

Greater London Authority Modern Slavery Statement

Legislation was passed throughout the 19th century to abolish the slave trade. But millions of people around the world are subjected to different forms of modern slavery. These people experience dehumanising mental and physical abuse and are treated as commodities with severe restrictions on their freedom of movement.

This statement sets out the steps that the Greater London Authority (GLA) and its subsidiary companies have and are taking to address the risks of slavery and human trafficking taking place in any of our supply chains.

Our organisation and supply chains

The GLA is the strategic authority for London. It has 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 since its inception evolved and as well as its strategic remit it now has delivery powers in housing, land and regeneration.

The GLA Act and GLA (Specified Activities) Order requires 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. The company in question is GLA Land and Property Limited (GLAP). The GLA has also established an umbrella company: Greater London Authority Holdings Limited (GLA Holdings), which could provide the scope for a tax group for accounting purposes for a number of trading companies were the GLA ever to have more than one.

The GLA's and its companies spend on goods and services was in the order of £66 million in 2015/16. Its supply chains are generally simple and involve predominantly UK companies. Nevertheless, we recognise the importance of taking appropriate steps to reduce the risk of modern slavery in its supply chains.

The procurement function of the GLA and by extension its companies are managed by Transport for London (TfL) as part of a shared service agreement. This brings economies of scale and allows the GLA to benefit from TfL's expertise as an organisation that spent some £6bn on goods, works and services with over 7,000 tier 1 suppliers and with supply chains spanning beyond the UK to Europe, Central and Northern America and Asia. It also allows us to take a common approach and joint action to address the risks of modern slavery in our supply chains.

Our policies

We have a responsibility to ensure our buying activities and those of our suppliers are responsible. We adopted the GLA Group Responsible Procurement Policy in June 2006 (updated in 2008). The GLA Group Responsible Procurement Policy consists of seven themes including 'ethical sourcing practices'.

An update to the GLA Group Responsible Procurement Policy will be published later this year which will continue this theme and reinforce our approach.: [\[insert link when published\]](#)

TfL published an Ethical Sourcing Policy in April 2008, which covers the GLA and its companies through its shared function arrangement. The policy is guided by five principles:

1. Identify suitable applications of ethical sourcing considerations
2. Improve labour conditions in the supply chain
3. Monitor working conditions
4. Engage with suppliers
5. Deliver benefits within law and best value

Similarly the GLA and its companies operate within TfL's Sustainable Timber Policy, adopted in May 2007. The policy promotes the use of sustainable timber that meets the standards set by the Forestry Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC) and/or equivalent sustainable timber standard. These standards include respecting the rights of workers, communities and indigenous peoples.

We signed up to the GLA Group's Sustainable Food Procurement Commitment in December 2010, which requires us to meet eleven best-in-class sustainable food procurement standards. This includes criteria around Fair Trade to promote decent working conditions, prompt payment and fair treatment of food producers at home and abroad.

Our Procedures

A procurement strategy is produced for all tenders above the OJEU threshold. Labour conditions and human rights risks are considered as part of this process and ethical sourcing tender questions and contract requirements are used if deemed relevant. These provisions require suppliers to detail how they comply, or are working towards complying, with the Ethical Trading Initiative (ETI) Base Code, and to disclose full details of the factories or sites they are using, or intend to use, to provide the goods or services.

All tenders are considered on a case-by-case basis and additional ethical sourcing requirements are included where appropriate.

For 2016/17, TfL procurement has identified Electronics Hardware as a priority category to promote ethical sourcing and has commenced action to address this.

Due diligence

The GLA and its companies benefits from a shared function with TfL that applies the following principles to TfL's and the GLA's procurements:

Ethical sourcing

For example, London Underground Limited (LUL) became the first public sector organisation to sign up to the Ethical Trading Initiative (ETI) in December 2006. In June 2007 LUL's uniform contract was the first in the public sector to include ethical sourcing requirements against the ETI Base Code as part contract conditions. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO), the UN agency responsible for labour standards and is an internationally recognised code of labour practice.

TfL became a member of Sedex in 2007 to engage with suppliers on the subject of ethical sourcing, map relevant supply chains, and monitor and report on labour conditions in those supply chains.

Fair Trade

Fair Trade standards are incorporated into relevant contracts including clothing. TfL became the first public sector organisation to source cotton under a new Fairtrade Cotton Sourcing Programme, introduced as part its new Uniform Contract that was awarded in 2015.

Protection of labour rights

TfL was one of the first major organisations to become an affiliate member of Electronics Watch in December 2015. Electronics Watch is an independent, non-governmental organisation that works with public sector buyers to protect the labour rights of workers in their global electronics supply chains. Through affiliation to Electronics Watch, public sector organisations across the EU collaborate to influence large electronics suppliers to drive real improvements for workers.

Monitoring

In any contracts identified as having high ethical sourcing risk, suppliers are required to conduct audits of their factories and sites, using an independent, third party auditor, and make the audit reports and related corrective actions plans available to us.

As part of TfL's continued membership of the ETI, an annual reporting submission is undertaken to monitor trends, assesses the overall impact of its ethical sourcing activity and identifies good practices. The annual submission for 2016 will help to identify appropriate action should there be any high risk supply chains.

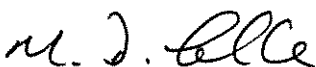
The GLA maintains a confidential and independent reporting service, available 24 hours a day, seven days a week, for staff and third parties to raise concerns. Staff can also raise concerns in other ways, as set out in our formal Whistleblowing Policy.

Awareness and Engagement

As part of a commitment to Ethical Sourcing, TfL procurement has delivered a number of general and contract-specific training and briefing sessions to employees, suppliers and other stakeholders. Continuous improvement and best practice on Ethical Sourcing is shared across TfL through a Knowledge Portal which employees can use to record, share and search for lessons learned. This in turn directly benefits procurement undertaken by TfL on the GLA's behalf.

TfL Procurement has been active in promoting ethical sourcing to external stakeholders through chairing the ETI Public Sector ethical Sourcing Working Group. It has also attended the European Working Group on Ethical Public Procurement, which took place in Bremen in March 2015. This stakeholder engagement activity enables it to develop its ethical sourcing strategy by collaborating and sharing knowledge with other stakeholders who share the same ethical sourcing agenda. During 2016/17, TfL Procurement will continue to raise awareness and share knowledge internally and externally of its ethical sourcing practices and its approach to addressing the risk of modern slavery in its and the GLA's supply chains.

Signed and dated



5.10.16

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Martin Clarke, Director of GLA Land and Property Limited (GLAP) and Greater London Authority Holdings Limited. Executive Director of Resources Greater London Authority

