

# GREATER LONDON AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2050

### Title: Modern Slavery Statement

#### Executive Summary:

The Modern Slavery Act 2015 (the Act) is now in force. Among other things, it requires commercial organisations to prepare a slavery and human trafficking statement setting out the steps they have taken to ensure that their supply chains are free from slavery and human trafficking.

The Greater London Authority has established two companies: Greater London Authority Holdings Limited and GLA Land and Property Limited. The companies are 'commercial' for the purposes of the Act and so each should have a statement. Given the imperative of tackling modern slavery applies to the GLA as a whole – not just to its two companies – and the interconnectedness of the objectives and procurement functions of the Authority and its companies, there is merit in adopting one statement covering all three entities.

This decision form asks the Executive Director to formally sign off the attached statement for the year 2015/16, thereby giving it formal effect.

#### Decision:

The Executive Director agrees, in his capacity as GLA Executive Director and as a Director of both Greater London Authority Holdings Limited and GLA Land and Property Limited, that:

- the appended modern slavery statement for the financial year 2015/16 is formally adopted by the GLA, Greater London Authority Holdings Limited and GLA Land and Property Limited.

#### 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:**

5.10.16

## **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 is 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 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. The approach proposed is that the GLA adopts one statement covering the Authority (though not commercial in of itself) and its two companies (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.
- 1.4. The GLA's statement is also closely aligned with that being 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, adopted in June 2006, has seven themes including 'ethical sourcing practices'. It will be updated later this year and will reinforce our commitment and approach to tackling modern slavery in our supply chains.
- 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. due diligence arrangements;
  - iv. monitoring arrangements; and
  - v. awareness and engagement activities.

##### *About the GLA's companies*

- 1.6. In January 2012 the then Mayor established two companies (reference MD937): Greater London Authority Holdings Limited and GLA Land and Property Limited (commonly referred to as GLAP). This was done to facilitate compliance with the Localism Act 2011 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.

- 1.7. The two companies' boards agreed a draft of the final version of the attached statement at their Annual General Meetings, both of which took place on 20 June 2016. The boards also agreed to delegate to a director agreeing the final form of the statement. The Executive Director of Resources can therefore agree the statement both for the GLA and the two companies in his role as a director of each.

## **2. Objectives and expected outcomes**

- 2.1. Publishing a modern slavery statement will:
  - i. meet legal requirements falling on the GLA's 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 in on the company's homepage with a link from a prominent place on the homepage. Neither of the GLA's companies have a website of its own. The statement will therefore be published within the Governance and Spending section of the GLA's own website (london.gov.uk).

## **3. Equality comments**

- 3.2. 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.

## **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 regards to 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**

<b>Activity</b>	<b>Timeline</b>
Publish the modern slavery statement	w/c 3 October 2016
Responsible procurement policy refreshed	By end 2016
Modern slavery statement refreshed	Summer 2017

### **Appendices and supporting papers:**

Modern Slavery Statement

**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**

**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:**

Tim Somerville 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.

✓

**EXECUTIVE DIRECTOR, RESOURCES:**

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

**Signature**

*M. D. Allen*

**Date**

*5.10.16*

