

Greater London Authority Modern Slavery Statement 2021-22

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 2021 to 31 March 2022, 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 (currently instead reporting to the Chief Capital 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 2021-22, spent over £134.58m on goods and services with 1011 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. A Responsible Procurement Implementation Plan for the current Mayoral term was approved in August 2022, and sets 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, catering and maintenance services | UK | Agency and sub-contracted 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.

TfL obtain assurances from directly through suppliers as part of the tendering process and then via online platforms such as the Supplier's Ethical Data Exchange (SEDEX), where independently verified audit reports of factories are assessed as part of the contract management processes.

TfL have undertaken a risk assessment of their supply chain and invited medium and high-risk suppliers to complete the Cabinet Office Modern Slavery Assessment Tool (MSAT). They held a supply chain engagement event to encourage completion of the MSAT and will use the results to work with our suppliers to improve their policies, practices and processes in preventing modern slavery in our supply chains.

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 City Hall : 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.

Supplier Engagement

This year, TfL commenced a campaign to invite medium and high-risk suppliers to complete the Cabinet Office MSAT. These were TfL suppliers, but some of them also supply shared services to the GLA through the Collaborative Procurement Programme. As of the end of the financial year, 54 suppliers have been invited with a 50 per cent completion rate. TfL have set a Key Performance Indicator for all 54 suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status. In the year ahead, they will be working with those suppliers who have scored below 70 per cent, providing access to training resources and supporting their development actions which are provided by the MSAT following completion. They will also encourage more suppliers to complete their assessments and begin to include contractual mechanisms to require completion in upcoming medium to high-risk tenders.

In 2022/23 the GLA will be commencing an equivalent exercise with GLA-specific suppliers to replicate this model.

As part of TfL's arrangement to provide procurement services to the GLA, the TfL team has engaged with solution providers on the Retrofit Accelerator for Homes Innovation Partnership to discuss the

issue of Uyghur Muslim forced labour in the supply chains of polysilicon. Following the release of the 'In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains' report from Sheffield Hallam University, a presentation was given to the solution providers providing an overview of the issues highlighted in the report. The solution providers will be encouraged to work on mapping their supply chains and work towards providing transparency and traceability of polysilicon. The CRPT will support providers on addressing this challenging and emerging issue, linking in with industry experts and providing training support via the Supply Chain Sustainability School.

Industry Engagement

This year, the CRPT established a pan-GLA Group practitioner learning group to share best practice and collaborate across the Group in relation to modern slavery due diligence. The group meets on a quarterly basis and has assisted with the roll out of the MSAT campaigns and sharing best practice from TfL's representation on both the Rail Safety and Standards Board (RSSB) and the Department for Transport modern slavery groups.

The CRPT continues to utilise its networks to collaborate and share knowledge on socially responsible procurement. In the first half of 2021, the team participated in the Organisation for Economic Co-operation and Development Pilot on Due Diligence in the Public Procurement of Garment & Textiles and the ICLEI (Local Governments for Sustainability)-led International Working Group on Ethics in Public Procurement for IT, with public authorities from a global and European reach respectively. The CRPT are also members of the International Working Group on ethical Public Procurement. Key learnings will be incorporated into future relevant procurements across TfL and the GLA group.

In October 2021, a CRPT member presented at a webinar titled 'How to break the cycle of climate change leading to forced labour', communicating our approach to audience members, sharing and learning from best practice to ensure a just transition to net zero.

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. To date, more than 600 TfL procurement practitioners have completed Responsible Procurement training, ensuring those undertaking GLA procurements recognise and how to manage the risks of modern slavery in procurement.

Further to this, GLA staff responsible for engaging TfL Procurement and Commercial on 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.

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 this approach. The GLA will learn from TfL's approach.

Supply Chain

Upskilling supply chains to help manage shared risks is a key priority, recognising that some suppliers are further on their journey than others. TfL delivered a workshop for ten supply partners on recognising the signs of modern slavery and raising awareness of the issue. The GLA will look to learn from and replicate this work.

Reporting

The Responsible Procurement Programme co-ordinates the TfL and GLA Group approach to promoting ethical sourcing practices and addressing the risks of modern slavery over the Mayoral term including metrics to monitor continuous improvement of internal capacity building and supply chain assurance.

The Programme requires each Functional Body to report on the number of medium and high risk suppliers who have completed the MSAT and the percentage of those who have met the threshold of 70 per cent. The GLA will begin reporting on this in 2023 once the TfL risk assessment approach has been replicated with our supply base and those suppliers have been invited to complete the MSAT.

Goals for 2022-23

In 2022-23 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 and across the supply chain.

Increase capability: further upskilling of 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: TfL host the pan-GLA Group practitioner learning group to share best practice and collaborate across the 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 with a view to inviting those suppliers to complete the MSAT.

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 11 August 2022, considered a draft of this Statement, 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:

.....

Date:

.....