

Appendix A



MODERN SLAVERY STATEMENT

HAMPSHIRE AND ISLE OF WIGHT FIRE AND RESCUE AUTHORITY

MODERN SLAVERY STATEMENT

REVIEWED APRIL 2024

ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

1. Introduction

Modern slavery, which includes human trafficking, is the illegal exploitation of people for personal or commercial gain.

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015.

- 'Slavery' is where ownership is exercised over a person.
- 'Servitude' involves the obligation to provide services imposed by coercion.
- 'Forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily.
- 'Human trafficking' concerns arranging or facilitating of another with a view to exploiting them.

It can take various forms including:

- Domestic exploitation
- Labour exploitation
- Organ harvesting
- EU Status exploitation
- Financial exploitation
- Sexual exploitation and
- Criminal exploitation.

Hampshire and Isle of Wight Fire and Rescue Authority (the Authority) is fully committed to preventing slavery and human trafficking in its business activities and across its supply chains – and to being open and transparent about any specific instances of slavery identified.

In line with best practice, and in compliance with Section 54 of The Modern Slavery Act 2015 (The Act), this statement sets out the actions taken by the Authority to understand, prevent and address all modern slavery risks within its services (directly provided and commissioned) and supply chains.

The Authority recognises its legal duties under Section 43 of the Act, which states that specified public authorities (including local authorities) have a duty to cooperate with the Independent Anti-Slavery Commissioner. Specifically, this means that:

- The Commissioner may request the Authority to cooperate in any way that the Commissioner considers necessary for the purposes of the Commissioner's functions.
- The Authority must, as far as reasonably practicable, comply with a request made to it under Section 43.

The Commissioner's Strategic Plan identifies several priorities, including *best practice within partnership working*. The Authority demonstrates this through its membership of the Hampshire and Isle of Wight Modern Slavery Partnership, which takes a cohesive approach to addressing the risks of modern slavery and ensuring Hampshire and the Isle of Wight is a supportive place for victims and a hostile place for perpetrators of slavery.

2. Organisation and supply chains

Hampshire is a large county based in the South of England which covers an area of more than 1,400 square miles. The county is home to a population of 1.85 million dispersed across urban and coastal areas.

The Isle of Wight is an island off the south coast of England. Home to around 140,000 and with an estimated 2.5 million visitors annually. The Isle of Wight is the largest and second most populated island in England.

Hampshire and Isle of Wight Fire and Rescue Authority is a Combined Fire Authority consisting of Members from the Constituent Authorities of Hampshire County Council, Isle of Wight Council, Portsmouth City Council and Southampton City Council. The Authority spends around £99m a year on making life safer for our communities.

The Authority set out its strategic direction in the Safety Plan 2020-2025. The Safety Plan details five strategic priorities (Our Communities, Our People, Public Value, High Performance and Learning & Improving) which are our commitments to ensure we make Hampshire and the Isle of Wight safer.

In achieving its priorities, the Authority provides a diverse range of public services delivered both in-house, through external contractors and in partnership. Consequently, the Authority has an equally diverse supply chain. For full information on the Authority's structure and services can be found on the [website](#).

3. Country of Operation and Supply

The Authority operates in the United Kingdom, where data suggests incidents of modern slavery are growing in prevalence. For example, according to the [Government's UK Annual Report on Modern Slavery](#), 10,613 potential victims were referred to the National Referral Mechanism in the year ended September 2021. There were 253 potential victims identified in Hampshire and the Isle of Wight in the year ended June 2023. In this context, the Authority remains vigilant and will take all steps available to manage risks presented.

Any organisation that works with the Authority, i.e. partnerships and suppliers, particularly those which are covered by Section 54 of the Act, are expected to understand and comply with the Act's requirements.

The Authority's procurement and contract management activities help to ensure that it works with compliant organisations. In addition, suppliers are expected to carry out checks on their sub-contractors to ensure there is no slavery or human trafficking in their own supply chains.

4. Responsibilities

The Service's Executive Group is responsible for ensuring appropriate recruitment, employment and purchasing policies are in place and are reviewed as appropriate.

Directors are responsible for ensuring that robust risk assessments are undertaken across relevant service areas where there is deemed to be a risk of modern slavery, including human trafficking. Modern Slavery risks are identified and mitigated within Directorate Risk Registers, with high risks being escalated to the Organisational Risk Register as deemed

necessary.

Service managers are responsible for ensuring that policies and procedures - such as those relating to the recruitment of personnel or procurement of goods and services – are adhered to by staff.

It is the responsibility of all staff and Authority Members – including those directly employed by the Authority, agency staff and within commissioned services, to report any concerns regarding modern slavery.

5. Policies

The Authority has a wide range of policies and procedures in place which support its commitment to preventing and tackling modern slavery throughout its business operations. All policies are subject to robust assurance processes, are agreed by the relevant Board, and are reviewed on a regular basis to ensure they remain compliant and fit for purpose.

These include:

Employee code of conduct – The Authority expects the highest standards of behaviour and ethical conduct from its employees. The code sets out the standards expected of staff when representing the Authority. The code also applies to contractors, agency staff and volunteers. Any breaches are investigated, and action taken, as necessary.

Core Code of Ethics – The Service has adopted the Local Government Association's Core Code of Ethics and embedded the Code of Ethics Fire Standard. The Core Code provides a clear understanding to the public regarding the expected standards of professional behaviour of employees and the way in which they conduct their business. Its employees follow the fundamental principles set out within the Code which are designed to ensure that the Service operates according to corporate ethical business practices. It will also ensure that its policies, procedures and plans comply with the Code.

Authority Member code of conduct – The Authority expects the highest standards of behaviour and ethical conduct from its Members. The codes set the standards expected of Members when representing the Authority.

Values – the Authority has a set of Values which set the expectation in terms of behaviour of all staff, temporary workers, contractors, suppliers and Members. These Values; Showing Respect, Supporting Others, Everyone Playing their Part and Reaching Further, underpin everything we do.

Expectations of suppliers – The Authority requires its suppliers to provide safe working conditions and to treat workers with dignity and respect, and act ethically and legally in their use of labour. Violations of these expectations will lead to review and investigation and ultimately may lead to the termination of the business relationship if the supplier is found not to have taken appropriate corrective actions.

Pay – The Authority operates a job evaluation system which is objective and non-discriminatory and supports the principles of equal pay. The Authority pays nationally agreed pay frameworks which ensure all employees earn more than the UK minimum wage. Currently, these pay frameworks also ensure all employees earn more than the National

Living Wage.

Safeguarding - The Service has a responsibility to ensure that its employees and volunteers, many of whom encounter members of the public as part of their normal duties, are aware of and can initiate the appropriate actions to safeguard those at risk. The Service must also ensure effective systems are in place to prevent and protect vulnerable groups from harm, abuse and neglect including the associated risks of modern slavery. Training, policies, procedures and guidance notes are used to inform employees and volunteers working in safeguarding roles 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, trafficking, poor working conditions, child/criminal exploitation) to identify, report and share safeguarding information securely, without delay and in accordance with the overarching Hampshire, Portsmouth, Southampton and IOW Safeguarding Multi Agency Adults and Children Policies and Procedures.

Inclusion equality and diversity – Inclusion, equality and diversity are paramount to the Authority, and we vehemently uphold the principles outlined in the Equality Act 2010. Fostering strong, inclusive communities for all is fundamental to us, and we are resolute in our stance as an inclusive employer. We unequivocally state that any form of inappropriate behaviour that undermines our commitment to inclusivity will be met with swift and thorough investigation. Our Service culture prioritises respect, fairness and equal opportunity for all. Discrimination, harassment or any other actions that impede this will not be tolerated. The Authority's Equality Objectives set how we will support the aims of the Equality Act 2010, in our efforts to advance equality of opportunity, to ensure every person receives fair access and treatment in employment, service delivery and partnership endeavours.

Whistleblowing policy – The Authority is committed to the highest standards of openness, probity, and accountability. As such, employees, customers, and other business partners are encouraged to report any concerns related to the direct activities, or the supply chains used by the organisation. This includes any circumstances that may give rise to a heightened risk of modern slavery. The Authority will endeavour to resolve such concerns without the need to raise a whistleblowing complaint – however, it is also recognised that this is sometimes necessary. The whistleblowing procedure is designed to make it easy for people to voice serious concerns without fear of harassment or victimisation.

Agency workforce – The Authority uses a compliant route to market for all agency staff using the [Crown Commercial Services Temporary Labour Framework RM6160](#). This framework provides assurance under [RM6160-Full-Terms-and-Conditions-1.pdf](#) (crowncommercial.gov.uk) that all suppliers are compliant with Modern Slavery, Child Labour and Inhumane Treatments terms.

6. Due diligence and risk management

The Authority undertakes due diligence in both its recruitment processes, and when reviewing or taking on new suppliers.

Recruitment processes – The Authority has robust recruitment policies and processes in place which ensure that all prospective employees undergo immigration and pre-employment checks in line with the latest UK [guidance](#) on Right to Work Checks (e.g. can confirm personal identities and qualifications, are paid directly into an appropriate, personal bank account and can supply evidence of eligibility to work in the UK). Agency appointments are

subject to the same rigour.

Managing Supply Chains: The Authority takes a practical, risk-based approach to managing its supply chain by identifying key risk areas and working with suppliers to monitor and mitigate these where practicable. Contract management is devolved across the Service, and it is the responsibility of individual contract managers to undertake appropriate due diligence checks etc. These policies and the associated staff training provide clear guidance to the HIWFRS Safeguarding reporting procedure as well as how when taking on new suppliers.

As a Contracting Authority, the Service undertakes procurement in compliance with the UK Public Contract Regulations 2015. The Standard Selection Questionnaire (asked in all competitive tenders) includes a requirement to declare and evidence (where applicable) compliance with the Modern Slavery Act 2015.

The Authority's due diligence and reviews include:

- Requiring suppliers covered by the Act to self-certify that they comply with the Modern Slavery Act, as part of the tender process.
- Including provisions in all new contracts requiring compliance with the Modern Slavery Act and enabling contract suspension /termination in the event of a breach where deemed necessary.
- Introducing action plans/sanctions where areas of poor compliance and/or performance are identified.

7. Reporting suspicions of modern slavery

If the Authority, or any of its staff, suspects slavery or human trafficking activity (for children, young people and adults) either within the community or the organisation, then the concerns will be reported through the Service's Safeguarding Reporting Procedure. If slavery or human trafficking activity is suspected through its supply chain, it will be reported to Hampshire Constabulary via the Modern Slavery Helpline (08000 121 700).

The Authority is not a First Responder organisation for the purposes of the Modern Slavery legislation and therefore is unable to report concerns via the National Referral Mechanism (NRM). Therefore, when a concern is reported, the Authority will obtain confirmation from the Local Authority that a referral has been processed through the NRM or where consent not been provided, the appropriate 'Duty to Notify' arrangements have taken place.

8. Staff training and capacity building

Modern Slavery awareness training is included within our Level 1 Safeguarding training, (which all new green book staff are required to complete as part of their induction followed by three yearly refresher training). This training signposts staff to additional information within our published Safeguarding guidance.

Modern Slavery training is also embedded within our Level 2 Safeguarding training which is completed by personnel and volunteers who engage with members of the community as part of their role responsibilities.

All personnel who have procurement responsibilities are required to complete additional training specific to the identification of the risk of modern slavery within supply chains. This training is provided by the Home Office.

In addition to the HIWFRA training there is a separate modern slavery training package from the Hampshire and Isle of Wight (HIOW) Modern Slavery Partnership – this is available for all staff and volunteers to complete.

Further information about the modern slavery, its types and prevalence can be found on the [Hampshire and Isle of Wight Modern Slavery Partnership's webpage](#) on the Office of the Police and Crime Commissioner's website,

Signed:

Chair of the HIWFRA

Date:

Chief Fire Officer

Date:

Business Activities and Supply Chains

A wide range of business activities are undertaken by the Service across four Directorates, as summarised below:

Corporate Services – activities include Information Compliance, Business Support, Property and Facilities, Information Communications Technology and Operational Assets.

Policy, Planning and Performance – activities include Health and Safety, Risk Management, Policy, Performance and Assurance, Governance, Communications and Insights, Stakeholder Management and Strategic Partnerships.

Operations – activities include Community Safety (Protection and Prevention), Safeguarding, Operational Groups.

People and Organisational Development – activities include Human Resource Management, Learning and Development and Training.

The Authority are part of the **Shared Services Partnership** – activities include Occupational Health, Finance, Procurement, and the Integrated Business Centre (IBC)