

Board



Date: 27 July 2022

Item: Slavery and Human Trafficking Statement

This paper will be considered in public

1 Summary

- 1.1 The Modern Slavery Act 2015 requires the publication of an annual slavery and human trafficking statement (the Statement). This paper describes the activity undertaken in compliance with the Act and seeks approval of a statement for the financial year 2021/22 that is required to be made and published.

2 Recommendation

- 2.1 **The Board is asked to note the paper and:**

- (a) **approve the draft TfL Slavery and Human Trafficking statement appended to this paper; and**
- (b) **authorise the General Counsel to agree the final form of the Statement.**

3 2021/22 Statement

- 3.1 A Statement is required to be made annually, within six months of the end of the financial year (i.e. by September) and must be published on the TfL website “with a direct link in a prominent place on the homepage”. That Statement must be approved at Board level prior to publication.
- 3.2 TfL’s approach is to require all its operating subsidiaries to make a single statement approved by the Board, whether or not they reach the turnover threshold set out in the Modern Slavery Act 2015. The proposed draft statement is included at Appendix 1 and has been approved by TfL’s subsidiary companies, subject to Board approval. Crossrail Limited, who previously prepared an equivalent statement tailored to its specific circumstances, has included its activity within the Statement this year.
- 3.3 TfL’s key categories of focus for 2021/22 have been critical infrastructure contracts, electronic equipment, facilities management, personal protective equipment (PPE) and supplier engagement.
- 3.4 To mitigate the risk of modern slavery associated with the provision of the Surface Technology contracts retender and HV Power contracts, we evaluated comprehensive Ethical Sourcing Actions Plans to be contract managed post-contract award which is expected in 2022/23.

- 3.5 Construction is a large part of our modern slavery risk profile in the UK. We have developed consistent requirements and embedded them within the property development portfolio, including in the Connected Living London Joint Venture and the Bollo Lane development.
- 3.6 We have started to display worker rights posters produced by the Gangmaster and Labour Abuse Authority on sites where we are the principal contractor and have encouraged our suppliers to do the same where we are not.
- 3.7 In response to Electronics Watch requirements included in ICT Hardware framework, the reseller of ICT Hardware disclosed further factory locations of some of their products which have been shared with Electronics Watch for worker-driven monitoring.
- 3.8 Through inclusion of direct employment requirements embedded in our cleaning contract TfL has taken a proactive approach to manage the risks of worker exploitation in the UK cleaning sector. As of March 2022, 95.1 per cent of the circa 2,500 cleaning staff were directly employed by the supplier.
- 3.9 Due to the recognised risk of modern slavery in the supply of PPE and the disposable glove industry in Malaysia, we worked closely with our Tier One supplier to manage these complex issues. We have moved our supply to a supplier recognised by the Responsible Glove Alliance, the secretariat for which sits with the Responsible Business Alliance, the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.
- 3.10 We risk assessed our suppliers using the Cabinet Office tool and invited all medium to high-risk suppliers to complete the Modern Slavery Assessment Tool. Fifty-four suppliers were invited and to date, 50 per cent have completed the assessment.
- 3.11 A GLA Group Central Responsible Procurement Team is hosted by TfL to support the Functional Bodies of the Greater London Authority in undertaking ethical sourcing activity and managing the risk of modern slavery, as outlined in the GLA Group Responsible Procurement Policy.

List of appendices to this report:

Appendix 1: Draft Slavery and Human Trafficking Statement 2021/22.

List of background papers:

None.

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