

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2385

Title: Modern Slavery Statement 2018/19

Executive Summary:

The Modern Slavery Act 2015 (the Act) requires “commercial” organisations to prepare annually a slavery and human trafficking statement setting 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 (GLA Holdings) and GLA Land and Property Limited (GLAP) – are captured by the requirement in the Act and have prepared an annual Modern Slavery Statement since 2016. One statement covers both companies and the GLA also. The statement has been updated for the financial year 2018/19.

The two companies have already reviewed a draft and passed a resolution to delegate authority to any Director to approve the final version. It now needs to be signed by the Executive Director to give it effect for the GLA, and for him to exercise that delegated authority as a Director of both GLA Holdings and GLAP.

Decision:

That the Executive Director of Resources approves:

- i. the adoption by the GLA of the appended 2018/19 Modern Slavery Statement;
- ii. the adoption by GLA Holdings and GLAP of the same statement, in accordance with the delegation provided at the Board meetings of both entities on 12 June 2019.

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: Martin Clarke

Position: Executive Director of Resources

Signature:



Date:

13.08.19

Tom MIDDLETON on BEHALF OF MARTIN CLARKE

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 was designed to eliminate slavery, servitude, forced or compulsory labour and human trafficking ('modern slavery') in organisations and their supply chains 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; and
 - vi. creating an Independent Anti-slavery Commissioner.
- 1.2. One of the main provisions of the Act, relating to (i) above, is section 54 that requires every organisation carrying on a business in the UK with a total annual turnover of £36m or more to produce a modern slavery statement. The statement must cover the prior financial year – and so be refreshed annually – and Government guidance is that it should be published as soon as possible and no later than within six months of 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 and must be published on the organisation's website with a link from its homepage.

The GLA's Modern Slavery Statement

- 1.3. It is proposed to adopt the same approach this year as in previous years: that the GLA adopts one statement covering the Authority (though not commercial in of itself) and two of its companies: GLA Holdings Limited and GLA Land and Property Limited (which are commercial for the purposes of the Act). This reflects the priority the GLA places on tackling modern slavery and the interconnectedness of the objectives and functions of the three entities. The GLA has assessed whether a statement is required for its other two subsidiaries and concluded that one is not. Since London Treasury Limited and SME Wholesale Finance Limited do not procure goods, certainly not at scale or where there are risks of modern slavery, there would not be value in expanding the remit of the GLA's statement to incorporate these two subsidiaries.
- 1.4. The GLA's statement continues to be closely aligned with that adopted by Transport for London 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. In addition, the GLA Group shares a Responsible Procurement Policy and this provides for further alignment in practices. The Policy, first adopted in June 2006 and updated in June 2017, has six themes including 'promoting ethical sourcing practices'.
- 1.5. The content of the statement is not prescribed in legislation and the Government's guidance does not detail a recommended approach. The GLA has chosen to structure its statement so it describes:
 - i. the purpose of the GLA, its companies and the nature of their supply chains;
 - ii. the extant policies and procedures to reduce the risk of modern slavery in supply chains;

- iii. spend categories that present risks of human rights abuses;
 - iv. due diligence arrangements;
 - v. training and capacity building; and
 - vi. goals for 2019/20.
- 1.6. The proposed format and content of the 2018/19 statement is broadly in line with previous statements and has drawn on the TfL statement, which was approved by their Board on 24 July 2019.

About GLA Holdings and GLAP

- 1.7. GLA Holdings and GLAP were established in January 2012 (see MD937) to facilitate compliance with the Localism Act 2011; and specifically concerning the commercial activities of the Homes and Communities Agency in London, the London Development Agency and the London Thames Gateway Development Corporation, which were devolved to the Greater London Authority (GLA) on 1 April 2012.
- 1.8. The Boards of GLA Land and Property Limited (GLAP) and Greater London Authority Holdings Limited considered a draft of this Statement at their respective meetings on 12 June 2019 and:
- i. approved the content of a draft statement;
 - ii. authorised any Director of the Company to agree the final form of the Statement, including, without limitation and changes necessary or desirable following consideration of the Statement by the TfL Board or pending the Mayoral Decision process.
- 1.9. The Executive Director of Resources is a Director of both companies and therefore best placed to exercise this Delegation. He is also required to agree the statement for the GLA and this agreement can be given 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:
- i. meet legal requirements falling on the GLA and its two companies;
 - ii. demonstrate the GLA's commitment to tackling modern slavery; and
 - iii. serve to reinforce the GLA's approach to tackling modern slavery.
- 2.2. The Act requires the statement to be published on the company's homepage with a link from a prominent place on the homepage. Neither of the GLA's companies has a website of its own. The statement will therefore, as previously, be published within the Governance and Spending section of the GLA's own website (london.gov.uk).

3. Equality comments

- 3.1 The driving purpose of the statement is to demonstrate our commitment and reinforce our approach to tackling modern slavery. Groups that are protected by the Public Sector Equality Duty 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

a) 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 within its and its companies' supply chains.
- 4.2 In any contracts that TfL procurement identifies as having high ethical sourcing risk, suppliers are required to conduct audits of their factories and sites using an independent, third party auditor.

b) Links to Mayoral strategies and priorities

- 4.3 The Mayor places a high priority on making London a fairer and more equal city, including: challenging equality and intolerance; opening up opportunity; making London accessible for all; sharing the rewards of prosperity; and leading by example. Adopting a modern slavery statement strongly supports all these objectives.

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 Resources given his areas of managerial responsibility.
- 6.2. It should also be noted that, in addition to the 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 and vigilance in this regard is therefore required.

7. Planned delivery approach and next steps

Activity	Timeline
Publish Modern Slavery Statement	As/When DD is approved (no later than 30 September 2019)
Review and refresh for 19/20	Spring 2020

Appendices and supporting papers:

Appendix 1: Modern Slavery Statement 2018/19

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) 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 either be published within one working day after approval or on the defer date.

Part 1 Deferral:

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

If YES, for what reason:

Until what date: (a date is required if deferring)

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – 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 that:

✓

Assistant Director/Head of Service:

Tom Middleton 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.

✓

Corporate Investment Board:

The Corporate Investment Board reviewed this proposal on 12 August 2019.

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature



Date

13.08.19

TOM MIDDLETON on BEHALF OF MARTIN CLARKE

