

Greater London Authority Modern Slavery Statement 2020-21

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 sixth 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 2020 to 31 March 2021, which is our financial year.

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 education budget.

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. The GLA's Executive Director of Resources is responsible for overseeing the service delivered to the GLA by TfL; and, at TfL, managing the supply chain is the direct responsibility of the Chief Procurement Officer, who reports to TfL's 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 Group annually procures about £9.5bn worth of products and services, of which the GLA, in 2020-21, spent over £117.8m on goods and services with 948 suppliers. Our supply chains are generally simple and involve predominantly UK companies. Nevertheless, we do source goods and services from further afield from time to time, and we recognise the importance of taking appropriate steps to reduce the risk of modern slavery in our supply chains.

Policies in relation to modern slavery

In March 2021, the Mayor published the refreshed [GLA Group Responsible Procurement Policy](#). Its overarching goal is to enhance social value, while prioritising five objectives:

- improving supply chain diversity
- embedding fair and inclusive employment practices
- enabling skills, training and employment opportunities
- promoting ethical sourcing practices (including tackling modern slavery)
- improving environmental sustainability.

The Policy reflects best practice and demonstrates how our procurement activities meet legislative requirements, including the Modern Slavery Act 2015. It commits us to promoting ethical sourcing and addressing the risk of modern slavery by:

- adopting the nine provisions of the Ethical Trading Initiative (ETI) Base Code,¹ or equivalent, as the standard we expect of our suppliers to support working conditions that are legal, fair and safe
- adopting a risk-and-opportunity-based approach to identify contracts and areas of spend where there may be a high risk of poor working conditions, modern slavery, forced labour, human rights abuses, sourcing from conflict-affected areas, or negative impacts on security and crime
- seeking to improve transparency within the supply chain by working with suppliers, and in partnership with the ETI and Electronics Watch, to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

TfL hosts the GLA Group's Central Responsible Procurement Team (CRPT), within its Procurement and Supply Chain function, to support the implementation of the policy. The team will shortly publish a Responsible Procurement Implementation Plan for the Mayoral term 2021-24. The plan will set out the actions we will prioritise to deliver the Policy's commitments.

¹ www.ethicaltrade.org/eti-base-code.

Spend categories that present risks of human rights abuses

The principal spend categories for the GLA and its companies identified as having the highest risks of human rights abuses are as follows:

Category	Corresponding source countries	Identified risks
Construction	UK	Multi-tiered supply chains involving the use of labour agencies that could result in poor labour practices due to lack of transparency. Unethical practices including workers being charged unlawful or excessive recruitment fees, workers being misinformed about terms of employment, and the withholding of passports may take place.
Facilities management: cleaning and catering services	UK	Agency labour leading to potential lack of transparency on employment practices.
Electronic equipment	China, East Asia, Eastern Europe	Labour-intensive, often low-skilled work; mining of raw materials in high-risk countries. Poor labour practices including underpayment of wages; delayed payment or wage deductions; physical abuse; working excessive overtime; a worker's visa or permit being tied to a single employer; and financial penalties for early contract termination may take place.
Corporate clothing	South Asia, China	Risks include gender inequality; weak protection of workers' rights; poor labour practices including excessive overtime, underpayment or deduction of wages, financial penalties for leaving an employer, and structural integrity of factories.

Due diligence and its effectiveness

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, TfL procurement staff can identify categories and contracts that are likely to present a high risk of human rights abuses and poor working conditions.

All relevant procurements include a question at supplier-selection stage on compliance with section 54 of the Modern Slavery Act 2015. TfL continues to include award criteria and contractual requirements in contracts where a significant risk of human rights abuses is identified.

This year, with support from modern slavery experts at Action Sustainability, TfL developed assurance tools, as part of our commercial processes, to identify and prevent modern slavery risks in our supply chain. A workshop with representation from TfL procurement teams took place in November enabling commercial managers to input into the following documents:

- a Modern Slavery Assurance Handbook – a detailed guide to assurance in construction relating to modern slavery and exploitation
- Procurement Guidance – an easy-to-use guide setting out the key procurement requirements at the planning, selection and management stages; and a risk assessment matrix of medium-to-high-risk categories.

TfL has reviewed the contract pipeline and undertaken work to include requirements in future contracts, with the expectation that the range of categories and number of contracts will increase as the approach continues to mature. Examples of good practice being followed are detailed below.

Contract management

- Refit and refurbishment works at the Crystal Building: as part of the supplier evaluation, bidders were required to outline their approach to identifying and managing the ethical sourcing risk in their supply chain's workforces.
- Retrofit accelerator for homes (deep retrofit of domestic properties): as part of the supplier evaluation, solution providers were required to provide a comprehensive response to the ethical sourcing requirements, including their policy, compliance with the ETI Base Code, risk analysis (in terms of human rights issues and labour conditions in their supply chains), and their approach to and actions for managing high-risk areas.

Industry engagement

- The CRPT is a member of the International Working Group on Ethical Public Procurement, and shares and implements relevant best practice.
- A CRPT member shared TfL's approach to corporate transparency as part of an international panel at the Electronics Watch Occupational Health and Safety Summit in December 2020.
- The CRPT is on the Supply Chain Sustainability School's (SCSS's) Labour Group: Modern Slavery Group, which includes key infrastructure and construction organisations in the UK.

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. Twenty-four GLA staff, including grants officers, completed TfL's half-day virtual training session.

Further to this, GLA staff responsible for procuring contracts for goods or services with a value over £25k are expected to complete the RP e-learning module, and to retake the training every two years. Some 115 GLA staff completed the module this year.

TfL intends to continue to use its membership of the ETI and Sedex to maintain awareness of best practice and current developments; benchmark with other organisations; and externally verify our approach.

Reporting and key performance indicators (KPIs)

The Responsible Procurement Implementation Plan 2021-24, referred to above, will include how we will promote ethical sourcing practices and address risks of modern slavery over the next three years, including metrics to monitor continuous improvement of internal capacity-building and supply chain assurance. The plan is expected to be published before 30 September 2021.

Goals for 2021-22

In 2021-22 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 the GLA Group, in part through TfL's membership of the SCSS.

Increase capability: we will further upskill commercial and procurement staff, as well as contract managers, on how to tackle modern slavery in supply chains through the Home Office e-learning package, and on supply-chain transparency through bespoke learning sessions with Electronics Watch.

Peer learning: we hold pan-GLA Group practitioner learning groups to share best practice and collaborate across the GLA Group in relation to modern slavery due diligence.

Risk assessment: undertake a risk assessment of our key suppliers using the Cabinet Office Risk Assessment Template to identify medium and high-risk suppliers.

Site set-up: TfL will develop standard criteria for project sites set up based on best practice, such as the 'SCSS Site Set Up Guidance', to include requirements for awareness raising and identifying and managing risks of exploitation onsite.

Supply chain assurance: improve performance of key suppliers, and those assessed to be medium-to-high-risk, in eradicating the risks of modern slavery in their organisations and their supply chains.

- All key suppliers to be risk assessed using the Cabinet Office Risk Assessment Template, by November 2021.
- All key suppliers, and those assessed to be medium-to-high-risk, will be required to complete the UK Government's Modern Slavery Assessment Tool (MSAT) by the end of 2021 and develop an improvement plan based on MSAT recommendations by April 2022.

- All key suppliers, and those assessed to be medium-to-high-risk, must achieve an MSAT score of at least 70 per cent by January 2024.

Minerals supply chains: support Electronics Watch in developing a new approach for public bodies to improve supply chain transparency of the mining and manufacturing of minerals used in the provision of batteries for electric vehicles.

State-sponsored forced labour: continue to collaborate with partner organisations such as the ETI and Electronics Watch to progress due diligence issues in our supply chains.

Approval of this statement

David Gallie, Executive Director of Resources, approved this statement on behalf of the GLA under the standing delegation given via Mayoral Decision-Making in the GLA. His approval is given by virtue of the covering director decision and signature below.

The Boards of GLAP and GLA Holdings, at their meetings of 6 July 2021, noted that a draft was still being prepared, and resolved to authorise the Executive Director of Resources to approve the final version. His signature below also gives this effect for GLA Holdings and GLAP.

Signature: 

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Date: 21/09/2021

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