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# Modern Slavery Statement 2023-2024

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Approved by	<ul style="list-style-type: none"><li>• SMT, 30 July 2024</li><li>• Audit and Risk Committee, 11 September 2024</li><li>• Noted by Board, 26 September 2024</li></ul>
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Senior owner	Head of Performance & Governance
Document owner	Corporate Performance and Governance Manager

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# Period covered by this statement

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Old Oak and Park Royal Development Corporation's (OPDC) financial year end occurs on 31 March. This statement covers the financial year 1 April 2023 – 31 March 2024.

## Introduction

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This is the Modern Slavery Statement produced by OPDC. As a public body, the Corporation is not required to produce a statement. However, to reflect good practice, in conjunction with TfL's Responsible Procurement Team based at Transport for London (TfL) and the Greater London Authority (GLA), we continue to complete an annual statement.

The Statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015](#), by setting out the steps that we have taken to address the risks of slavery and human trafficking in our supply chains. It outlines the policies and processes we have in place; and the steps taken to identify, prevent and mitigate the risks. This is OPDC's third annual statement to be published under the Act and relates to the period 1 April 2023 through to 31 March 2024.

## Our organisation and supply chains

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OPDC is a Mayoral Development Corporation (MDC), established by the Mayor of London, with a statutory objective to secure the regeneration of our area, which spans land across three London boroughs: Ealing, Brent, and Hammersmith & Fulham. Our area includes the vast Park Royal industrial estate, the Old Oak development area around the new High Speed 2 Old Oak Common station and the protected 67 hectares of parkland at Wormwood Scrubs. We are the statutory Local Planning Authority (LPA) for development in this area and we have land assembly, housing, and infrastructure delivery powers, including purchase powers.

OPDC is accountable to both the Mayor and our Board, who are appointed by the Mayor. Chaired by Liz Peace CBE, the Board includes three elected leaders from our host boroughs, industry experts, community engagement specialist and business representatives. There are three main committees that support our Board: the Planning Committee and the Audit & Risk Committee, and the Development, Investment, and Sustainability Committee.

The Mayor allocates our annual budget and we work closely with City Hall to ensure we are delivering the Mayor's priorities. The London Assembly, made up of 25 elected members, scrutinises our work and ensures that our policies, actions, and strategies are in the public interest.

The main procurement function at OPDC is managed by Transport for London (TfL) as part of a shared service agreement. OPDC's Chief Finance Officer is responsible for overseeing the service delivered to OPDC by TfL. At TfL, managing the supply chain sits in the Procurement and Commercial function, reporting to the Chief Finance Officer who in turn reports to the Commissioner of TfL.

The shared service agreement allows OPDC to take a common approach and joint action across the GLA Group to address the risks of modern slavery in our supply chains. We attend and take part in the GLA Group Responsible Procurement Forum on a quarterly basis, where we report on OPDC's actions and initiatives around responsible procurement.

TfL hosts the GLA Group's Central Responsible Procurement Team (CRPT), within its Procurement and Supply Chain function, to support the implementation of the Responsible Procurement [policy](#). OPDC works with the CRPT and TfL to prioritise and deliver the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery.

The OPDC procured about £7m worth of goods and services in 2023-24, with 137 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

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In March 2021, the Mayor published the refreshed GLA Group Responsible Procurement Policy and its associated Responsible Procurement Implementation Plan (RPIP). The RPIP sets out how the GLA and functional bodies (including TfL) will deliver the goals of the GLA Group RP Policy, between 2022 and 2024. 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, 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 labor, 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,
- seeking to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

The RP Policy is supported by the [Responsible Procurement Implementation Plan \(RPIP\) 2022-24](#) which sets out the key actions proposed to deliver on the commitments of the RP Policy and shapes the work outlined in this Modern Slavery Statement. It commits OPDC, as a member of 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 including the Home Office developed e-learning module and the Supply Chain Sustainability School's Modern Slavery Learning Pathway.
- Structure commercial development arrangements to ensure relevant GLA Group best practice modern slavery due diligence provisions are undertaken by property development companies, consortia and suppliers.

# Spend categories that present risks of human rights abuses

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The principal spend categories for the OPDC identified as having the highest risks of human rights abuses are as follows:

Category	Corresponding source countries	Identified risks
Construction	United Kingdom	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	United Kingdom	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.

Waste Collection	United Kingdom	High risk of modern slavery, with two thirds of modern slavery victims in the UK working in the waste industry. Low paid, often migrant labour; 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 and its effectiveness

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The main procurement function at OPDC is managed by Transport for London (TfL) as part of our Shared Service Agreement. 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 have undertaken a risk assessment of our 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 hosted two due diligence workshops through their membership with the Supply Chain Sustainability School. This will support 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 human rights 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*

This year, TfL's Central Responsible Procurement Team (CRPT), who support OPDC as part of a shared service agreement, continued to chair the pan-GLA Group practitioner learning group, the Modern Slavery Delivery Group, of which OPDC is a member, 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 groups and other external stakeholders such as 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. The CRPT are also members of the International Working Group on Ethical Public Procurement and advise OPDC on measures to take to ensure ethical sourcing in all relevant procurements.

# Training and awareness-raising

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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, contract management and on-site professionals to refresh knowledge and awareness of how to spot the signs of modern slavery, which OPDC avails of, where appropriate.

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 our approach. OPDC will work with TfL to ensure this best practice is highlighted to our staff and improvements to practices made as needed.

## Reporting, Key Performance Indicators, and Goals for 2024-25

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TfL's Responsible Procurement Programme co-ordinates the TfL and GLA Group, which includes OPDC, 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.

### Key Performance Indicators

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MSAT: All TfL suppliers who have been assessed to be high and medium risk, to complete the tool and achieve an MSAT score of a minimum 70 per cent by March 2024. We will work with lower scoring suppliers to support improvements to their scores and encourage more suppliers to complete the assessment.

### Goals for 2024-2025

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In 2022, in OPDC's first Modern Slavery Statement, we set out a number of goals for the organisation to work towards by 2024. In 2024-2025 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 OPDC and across the supply chain, committing to all OPDC staff completing TfL's Responsible Procurement training by March 2025. OPDC will be undertaking a risk assessment of our supply chain and invite medium and high-risk suppliers to complete the Cabinet Office Modern Slavery Assessment Tool (MSAT) for those suppliers that are not shared with TfL.

**Increase capability:** further upskilling of OPDC staff, on how to tackle modern slavery in



supply chains through the Home Office e-learning package, and on supply-chain transparency through engagement with Electronics Watch.

**Peer learning:** TfL host the practitioner learning group to share best practice and collaborate across the Group in relation to modern slavery due diligence, which OPDC will continue to attend.

Approval of this statement

Signature:

A handwritten signature in black ink, appearing to read 'D Lunts', with a large loop at the start and a stylized 'Lunts'.

David Lunts, Chief Executive Officer

Date:

02 October 2024