

# Transport for London Slavery and Human Trafficking Statement 2021/22

## 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 2021 – 31 March 2022.

## 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 Earls 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-subsiary-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 seventh annual statement to be published under the Act and relates to the period 1 April 2021 through to 31 March 2022.

## **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 and is now regularly around 60 per cent of pre-pandemic levels, increasing from 3.5 million daily journeys during the pandemic. 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 is the direct responsibility of the Chief Procurement Officer currently reporting to the Chief Capital Officer, who in turn reports to the Commissioner of TfL. During 2021/22, TfL spent in excess of £6.1bn on goods, services and works required to operate and upgrade services across all transport modes. Our Procurement and Commercial (P&C) function has around 567 staff.

Our 64 key suppliers represent around £3.7bn of our addressable spend. These suppliers offer a wide range of strategically important goods and services to TfL. Over 95 per cent 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 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 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.

To support the business in implementing the Policy, 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 GLA Group Responsible Procurement (RP) Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery.

### **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. The mining and extraction of conflict and rare earth minerals such as copper, lithium, nickel and cadmium, 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:

---

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

<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, US.	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, US.	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 and Copper – Chile.	Sourcing of cobalt presents 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

Personal Protective Equipment (PPE)	China and Malaysia	Similar risks to those for uniforms and workwear, compounded by the rapid increase in global demand from 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, 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 Cabinet Office Modern Slavery Assessment Tool (MSAT). We held a supply chain engagement event to encourage completion of the MSAT and will use the results to work with our suppliers to improve 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

##### Property Developments and Construction Sites

The construction sector is a large part of our risk profile and TfL’s vast 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 and this year were included them in the suite of developments under the Connected Living London Joint Venture and the Bollo Lane development which is delivering approximately 800 units. Tender questions asked 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, 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 Gangmaster and Labour Abuse Authority worker checklist posters explaining the rights as a worker in the UK. 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.

### **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. Considering feedback from early market engagement in early summer, therefore, we developed a bespoke approach to mitigate these risks.

At the tender stage, bidders were evaluated on their approach to identifying the modern slavery risk in their workforce, and their supply chains workforces and as a minimum, include: 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. 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.

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, were also included in the STCR. Bidders were asked at the tender stage 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. We will closely monitor these outcomes going forward to ensure our suppliers share their often-complex global supply chains with us.

## **Contract Management**

### **London Underground bespoke components**

The framework for London Underground bespoke components supplying copper and steel parts commenced this year and suppliers have been required to submit their modern slavery action plans. Many of the suppliers on the framework are Small and Medium Enterprises and so the TfL Responsible Procurement team has provided support to suppliers in developing these plans to ensure a base level of due diligence activity is undertaken. Guidance has been provided to contract managers so they are able to raise any issues during contract reviews meetings and can provide ongoing support to suppliers as they progress their activity in this area.

### **Electronic equipment:**

Our frameworks for our ticketing payment solution - Oyster Cards - and ICT Hardware included Electronics Watch contract conditions and this year our reseller of ICT Hardware disclosed further factory locations of some of their products and we will continue to work with our reseller and Electronics Watch to increase the transparency of their supply chain.

We have been working closely with our supplier of CCTV cameras on the London Underground to ensure they are registered with Sedex and have completed their Self-Assessment Questionnaire for their sites of production in their supply chain. Once complete, we will gain transparency of these sites and can use the Sedex Radar tool to assess the risk profile and take appropriate action.

### **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 2022, 95.1 per cent of the circa 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.

### **Uniforms:**

We continue to work with our supplier of TfL Uniforms on a programme of supplier development and assurance. Long-term commitments such as engagement in ETI programmes has been on hold until Commercial issues are finalised but ongoing auditing and updates on supplier development activity continue. 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.

### **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. Contract mobilisation has commenced following a delay due to the coronavirus pandemic. 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 (SMETA) 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.

### **Supplier Engagement**

This year, we commenced our campaign to invite medium and high-risk suppliers to complete the Cabinet Office MSAT. As of the end of the financial year, 54 suppliers have been invited with a 50 per cent completion rate. We have set a Key Performance Indicator for all 54 suppliers to score 70 per cent or above, the threshold to achieve a 'Green' status. In the year ahead, we will be working with those suppliers who have scored below 70 per cent, providing access to training resources and supporting their development actions which are provided by the MSAT following completion. We will also encourage more suppliers to complete their assessments and begin to include contractual mechanisms to require completion in upcoming medium to high-risk tenders.

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. The CRPT will support providers on addressing this challenging and emerging issue, linking in with industry experts and providing training support via the Supply Chain Sustainability School.

### **Industry Engagement**

This year, the CRPT established a 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 representation on

---

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

both the Rail Safety and Standards Board (RSSB) and the Department for Transport modern slavery groups.

The CRPT continues to utilise its networks to collaborate and share knowledge on socially responsible procurement. In the first half of 2021, the team participated in the Organisation for Economic Co-operation and Development Pilot on Due Diligence in the Public Procurement of Garment & Textiles and the ICLEI (Local Governments for Sustainability)-led International Working Group on Ethics in Public Procurement for IT, with public authorities from a global and European reach respectively. 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.

In October 2021, a CRPT member presented at a webinar titled 'How to break the cycle of climate change leading to forced labour', communicating our approach to audience members, sharing and learning from best practice to ensure a just transition to net zero.

## **Crossrail**

This will be the final year in which there will be a dedicated Crossrail section within the TfL statement. As at March 2021 the construction railway transitioned to an operational railway. During early months of the 21/22 financial all the remaining stations (except Bond Street) ceased to be construction sites; and passed to RFLI or LUL as operational properties.

The year 2021/22 has consisted primarily of railway testing and commissioning activities. Revenue services commenced on 24 May 2022. The extent of construction activities and the number of active suppliers has thus greatly reduced from 2020/21. With few exceptions (Bond St, signalling and comms), residual Crossrail works are now being progressed through existing LU and RFL supply chains and to which other sections of this statement apply.

As with earlier years, CRL have obtained reaffirmation from their contractors that they are paying their own employees the London Living Wage and using reasonable endeavours to ensure that their supply chains also pay the LLW for time worked on the CRL Project.

## **London Transport Museum**

London Transport Museum (LTM) assessed their top 20 retail suppliers approaches to modern slavery by inviting them to complete the UK Government's MSAT this year. All 20 suppliers have now completed the assessment, with a wide range of scores, evidencing a breadth of maturity in combatting modern slavery. The LTM Retail Team will collaborate with the TfL team to work with the low scoring suppliers across their supply chains and act on the tailored good practice recommendations to improve their anti-slavery activity. This will include guiding suppliers to best practice resources, training materials and workshops. The LTM will continue to monitor medium and high-risk suppliers via their MSAT improvements.

## **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 Supply Chain**

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 616 staff members to date which includes an overview of TfL's approach to ethical sourcing and modern slavery risk management. As of 31 March 2022, 48 P&C staff have completed all modules of the Home Office modern slavery e-learning.

### **Capital Delivery and Projects**

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 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 ran three modern slavery awareness raising sessions this year. We arranged training courses via the Supply Chain Sustainability School for our remaining colleagues from our Safety, Health and Environment team who hadn't attended previous sessions and the Property Management team with. A total of 85 staff attended these sessions.

TfL intends to continue to use its membership of the ETI and Sedex 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. One-hundred colleagues from our Technology and Data team attended a lunch and learn session delivered by the CRPT. We have also increased our organisation-wide communications, publishing an Intranet article to mark Anti-Slavery day on 18 October 2021 as well as a dedicated site for staff to access resources and learn more about the issues and our approach to managing it.

### **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. We delivered a workshop for ten of our supply partners on recognising the signs of modern slavery and raising awareness of the issue. Suppliers from across our supply chain attended, covering track maintenance, IT, rolling stock, construction and uniforms. Feedback was 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 2022/23

The Responsible Procurement Programme co-ordinates the TfL and GLA Group approach to promoting ethical sourcing practices and addressing the risks of modern slavery over the Mayoral term including metrics to monitor continuous improvement of internal capacity building and supply chain assurance.

Our priorities for the year 2022/23 will be a combination of quantifiable key performance indicators and ongoing participation in projects, programmes and initiatives:

### **KPIs:**

**Training:** All TfL commercial and procurement staff to complete modern slavery training, such as the Home Office developed e-learning module by April 2023

**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 2022/23:**

**Raise Awareness:** Continue to raise awareness of modern slavery to our supply chain, assisting suppliers by providing workshops, resources and training materials, as well as TfL staff in the Safety, Health and Environment (SHE) Directorate; Commercial Development and the Capital Delivery and Projects community, through TfL's membership of the Supply Chain Sustainability School.

**Increase capability:** We will continue to upskill commercial and procurement staff, as well as contract managers on how to tackle modern slavery in supply chains through the Home Office e-learning package and on supply chain transparency through bespoke learning sessions with Electronics Watch.

**On-site awareness:** Encourage our suppliers and site managers to display the Gangmaster 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 RSSB Modern Slavery Group.

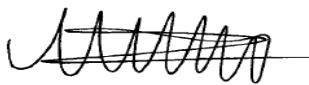
**Minerals Supply Chains:** Take part in the Electronics Watch Low-Emission Vehicle programme encouraging bus manufacturers and fleet providers to work with us to improve supply chain transparency and working conditions in the mining and manufacturing of minerals used in the production of batteries for 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.

**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.



**Howard Carter, General Counsel**

**30 September 2022**

For TfL Board

On 27 July 2022 (Minute 58/07/22) the TfL Board approved the draft TfL Slavery and Human Trafficking Statement 2021-22 and authorised the General Counsel to agree the final form of the Statement.