

Greater London Authority Modern Slavery Statement 2022-23

This statement sets out the steps that we have taken to address the risks of slavery and human trafficking in our supply chains, pursuant to section 54 of the Modern Slavery Act 2015. It outlines the policies and processes we have in place; the areas we have identified as high risk; and the actions we have taken to mitigate such risks. This is our seventh such statement under the Act.

This statement is for:

- the Greater London Authority (GLA)
- Greater London Authority Holdings Limited (GLA Holdings) (a GLA subsidiary)
- GLA Land and Property Limited (GLAP) (a subsidiary of the GLA and GLA Holdings)

It covers the period 1 April 2022 to 31 March 2023, which is our financial year.

Our organisation and supply chains

The GLA is the strategic authority for London. It has a broad remit but specific responsibilities for spatial development, housing, environment, economic development, culture and health. In addition, the GLA has a general power to promote economic development and social development, and to improve London's environment.

The GLA has evolved since its inception, and as well as its strategic remit now has delivery powers in housing, land and regeneration. It also administers a devolved adult education budget.

The GLA Act and GLA (Specified Activities) Order require the GLA to channel all its commercial activities through a trading company, so as to create a level playing field with the private sector on tax. GLAP was established for this purpose. The GLA has also established an umbrella company – GLA Holdings – that allows for a tax group for accounting purposes, also encompassing other trading companies.

The procurement function of the GLA, and by extension GLAP and GLA Holdings, is managed by Transport for London (TfL) as part of a shared-service agreement. The GLA's Executive Director of Resources is responsible for overseeing the service delivered to the GLA by TfL; and, at TfL the supply chain is managed by the Procurement and Commercial (P&C) function, reporting to the Chief Finance Officer who in turn reports to the Commissioner of TfL.

The shared-service agreement allows us to take a common approach and joint action to address the risks of modern slavery in our supply chains.

The GLA Group annually procures about £9.5bn worth of products and services, of which the GLA, in 2022-23, spent over £106.98m on goods and services with 1175 suppliers. Our supply chains are generally simple and involve predominantly UK companies. Nevertheless, we do source goods and services from further afield from time to time, and we recognise the importance of taking appropriate steps to reduce the risk of modern slavery in our supply chains.

Policies in relation to modern slavery

In March 2021, the Mayor published the refreshed [GLA Group Responsible Procurement Policy](#). Its overarching goal is to enhance social value, while prioritising five objectives:

- improving supply chain diversity
- embedding fair and inclusive employment practices
- enabling skills, training and employment opportunities
- promoting ethical sourcing practices (including tackling modern slavery)
- improving environmental sustainability.

The Policy reflects best practice and demonstrates how our procurement activities meet legislative requirements, including the Modern Slavery Act 2015. It commits us to promoting ethical sourcing and addressing the risk of modern slavery by:

- adopting the nine provisions of the Ethical Trading Initiative (ETI) Base Code,¹ or equivalent, as the standard we expect of our suppliers to support working conditions that are legal, fair and safe
- adopting a risk-and-opportunity-based approach to identify contracts and areas of spend where there may be a high risk of poor working conditions, modern slavery, forced labour, human rights abuses, sourcing from conflict-affected areas, or negative impacts on security and crime
- seeking to improve transparency within the supply chain by working with suppliers, and in partnership with the ETI and Electronics Watch, to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

The Responsible Procurement Policy is supported by the [Responsible Procurement Implementation Plan \(RPIP\) 2022-24](#) which sets out the key actions required to deliver on the commitments of the RP Policy and helps shape the work outlined in this Modern Slavery Statement. It commits the GLA Group to:

- improve performance of key suppliers, and those assessed to be medium and to high risk, in eradicating the risks of modern slavery in their organisations and their supply chains by using a risk-based approach to utilise the Cabinet Office Modern Slavery Assessment Tool
- increase internal awareness and capability to address modern slavery risks for staff through training and learning including the Home Office developed e-learning module and the Supply Chain Sustainability School's Modern Slavery Learning Pathway by April 2023
- ensure all commercial development arrangements within the GLA Group require best practice modern slavery due diligence provisions to be undertaken by property development companies, consortia and suppliers
- collaborate with partner organisations, such as the Ethical Trading Initiative and Electronics Watch, to improve supply-chain transparency of the mining and manufacturing of minerals used in batteries for electric vehicles and state-sponsored forced labour risks, such as the treatment of Uyghur Muslims in China, in our supply chains.

To support the business in implementing the RP Policy and RPIP, TfL hosts the GLA Group's Central Responsible Procurement Team (CRPT) within its P&C function. The CRPT works with TfL, along with the wider GLA Group, to prioritise and deliver on the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery. The CRPT Chairs and co-

¹ www.ethicaltrade.org/eti-base-code.

ordinates a practitioner learning group to share best practice, emerging risks and ensure delivery of the RP Policy.

Risk assessment and management

The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers and those undertaking service contracts in sectors such as cleaning, catering, security and waste management, where low pay, migrant labour and/or indirect labour are prevalent.

The highest risks of poor working conditions and human rights abuses from our global supply chain are associated with the production and manufacture of electronic equipment, textiles and materials used by our staff (primarily technology for all staff and also corporate clothing for Facilities Management staff).

The principal spend categories for the GLA and its companies identified as having the highest risks of human rights abuses are as follows:

| Category | Corresponding source countries | Identified risks |
|--|----------------------------------|--|
| Construction | UK | Multi-tiered supply chains involving the use of labour agencies that could result in poor labour practices due to lack of transparency. Unethical practices including workers being charged unlawful or excessive recruitment fees, workers being misinformed about terms of employment, and the withholding of passports may take place. |
| Facilities management: cleaning, catering and maintenance services | UK | Agency and sub-contracted labour leading to potential lack of transparency on employment practices. |
| Electronic equipment | China, East Asia, Eastern Europe | Labour-intensive, often low-skilled work; mining of raw materials in high-risk countries. Poor labour practices including underpayment of wages; delayed payment or wage deductions; physical abuse; working excessive overtime; a worker's visa or permit being tied to a single employer; and financial penalties for early contract termination may take place. |
| Corporate clothing | South Asia, China | Risks include gender inequality; weak protection of workers' rights; poor labour practices including excessive overtime, underpayment or deduction of wages, financial penalties for leaving an employer, and structural integrity of factories. |

Due diligence

Through robust procurement and governance processes, including the use of a responsible procurement (RP) checklist for each tender in developing an approach to the market, TfL procurement staff can identify categories and contracts that are likely to present a high risk of human rights abuses and poor working conditions.

All relevant procurements include a question at supplier-selection stage on compliance with section 54 of the Modern Slavery Act 2015. TfL continues to include award criteria and contractual requirements in contracts where a significant risk of human rights abuses is identified.

TfL obtain assurances from directly through suppliers as part of the tendering process and then via online platforms such as the Supplier's Ethical Data Exchange (SEDEX), where independently verified audit reports of factories are assessed as part of the contract management processes.

TfL have undertaken a risk assessment of their supply chain and invited medium and high-risk suppliers to complete the Cabinet Office Modern Slavery Assessment Tool (MSAT). They held a supply chain engagement event to encourage completion of the MSAT and will use the results to work with our suppliers to improve their policies, practices and processes in preventing modern slavery in our supply chains.

TfL has reviewed the contract pipeline and undertaken work to include requirements in future contracts, with the expectation that the range of categories and number of contracts will increase as the approach continues to mature. Examples of good practice being followed are detailed below.

Contract management

Refit and refurbishment works at City Hall: as part of the supplier evaluation, bidders were required to outline their approach to identifying and managing the ethical sourcing risk in their supply chain's workforces.

Supplier engagement

This year, TfL continued the campaign to invite medium and high-risk suppliers to complete the Cabinet Office MSAT and used contract management to improve the response rate. These were TfL suppliers, but some of them also supply shared services to the GLA through the Collaborative Procurement Programme.

As of the end of the financial year, 51 suppliers have been invited with an 80 per cent completion rate, an increase from 50 per cent last year. TfL has set a Key Performance Indicator for all 51 suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status, by March 2024. To date, 61 per cent of those suppliers who have completed the MSAT have hit this threshold.

To support suppliers in meeting the target, in 2022-23 TfL arranged two modern slavery due diligence workshops with the Supply Chain Sustainability School, free of charge, for suppliers. These workshops trained suppliers in best-practice due diligence, risk assessment, supply chain mapping and other key areas to support any gaps in their MSAT responses.

Work has been undertaken to ensure all GLA suppliers deemed medium to high risk are invited to complete MSAT, as well as invited to training and supplier engagement events. In 2023-24 this exercise will be continued with GLA-specific suppliers.

As part of TfL's arrangement to provide procurement services to the GLA, the TfL team has engaged with solution providers on the Retrofit Accelerator for Homes Innovation Partnership to discuss the issue of Uyghur Muslim forced labour in the supply chains of polysilicon. Following the release of the 'In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains' report from Sheffield Hallam University, a presentation was given to the solution providers setting out an overview of the issues highlighted in the report. The solution providers will be encouraged to work on mapping their supply chains and work towards providing transparency and traceability of polysilicon.

In 2023-24, the Central Responsible Procurement Team (CRPT) are providing a bespoke three-hour workshop with the lead Modern Slavery Consultant from the Supply Chain Sustainability School to the solution providers to specifically address the complexities of forced labour risks in polysilicon supply chains. This will support providers on addressing this challenging and emerging issue and address the need for London's transition to a zero-carbon city be fair and just for workers in our supply chains.

Industry engagement

The CRPT continues to chair the pan-GLA Group practitioner learning group to share best practice and collaborate across the Group in relation to modern slavery due diligence. The group meets on a quarterly basis and has assisted with the roll out of the MSAT campaigns and sharing best practice from TfL's engagement with the Department for Transport modern slavery group and other industry bodies such as the ETI, Sedex and Electronics Watch.

The CRPT continues to utilise its networks to collaborate and share knowledge on socially responsible procurement, a key part of continuously improving our approach and sharing successes and challenges with our peers. In November 2022, the team presented to Electronics Watch affiliates on the TfL's progress on the Low-Emission Vehicle Programme as well as to the C40 Cities Network, attended by cities across, North and South America and Europe. The CRPT are also members of the International Working Group on ethical Public Procurement. Key learnings will be incorporated into future relevant procurements across TfL and the GLA Group.

Training and awareness-raising

To ensure that modern slavery and ethical sourcing risks are considered in the early stages of procurement when developing business cases and category management strategies, TfL delivers training for procurement and contract management professionals to refresh knowledge and awareness of RP. To date, more than 700 TfL procurement practitioners have completed Responsible Procurement training, ensuring those undertaking GLA procurements recognise and how to manage the risks of modern slavery in procurement.

Further to this, GLA staff responsible for engaging TfL Procurement and Commercial on procuring contracts for goods or services with a value over £25,000 are expected to complete the RP e-learning module, and to retake the training every two years.

TfL intends to continue to use its membership of the ETI and Sedex to maintain awareness of best practice and current developments; benchmark with other organisations; and externally verify this approach. The GLA will learn from TfL's approach.

Supply chain

Upskilling supply chains to help manage shared risks is a key priority, recognising that some suppliers are further on their journey than others. TfL continues to deliver workshops via the Supply Chain

Sustainability School to suppliers completing the MSAT and will be offering further support to high-risk contracts and suppliers.

Reporting

The Responsible Procurement Programme co-ordinates the TfL and GLA Group approach to promoting ethical sourcing practices and addressing the risks of modern slavery over the Mayoral term including metrics to monitor continuous improvement of internal capacity building and supply chain assurance.

The Programme requires each GLA Group organisation to report on the number of medium and high-risk suppliers who have completed the MSAT and the percentage of those who have met the threshold of 70 per cent.

The GLA will begin reporting in 2023 and an update will be included in next year's statement once the TfL risk assessment approach has been replicated with our full supplier base and those suppliers unique to the GLA have been invited to complete the MSAT.

Goals for 2023-24

In 2023-24 we will continue to improve and refine our approach to managing the risk of slavery and human trafficking in our supply chain. We will pursue the following goals:

Raise awareness: continue to raise awareness of modern slavery to staff across the GLA Group and across the supply chain.


Peer learning: TfL chair the pan-GLA Group practitioner learning group to share best practice and collaborate across the GLA Group in relation to modern slavery due diligence, and to continue to learn and share with the transport industry through TfL's representation on the DfT Modern Slavery Group.

State-sponsored forced labour: continue to collaborate with partner organisations such as the ETI and Electronics Watch to progress due diligence issues in our supply chains.


Approval of this statement

Enver Enver, Interim Chief Financial Officer approved this statement on behalf of the GLA under the standing delegation given via Mayoral Decision-Making in the GLA, and his responsibilities while the Executive Director of Resources post is vacant. His approval is given by virtue of the covering director decision and signature below.

The Boards of GLAP and GLA Holdings, at their meetings of 7 July 2023, considered a draft of this Statement, and resolved to authorise 'any Director' to approve the final version. This duty is conferred to David Bellamy, as a Director of both companies. His signature below also gives this effect for GLA Holdings and GLAP.

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Date: 25/09/2023
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Signature: 
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Date: 20/09/2023
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