

Greater London Authority Modern Slavery Statement 2018/19

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 fourth 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 2018 to 31 March 2019, 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 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. GLAP was established for this purpose. The GLA has also established an umbrella company – GLA Holdings Limited – that allows for a tax group for accounting purposes encompassing also other trading companies.

In 2018/19, we spent £69 million on goods and services with 919 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 its supply chains.

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 reports to the Commissioner of TfL.

The shared service agreement brings economies of scale and allows the GLA to benefit from TfL's expertise as an organisation that spent in excess of £6bn on goods, works and services in 2018/19. It also allows us to take a common approach and joint action to address the risks of modern slavery in our supply chains.

TfL was the first public sector organisation to join the Ethical Trading Initiative (ETI), a leading alliance of companies, trade unions and non-governmental organisations (NGOs) that promotes respect for workers' rights around the globe. TfL was also the first public body to join Sedex, home to one of the world's largest collaborative platforms for sharing data on supply chains. Sedex is used by organisations to deliver high standards of procurement in respect of labour rights, health and safety, the environment and business ethics. TfL's membership of both these initiatives means GLA procurement benefits from best practice, awareness of current developments and comparison against other organisations.

Our policies

In June 2017, the Mayor published the GLA Group Responsible Procurement Policy that sets out the GLA Group's plans, ambitions and commitments for ensuring continuous improvement in procurement activities. It reflects best practice, demonstrates our procurement activities meet all legislative requirements, including the Modern Slavery Act, and links to the Mayor's wider strategic priorities for London.

The Mayor's policy commits us to promote ethical sourcing by:

- adopting the nine provisions of the ETI Base Code, or equivalent, as the standard we expect of our suppliers to support working conditions that are legal, fair and safe; and
- 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, human rights abuses or negative impacts on security and crime. We will seek to improve transparency within the supply chain, and work with suppliers to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

To support implementation of the Policy, TfL hosts the GLA Group's central Responsible Procurement team. The team has now published a Responsible Procurement Implementation Plan. This plan details how the GLA Group will deliver the commitments in the Mayor's Responsible Policy, including ethical sourcing practices.

The Plan commits TfL to actively encourage its key suppliers to produce a compliant Modern Slavery Statement. TfL has monitored key suppliers and as of March 2019, 66 per cent of TfL's key suppliers have issued a statement compliant to Section 54 of the Act, which compares to 52% reported in August 2017. In 2019 / 20 TfL procurement will aim to continue this positive trend by engaging our key suppliers on this issue and developing an approach to address those suppliers who fall short of their obligations.

Our spend categories that present risks of human rights abuses

The principal spend categories where there are risks of human rights abuses are:

Category	Corresponding source countries	Identified risks
Corporate clothing	Bangladesh, China	High risk countries as identified by the government response, vulnerability and prevalence ratings in the global slavery index
Electronic equipment	East Asia, China, India, Eastern Europe, Mexico	Labour-intensive, often low-skilled work, mining of raw materials in high-risk countries
Cleaning services	United Kingdom	High numbers of agency and migrant workers
Construction	United Kingdom	Migrant workers, documented instances of forced and bonded labour, multi-tier supply chains, low paid roles

Our supply chain due diligence and its effectiveness

During 2018, TfL invested in better understanding higher-risk supply chains, gained first-hand experience in supply chain due diligence and risk mitigation and implemented strategies to address risks of human rights abuses.

Promoting respect for human rights in garment supply chains

TfL is actively ensuring that workers producing the garments it procures are treated fairly, wherever they may be in the world. TfL has been including clear requirements safeguarding human rights and working conditions in relevant contracts for many years and, in this area, has set new levels of excellence for supply chain due diligence in public procurement. More information about TfL's approach is set out in its own Modern Slavery Statement.

Helping eradicate abuses in global electronics supply chains: continued support for Electronics Watch

TfL remains an engaged founder member of Electronics Watch, the non-profit, collaborative organisation monitoring global electronics supply chains and has included supplier due diligence and monitoring clauses in a number of key contracts.

Minimising the risk of forced labour: cleaning services

We keep our cleaning services contract under review and are confident we meet legislative and best practice requirements. Given the high number of agency and migrant workers employed in the cleaning industry, TfL has continued to take a proactive approach to managing the risks of worker exploitation.

Construction supply chains

Construction sites, in particular, pose a significant risk to poor employment practices through the use of agency workers and multiple tiered supply chains. Through TfL's membership of the Supply Chain Sustainability School, we can discuss and share best practice on the industry-wide risks facing the built

environment, gain greater transparency on the issues faced by our supply chain and work closely with them to mitigate the risks of human rights abuses on construction sites. TfL will be developing an approach for use when letting and managing construction contracts to ensure the real risk of modern slavery in this sector is minimised.

Training and capacity building

TfL, as our shared service provider, seeks to improve itself and others by facilitating training for its staff and staff from the wider GLA Group. In 2018-19, TfL continued to deliver a programme of training in a range of responsible procurement disciplines including ethical sourcing. In 2019-20, TfL will roll out further training to enhance the knowledge of key commercial staff to manage the risks of modern day slavery through a combination of e-learning and classroom based training. The training will have a focus on ensuring that ethical sourcing risks are considered in the early stages of procurement when developing business cases and category management strategies.

TfL has also actively contributed to a series of external conferences and workshops on Responsible Procurement, many focussing on human rights in public supply chains. It continues to benefit from its membership of the ETI and is an active member of the Public Procurement Working Group.

Our goals for 2019-20

In 2019-20 we will continue to improve and refine our approach to managing the risk of slavery and human trafficking in our supply chain. A significant step in doing this will be to map our risk exposure throughout our supply chain and this will be a focus in the coming year.

In the year ahead, through the shared procurement service delivered by TfL, we will pursue the following goals:

- develop a robust assurance process for preventing modern slavery on construction sites. Our aim is to develop our risk mitigation from desk-based monitoring of Section 54 compliance to on-the-ground, empirical evidence of modern slavery prevention measures
- roll out external training to key Commercial staff to support the robust implementation of our ethical sourcing approach. This will be formed of online and classroom-based learning and will ensure commercial staff can make procurement decisions with an in depth understanding of how to manage against the risk of human and labour rights abuses.
- ensure implementation and contract management of Electronics Watch contract terms in ICT contracts upon contract award. The clauses stipulate disclosure of factory locations and we will work closely and collaboratively with our supply chain to understand the risks each location presents and appropriate approaches to mitigating these risks
- undertake an ethical sourcing risk mapping exercise of our supply chain to ensure proactive identification and management of risk and enable effective prioritisation of activity

Approval of this Statement

Martin Clarke, 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.

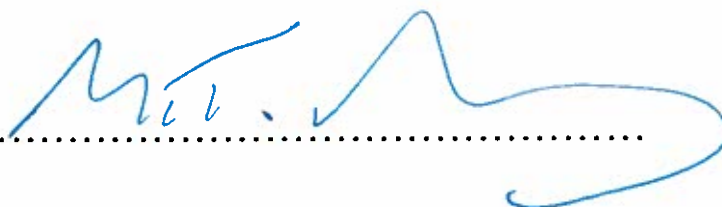
The Boards of GLA Land and Property Limited (GLAP) and Greater London Authority Holdings Limited considered a draft of this Statement at their respective meetings on 12 June 2019 and:

(a) approved the content of the draft statement

(b) 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

As a Director of both, Martin Clarke also approves the final version of this statement for and on behalf of GLAP and GLA Holdings in accordance with that delegation provided at the 12 June meetings.

Signature:



Date:

13.08.19

