



# Transport for London Modern Slavery Statement 2023/24

## Period covered by this statement

Transport for London's (TfL) financial year end occurs on 31 March. This statement covers the financial year 1 April 2023 – 31 March 2024.

## Organisations covered by this statement

This statement covers Transport for London, its subsidiary company Transport Trading Limited and the following subsidiary companies of Transport Trading Limited:

Crossrail Limited  
Docklands Light Railway Limited  
London Buses Limited  
London Bus Services Limited  
London River Services Limited  
London Transport Museum Limited  
London Transport Museum (Trading) Limited  
London Underground Limited  
Places for London Limited  
Rail for London (Infrastructure) Limited  
Rail for London Limited  
Tramtrack Croydon Limited  
TTL Blackhorse Road Properties Limited  
TTL Earls Court Properties Limited  
TTL Build to Rent Limited  
TTL Kidbrooke Properties Limited  
TTL Landmark Court Properties Limited  
TTL Southwark Properties Limited  
TTL South Kensington Properties Limited  
TTL Wembley Park Properties Limited  
Tube Lines Limited  
Victoria Coach Station Limited

Dormant subsidiaries covered in previous statements have been removed from the above list. More information on TfL and its subsidiaries can be found on our website: <https://content.tfl.gov.uk/tfl-subsiidiary-organisation-chart-july-2023-web.pdf>

## Introduction

This Statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015](#), by informing our customers, suppliers, staff, and the public about TfL's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains, and the steps taken to identify, prevent and mitigate the risks. This is TfL's ninth annual statement to be published under the Act and relates to the period 1 April 2023 to 31 March 2024.

### 1 Our organisation and supply chain

TfL is the integrated transport authority responsible for delivering the Mayor of London's strategy and commitments on transport. We run the day-to-day operation of the Capital's public transport network and manage London's main roads. In a normal year of operations, more than 31 million journeys are made across our network each day.

Responsibility for managing TfL's supply chain sits with our Procurement and Commercial (P&C) function, reporting to the Chief Finance Officer, who in turn reports to the Commissioner of TfL. During 2023/24 TfL spent in excess of £7.3bn on goods, services and works required to operate and upgrade services across all transport modes.

Our key suppliers represent around 67 per cent of our addressable spend. These suppliers offer a wide range of strategically important goods and services to TfL. A large proportion of our key suppliers are registered in the United Kingdom (UK) but many of their operations and supply chains are global. Some of our suppliers have complex supply chains with multiple tiers of sub-contracting and, in some cases, such as construction or electronic equipment, we have little visibility over where products are made. Therefore, we are using a risk-based approach, taking expert advice from the Ethical Trading Initiative (ETI) and Electronics Watch where relevant, prioritising steps to achieve greater supply chain visibility where our risks are highest, and recognising that workers in the lowest tiers of supply chains are often the most vulnerable.

### 2 Policies in relation to modern slavery

In March 2021, the Mayor published the refreshed [Greater London Authority \(GLA\) Group Responsible Procurement \(RP\) Policy](#) and its associated Responsible Procurement Implementation Plan (RPIP). The RPIP sets out how the GLA and its functional bodies (including TfL) will deliver the goals of the GLA Group Responsible Procurement Policy, between 2022 and 2024.

This document is a high-level strategic policy setting out the GLA Group's plans, ambitions, and commitments for ensuring continuous improvement in London delivered through the Group's procurement activities. It supports the delivery of the Mayor's commitments and strategies, reflects best practice and

demonstrates that our procurement activities meet legislative requirements, including the Modern Slavery Act 2015.

The GLA Group RP Policy commits us to promote ethical sourcing and addresses risks of modern slavery by:

- adopting the nine provisions of the ETI Base Code<sup>1</sup>, or equivalent, as the standard we expect of our suppliers ensuring our supply chain supports 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; and
- seeking to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance where relevant.

The GLA Group RP Policy is supported by the [Responsible Procurement Implementation Plan \(RPIP\) 2022-24](#) which sets out the key actions to deliver the commitments of the RP Policy, and shapes the work outlined in this Modern Slavery Statement. It commits TfL, as a member of the GLA Group, to:

- improve the performance of key suppliers, and those assessed to be medium to high risk, by utilising the Cabinet Office Modern Slavery Assessment Tool (MSAT);
- structure commercial development arrangements to ensure relevant GLA Group best practice modern slavery due diligence provisions are undertaken by property development companies, consortia, and suppliers; and
- collaborate with partner organisations, such as the ETI and Electronics Watch, to improve supply-chain transparency of the mining and manufacturing of minerals used in batteries for electric vehicles and state-sponsored forced labour risks, such as the treatment of Uyghur Muslims in China, in our supply chains.

To support the business in implementing the GLA Group RP Policy and RPIP, TfL hosts the GLA Group's Central Responsible Procurement Team (CRPT) within its P&C function.

The CRPT works with TfL, along with the wider GLA Group, to prioritise and deliver the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery. The CRPT chairs and coordinates

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<sup>1</sup> <https://www.ethicaltrade.org/eti-base-code>

a practitioner learning group to share best practice, manage emerging risks and ensure delivery of the RP Policy.

### 3 Risk assessment and management

The groups of people at highest risk of being subjected to modern slavery in our UK-based supply chain include construction workers and those undertaking service contracts in sectors such as cleaning, catering, security, and waste management, where low pay, migrant labour and/or indirect labour are prevalent.

The highest risks of poor working conditions and human rights abuses from our global supply chain are associated with the production and manufacture of electronic equipment, textiles and materials used in our construction and infrastructure projects including solar panels. As TfL transitions to a zero emission fleet, its exposure to risks associated with the mining and extraction of conflict and rare earth minerals, such as copper, lithium, nickel, tin, and cobalt, used in the production of batteries for electric vehicles, has also increased. We are working with partners, such as Electronics Watch, to address these risks as outlined in Section 6.

TfL recognises the corresponding source countries and associated sector risks in its supply chains for these categories to be as follows:

<b>Category</b>	<b>Country</b>	<b>Identified Sector Risks</b>
Construction	United Kingdom	Multi-tiered supply chains involving the use of labour agencies which 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, security, and catering services	United Kingdom	Low skilled labour; migrant labour; agency labour leading to lack of transparency in 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; worker's visa or permit is tied to a single employer; and financial penalties for early contract termination.
Uniforms and workwear	Bangladesh, 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 employer and structural integrity of factories.

Steel and steel components	China, Europe, Japan, India, USA	Country of production where labour rights might not be well protected; low-skilled labour, and dirty, dangerous, or difficult work in mines and smelting plants leading to poor labour conditions.
Stone	Brazil, China, Europe, India, USA	Country of production - US State Department of Labour highlights multiple countries where child and forced labour exists in quarries; child labour and unsafe working conditions.
Batteries	Cobalt – Democratic Republic of Congo (DRC); Lithium - Chile, Bolivia, China; Nickel – Indonesia, Philippines; Tin – Bolivia; Copper – Chile and semi-conductors – China, Malaysia, Taiwan	Sourcing of minerals presents the greatest risk to human rights abuses. Political instability or conflict particularly in the DRC; weak protection of civil liberties and workers’ rights; safe and healthy working conditions in mines can be poorly regulated and protected, particularly in artisanal mines.
Personal Protective Equipment (PPE)	China and Malaysia	Similar risks to those for uniforms and workwear
Waste Collection	United Kingdom	High risk of modern slavery, with two thirds of modern slavery victims in the UK working in the waste industry. Low paid, often migrant labour; prevalence of subcontracting and agency work leading to lack of transparency on employment practices. High profile cases in the press against waste suppliers operating in the UK.
Solar Panels	China	Reliance on manufacturing in China, with well documented state-sponsored forced labour practices, especially in the Xinjiang region affecting the Uyghur population.

TfL mitigates and manages these risks through its due diligence processes. A summary of our activity this year is set out in Section 4 below.

#### **4 Due diligence**

Through robust procurement and governance processes our P&C staff identify categories and contracts which are likely to present a high risk of human rights abuses and poor working conditions. This includes the use of an RP checklist for each tender and a spend category risk assessment.

All relevant procurements include a question at supplier selection stage on compliance to 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 abuse is identified.

We obtain assurances from our supply chain directly through our suppliers as part of the tendering process and then via online platforms such as the Supplier's Ethical Data Exchange (Sedex), where we access independently verified audit reports of factories as part of our contract management processes.

We have undertaken a risk assessment of our supply chain and invited medium and high-risk suppliers to complete the MSAT. We held a supply chain engagement event to encourage completion of the MSAT and hosted two due diligence workshops through our membership with the Supply Chain Sustainability School. This is to support our suppliers in improving their policies, practices, and processes in preventing modern slavery in our supply chains. More information about supplier completions of the MSAT is in the section below.

The following section highlights this year's interventions at the procurement and contract management stages. We have reviewed our 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 our approach continues to mature.

## **Examples of how TfL manages these matters**

### **Electronic equipment**

TfL is a founding member of Electronics Watch - an independent monitoring organisation that assists public sector buyers to meet their responsibility to protect the human rights of electronics workers in their global supply chains. Electronics Watch contract conditions, where suppliers are required to disclose the factories where goods and key components are produced, are included in our tenders for electronic equipment. For relevant tenders, bidders are also asked to outline how they would work towards establishing supply chain transparency over the duration of the contract, to assist with monitoring and improving labour conditions at sites of production.

Our frameworks for purchasing Oyster Cards and Information and Communication Technology (ICT) hardware included the Electronics Watch contract conditions. We work closely with Electronics Watch and our ICT reseller to improve the level of supply chain information that is shared with us, including going into component level factory disclosures as we recognise the risk increases further down our supply chain. In 2023/24, we continued engaging with Electronics Watch affiliates in Europe to learn from their experiences with brands and used our combined purchasing leverage to request greater engagement and transparency from them.

## **Low Emission Vehicle Programme**

In 2023/24, we continued our involvement in the Electronics Watch Low-Emission Vehicle Programme. In particular, we engaged with the Managing Directors from all eight of TfL's contracted bus operating companies (who procure and operate the zero-emission London buses), with a view to engaging with zero-emissions bus manufacturers.

In 2024/25, we will continue to collaborate with relevant bus manufacturers and Electronics Watch on a confidential basis, focusing on human rights due diligence and supply chain transparency. The information collected through this engagement will inform the Electronics Watch monitoring activity, which has a presence in key countries of the battery supply chain, including the Democratic Republic of Congo, Indonesia, Bolivia, the Philippines, China, Malaysia, and Taiwan. This monitoring activity will enable TfL, its bus operators, and manufacturers to understand more about their multi-tiered supply chains and to act appropriately to remedy any violations. It will also support TfL in achieving a just transition to net zero, ensuring that workers in its supply chains are not negatively impacted in the process of achieving this goal.

In 2024/25, we will also expand our risk-management approach to include requirements in the tender for cycle hire across London, which includes e-bikes and therefore has similar human rights risks in the supply chain as passenger vehicles.

## **Property developments and construction sites**

The construction sector is a large part of our risk profile. TfL's significant property development portfolio therefore requires thorough due diligence and mitigation activity.

In 2023/24 standardised tender questions and contractual requirements were included in Limmo Development joint venture tender run by Places for London. Limmo is a residential led development that would deliver circa 1500 homes in Canning Town, East London. Tender questions asked developers and potential Joint Venture partners how they will set up their construction sites to manage the risk of modern slavery, including how they manage recruitment processes with third parties. In 2024/25, tender requirements will be followed up with the successful bidder.

On our construction sites where we are the principal contractor, we have displayed the Gangmasters and Labour Abuse Authority worker checklist posters explaining the rights as a worker in the UK and where to find more information. These are translated into Romanian, Bulgarian and Polish and are being displayed on site noticeboards and in welfare units. Where we are not principal contractor, we have encouraged our suppliers to do the same and will continue to do so in the year ahead.

## **Managing our commercial property estate**

Places for London (formerly TTL Properties Limited) is our subsidiary commercial property company. It plans to deliver 20,000 homes over the next ten years and currently manages around 1,300 commercial tenants.

In 2023/24, we analysed our customer segments for modern slavery risk, and sent the information to the property management team, so that it can inform their inspection schedule as well as the inspections themselves.

Places for London has also formed Customer Advisory Groups for its retail and arches customers, respectively. The purpose of the Customer Advisory Groups is to provide further engagement between Places for London as landlord and its tenant customers, and to discuss and update on important policies and other matters. We discussed modern slavery at the Customer Advisory Groups in 2023/24 and will continue to have it on the agenda for meetings in 2024/25.

To further raise awareness of modern slavery, we also included modern slavery as a topic in the customer information campaign on compliance and safety.

### **Facilities management (cleaning, catering, and security services)**

TfL has taken a proactive approach to manage the risks of worker exploitation in the cleaning, catering, and security services contracts by including direct employment requirements in each contract. At the close of the financial year 2023-24, our security contractor directly employed 461 colleagues while the cleaning contractor directly employed 2,302 employees. All contracted and sub-contracted workers on these contracts receive the current London Living Wage rate or above. TfL continues to provide free travel to around 2,646 workers including cleaners, catering, and security staff from April 2024.

### **Uniforms**

In 2023/24 we have strengthened the requirements for our uniforms contract relet, which will be awarded in 2024/25. The requirements include commitments to publish factory locations on the Open Apparel Registry and engagement with ETI development programmes where relevant. This ensures transparency and allows us to adhere to the reporting requirements of our ETI membership, as well as appropriately manage the risk of state-sponsored forced labour in our textile supply chains.

### **Modern Slavery Assessment Tool**

This year, we continued our campaign to invite medium and high-risk suppliers to complete the MSAT and used contract management to improve the response rate. As of the end of the financial year, 44 suppliers have been invited with an 89 per cent completion rate, an increase from 80 per cent last year. We set a Key Performance Indicator for all 44 suppliers to score 70 per cent or above (the threshold to achieve a 'Green' status) by March 2024. To date, 50 per cent of those suppliers who have completed the MSAT have hit this threshold. A further 10 per cent of suppliers are currently in the process of improving their score by revisiting their submission. Contract managers of those suppliers that have not completed the MSAT will continue to emphasise the importance of completion to TfL during contract review meetings.

### **Solar panels**

TfL is continuing efforts to decarbonise our energy sources. Just transition is a crucial consideration as we uptake more renewable energy, ensuring that we are striving towards environmental commitments in a way that is fair and inclusive and



creating decent work opportunities and leaving no one behind. TfL works to address human rights concerns in the renewable energy supply chains and make London's transition to a zero-carbon city fair and just for workers in our supply chains.

In 2023/24, TfL 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. This is part of TfL's arrangement to provide procurement services to the GLA.

In 2023/24, we also began preparation for the procurement of a Solar Private Wire Framework that will increase our exposure to risks of forced labour, including state sponsored forced labour, in the solar photovoltaic (PV) supply chain. To address these risks, relevant areas of the framework agreement have been developed, setting out requirements for suppliers to adhere to the ETI Base Code, provide PV supply chain visibility, and monitor and report on labour practices in the PV supply chain. Where reasonably practicable, the supplier will also be asked to provide third-party social audit reports to TfL. TfL Responsible Procurement Managers will work with the supplier to address any non-compliance issues.

To address shared modern slavery and forced labour risks, TfL regularly engages with industry and civil society organisations. For example, we attended the Supply Chain Sustainability School's Net Zero Summit in September 2023 where Just Transition was a key focus of the discussion.

### **Industry engagement**

The CRPT continues to chair the 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 quarterly and has assisted with the roll out of the MSAT campaigns and sharing best practice from TfL's engagement with the Department for Transport modern slavery group and other industry bodies such as the ETI, Sedex and Electronics Watch.

The CRPT continues to utilise its networks to collaborate and share knowledge on socially responsible procurement, a key part of continuously improving our approach and sharing successes and challenges with our peers. The CRPT are also members of the International Working Group on Ethical Public Procurement. The Responsible Procurement Manager attended two meetings in 2023/24 where new working groups were formed to progress on policy, practice, and research in the field. Key learnings will be incorporated into future relevant procurements across TfL and the GLA Group.

### **London Transport Museum**

London Transport Museum (LTM) assessed its top 20 retail suppliers' approaches to modern slavery by inviting them to complete the MSAT. All 20 suppliers completed the assessment, with a wide range of scores, evidencing a breadth of maturity in combatting modern slavery. LTM promoted training materials and workshops to their retail suppliers to help improve their MSAT scores and develop their risk management approaches.

LTM's catering supplier has a comprehensive modern slavery statement and has taken proactive steps to manage their labour exploitation risks. Aligning to TfL's contract terms, the supplier uses the Sedex Self-Assessment Questionnaire (SAQ) with their supply chain to capture supply chain transparency data and gain greater visibility of working conditions. The supplier is targeting to have all their suppliers complete SAQs by the end of 2025.

## **5 Training and Awareness Raising**

This year we continued to focus on training and raising awareness, especially in relation to our supply chain and Places for London customers.

Upskilling our supply chain to help manage our shared risks is a key priority for us, recognising that some suppliers are further on their journey than others. In 2023/24, we arranged two workshops via the Supply Chain Sustainability School to suppliers completing the MSAT. These three-hour workshops trained suppliers in best-practice due diligence, risk assessment, supply chain mapping and other key areas to support any gaps in their MSAT responses.

Additionally, the CRPT provided a bespoke three-hour workshop with the lead Modern Slavery Consultant from the Supply Chain Sustainability School to the Retrofit Accelerator for Homes Innovation Partnership solution providers to specifically address the complexities of forced labour risks in polysilicon supply chains.

In 2023/24, Places for London repeated the 'spotting the signs' training for its property team, with 30 people completing the training. They also launched a responsible business skills programme. The programme, which lasts 12 months and is delivered by charity Heart of the City, will take around 40 of our small business customers through training on a range of responsible business practices, including managing their workforce and supply chain. The content includes modern slavery and how it relates to small businesses.

## **6 Reporting, key performance indicators (KPIs) and Goals for 2024/25**

The Responsible Procurement team co-ordinates the TfL and GLA Group approach to promoting ethical sourcing practices and addressing the risks of modern slavery, including metrics to monitor continuous improvement.

Our priorities for the year 2024/25 will be a combination of quantifiable key performance indicators and ongoing participation in projects, programmes, and initiatives:

### **KPIs:**

**Training:** Ensure staff in the Project Management Office working on relevant risk categories, including construction and capital projects, complete the Home Office Modern Slavery e-learning module.

**MSAT:** All TfL suppliers who have been assessed to be high and medium risk, to complete the tool and achieve an MSAT score of a minimum 70 per cent by March 2025. We will work with lower scoring suppliers to support improvements to their scores and encourage more suppliers to complete the assessment.

**Goals for 2024/25:**

**Internal Capability & Capacity:** New TfL staff in the Safety, Health and Environment Directorate, Places for London and the Capital Delivery and Projects community will be prioritised to receive training via TfL's membership of the Supply Chain Sustainability School.

**Supplier development:** Continue to raise awareness of modern slavery to our supply chain, assisting suppliers by providing workshops, resources, training materials and bidder briefings. Specific attention will be paid to London Transport Museum suppliers.

**Peer Learning:** Chair the pan-GLA Group practitioner learning group to share best practice and collaborate across the GLA Group and wider London Responsible Procurement Network in relation to modern slavery due diligence.

**External collaboration:** Continue to collaborate with partner organisations such as the ETI and Electronics Watch to address supply chain transparency and human rights due diligence issues, for example in the context of solar panels and zero-emission buses.

This Statement has been approved and published by the TfL Board and will continue to be reviewed at least once annually.

**Andrea Clarke, General Counsel**

**30 September 2024**

On 24 July 2024, the TfL Board approved the TfL Slavery and Human Trafficking Statement 2023/24 and authorised the General Counsel to agree the final form of the Statement.