



# Transport for London Slavery and Human Trafficking Statement 2022/23

## 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 2022 – 31 March 2023.

## 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  
LUL Nominee BCV Limited  
LUL Nominee SSL Limited  
Rail for London (Infrastructure) Limited  
Rail for London Limited  
Tramtrack Croydon Limited  
TTL Blackhorse Road Properties Limited  
TTL Earl's Court Properties Limited  
TTL Kidbrooke Properties Limited  
TTL Landmark Court Properties Limited  
TTL Northwood Properties Limited  
TTL Properties Limited  
TTL Southwark Properties Limited  
TTL South Kensington Properties Limited  
Tube Lines Limited  
Victoria Coach Station Limited

More information on TfL and its subsidiaries can be found on our website:

<https://content.tfl.gov.uk/tfl-subsiidiary-organisation-june-2020.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 eighth annual statement to be published under the Act and relates to the period 1 April 2022 through to 31 March 2023.

### 1 Our organisation and supply chain

TfL is the integrated transport authority responsible for delivering Mayor of London, Sadiq Khan'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. Daily ridership is increasing since the lifting of lockdown restrictions in early 2022. Around 80 per cent of the customers that we served before the pandemic are now travelling on our network again, which has increased from around 25 per cent of pre-pandemic levels at the start of 2021/22. Our supply chain required to deliver our services has remained in place throughout. We do all we can to keep the city moving, working and growing and to make life in our city better.

Managing TfL's supply chain sits in our Procurement and Commercial (P&C) function, reporting to the Chief Finance Officer who in turn reports to the Commissioner of TfL. During 2022/23, TfL spent in excess of £5.8bn on goods, services and works required to operate and upgrade services across all transport modes. Our P&C function has around 568 staff.

Our key suppliers represent around 44% 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 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, receiving 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, 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](#).

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 all the Group's procurement activities, which support the delivery of the Mayor's commitments and strategies. It reflects best practice and

demonstrates our procurement activities meeting 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 to support 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; and
- seeking to improve transparency within the supply chain by working with suppliers and in partnership with the ETI and Electronics Watch to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

The RP Policy is supported by the [Responsible Procurement Implementation Plan \(RPIP\) 2022-24](#) which sets out the key actions proposed to deliver on 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 performance of key suppliers, and those assessed to be medium and to high risk, in eradicating the risks of modern slavery in their organisations and their supply chains by using a risk-based approach to utilise the Cabinet Office Modern Slavery Assessment Tool (MSAT).
- Increase internal awareness and capability to address modern slavery risks for staff through training and learning including the Home Office developed e-learning module and the Supply Chain Sustainability School's Modern Slavery Learning Pathway by April 2023.
- 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.
- Collaborate with partner organisations, such as the Ethical Trading Initiative 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 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 on 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 co-

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

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

### 3 Risk assessment and management

The highest risks of people falling victim 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. 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, is an increasing risk as TfL supports the transition to a net zero fleet. 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 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 and catering services | United Kingdom                   | Low skilled labour; migrant labour; agency labour leading to lack of transparency on 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 present 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, compounded by the rapid increase in global demand as a result of coronavirus resulting in pressure on manufacturers to produce large quantities in short timeframes.   |

TfL mitigates and manages these risks through our due diligences processes. A summary of our activity this year is outlined below.

#### **4 Due diligence**

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

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 abuses 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 to support our suppliers in improving their policies, practices and processes in preventing modern slavery in our supply chains.

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. 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 certain 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 one of our ticketing payment solution - Oyster Cards - and ICT hardware included 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. We engage with Electronics Watch affiliates in Europe to learn from their experiences with brands and use our combined purchasing leverage to request greater engagement and transparency from them. Since our affiliation with Electronics Watch in 2015, the level of factory disclosures and engagement from brands has improved greatly, demonstrating the role that public procurement has in driving industry change with regards to human rights due diligence.

#### **Low emission vehicles and charging infrastructure**

In April 2022, we 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 working conditions and strengthen workers voices in the supply chains of low emission vehicle batteries by applying the successful worker-driven monitoring model of Electronics Watch to the electric vehicle market. The model goes beyond traditional audit programmes to put workers

and rights holders at the centre of monitoring activity, helping us to gain a true understanding of working conditions in our supply chain.

TfL's Corporate Environment Plan and the 2023 Business Plan commit us to have a zero-emission bus fleet, currently around 9,000 buses, by 2034 at the latest with the possibility of delivering this by 2030. The Mayor of London, through his Responsible Procurement programme and his chairing of the C40 Cities Climate Leadership Group, is committed to ensuring the transition to a zero-carbon London is fair and just which includes tackling the significant human rights risks in electrifying the bus fleet.

The first step in human rights due diligence begins with supply chain transparency which we recognise as a particular challenge in the vehicle battery market. In 2022/23 we engaged with the Managing Directors from all eight of TfL's bus operators, who procure, own, and operate buses used on TfL's network, with a view to collaborating with bus manufacturers and improving their supply chain transparency.

In 2023/24, with the approval of all our bus operators, we will collaborate with bus manufacturers and Electronics Watch on a confidential basis to establish supply chain transparency. This information 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, appropriately act to remedy any violations and take a pragmatic approach to support a just transition to net zero.

We have shared this industry-leading approach internationally to the C40 Cities network as a platform to collaborate and share best practice with our peers who are also addressing supply chain ethics in the transition to net zero carbon cities. International collaboration on these global issues remains key and the low-emission vehicle programme allows us to join up discussions with other transport bodies in Europe where we share supply chains and leverage our procurement power to make a meaningful impact.

With the increasing level of private electric vehicle ownership, TfL went to market for Electric Vehicle Infrastructure Delivery which seeks to align and simplify how charge points are procured across London. The call-offs under this framework will be 15 years in length meaning that, while the charge point market may not currently be mature in its human rights due diligence, we have leverage as a contracting authority to expect improved levels of supply chain transparency and due diligence over the life of the contracts. We have included requirements to this effect and will monitor delivery in the years ahead, taking a holistic approach to managing modern slavery risks in the electrification of London's vehicles.

In 2023/24 we will expand our risk-management approach to include requirements in the tender for cycle hire across London which includes e-bikes and therefore poses similar human rights risks and supply chains to passenger vehicles.

## **Property developments and construction sites**

The construction sector is a large part of our risk profile and TfL's significant property development portfolio therefore requires thorough due diligence and mitigation activity. Standardised tender questions and contractual requirements have been produced and included across the property portfolio which to date has included the Connected Living London Joint Venture, the Bollo Lane development and the over station development sites in Bank, Paddington and Southwark. Tender questions ask 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, and points bidders towards best practice material such as the Supply Chain Sustainability School's Awareness Identification Response model. Potential developers are also asked how they will ensure core construction materials such as brick, quarry products, steel and timber are sourced to ensure compliance with the ETI Base Code.

These tender requirements will then be followed up with the successful bidder who is required to produce an ethical sourcing and modern slavery action plan, building on any feedback received at the tender stage as well as documenting the main products originating from source countries where there is a documented risk of modern slavery.

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**

Transport Trading Land and Property (TTLP) is our subsidiary commercial property company which has plans to deliver 20,000 homes over the next ten years and currently manages around 1,300 commercial tenants. We formed a new compliance team within TTLP Asset Management in 2022. The compliance team is tasked with engaging with our tenant customers directly on their statutory compliance, maintenance and documentation. The compliance team has created a clear enforcement regime and as members of staff who regularly visit our estate, their role in identifying possible instances of modern slavery is an important one.

In March 2022, the compliance team received training in how to spot the signs of modern slavery, delivered by the Supply Chain Sustainability School. The training increased awareness of the issues and how to report concerns via our internal processes or seek further assistance externally. The training was also attended by our TTLP Commercial Director. A refresher course was offered to our property surveyors, who had been previously trained in September 2021. Both the compliance team and property surveyors regularly visit our commercial property customers and premises, and the training enables them to spot and report the signs of modern slavery on our estate.

In 2023/24 we will further mitigate the risk of modern slavery on the TTLP commercial property estate by setting clear expectations and issuing helpful information to our tenant customers. We will further analyse our customer segments for modern slavery risk to ensure our compliance team are clear on where our risks lie across the estate and how these risks overlap with wider compliance checks the team will undertake.

TTLP has formed Customer Advisory Groups for its retail and arches customers, respectively. The purpose of the Customer Advisory Groups is to provide further engagement between TTLP as landlord and its tenant customers and to discuss and update on important policies and other matters. We will discuss modern slavery at the Customer Advisory Groups in 2023/24.

To further raise awareness of modern slavery, we will include modern slavery as a topic in our upcoming customer information campaign on compliance and safety.

### **Brand licensing**

In 2022/23, we ran a procurement exercise for the relet of our brand licensing contract, for an agency to manage TfL branded products on our behalf. The products can range from textiles through to games and children's toys, some of which are sold in the London Transport Museum. As a result, we need to ensure products sourced from high-risk countries or that have an inherent risk, such as textiles, meet our ethical standards which align to the ETI Base Code, before production begins. All prospective brands who wish to work with TfL are required to provide evidence demonstrating their adherence to the Base Code meaning we gain greater visibility of working conditions in the vast and varied supply chain operating under this contract. Prospective suppliers were asked to demonstrate their process for engaging with brands on their ethical sourcing activity and how they would share this information with TfL as part of future brand proposals.

### **Surface Technology Contract Retender (STCR)**

The STCR contract includes the supply of a number of essential assets to Surface Transport, notably CCTV, Traffic Signals, Variable Message Signs, Overhead Vehicle Detection devices, etc. plus the provision of capital works and maintenance activities across London for the above asset categories. Modern slavery risks were identified in the supply of these assets and in the labour provision in London.

In 2022/23 we continued the evaluation of bidders approaches to identifying the modern slavery risk in their workforce, and their supply chains workforces which as a minimum, included: management practices and governance structure; risk assessment and due diligence procedures, including the use of auditing; communication with suppliers and supply chain; policies / contract requirements and supply chain training. They were also asked to disclose how far down the supply chain they would disclose factory locations and commit to improving supply chain transparency over the life of the contract, as part of the Electronics Watch terms and conditions.

In 2023/24 the successful bidder(s) will be required to provide an Ethical Sourcing Plan to be agreed by the contractor and TfL Responsible Procurement Manager and will be updated on an annual basis for the duration of the contract.

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

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. In March 2023, 95 per cent of the around 2,500 cleaning staff were directly employed by the supplier. All contracted and sub-contracted workers on this contract receive the current London Living Wage rate or above and TfL have committed to providing free travel to around 5,800 workers including cleaners, catering and security staff from April 2023.

### **Uniforms**

We continue to work with our supplier of TfL uniforms on a programme of supplier development and assurance. Our supplier completed the ETI's Enhanced Expectations Survey, for their factories in Bangladesh and China, and were not deemed to be a risk as a result.

In 2023/24 we are undergoing the relet of our uniforms contract and have strengthened the requirements to include commitments to publish factory locations on the Open Apparel Registry and engagement with ETI development programmes where relevant. This ensures transparency for this at-risk supply chain, that we can adhere to the reporting requirements of our ETI membership and appropriately manage the risk of state-sponsored forced labour in our textile supply chains.

### **Workwear and laundry**

This contract replicated the approach to ethical sourcing included in TfL's uniform contract where, following contract mobilisation each factory is required to undergo an annual, independent, third-party social audit against the nine principles of the ETI Base Code. The contract conditions include a time-bound corrective action plan for each factory to address any areas of non-compliance identified in the annual audit. Audit results are viewed, and corrective action plans tracked online through the Sedex system.

### **Personal protective equipment**

Due to the recognised risk of modern slavery in the supply of PPE, we have continued to work closely with our Tier 1 supplier who previously shared evidence of the due diligence processes of their two key suppliers, which included manufacturing factories to be audited at least every two years (Sedex Members Ethical Trade Audit or SA8000 Social Accountability audits) and compliance to their Ethical Standard Code of Conduct, as well as other due diligence initiatives. We have remained informed on labour issues in the PPE supply chain via industry-level modern slavery groups and have raised any issues directly with our Tier 1 supplier. We have considered industry codes such as the Responsible Glove Alliance to inform our due diligence approach and have made labour rights issues a standing agenda item at contract review meetings. We will continue to work with our main supplier to improve transparency of these supply chains, as the issues are complex and systemic and will take time and collaboration to fully address.

### **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, 51 suppliers have been invited with an 80 per

cent completion rate, an increase from 50 per cent last year. We have set a Key Performance Indicator for all 51 suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status, by March 2024. To date, 61 per cent of those suppliers who have completed the MSAT have hit this threshold.

To support our suppliers in meeting the target, in 2022/23 we arranged two modern slavery due diligence workshops with the Supply Chain Sustainability School put on free of charge for our suppliers. 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.

### **Solar panels**

As part of TfL's arrangement to provide procurement services to the GLA, the TfL team has 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. Following the release of the 'In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains' report from Sheffield Hallam University<sup>2</sup> a presentation was given to the solution providers providing an overview of the issues highlighted in the report. The solution providers will be encouraged to work on mapping their supply chains and work towards providing transparency and traceability of polysilicon.

In 2023/24, the CRPT are providing a bespoke three-hour workshop with the lead Modern Slavery Consultant from the Supply Chain Sustainability School to the solution providers to specifically address the complexities of forced labour risks in polysilicon supply chains. This will support providers on addressing this challenging and emerging issue and address the need for London's transition to a zero-carbon city be fair and just for workers in our supply chains.

### **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 on a quarterly basis 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. In November 2022, the team presented to Electronics Watch affiliates on the TfL's progress on the Low-Emission Vehicle Programme as well as to the C40 Cities Network, attended by cities across, North and South America and Europe. The CRPT are also members of the International Working Group on ethical Public Procurement. Key learnings will be incorporated into future relevant procurements across TfL and the GLA group.

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<sup>2</sup> <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/in-broad-daylight>

## **London Transport Museum**

London Transport Museum (LTM) assessed their 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 continues to promote training materials and workshops to their retail suppliers to help improve their MSAT scores and develop their risk management approaches.

LTM's TfL licensed suppliers are contracted via the TfL brand agency contract, the recent relet of which includes strengthened contractual requirements and tender questions, referenced above, helping to manage the modern slavery risk of these suppliers. Future licensees used by LTM under this contract will be monitored and required to demonstrate how they adhere to the principles of the ETI Base Code as part of their onboarding under the contract.

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 suppliers with completed SAQs by the end of 2025.

## **5 Training and Awareness Raising**

This year we continued to focus on training and raising awareness in our P&C department and our Capital Delivery and Projects teams, as these are the business areas identified from our risk assessment in section 3 of this statement.

### **Procurement and Commercial**

To ensure that modern slavery and ethical sourcing risks are considered in the early stages of procurement when developing business cases and category management strategies, RP training is available to the P&C teams. The RP e-learning module has been completed by over 700 staff members to date which includes an overview of TfL's approach to ethical sourcing and modern slavery risk management.

In Autumn 2022, all P&C staff received a one-hour classroom learning on Responsible Procurement which communicated our approach to managing modern slavery risks, where to go for extra support and how to assess risk using internal and external resources. This means all procurement staff have received an overview of internal approaches and we will ensure more detailed training is undertaken by those managing relevant categories, as detailed below. As of 31 March 2023, 56 P&C staff have completed all modules of the Home Office modern slavery e-learning.

### **On-site staff**

Due to the need for high volumes of low-skilled labour with relatively short delivery deadlines using tiered supply chains, the UK construction sector is identified as a high-risk by the Gangmasters and Labour Abuse Authority. To ensure our staff working on our construction and project sites are aware of the signs of modern slavery and know what to do if they do see suspicious behaviour we have previously trained staff via the Supply Chain Sustainability School for colleagues from Safety,

Health and Environment and Property Management. In March 2023 we hosted a lunch and learn session for those colleagues who hadn't previously attended and as a refresher for those who had. This included the newly formed TTLP compliance team who manage and visit TfL tenants across the estate and therefore play an important role in our risk management.

TfL will continue to use its membership of the ETI, Sedex and Electronics Watch to maintain awareness of best practice and current developments, benchmark with other organisations and externally verify our approach.

### **Awareness raising**

Further awareness raising across the organisation continued this year, building on existing activity. Previously, 100 colleagues from our Technology and Data team attended a lunch and learn session delivered by the CRPT to highlight the risks to staff outside of P&C. We have also increased our organisation-wide communications, previously marking Anti-Slavery Day with an internal blog post as well as producing a dedicated site for staff to access resources and learn more about the issues and our approach to managing them. We will continue to ensure the risk of modern slavery is highlighted to relevant category teams and that refresher training is offered as our approach continues to develop and mature.

### **Supply chain**

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 2022/23 we continued to host workshops via the Supply Chain Sustainability School to suppliers completing the MSAT and will be offering further support to high-risk contracts and suppliers in the year ahead. To date, suppliers from across our supply chain have attended training sessions provided free of charge, covering track maintenance, IT, rolling stock, construction and uniforms. Feedback has been positive and we will build on this engagement as we continue to rollout the MSAT and support suppliers to develop their practices, policies and processes.

## **6 Reporting, key performance indicators (KPIs) and Goals for 2023/24**

The Responsible Procurement Programme 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 of internal capacity building and supply chain assurance.

Our priorities for the year 2023/24 will be a combination of quantifiable key performance indicators and ongoing participation in projects, programmes and initiatives:

### **KPIs:**

**Training:** Build on the overview of modern slavery which all TfL commercial and procurement staff received in 2022 by ensuring staff in relevant risk categories complete the Home Office developed 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 2024. We will work with lower scoring suppliers to support improvements to their scores and encourage more suppliers to complete the assessment.

#### **Goals for 2023/24:**

**Commercial Property:** We will further analyse our customer segments for modern slavery risk to ensure our compliance team are clear on where our risks lie across the estate. We will put modern slavery on the agenda at the Customer Advisory Groups in 2023/24. We will include modern slavery as a topic in our upcoming customer information campaign on compliance and safety.

**Public Procurement Note (PPN) 02/23:** Review the PPN 02/23 guidance on tackling modern slavery in government supply chains and embed learnings from it into future procurements and/or approaches.

**Raise Awareness:** Continue to raise awareness of modern slavery to our supply chain, assisting suppliers by providing workshops, resources, training materials and bidder briefings. New TfL staff in the Safety, Health and Environment Directorate; TTLP and the Capital Delivery and Projects community will be prioritised, through TfL's membership of the Supply Chain Sustainability School.

**On-site awareness:** Ensure our new and current suppliers and site managers continue to display the Gangmasters and Labour Abuse Authority's worker rights checklist on all construction sites.

**Peer Learning:** Chair the pan-GLA Group practitioner learning group to share best practice and collaborate across the GLA Group in relation to modern slavery due diligence and to continue to learn and share with the transport industry through TfL's representation on the DfT Modern Slavery Group.

**Low-emission Vehicles:** Continue to take part in the Electronics Watch Low-Emission Vehicle programme encouraging bus manufacturers and fleet providers to collaborate with us to improve supply chain transparency and working conditions in the mining and manufacturing of minerals used in the production of batteries for electric vehicles.

**State-sponsored forced labour:** Continue to collaborate with partner organisations such as the ETI and Electronics Watch to progress due diligence issues, such as the treatment of Uyghur Muslims in China, in our supply chains and those of the GLA where TfL provide procurement services, such as the provision of solar panels in the Retrofit Accelerator framework.

**London Transport Museum:** The LTM Retail Team will work with the CRPT and TfL procurement team to support low scoring suppliers from their MSAT campaign and act on the recommendations provided. This will include providing access to workshops and training resources and monitoring engagement.

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

A handwritten signature in black ink, appearing to be 'Howard Carter', written over a horizontal line.

**Howard Carter, General Counsel**

**19 September 2023**

On 25 July 2023, the TfL Board approved the TfL Slavery and Human Trafficking Statement 2023 and authorised the General Counsel to agree the final form of the Statement.