

Greater London Authority Modern Slavery Statement 2023-24

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 eighth 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 2023 to 31 March 2024, 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. As at 31 March 2024, the GLA's Chief Finance Officer 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, in 2023-24, spent around £124.7m on goods and services with 1,029 suppliers.

A large proportion of GLA Group key suppliers are registered in the UK but many of their operations and supply chains are global. Some suppliers have complex supply chains with multiple tiers of sub-contracting and, in some cases, such as electronic equipment, there is little visibility of where products are made. Therefore, a risk-based approach is used, with expert advice from the [Ethical Trading Initiative \(ETI\)](#) and [Electronics Watch](#) where relevant, prioritising steps to achieve greater supply chain visibility where risks are highest, and recognising that workers in the lowest tiers of supply chains are often the most vulnerable.

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
- seeking to improve any poor supplier performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance where relevant.

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 (MSAT)
- increase internal awareness and capability to address modern slavery risks for staff through training and learning
- 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 groups of people at highest risk of being subjected 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.
Solar Panels	China	Reliance on manufacturing in China, with well documented state-sponsored forced labour practices, including in the Xinjiang region affecting the Uyghur population.

Waste Management	UK	Low paid and migrant labour can be common in the waste management industry; prevalence of subcontracting and agency work leading to lack of transparency on employment practices. High profile cases in the press against waste suppliers operating in the UK.
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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 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). Through membership of the Supply Chain Sustainability School, due diligence workshops have been held to improve suppliers’ policies, practices and processes in preventing modern slavery in GLA Group 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.

Industry engagement

The Central Responsible Procurement Team (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 quarterly 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 the approach and sharing successes and challenges with peers. The CRPT are also members of the International Working Group on Ethical Public Procurement. TfL’s Responsible Procurement Manager attended two meetings in 2023-24 where new working groups were formed to progress on policy, practice, and research in the field. Key learnings will be incorporated into future relevant procurements across TfL and the GLA Group.

Supplier engagement

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 2023-24, 44 suppliers have been invited, with an 89 per cent completion rate. TfL has set a Key Performance Indicator for all 44 suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status. To date, 56 per cent of those suppliers who have completed the MSAT have hit this threshold. Contract managers of those suppliers that have not completed the MSAT will continue to be informed of the importance of completion to TfL and the wider GLA Group during contract review meetings.

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, nearly 200 GLA staff have completed Responsible Procurement training, helping ensure those undertaking GLA procurements recognise how to manage the risks of modern slavery in procurement. 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.

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 including metrics to monitor continuous improvement of internal capacity building and supply chain assurance.

Goals for 2024-25

In 2024-25 we will continue to improve and refine our approach to managing the risk of slavery and human trafficking in our supply chain. The following goals will be pursued:

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 and wider London Responsible Procurement Network in relation to modern slavery due diligence.

External collaboration: TfL will continue to collaborate with partner organisations such as the ETI and Electronics Watch to address supply chain transparency and human rights due diligence issues, for example in the context of solar panels and zero-emission buses.

Supplier development: TfL will continue to raise awareness of modern slavery to our supply chain, assisting suppliers by providing workshops, resources, training materials and bidder briefings.

Approval of this statement

The Chief Finance Officer approved this statement on behalf of the GLA under the standing delegation given via Mayoral Decision-Making in the GLA, 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 11 July 2024, considered a draft of this Statement, and resolved to authorise 'any Director' to approve the final version. This duty is conferred to Tim Steer as a Director of both companies. His signature below also gives this effect for GLA Holdings and GLAP.

Signature: 

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Date: 10/09/2024

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Signature: 

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Date: 10/09/2024

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