

## REQUEST FOR DIRECTOR DECISION – DD2599

### Title: Modern Slavery Statement 2021-22

#### Executive summary:

The Modern Slavery Act 2015 (the Act) requires “commercial” organisations to annually prepare 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 a modern slavery statement annually since 2016. One statement covers both companies as well as the GLA. The statement has been updated for the financial year 2021-22.

The two companies, at their meetings of 11 August 2022, noted that a draft was still being prepared, and resolved to authorise the Executive Director of Resources to approve the final version. It now needs to be signed by the Executive Director to give it effect for the GLA, and for GLA Holdings and GLAP.

#### Decision:

That the Executive Director of Resources approves:

1. the adoption by the GLA of the appended 2021-22 Modern Slavery Statement
2. the adoption by GLA Holdings and GLAP of the same statement, in accordance with the delegation given at their company meetings on 11 August 2022.

#### AUTHORISING DIRECTOR

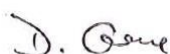
I have reviewed the request and am satisfied it is correct and consistent with the Mayor’s plans and priorities.

It has my approval.

**Name:** David Gallie

**Position:** Executive Director of Resources

**Signature:**



**Date:**

**29/9/22**

## 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
  - vi. creating an Independent Anti-slavery Commissioner.
- 1.2. One of the main provisions of the Act, relating to (i) above, is section 54, which 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 six months after 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 and GLA Land and Property Limited (GLAP), 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 subsidiaries and concluded that this is not the case. 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. The turnover for London Power Co in 2021-22 did not meet the threshold required for issuance of a modern slavery statement.
- 1.4. The GLA's statement continues to be closely aligned with that adopted by Transport for London (TfL) 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, a refreshed version of which was published by the Mayor in March 2021. The Policy prioritises five objectives, one of which is

‘embedding fair and inclusive employment practices’ (including tackling modern slavery). The updated Responsible Procurement Implementation Plan was approved in August 2022.

- 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 in a similar way to previous years so it describes:
- the purpose of the GLA, its companies and the nature of their supply chains
  - the policies and procedures in place to reduce the risk of modern slavery in supply chains
  - spend categories that present risks of human rights abuses
  - due diligence arrangements
  - training and awareness-raising
  - goals for 2022-23.
- 1.6. The proposed format and content of the 2021-22 statement is broadly in line with previous statements. The TfL statement it draws on was approved in draft by its Board on 27 July 2022, who delegated authority to TfL’s General Counsel to agree the final form.

#### GLA Holdings and GLAP approval

- 1.7. The Boards of GLAP and GLA Holdings were advised that a statement was in preparation at their respective meetings on 11 August 2022 and authorised the Executive Director of Resources to agree the final form of the statement.
- 1.8. The Executive Director of Resources 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:
- meet legal requirements falling on the GLA and two of its companies
  - demonstrate the GLA’s commitment to tackling modern slavery
  - serve to reinforce the GLA’s approach to tackling modern slavery
- 2.2. The Act requires the statement to be published on each 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](https://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**

#### 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 a high ethical sourcing risk, suppliers are required to conduct audits of their factories and sites using an independent, third-party auditor.

#### 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.
- 4.4 Adoption of the statement is one of the responsible procurement initiatives that makes a contribution towards the Mayor's Good Work Standard.
- 4.5 There are no conflicts of interest to declare from any of those involved in the drafting or clearance of this Decision Form.

### **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 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. Vigilance in this regard is therefore required.

**7. Planned delivery approach and next steps**

<b>Activity</b>	<b>Timeline</b>
Publish Modern Slavery Statement 2021-22	As/when DD is approved (no later than 30 September 2022)
Review and refresh for 2022-23	Spring/summer 2023

**Appendices and supporting papers:**

Appendix 1: Modern Slavery Statement 2021-22

**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:**

Jack Pascoe has drafted this report in accordance with GLA procedures and confirms that:

✓

**Assistant Director/Head of Service:**

Enver Enver 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 5 September 2022

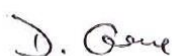
✓

**EXECUTIVE DIRECTOR, RESOURCES:**

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

**Signature**

**Date**



**29/9/22**