

**Date: 4 June 2025**

**Item: Legal Compliance Report (1 October 2024 – 31 March 2025)**

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**This paper will be considered in public**

**1 Summary**

- 1.1 This paper provides the Committee with summaries of legal and compliance information provided by each TfL Directorate for the Legal Compliance Report for the period 1 October 2024 to 31 March 2025. Updates are also provided for ongoing matters carried over from the previous reports where applicable.
- 1.2 There are no material breaches of law which would affect TfL's continued operations and reported matters continue to be broadly in line with previous reports.

**2 Recommendation**

- 2.1 **The Committee is asked to note the report.**

**3 Background**

- 3.1 The Legal Compliance Report is compiled from information supplied through questionnaires completed by each TfL Directorate and follow up discussions concerning known legal compliance issues.
- 3.3 The Directorates were asked to identify where they are aware of any alleged breaches of law between 1 October 2024 and 31 March 2025. The questionnaire sought responses concerning the following:
  - (a) prosecutions against TfL;
  - (b) formal warnings or notices from the Health and Safety Executive (HSE), the Office of Rail and Road (ORR), the London Fire Commissioner, the Environment Agency, the Information Commissioner, or the other Government agencies;
  - (c) investigations by the Ombudsman;
  - (d) alleged legal breaches notified by local authorities or other bodies;
  - (e) judicial reviews;
  - (f) involvement in inquests;
  - (g) commercial/contract claims in excess of £100,000;

- (h) personal injury claims;
  - (i) proceedings in relation to discrimination including on the grounds of race, sex, disability, age, religion or belief, sexual orientation, equal pay, or breach of contract;
  - (j) wrongful or unfair dismissal;
  - (k) actions to recover unpaid debt in excess of £5,000;
  - (l) breaches of procurement rules and/or the Competition Act 1998;
  - (m) other material compliance issues; and
  - (n) any initiatives introduced by Directorates to address compliance issues.
- 3.4 The numbers of matters reported against each of the categories listed in section 3.2 (a) to (l) above, together with the number of matters reported against them in each of the preceding two reporting periods, is set out in Appendix 1.

## **4 Commentary on Legal Compliance Issues**

### **Prosecutions**

- 4.1 No formal warnings or notices of prosecution were received during this reporting period.

### **Formal Warnings or Notices from the Health and Safety Executive or Office of Rail and Road**

- 4.2 On 28 March 2024, the HSE served a Notification of Contravention on TfL following its investigation into the tragic death of a pedestrian at Walthamstow bus station on 15 December 2023. The HSE identified a failure to provide safe crossings for vehicles and pedestrians which contravenes sections 2(1) and 3(1) of the Health and Safety at Work etc. Act 1974 and regulation 4(1) of the Workplace (Health, Safety and Welfare) Regulations 1992. Temporary measures were reported in the previous Legal Compliance Report. Permanent changes to the pedestrian crossings in the station to reduce pedestrian risk have now been made.
- 4.3 The HSE carried out an unannounced visit on 11 March 2025 and, on 24 March 2025, served a Notification of Contravention in relation to its observations at that visit. The HSE identified a failure to monitor driver activity on site which contravenes regulation 5(1) of the Management of Health and Safety at Work Regulations 1999. The HSE also identified a failure to provide instruction, and supervision to drivers which contravenes sections 2(2)(c) and 3(1) of the Health and Safety at Work etc. Act 1974. The HSE asked to see a clear process for tracking findings, monitoring trends and taking action against operators for poor driver behaviour. TfL already gains insight from engagement tours, official reports, daily checks and incident reports. Additional monitoring will be undertaken at Walthamstow bus station to provide a greater overall review of activity. TfL has also communicated with all bus operators reminding them of their safety duties and requested an update of the actions they have and are taking to address the

concerns in relation to driver behaviour. A response has been provided to the HSE.

- 4.4 Since the end of the reporting period, following an inspection, the ORR served TfL an Improvement Notice, dated 30 April 2025, in relation to platform-end barriers at Stepney Green station, following an inspection. The ORR has identified contraventions under section 3(1) of the Health and Safety at Work etc. Act 1974 for failing to implement effective measures to deter and prevent unauthorised access to the railway infrastructure beyond the platforms end barriers, namely to operational railway tracks and exposed high voltage electrical conductors. The notice requires that TfL remedy the contravention by 23 June 2025. We are working to address the issues raised and will provide a response by the deadline.

#### **Formal Warnings or Notices from the London Fire Commissioner**

- 4.5 The London Fire Brigade issued us with an Order under the Regulatory Reform (Fire Safety) Order 2005, dated 23 January 2025, for fire safety deficiencies following an inspection at Baker Street Underground station. The fire safety deficiencies identified included water ingress at the premises causing water damage to electrical equipment; an insufficient fire detection and warning system; a faulty fire control panel and insufficient fire risk assessment measures. TfL has commenced work to address the deficiencies by 10 July 2025, in compliance with the Order.
- 4.6 Since the end of the reporting period, the London Fire Brigade issued us with a Fire Safety Deficiency Notice, dated 16 April 2025, following an inspection at West Ruislip Underground station. The fire safety deficiencies identified included an inadequate fire detection and warning system; insufficient fire risk assessment and monitoring arrangements; and inadequate safety training for staff. TfL has commenced work to address the deficiencies by 28 May 2025.
- 4.7 No other fire safety deficiencies were reported on the rest of the network during this reporting period.

#### **Formal Warnings or Notices from the Environment Agency**

- 4.8 We previously reported a Compliance Notice received from the Environment Agency dated 7 October 2019 requiring the removal of all equipment containing polychlorinated biphenyls (PCBs) on the London Underground (LU) network by the end of 2023. PCBs on our network were safely contained within electrical components, not accessible to the public and had not escaped into the environment. We made good progress in complying with the Compliance Notice, however, due to a number of issues which were outside our control, including the coronavirus pandemic, we were unable to remove and replace all PCBs by that date. We have continually updated the Environment Agency with our progress in removing PCBs from the network, including where there were risks to completion. At the end of 2023 we confirmed to the Environment Agency that the remaining PCBs would be removed from the LU network by the end of 2024. On 10 October 2024, the Environment Agency issued a fine to LU of £150,000 for not completing the removal of all PCBs by the end of 2023 as required by the Compliance Notice, which, as reported previously, has been paid. The Environment Agency acknowledged the mitigating circumstances which delayed the PCB removal

programme and our extensive actions throughout the removal programme to ensure the LU network is free from PCBs when deciding on the level of the fine.

- 4.9 Our programme to remove and replace equipment containing PCBs on the LU network continued at pace in 2024 and in November 2024, the very last pieces of equipment containing PCBs were safely removed from our network. We subsequently informed the Environment Agency that we had complied with the Compliance Notice. The Environment Agency conducted a final inspection visit to LU on 19 March 2025 and confirmed completion of the work required under the PCB Compliance Notice, bringing this matter to a close.

#### **Formal Warnings or Notices from the Information Commissioner**

- 4.10 The Information Commissioner's Office (ICO) investigates alleged instances of non-compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act (DPA) 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (together, data protection legislation), the Freedom of Information Act 2000 (the FOIA) and the Environmental Information Regulations 2004 (the EIRs).
- 4.11 No formal action was taken by the ICO in the reporting period in connection with TfL's compliance with data protection legislation.
- 4.12 A requirement of the UK GDPR is for all data breaches posing a risk to individuals' rights and freedoms to be reported to the ICO within 72 hours, and for affected data subjects to be informed of the breach if it represents a high risk to their rights and freedoms.
- 4.13 TfL was subject to a cyber incident which was detected on 1 September 2024. We notified the ICO on 2 September and, on 13 February 2025, the ICO confirmed that it will not be taking any regulatory action against TfL as a result of the cyber incident and it considers the matter closed, unless new information comes to light which significantly changes its understanding of the incident. No other data breaches were reported to the ICO in this reporting period.
- 4.14 There were three new complaints to the ICO in this reporting period relating to TfL's compliance with data protection legislation. All three are now closed. There were no open complaints at the end of the last reporting period.
- 4.15 Two of the new complaints related to the handling of Subject Access Requests (SARs). In one case the ICO advised that they had been contacted by an individual who had not received a response that was posted to them. A further copy of the previously disclosed information was sent to the individual by Special Delivery. The second complaint was from an individual who had difficulty making a request by telephone. The ICO requested TfL review its processes and training. The right to make a verbal SAR already forms part of TfL's mandatory data protection training course. Guidance has been produced to reduce the need for customers to send in written proof of identity and to improve handling of verbal requests.

- 4.16 The third complaint was from an employee concerned about the inclusion of health data in a risk assessment shared with a contractor. The complaint was already under investigation by the TfL Privacy and Data Protection team and the ICO required TfL to respond to the employee within 28 days. That response has been provided and advice on data minimisation has been provided to the manager who made the disclosure and to people leaders working in that business area.
- 4.17 The FOIA and the EIRs give a general right of access to information held by public authorities. Public authorities are generally required to respond to requests for information within 20 working days and provide the requested information unless an exemption applies. Any person who has made a request to a public authority for the disclosure of information under the FOIA or the EIRs can complain to the ICO. Unless the complaint is resolved informally, the ICO records the outcome in a published Decision Notice. Appeals against the ICO's decision are heard by the First-Tier Tribunal (Information Rights).
- 4.18 In this reporting period 1,962 replies were provided within the statutory deadline to 1,967 requests made to TfL under the FOIA and EIRs (99.75 per cent).
- 4.19 There were four open ICO complaints at the end of the last reporting period. These related to the use of the EIR exceptions relating to confidentiality of proceedings and adverse effect on the course of justice, the use of an FOI cost limit exemption, the use of an FOI exemption relating to personal data and to the general handling of a request and the extent to which the requested information was held. All of these complaints resulted in a Decision Notice in TfL's favour.
- 4.20 Four new complaints were received by the ICO in this reporting period. Two complaints relate to the application of an FOI exemption protecting law enforcement and one complaint relates to the use of EIR exceptions relating to the adverse effect on internal defence, public safety and national security, the course of justice and commercial information. The fourth complaint was a general complaint regarding a response.
- 4.21 One of the complaints concerning the law enforcement exemption and the complaint relating to the adverse effect on internal defence, public safety and national security, the course of justice and commercial information resulted in Decision Notices issued by the ICO in TfL's favour and the general complaint was closed informally. One complaint remains open.
- 4.22 During this reporting period, the First-Tier Tribunal (Information Rights) dismissed an appeal against a Decision Notice which had been issued in TfL's favour in an earlier reporting period. This concerned the use of the FOI exception for law enforcement in a case about the cost of damage caused by graffiti on the TfL network. The Tribunal also dismissed five linked appeals against Decision Notices issued in TfL's favour relating to the non-disclosure of information about cameras used to enforce traffic restrictions and road user charging.

- 4.23 During this reporting period we were notified of a new appeal to the First-Tier Tribunal (Information Rights) submitted on 21 November 2024 against a Decision Notice in TfL's favour. The Decision concerned an EIR request about the technology used by Ultra Low Emission Zone (ULEZ) cameras. An application to strike out the appeal has been made as we consider it has no merit (the information does not exist) and we await the outcome. If it goes ahead the hearing will take place in June 2025.

**Formal Warnings or Notices from any other Government Department or Agency Indicating a Breach of Law**

- 4.24 One ongoing matter from the last period relates to a Notice of Assessment from HM Revenue and Customs (HMRC) issued following an investigation of TfL's Off Payroll Working process and whether the Off Payroll Working rules have been applied correctly. TfL is liaising with HMRC and continues to provide requested information. The matter is ongoing.
- 4.25 Since the end of the current reporting period, Thames Water served TfL with a notice of contravention on 4 April 2025 under the Water Industry Act 1991 and Water Supply (Water Fittings) Regulations 1999, following an inspection at the Battersea Power Station Underground station. The contravention relates to contamination, waste, misuse, erroneous measurement, and undue consumption of water. Works to rectify the contraventions have been completed and a follow-up inspection was undertaken on 16 April 2025, within 21 days, as required by the notice. Thames Water was satisfied with the works completed. No further action is required.

**Investigation by an Ombudsman**

- 4.26 There were two ongoing investigations from the last reporting period and one new investigation reported for this reporting period.
- 4.27 In the first ongoing investigation relating to the processing of a private hire vehicle licence renewal application, the Ombudsman agreed that TfL's offer to refund the licence fee for the delay caused in processing the renewal application was a satisfactory remedy. No further action is required.
- 4.28 In the second ongoing investigation relating to a rejected application made to the ULEZ scrappage scheme, the Ombudsman found that TfL had not correctly publicised the changes to the scrappage scheme requirements for taxis. In accordance with the Ombudsman's recommendation, TfL processed the application, made a payment and apologised to the complainant.
- 4.29 The new investigation related to the delayed processing of a private hire vehicle driver licence renewal application. The Ombudsman agreed that TfL's action to refund the licence fee was a satisfactory remedy. No further action is required.

## **Notices Received Regarding any Alleged Breach of Law by a Local Authority or Other External Agency**

- 4.30 There were four ongoing enforcement notice matters reported in the last reporting period and four new enforcement notices issued during the reporting period.
- 4.31 The first ongoing enforcement notice (received in October 2022) was issued by the London Borough of Haringey in relation to planning conditions for improvements to Tottenham Hale station. TfL's revised planning application was refused by the borough on 8 October 2024. on the grounds that it did not support the boroughs regeneration aspirations and safety. TfL submitted a further amended application, in March 2025, addressing the borough's concerns. This application is scheduled a review by the borough in early June 2025. The borough has decided not to enforce the notice in the meantime. The matter remains ongoing.
- 4.32 The second ongoing enforcement notice (received on 14 April 2023) was a Community Protection Notice issued pursuant to the Anti-social Behaviour, Crime and Policing Act 2014 which relates to the removal of graffiti at 19 locations in the Royal Borough of Kensington and Chelsea. TfL informed the Royal Borough of Kensington and Chelsea that the graffiti has been removed from all TfL property listed in the Notice by 29 November 2023 and that not all 19 locations in the Notice are TfL property. We received confirmation after the end of this reporting period, on 28 April 2025, from the Royal Borough of Kensington and Chelsea that the Notice is closed.
- 4.33 The third ongoing enforcement notice (received 1 December 2022) was issued by Westminster City Council in relation to improvement works required to the building façade at Queensway Underground station. The work was due to be completed by 23 June 2023 but was delayed due to complications in agreeing the construction design of the scaffolding. On 1 May 2024 Westminster City Council informed TfL that the work had not been undertaken in accordance with the enforcement notice. TfL completed the works in February 2025 which included reinstating the heritage features in compliance with the enforcement notice. The matter is now closed.
- 4.34 The fourth ongoing notice (received on 3 July 2024) issued by the London Borough of Tower Hamlets was for use of land adjacent to Magdalen Passage for the unauthorised installation of a container. As reported previously, TfL wrote to the tenant requiring them to remove the container or obtain the relevant planning permission. TfL has since discovered that the land is in the control of Network Rail and has informed the London Borough of Tower Hamlets of this. As there is no further action TfL can take, the matter is considered closed.
- 4.35 The first new enforcement notice (dated 12 December 2024) was a Planning Contravention Notice issued by the London Borough of Redbridge regarding land adjacent to 1041 Romford Road, Manor Park, for unauthorised advertisement, construction and use as a builder's merchant. Engagement has taken place between the property manager, the council and the tenant. The London Borough of Redbridge officers have confirmed to the tenant that they can submit a retrospective planning application. The matter is ongoing.

- 4.36 The second new enforcement notice (dated 10 January 2025) was issued by the Westminster City Council in relation to the display of five illuminated advertisements at a property at 1 Temple Place, London, which are not in keeping with the character and appearance of the Strand Conservation Area. The notice was issued pursuant to the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and required the removal of the advertisements by 11 April 2025. The tenant subsequently sought to appeal the Westminster City Council's decision. TfL has, in parallel, advised the tenant that their lease will not be renewed, and vacant possession is being sought. If the advertisements have not been removed by the date of vacation (to be agreed), TfL will remove them.
- 4.37 The third new enforcement notice (dated 20 January 2025) was issued by the London Fire Brigade following an inspection at Karridale Mansions, London (residential flats above Goodge Street station). The notice required that (i) the deteriorated condition of the external metal staircase serving as a secondary fire escape for residents; and (ii) the convoluted and narrow nature of the escape route leading over the station roof and through the station to the highway be addressed. The notice was subsequently withdrawn by the London Fire Brigade on 28 February 2025 due to an error in the notice. TfL is engaging with the leaseholder to find a suitable solution to the issues with the condition of the secondary fire escape, failing which it will commence a project to replace the staircase.
- 4.38 The fourth new enforcement notice (dated 22 January 2025) was a Community Protection Notice issued by the London Borough of Redbridge, pursuant to the Anti-social Behaviour, Crime and Policing Act 2014 which required the removal of bulky waste and litter from land at Newbury Park station, Eastern Avenue, within seven days of the notice. The bulky waste and litter were removed in compliance with the notice. The matter is now closed.

### **Decisions Subject to Judicial Review**

- 4.39 There were two ongoing judicial reviews from the previous reporting period and no new judicial reviews reported during this period.
- 4.40 The first ongoing judicial review claim was issued on 25 October 2023 by a group of claimants based in the Netherlands seeking to challenge the lawfulness of penalty charge notices (PCNs) issued to drivers working for those companies. The claim included allegations that PCNs issued under the Low Emission Zone and ULEZ schemes were unlawfully denominated in Euros and exceeded the amount prescribed by the relevant legislation. TfL has agreed a settlement of the claim which has been approved by the court. Any financial remedies will be subject to further directions from the court.
- 4.41 The second ongoing judicial review application was issued on 21 October 2024 by an individual challenging the decisions of the Parking Adjudicator to dismiss their appeal against a PCN issued by TfL following a moving traffic contravention. TfL responded to the claim and lodged its summary of grounds of resistance with the court. On 10 March 2025, the claimant's application for permission was dismissed but they have exercised their right to seek a review of that decision at an oral hearing. A hearing date is scheduled for 3 June 2025.



## **Inquests**

- 4.42 This section reports on those inquests in which TfL is either a witness, has been asked to provide information to the coroner or is, or may be, an interested person.
- 4.43 There were 14 ongoing inquests from the last reporting period and three new inquests reported during this reporting period. Seven of the 14 ongoing inquests were concluded: two were recorded as road traffic collision, two were accidental death, one suicide, one narrative conclusion, and one misadventure. In one case, TfL is considered not to be an interested person. Of the three new inquests, one was concluded as an accidental death. The outcomes of the six remaining ongoing inquests in which TfL is an interested person and the two new inquests are awaited.

## **Commercial/ Contract Claims Brought by or Against TfL in Excess of £100,000 (Not including Personal Injury Claims)**

- 4.44 Three new court claims were received on 17 and 18 March 2025, for unpaid debt relating to an equipment hire contract. TfL is arranging to pay the claims.

## **Personal Injury Claims**

- 4.45 TfL has been subject to 303 claims for personal injury that were closed during the reporting period, of which 18 were employers' liability claims by staff and 285 were for public liability, brought by customers/members of the public.
- 4.46 Of the 285 claims for public liability, 241 were closed without payment and 44 were settled. Two claims are made under the Equality Act 2010 by customers who allege their accessibility needs were not met; one of these claims is now being handled by the operator of the service concerned.
- 4.47 Of the 303 claims, 176 related to LU and 127 to other parts of the network. This is an increase from 145 and decrease from 149 respectively in the previous reporting period and compare with 140 and 119 in the period before that and the increases will be kept under review for trends.
- 4.48 Of the 18 claims for employers' liability, 10 were closed without payment and eight were settled.
- 4.49 There was a decrease in the number of closed claims compared with the last reporting period which reflects the decrease in the number of claims received overall. These are still significantly lower than they were pre-pandemic at 415 claims.

## **Employment Tribunal (ET) Proceedings**

- 4.50 There were 125 ET claims reported during the period, of which 89 were carried forward from the previous report and 36 were reported for the first time.
- 4.51 Of the 125 ET claims, 39 were for unfair dismissal, five for constructive unfair dismissal, one for wrongful dismissal, 10 for sex discrimination, 29 for disability discrimination, two for discrimination on the grounds of religion/belief, 21 for race or ethnic origin discrimination, two for age discrimination, three for whistleblowing,

two for part-time worker discrimination/detriment, three for unpaid holiday pay, two for breach of contract, two for health and safety detriment/breach of health and safety legislation, one for unauthorised deduction from wages, one for equal pay, one for the denial of the right to be accompanied, and one for flexible working detriment.

- 4.52 Of the 125 ET claims reported during the period, 91 cases are ongoing, 33 were concluded during the period and one was concluded during the last period but the Claimant's appeal remains outstanding. Of the 33 ET cases concluded, nine were won, seven were settled (two of which were non-financial and one of which was for reinstatement), one was lost (for which the remedy decision is awaited), three were partially won (and the remedy decision in relation to lost element is awaited), three were struck out, and 10 were withdrawn.
- 4.53 Considering the nature of new claims, settlements, and tribunal outcomes over the last 12 months, there has been no clear or discernible trend (either upwards or downwards) in relation to the number of claims relating to any specific protected characteristics. Overall, the number of ET claims lodged and the number of claims that are settled is the same level as in previous reporting periods. Any lessons learnt in relation to ET matters will be addressed in regular reporting to the People and Remuneration Committee.

#### **Civil Debt Claims in Excess of £5,000**

- 4.54 No such claims were brought during this reporting period.

#### **Other Material Compliance Issues**

- 4.55 Since 1 October 2022, the environmental activist group Just Stop Oil (JSO) has engaged in protests in London, including on a number of TfL's roads, resulting in obstruction of the highway and significant road traffic disruption. In response to these protests, on 17 October 2022 TfL made an application to the High Court seeking an interim injunction to protect the most important roads on the TfL network, preventing further protests designed to obstruct the highway. The interim injunction was granted on 18 October 2022.
- 4.56 A final hearing took place on 4 May 2023 to determine TfL's application for the interim injunction to be made permanent. A number of defendants signed an undertaking not to commit any prohibited acts set out in the injunction and as such were removed from the final injunction Order and were not liable to pay TfL costs, but a breach of the undertaking could result in contempt of court proceedings. A final injunction was granted against the remaining named defendants and Persons Unknown. The final injunction was granted for five years from the date of the Order made by the Judge in the Insulate Britain case (3 May 2023), with the consequence that the JSO injunction expires at the same time as the Insulate Britain injunctions.
- 4.57 Both the JSO and Insulate Britain final injunctions are subject to annual supervisory review by the court. The first such review took place on 13 and 20 May 2024 and, on 16 January 2025, the injunction was retained for the original term of five years from May 2023 subject to continuing annual supervisory review.

- 4.58 On 27 March 2025 JSO announced that they will no longer be engaging in the kind of disruptive protests which gave rise to our applications for injunctions since October 2022. We notified the court of this but sought to retain the injunctions at the annual review hearing on 12 May 2025. Following the review hearing the injunctions have been retained for six months until November 2025 when another review will take place.
- 4.59 On 24 December 2024, the Intellectual Property Office upheld a number of claims in TfL's favour in relation to the use by clothing company (Gap) of TfL's intellectual property. Protection of our trademarks is important to safeguard our successful brand licensing programme and generate revenue to reinvest into public transport.

### **Breaches or Alleged Breaches of Procurement Rules and/or the Competition Act 1998**

- 4.60 No known breaches or alleged breaches were reported.

### **Management of Compliance Issues**

- 4.61 TfL's legal and compliance risks are managed as part of TfL's overarching Enterprise Risk Management Framework. A range of operational and assurance processes are in place to mitigate these risks at all levels in the organisation.
- 4.62 These safeguards are supported by the provision of advice on, and training in relevant legal and corporate governance issues, which are tailored to the needs of TfL's business units.
- 4.63 The legal and compliance framework is the subject of continuous review and improvement. Initiatives to address compliance across TfL have included:
- (a) the continued provision of online training on Inclusion Matters including online and in-person training on Disability Awareness for People Leaders, to improve disability awareness across TfL to create an inclusive workplace and improving the experience of disabled colleagues;
  - (b) ongoing work to update contractual and commercial templates and forms to ensure they align with legal requirements;
  - (c) ongoing work to support Procurement and Commercial activity including reviewing arrangements for the implementation of the Procurement Act 2023;
  - (d) promoting ongoing compliance with information governance legislation (including the FOIA, EIRs, DPA 2018 and UK GDPR) and associated statutory Codes of Practice, including transparency and the proactive publication of information;
  - (e) ongoing use of Data Protection Impact Assessments, to review proposed new or changed uses of personal data;
  - (f) the promotion through the TfL Management System of Information Governance policies, instructions and guidance;

- (g) an independent review of safety governance and decision making and the formal investigation reporting process in TfL was completed in 2024/25 and supported by Risk and Assurance. The findings were reported to the Executive Committee and Safety and Security Panel and the actions will enhance the robustness of safety governance in TfL;
- (h) ongoing bespoke training to the business on a range of employment issues including employment law updates, reasonable adjustments requirements, disability discrimination, tribunal procedures, witness workshops, mediation and alternative dispute resolution, diversity and inclusion, respect in the workplace, probation, effective case management and providing guidance and best practice learnt from ET cases;
- (i) ongoing and regular issue of the employment law bulletin to managers and HR to support the dissemination of the latest developments in the law and best practice;
- (j) training on a wide range of legal issues including employment law updates, witness workshops, common contract pitfalls, money claims and court judgments, a practical guide to public inquiries, an update on compulsory purchase law, Greater London Authority powers and powers of functional bodies, legal privilege; and the Equality Act 2010 and the Public Sector Equality;
- (k) continued support with the use of TfL's e-tendering system to assist users to comply with the procurement regulations, and to observe the principles of transparency and equal and fair treatment of suppliers;
- (l) continued production of instructions, guidance and templates in the TfL Procurement and Commercial Management Framework to support compliance with regulations and governance; and
- (m) ongoing work to identify and address areas of weakness in TfL's processes, helping to implement corrective actions where appropriate.

## **5 Conclusions**

- 5.1 The Legal Compliance Report for the period 1 October 2024 to 31 March 2025 sets out the legal and compliance matters of which TfL senior management is aware. There are no material breaches of law which would affect TfL's continued operations.
- 5.2 Reported matters continue to be broadly in line with previous reports.

### **List of appendices to this report:**

Appendix 1: Legal and compliance matters covering reporting periods from 1 October 2022 to 31 March 2025.

**List of Background Papers:**

None

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