stakeholder engagement

Compliance and positive steps towards change relies on teamwork and our partnerships are integral for WYFRA in addressing modern slavery risks.

Key organisations and initiatives we continue to partner with are:

Partner	Who	Issues/Areas of work	Working together
The Salvation Army	24/7 support.	Modern Slavery Helpline available 24/7.	Support provided via the helpline if concerns are identified/further advice needed.
Gangmasters and Labour Abuse Authority	Non-Departmental Public Body set up to protect vulnerable and exploited workers.	Investigate reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision, as well as offences under the National Minimum Wage and Employment Agencies Acts.	Point of reference for knowledge, skills and experience in terms of all aspects of human rights abuse.
West Yorkshire Police	Emergency services partner.	First responders for modern slavery issues.	Sharing of information if detected to help trace individuals.
UK Fire and Rescue Services	Fire and Rescue Sector.	Sharing of information and learning.	Receipt of model template for Modern Slavery Policy for adopted sector wide.
SaySo	All staff.	Anonymous reporting tool for all staff.	Partnership with SaySo (from September 2022)

Looking ahead

Combatting modern slavery is important to WYFRA and it is everyone's responsibility to promote changing this distressing reality and that WYFRA can be a positive force to this cause.

WYFRA is committed to ensuring that there are no forms of modern slavery in our supply chains or business operations. It is our responsibility to continually improve transparency; to seek out, identify and resolve problems and risks; to regularly review our procurement practices; to collaborate with others to protect the rights of workers, particularly those who are most vulnerable to abuse such as modern slavery and continually review our efforts to ensure that we mitigate negative human rights impacts on vulnerable people in our supply chains. We must remain particularly aware of emerging risks and be alert to the dynamic nature of modern slavery.

Our commitments for the next year are to gain greater visibility throughout our supply chain. We will continue to take steps to implement our human rights due diligence processes, in line with all current and forthcoming legislation, ensuring that our contractual terms and conditions align to all relevant legislation and we will continue to work with our Suppliers to ensure that the stated procurement criteria on modern slavery are met. Our programme of training and awareness will

continue to be updated and delivered accordingly, ensuring that our staff remain fully aware of what they can do to help tackle modern slavery in their daily lives.

WYFRA is committed to working with not just our staff, but also with our suppliers, customers, other stakeholders and partners to continue to drive change and make modern slavery a thing of the past.

WYFRA intends during the next twelve months to:

- Review and risk assess our most important existing contracts and undertake random sampling of lower value requirements.
- Place a stronger emphasis on effective contract performance reviews.
- Focus on improvements that suppliers can make to their ways of working.
- Review new commercial agreements considering modern slavery risk management, assurance and prevention proposals.
- Review SaySo complaints and identify modern slavery considerations, taking appropriate action.
- Ensure the Procurement Act 2023 requirements in regard to Modern Slavery are met.