

**Board**

**Date: 25 July 2023**

**Item: Slavery and Human Trafficking Statement**

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**This paper will be considered in public**

## **1 Summary**

- 1.1 The Modern Slavery Act 2015 (the 2015 Act) requires the publication of an annual Slavery and Human Trafficking Statement (the Statement). This paper describes the activity undertaken in compliance with the 2015 Act, including changes and updates from the previous Statement and details of ongoing activity. It seeks approval of a Statement for the financial year 2022/23 (1 April 2022 to 31 March 2023) that is required to be made and published, as set out in Appendix 1.

## **2 Recommendations**

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

- (a) approve the draft TfL Slavery and Human Trafficking Statement, attached as Appendix 1 to this paper; and**
- (b) authorise the General Counsel to agree the final form of the Statement.**

## **3 2022/23 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 2015 Act. The proposed draft Statement is included at Appendix 1 and has been approved by TfL’s subsidiary companies, subject to Board approval.

## **4 Changes and updates from the 2021/22 Statement**

- 4.1 As requested by the Board in July 2022, this year’s Statement has more detail on how TfL manages risks in its role as a landlord.

- 4.2 A new compliance team was formed within TTL Properties Limited (TTLP) Asset Management in 2022. The team is responsible for engaging with tenants on their statutory compliance and has created a clear enforcement regime. Since the team regularly visit the estate, their role in identifying possible instances of modern slavery is important. In March 2022 all members of the team received training in how to spot the signs of modern slavery which was also attended by property surveyors and the Director of Procurement for TTLP.
- 4.3 In 2023/24, TTLP will issue information to its tenants on modern slavery as well as further analyse customer segments to identify where our risks lie across the estate and how these overlap with wider compliance checks to be undertaken.
- 4.4 In April 2022, TfL joined the Electronics Watch Low-Emission Vehicle Programme to address human rights risks in the production of electric vehicle batteries, including the sourcing of rare earth minerals and the production of semi-conductors. The three-year programme aims to improve supply chain transparency and working conditions in the supply chains of low emission vehicles, most notably TfL's fleet of approximately 9,000 buses.
- 4.5 We received approval from TfL's Bus Operators to approach the bus manufacturers and collaborate with them on a confidential basis to establish supply chain transparency, including sites of mining operations for rare earth metals used in the production of electric vehicle batteries. The programme is fully funded by 10 European cities in total and Electronics Watch will apply their worker-driven monitoring model to sites of production shared with TfL. TfL expects the manufacturers to work with Electronics Watch to remedy any violations uncovered and ultimately improve the lives of those most vulnerable to exploitation in our supply chain.
- 4.6 The relet of TfL's brand licensing contract included strengthened requirements to protect labour conditions in our licensees' supply chains. Due to the breadth of products ranging from textiles to games and toys we have required that every deal proposal is to be accompanied with objective evidence that labour rights are adhered to and protected.
- 4.7 A bespoke three-hour workshop was delivered with a Modern Slavery Consultant to the solution providers on the Greater London Authority's (GLA) retrofit for homes contract, which TfL provides the procurement service for. Solar panels are strongly linked to state-sponsored forced labour programmes in China and so collaboration and upskilling our suppliers in this challenging area is important.
- 4.8 London Transport Museum's catering suppliers has provided its due diligence activity, demonstrating it is taking proactive steps to manage labour exploitation risks. They are targeting to have all suppliers complete Self-Assessment Questionnaires with the Sedex platform by 2025.

## **5 Ongoing activity**

- 5.1 TfL's key risk categories continue to be in critical infrastructure contracts, electronic equipment, facilities management, personal protective equipment (PPE), uniforms and batteries.

- 5.2 We continue to utilise our affiliation with Electronics Watch to manage risks of modern slavery in the supply chain of Information and Communication Technology Hardware and our Oyster card framework.
- 5.3 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 2023, 95 per cent of the circa 2,500 cleaning staff were directly employed by the supplier.
- 5.4 Due to the recognised risk of modern slavery in the supply of PPE and the disposable glove industry in Malaysia, we work closely with our Tier One supplier to manage these complex issues and continue to monitor their activity.
- 5.5 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. At the time of writing the Statement, 80 per cent have completed the assessment, an increase from 50 per cent in the previous year.
- 5.6 A GLA Group Central Responsible Procurement Team is hosted by TfL to support the Functional Bodies of the Group in undertaking ethical sourcing activity and managing the risk of modern slavery, as outlined in the Mayor's Responsible Procurement Policy.

**List of appendices to this report:**

Appendix 1: Draft Slavery and Human Trafficking Statement 2022

**List of background papers:**

None

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