

Modern Slavery Statement 2024-2025

Approved by	<ul style="list-style-type: none">• Head of Governance, 20 August 2025• Audit and Risk Committee, 16 September 2025• Noted by Board, 25 September 2025
Changes from previous version	<ul style="list-style-type: none">• N/A – annual document
Review date	July 2026
Senior owner	Head of Governance
Document owner	Corporate Performance and Governance Manager

Period covered by this statement

Old Oak and Park Royal Development Corporation's (OPDC) financial year end occurs on 31 March. This statement covers the financial year 1 April 2024 – 31 March 2025.

Introduction

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 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 fourth annual statement to be published under the Act and relates to the period 1 April 2024 through to 31 March 2025.

Our organisation and supply chains

OPDC is a Mayoral Development Corporation (MDC), established by the Mayor of London, with the statutory purpose and powers to deliver the regeneration of the Old Oak and Park Royal Opportunity Area and deliver many thousands of new and affordable homes for Londoners. Established in 2015, OPDC is one of the largest regeneration schemes in the United Kingdom (UK), capitalising on the investment and connectivity enhancements created by High Speed Two's (HS2) Old Oak Common Station.

We are the statutory Local Planning Authority (LPA), and we have land assembly, housing and infrastructure delivery powers, including compulsory purchase powers that span three London Boroughs, Ealing Brent and Hammersmith and Fulham.

OPDC is accountable to both the Mayor and our Board, who are appointed by the Mayor. Chaired by Dame Karen Buck, the Board includes three elected leaders from our host boroughs, industry experts, those with community engagement experience and business representatives.

There are four main committees that support our Board: the Planning Committee and the Audit & Risk Committee, the Development, Investment, and Sustainability Committee, and the Governance and Nominations 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 (P&C) 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 responsible procurement. OPDC works with the CRPT and TfL Procurement & Commercial (P&C) to prioritise and deliver these commitments, including how we plan to promote ethical sourcing practices and address risks of modern slavery.

The OPDC procured about £8.7m worth of goods and services in 2024-25, with suppliers.

OPDC's procurement requirements are currently focused around technical advice and professional services as the organization prepares for comprehensive development at Old Oak. As such, modern slavery is not a significant risk for the Corporation at this time. Where risks have been identified, these are considered during procurement stage and assurance is sought from prospective partners and suppliers (see 'Due diligence').

Policies in relation to modern slavery

In July 2025, the Mayor published the refreshed GLA Group Responsible Procurement (RP) Policy and its associated Responsible Procurement Delivery Plan (RPDP). The RPDP sets out how the GLA and functional bodies (including TfL) will deliver the goals of the GLA Group RP Policy between 2025 and 2028 and includes metrics for quarterly and annual reporting to the Group. Its overarching goal is to enhance social value, while prioritising three objectives:

- Open up our supply chains to small and diverse-owned businesses
- Support skills and good work
- Improve the environment

GLA Group Responsible Procurement Policy and Delivery Plan

The RP Policy and Delivery Plan commits us to seek fair employment practices and promote ethical sourcing by:

- Integrating the Mayor's Good Work Standard¹ into relevant procurements;
- Requiring that all suppliers pay the London Living Wage;
- Adopting a risk and opportunity-based approach to identify contracts where there may be a high risk of human and labour rights abuses;
- Adopting the nine provisions of the ETI Base Code, or equivalent, as the standard we expect of our suppliers;
- Engaging with our medium and high-risk suppliers through the UK Cabinet Office's Modern Slavery Assessment Tool (MSAT);
- Improving any poor performance by suppliers as part of a process of continuous improvement, and achieving supply chain transparency;
- Seeking to contract with suppliers that recognise and respect the rights of freedom of association and collective bargaining; and
- Collaborating with relevant partner organisations, including Electronics Watch and the ETI.

¹ The Good Work Standard (GWS) is a free accreditation programme developed by the GLA in collaboration with London's employers, trade unions, professional bodies and experts. It is organised into four Pillars, which set the benchmark for good work. These are: 1. Fair pay and conditions 2. Engagement, voice and wellbeing 3. Skills and progression 4. Diversity and inclusive recruitment Businesses can achieve three different levels of accreditation: Foundation, Achievement and Excellence. Recognising that good pay is the foundation of good work, all levels require accreditation to the [Living Wage Foundation](#). More information about the programme can be found [here](#).

Due diligence

To address the human and labour rights risks in our supply chains, OPDC, through its shared service agreement with TfL's Procurement and Commercial (P&C) function, follow a Human Rights Due Diligence (HRDD) approach, as defined by the UN Guiding Principles on Business and Human Rights. Full details of our approach and action towards supply chain mapping, risk identification, prioritisation and management, and collaboration, can be found in TfL's annual [modern slavery statement](#).

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, 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, Electronics Watch, 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

TfL's Responsible Procurement Programme co-ordinates the TfL and GLA Group's 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

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 2025. We will work with lower scoring suppliers to support improvements to their scores and encourage more suppliers to complete the assessment.

Goals for 2025-2026

In 2025-2026 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 2026. 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: Continue to attend the TfL Responsible Procurement Forum and Modern Slavery Delivery 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:

David Lunts, Chief Executive Officer

Date: 19 September 2025