

# Greater London Authority Modern Slavery Statement 2024-25

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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 ninth 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 2024 to 31 March 2025, which is our financial year. The above two named subsidiaries are the only GLA subsidiaries that meet the turnover threshold set out in the Act.

## 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 Skills Fund.

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 2025, the GLA's Executive Director of Corporate Resources and Business Improvement is responsible for overseeing the service delivered to the GLA by TfL; and, at TfL the supply chain is managed by the Procurement & Commercial (P&C) function, which is led by TfL's Group Procurement & Commercial Director, who reports 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 2024-25, spent around £141.9m on goods and services with 985 suppliers.

## Policies in relation to modern slavery

A large proportion of GLA 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.

The commitment to respecting human and labour rights in operations and supply chains is enshrined at GLA Group level through [the Responsible Procurement \(RP\) Policy](#) and [Implementation Plan](#) (RPIP), under the themes of Fair and inclusive employment practices, as well as Ethical sourcing.

The RP Policy is a high-level strategic document setting out the GLA Group's ambitions and commitments for achieving continuous improvement in London through procurement. The RPIP sets out how the GLA and its functional bodies will deliver the goals of the Policy and includes metrics for quarterly and annual reporting to the Group. The specific provisions contained in the Policy and the RPIP most relevant for this Statement are summarised below. Both the Policy and RPIP will be updated in the 2025-26 financial year, with the involvement of GLA colleagues as appropriate.

### ***GLA Group Responsible Procurement Policy and Implementation Plan***

The RP Policy and Implementation Plan commits the GLA Group to seek fair employment practices and promote ethical sourcing by:

- Integrating the Mayor's Good Work Standard\* in 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 Ethical Trading Initiative](#), 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.

\*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 be accredited at Achievement or Excellence. Recognising that good pay is the foundation of good work, accreditation by the [Living Wage Foundation](#) as a Living Wage Employer is a first step to accreditation to the GWS. More information about the GWS can be found [here](#).

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 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-ordinates a practitioner learning group to share best practice, emerging risks and ensure delivery of the RP Policy. Within the GLA, the Economic Fairness team provides policy leadership on responsible procurement to ensure the policy fully reflects wider priorities for economic fairness.

## 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, the TfL procurement staff who provide the GLA with a shared procurement service can identify categories and contracts that are likely to present a high risk of human rights abuses and poor working conditions.

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.

Further detail on TfL Procurement & Commercial (P&C) function's due diligence can be found in the TfL 24-25 Modern Slavery here: <https://content.tfl.gov.uk/tfl-modern-slavery-statement.pdf>

### *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, and textiles and materials used by our staff (primarily technology for all staff and also corporate clothing for Facilities Management staff).

### *Risk identification, prioritisation and mitigation - 2024-25 examples:*

#### *1. Refit Framework*

In 2024-25, the GLA initiated the tendering process for the fifth iteration of the Refit Framework. This framework provides energy performance contracting across all sectors in England, Wales, Scotland and Northern Ireland, supporting public, private, and third sector organisations — including charities and churches — to implement energy efficiency, local energy generation, and decarbonisation measures across their estates and buildings. The new framework is expected to be awarded at the end of 2025 and will run for four years, with the option for individual call-off contracts to extend beyond the duration of the framework. While the GLA manages the framework, call-offs are managed by individual contracting authorities, such as London boroughs.

This framework plays a central role in delivering a green transition. As part of its broader climate and social justice commitments, the GLA is focused on ensuring that this transition is not only environmentally sustainable but also fair and inclusive — a just transition. That also means recognising and addressing the human and labour rights risks that may arise in the supply chains of goods and services used to decarbonise buildings and infrastructure. These risks can include exploitative labour

practices in the production of solar panels, batteries, and other clean energy technologies, as well as poor working conditions in construction and maintenance services.

Given the wide scope of the framework, the Invitation to Tender (ITT) included a human rights due diligence question that addressed the full spectrum of potential risks, encouraging bidders to take a comprehensive view of their supply chains and potential risks within them. It asked about their supply chain mapping activities, risk assessment and risk mitigation practices.

## *2. Crystal Palace National Sports Centre Redevelopment*

The GLA is leading the redevelopment of the Crystal Palace National Sports Centre, a core GLA asset. The project is being delivered through a call-off under an existing framework, which includes a mandatory 10 per cent weighting for social value, including human rights considerations. The redevelopment includes the refurbishment of the sports centre.

In 2024-25, the GLA initiated Stage 1 of the redevelopment with a supplier appointed under a pre-construction services agreement to complete the design and surveys. The intention is that this is followed by a construction agreement, subject to satisfactory performance in the first phase. The procurement process included questions on risk identification and management, employment and skills, ensuring equality, diversity and inclusion, measuring impact, ethical sourcing (human rights and labour force) and supply chain payment.

### *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 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 GLA is a member of the practitioner learning group.

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. TfL are also members of the International Working Group on Ethical Public Procurement (IWGEPP), a group that brings together different stakeholders working on ethical public procurement, including practitioners, policymakers and researchers. In 2024-25, meetings of the Practice sub-working group were attended, to share and discuss the different approaches to Human Rights Due Diligence (HRDD) among participants. This has been very useful in shaping TfL's approach to risk assessment and management.

As part of the IWGEPP, TfL also started organising 'clinic' sessions, creating a forum to discuss practical challenges on upcoming tenders, including on risks related to specific industries, and best approaches to contract management. Three sessions were held in 2024-25.

## **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, 207 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, SEDEX and Electronics Watch, 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 2025-26

In 2025-26 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 modern slavery delivery learning group, which GLA officers sit on, 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.

**Workers' rights and collective bargaining:** TfL will also identify opportunities to engage with workers and independent, legitimate worker representatives and, in collaboration with Electronics Watch and the Freedom of Association Working Group, take substantive action to address risks to freedom of association and collection.


Approval of this statement

The Executive Director of Corporate Resources and Business Improvement approved this statement on behalf of the GLA under the standing delegation given via Mayoral Decision-Making in the GLA. Their approval is given by virtue of the covering director decision and signature below.

The Boards of GLA Holdings and GLAP, at their meetings of 7 July 2025, 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.

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Date: 22 December 2025  
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Signature:   
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Date: 22 December 2025  
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