

REQUEST FOR DIRECTOR DECISION – DD2824

Modern Slavery Statement 2025-26

Programme: Supporting Londoners To Benefit From Growth

Executive summary:

The Modern Slavery Act 2015 (the Act) requires “commercial” organisations to prepare a slavery and human trafficking statement every year. This must set out the steps taken to ensure their supply chains are free from slavery and human trafficking.

Two of the GLA’s subsidiary companies – Greater London Authority Holdings Limited, and GLA Land and Property Limited – are captured by the requirement in the Act. They have prepared a modern slavery statement every year since 2016. One statement covers both companies, as well as the GLA. The statement has been updated for the financial year 2025-26.

The statement was also approved by both companies at their general meetings on 29 September 2026.

Decision:

That the Executive Director of Corporate Resources and Business Improvement approves the GLA adopting the appended 2025-26 Modern Slavery Statement – noting that GLA Holdings Limited, and GLA Land and Property, adopted the same statement at their general meetings on 29 September 2026.

AUTHORISING DIRECTOR

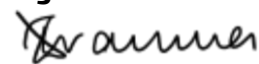
I have reviewed the request and am satisfied it is correct and consistent with the Mayor’s plans and priorities.

It has my approval.

Name: Dianne Tranmer **Position:** Executive Director of Corporate Resources and Business Improvement

Signature:

Date: 29 September 2026



PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

The Modern Slavery Act 2015

1.1. The Modern Slavery Act 2015 (the Act) was designed to eliminate slavery, servitude, forced or compulsory labour, and human trafficking (modern slavery) in organisations and their supply chains. As per the Act, this is done by:

- (i) increasing transparency as to what steps, if any, any organisation is taking to combat slavery and trafficking
- (ii) consolidating criminal offences for slavery and trafficking
- (iii) remedying victims
- (iv) providing for greater identification and reporting of slavery and trafficking
- (v) creating new civil sanctions
- (vi) creating an Independent Anti-slavery Commissioner.

1.2. One of the main provisions of the Act, relating to (i) above, is section 54. This requires every “commercial” organisation that carries on business in the UK, and has a total annual turnover of at least £36 million, to produce a modern slavery statement. The statement must cover the previous financial year – and so must be refreshed annually. Government guidance is that it should be published:

- as soon as possible, once each financial year has ended
- no more than six months after the end of that financial year.

It should describe what action the organisation has taken to ensure their supply chains are free from modern slavery. It must be published on the organisation’s website; and there must be a link on its homepage.

The GLA’s modern slavery statement

1.3. This decision proposes adopting the same approach this year as in previous years: that the GLA adopts one statement covering itself and two of its companies: GLA Holdings, and GLA Land and Property Limited (GLAP). The GLA is not a commercial organisation; but, for the Act’s purposes, GLA Holdings and GLAP both are. This reflects the priority the GLA places on tackling modern slavery; and how the three entities’ objectives and functions are all connected. The GLA has assessed whether a statement is required for its other subsidiaries; it has concluded that this is not the case, on the basis that either:

- their respective turnovers do not meet the threshold required for issuance of a modern slavery statement
- in the case of London Stadium LLP, they make their own arrangements to publish a statement.

1.4. The GLA’s statement remains closely aligned with that adopted by Transport for London (TfL) and its subsidiaries. The logic for this is that the GLA’s procurement function is provided by TfL – and the main focus of the statement is tackling modern slavery in supply chains. Members of the GLA Group also share a [Responsible Procurement and Social Value Policy](#), published in July 2025. Under the

commitment to promote 'skills and good work', the policy seeks to promote ethical sourcing; and address risks of human and labour rights abuses in our supply chains, including modern slavery.

- 1.5. The Responsible Procurement Policy is supported by a GLA Group Responsible Procurement Delivery Plan 2025-28. This sets out the key actions required to deliver on the Responsible Procurement Policy's commitments; and helps shape the work outlined in this and TfL's Modern Slavery statements.
- 1.6. The content of the statement is not prescribed in legislation; and the government's guidance does not specifically recommend any approach. The GLA has chosen to structure its statement in a way that resembles that of TfL – given that all procurement, other than low-value procurement, is provided by TfL under a shared service. The statement describes:
 - the purpose of the GLA and its companies; and the nature of their supply chains
 - the policies and procedures in place to reduce the risk of modern slavery in supply chains
 - due diligence arrangements in procurement governance
 - training and awareness-raising
 - goals for 2026-27.
- 1.7. The draft TfL Modern Slavery Statement, which the GLA statement draws on, was approved by the TfL Board on 23 September 2026. The Board authorised the TfL General Counsel to agree the final form of the statement.

GLA Holdings, GLAP and GLA approval

- 1.8. The Boards of GLAP and GLA Holdings approved the appended statement at their general meetings, both held on 29 September 2026. The Executive Director of Corporate Resources and Business Improvement is asked to agree the statement for the GLA by virtue of this decision, under the powers conferred through the General Delegation set out in Mayoral Decision-Making in the GLA.

2. Objectives and expected outcomes

- 2.1. Publishing a modern slavery statement will:
 - meet legal requirements falling on the GLA and two of its companies
 - show the GLA's commitment to tackling modern slavery
 - reinforce the GLA's approach to tackling modern slavery.
- 2.2. The Act requires the statement to be published on each company's website; their homepages must contain a prominent link to the statement. The GLA has its own website (london.gov.uk); but neither GLAP nor GLA Holdings have one. The statement will therefore, as previously, be published in the 'Governance and Spending' section of the GLA website.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010 (Equality Act), the Mayor and the GLA must comply with the public sector equality duty (PSED) by having due regard in the exercise of our functions to the need to:

- eliminate unlawful discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a relevant protected characteristic and those who do not.

3.2. The relevant protected characteristics under section 149 the 2010 Act are: age, disability, gender reassignment, pregnancy and maternity, marital or civil partnership status, race, religion or belief, sex, and sexual orientation. Compliance with the duty may involve ensuring people with a protected characteristic are provided with all the opportunities that those without the characteristic would have.

3.3. The Mayor is required to comply with the PSED when taking this decision. This, in broad terms, involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

3.4. The driving purpose of the statement is to show our commitment, and reinforce our approach, to tackling modern slavery. Individuals with protected characteristics are disproportionately likely to be subject to modern slavery; and so the statement explicitly promotes equality, and fosters good relations, between those groups.

4. Other considerations

Key risks and issues

4.1. There are no significant risks that will flow from taking this decision. Indeed, adopting the statement will remove the risk of the GLA not being compliant with section 54 of the Act; and reduce the (already low) risk of modern slavery in the GLA, and in its companies' supply chains.

Links to Mayoral strategies and priorities

4.2. Adopting a modern slavery statement supports a number of London-level outcomes, including that Londoners are treated fairly and with dignity; and that Londoners have access to good work.

4.3. Adopting the statement is one of the responsible procurement initiatives that makes a contribution towards the Mayor's Good Work Standard.

4.4. There are no conflicts of interest to declare from any of those involved in the drafting or clearance of this decision form.

5. Financial comments

5.1. There are no direct financial implications in respect of this decision.

6. Legal comments

6.1. As the requirements of the Modern Slavery Act 2015 relate to GLA's workforce and its supply chain, it is appropriate for approval of the statement to be given by the Executive Director of Corporate Resources and Business Improvement, given their areas of managerial responsibility.

- 6.2. It should also be noted that – in addition to publication of the statement referred to above – local authorities (including the GLA) are required, by section 52 of the Act, to notify the Secretary of State upon developing reasonable grounds to believe that a person may be a victim of slavery or human trafficking. Vigilance in this regard is therefore required.

7. Planned delivery approach and next steps

- 7.1. Next steps are below:

Activity	Timeline
Publish Modern Slavery Statement 2025-26	On approval of this form; and after the relevant company meetings on 29 September 2026
Review and refresh for 2026-27	Spring/Summer 2027

Appendices and supporting papers: Appendix 1: Draft Modern Slavery Statement 2025-26

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES

If YES, which programme/s does this fall within: Supporting Londoners to Benefit From Growth

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? YES/NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Andrew Nathan has drafted this report in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service:

Michelle Wells has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 28 September 2026.

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

Fay Hammond

Date 29 September 2026