

Board

Date: 24 July 2024

Item: Modern Slavery Statement

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 Modern Slavery 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 backward looking approval of a Statement for the financial year 2023/24 (1 April 2023 to 31 March 2024) that is required to be made and published, as set out in Appendix 1.
- 1.2 At its meeting on 16 May 2024, the Safety, Sustainability and Human Resources Panel considered the draft Modern Slavery Statement, as part of its wider consideration of responsible procurement.

2 Recommendation

- 2.1 **The Board is asked to note the paper and:**
- (a) **approve the draft TfL Modern Slavery Statement, attached as Appendix 1 to this paper; and**
 - (b) **authorise the General Counsel to agree the final form of the Statement.**

3 2023/24 Statement

- 3.1 A Statement is required to be made annually, within six months of the end of the financial year (i.e. by 30 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 a number of TfL’s subsidiary companies, subject to Board approval and will be considered by the remaining subsidiaries who are listed in the draft Statement before its publication at the end of September.

4 Updates from the 2022/23 Statement

- 4.1 The 2023/24 Modern Slavery Statement and supporting work saw the addition of two identified risk categories, to further increase transparency and risk mitigation. These are waste collection and solar panels.

Key and ongoing activity

- 4.2 2023/24 was an active year, where we built on our work to date and continued to identify categories and contracts which are likely to present a significant risk of human rights abuses and poor working conditions, and to develop appropriate mitigations. The paragraphs below outline our activities.
- 4.3 In 2023/24 we continued to manage our high-risk contracts, including uniforms, electronics, facilities management, construction, electric vehicles, and solar panels, and to evaluate tenders and embed contract conditions that address modern slavery risk.
- 4.4 This year, Places for London issued a joint venture tender for the Limmo Development site, a residential-led development in Canning Town that will deliver around 1,500 homes. Tender questions were included to ask developers how they will set up their construction sites to manage the risk of modern slavery, including how they manage recruitment processes with third parties. We will work with the successful bidder to ensure that contract requirements are adhered to and risks are mitigated effectively.
- 4.5 TfL continues to take a proactive approach to managing the risk of worker exploitation in the cleaning, security, and catering sectors by including direct employment requirements. As of 31 March 2024, our cleaning contractor directly employed 2,302 cleaning staff and our security services contractor directly employed 461 staff. All contracted and sub-contracted workers on these contracts receive the current London Living Wage rate or above. TfL will continue to provide free travel to around 2,646 workers including cleaners, catering, and security staff from April 2024.
- 4.6 In 2023/24, with the approval of our bus operators, we began collaborating with bus manufacturers and Electronics Watch, an industry-independent not-for-profit organisation, to achieve transparency regarding our electric vehicles supply chains. There is a three-year programme which aims to improve working conditions and strengthen workers voices in the supply chains of low emission vehicle batteries, where there are well documented human rights risks associated in the production and in the sourcing of raw material inputs such as cobalt, lithium, nickel and tin. The programme applies the successful worker-driven monitoring model of Electronics Watch to the electric vehicle market. 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. This monitoring activity will enable TfL, its bus operators, and manufacturers to understand more about their multi-tiered supply chains and to act appropriately. 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.

- 4.7 In 2024/25, we will expand our risk-management approach to include modern slavery 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 electric buses. We have used the learning and experience to date from our participation in the Electronics Watch electric vehicle programme to include transparency requirements in tenders relating to e-bikes. We will use this to engage with the successful supplier to work with them in identifying human rights risks.
- 4.8 We risk assessed all of our current 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, 89 per cent of the 44 invited suppliers have completed the assessment, an increase from 80 per cent in the previous year. We will continue to use contract management and supplier relationship management channels to encourage those that have not engaged to do so. We are also investigating whether there is a mechanism whereby those that have completed can demonstrate this publicly, to further encourage those that haven't. We will also explore the option to share anonymised scores with all suppliers so they can see how they are scoring compared to their peers, to incentivise them to aim for higher scores.

List of appendices to this report:

Appendix 1: Draft Modern Slavery Statement 2023

List of background papers:

None

Contact Officer: Rachel McLean, Chief Finance Officer
Email: RachelMclean@tfl.gov.uk