



Transport for London Modern Slavery Statement 2024/25

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 2024 – 31 March 2025.

Organisations covered by this statement

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

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

Dormant subsidiaries covered in previous statements have been removed from the above list. More information on TfL and its subsidiaries can be found on our website: [TfL Subsidiary Companies Structure as March 2025](#)

Introduction

This Statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015](#) (MS Act) by informing our customers, suppliers, colleagues, and the public about TfL's approach to identify, prevent and mitigate the risks of modern slavery, human trafficking, forced and bonded labour and human and labour rights violations in its supply chains. This is TfL's tenth annual statement to be published under the MS Act and relates to the period 1 April 2024 to 31 March 2025.

A record of all of our Statements can be found in the TfL July Board papers:

- from 2022 onwards on the [TfL Board website](#); and
- from 2016 to 2021 inclusive in the [Publications and Reports](#) section of the TfL website.

The statement is organised as follows:

1. Our organisation's structure, business and supply chains
2. Policies in relation to modern slavery
3. Due diligence process
4. Training
5. Goals and Key Performance Indicators (KPIs)

1. Our organisation's structure, business and supply chains

TfL is the integrated transport authority created by the Greater London Authority Act 1999 and is responsible for delivering the Mayor of London's strategy and commitments on transport. We run most of London's public transport services and manage the city's red route strategic roads.

The Greater London Authority (GLA) is the main governing body for London, responsible for the strategic planning and social and economic development of the city. The GLA Group is made up of its functional bodies, including TfL and four other key organisations overseeing policing, fire and rescue, and planning. More information can be found on the [GLA Website](#).

As the largest procurement authority within the GLA Group, TfL provides a core function for the procurement of goods and services for the GLA and some of its smaller functional bodies including Old Oak Park Royal Development Corporation (OPDC) and London Legacy Development Corporation (LLDC).

During 2024/25, TfL spent in excess of £7.46bn on a [range of goods, services and works](#) required to operate and upgrade services across all transport modes. An independent [report produced by Hatch](#) provides more information about TfL's UK supply chains. Our efforts to map our global supply chains can be found in Section 3 below.

2. Policies in relation to modern slavery

TfL is committed to respecting human and labour rights in its operations and supply chains. This includes respecting, and holding our suppliers accountable to, the rights defined by the International Bill of Human Rights and the ILO Declaration on

Fundamental Principles and Rights at Work and related Conventions, and implementing human rights due diligence (HRDD) according to the UN Guiding Principles on Business and Human Rights. Our main reference point when working with suppliers is the [Ethical Trading Initiative \(ETI\)'s Base Code](#).

Our commitment is enshrined at GLA Group level through [the Responsible Procurement \(RP\) Policy](#) and [Implementation Plan](#) (RPIP), under the themes of Fair and inclusive employment practices, as well as Ethical sourcing.

The RP Policy is a high-level strategic document setting out the GLA Group's ambitions and commitments for achieving continuous improvement in London through procurement. The RPIP sets out how the GLA and its functional bodies (including TfL) will deliver the goals of the Policy and includes metrics for quarterly and annual reporting to the Group. The specific provisions contained in the Policy and the RPIP relevant for this Statement are summarised in Table 1. Both the Policy and RPIP will be updated in the 2025-26 financial year.

Table 1. GLA Group Responsible Procurement Policy and Implementation Plan

The RP Policy and Implementation Plan commit us to seek fair employment practices and promote ethical sourcing by:

- Integrating the Mayor's Good Work Standard* in relevant procurements;
- Requiring that all suppliers pay the London Living Wage;
- Adopting a risk and opportunity-based approach to identify contracts where there may be a high risk of human and labour rights abuses;
- Adopting the nine provisions of the ETI Base Code, or equivalent, as the standard we expect of our suppliers;
- Engaging with our medium and high-risk suppliers through the UK Cabinet Office's Modern Slavery Assessment Tool (MSAT);
- Improving any poor performance by suppliers as part of a process of continuous improvement, and achieving supply chain transparency;
- Seeking to contract with suppliers that recognise and respect the rights of freedom of association and collective bargaining; and
- Collaborating with relevant partner organisations, including Electronics Watch and the ETI.

*The Good Work Standard (GWS) is a free accreditation programme developed by the GLA in collaboration with London's employers, trade unions, professional bodies and experts. It is organised into four Pillars, which set the benchmark for good work. These are:

1. Fair pay and conditions
2. Engagement, voice and wellbeing
3. Skills and progression
4. Diversity and inclusive recruitment

Businesses can achieve three different levels of accreditation: Foundation, Achievement and Excellence. Recognising that good pay is the foundation of good work, all levels require accreditation to the [Living Wage Foundation](#). More information about the GWS can be found [here](#).

Responsibility for managing TfL's supply chain sits with our Procurement and Commercial (P&C) function, reporting to the Chief Finance Officer, who in turn reports to the Commissioner of TfL.

The TfL Responsible Procurement Manager is responsible for planning, developing and delivering ethical sourcing commitments and requirements across the P&C function, following the due diligence process described below.

TfL also hosts the GLA Group's Central Responsible Procurement Team (CRPT) within its P&C function. The CRPT works with TfL, along with the wider GLA Group, to prioritise and deliver the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery.

3. Due diligence process

To address the human and labour rights risks in our supply chains, we follow a HRDD approach, as defined by the UN Guiding Principles on Business and Human Rights.

This section includes our approach and action towards supply chain mapping, risk identification, prioritisation and management, and collaboration.

3.1. Supply chain mapping

Mapping our supply chain is an important precondition to effective human rights due diligence. We have started our mapping through our partnership with Electronics Watch and the Ethical Trading Initiative, focusing on electronic hardware, zero emission vehicles, and garments supply chains.

Our electronic hardware supply chains extend to Austria, Canada, China, the Czech Republic, Italy, Malaysia, the Netherlands, Romania, South Korea, Thailand and the UK. Based on the data provided by Electronics Watch, it is also likely that they include Bolivia, Hungary, India, and Taiwan. These countries include locations of final production factories, component manufacturers, and mines.

In 2024-25, following active engagement with the Original Equipment Manufacturers, we also started to receive information about the supply chains of our electric buses. The data is currently being reviewed for accuracy and will be disclosed in the next Modern Slavery Statement.

TfL uniforms are procured from a UK-based supplier. Our tier 2 suppliers, who manufacture our uniforms, are located in China and Bangladesh. Since December 2024, they can be found on our account on the [Open Supply Hub](#), a free, open and accessible global supply chain map. We recognise the importance of transparency and are committed to make our supply chain mapping available on the platform where possible.

3.2. Risk identification, prioritisation and mitigation: process

Our risk categories can be found in Table 2. In 2021, we commissioned Action Sustainability to produce a preliminary list of our medium and high-risk categories of spending. The list is reviewed on an annual basis, adding new risk categories as

they emerge. Sources for the assessment have so far included media and reports from the [Business and Human Rights Resource Centre](#). As we progress, our supply chain mapping will also feed into this risk assessment.

Table 2. Medium and high risk categories in TfL purchasing

- Facilities management
- Electronic equipment, including microchips, semi-conductors and batteries
- Construction
- Uniforms and workwear
- Steel and steel components
- Stone
- Solar panels
- Zero-emission vehicles

Our risk prioritisation and mitigation are shaped by our procurement process, timelines, and contract value. Our approach for new procurements is the following:

- Contracts above Procurement Act 2023 threshold and below £15m: since mid-2024, bidders have been required to register and use the [Social Value Portal](#). The organisation provides a framework to measure the social value delivered by our suppliers. At tender stage, bidders are required to choose among different commitments relating to Economy, Planet, Work and Community, which they will be required to implement if they win the bid. Some of these relate to modern slavery, such as the undertaking of social audits and the allocation of resources to identify and address risks in a bidder's supply chains. Currently, we do not mandate specific categories for bidders to commit to. This means that they may not choose measures related to modern slavery. We will keep this under review.
- Contracts above £15m: Standardised process to identify and mitigate risks, as shown in Table 3.

Table 3. Standardised risk identification and mitigation for new contracts above £15m

1. Procurement planning

- Procurement managers fill in an RP checklist with responses to questions about the contract (including cross-referencing the risk categories above). The answers determine the risk of human and labour rights abuses related to the contract and inform what considerations should be included at tender stage.

2. Tender stage

- The Procurement Specific Questionnaire includes a pass/fail question to ensure bidders be compliant with the MS Act;
- The RP team provides tailored award questions for the Invitation To Tender (ITT) stage. These are refined, in conversation with procurement staff, to reflect their commercial expertise. TfL allocates a minimum of 10 per cent of the award scoring to RP, of which ethical sourcing is a part. Specific weighting is decided on a case-by-case basis by the RP team, depending on risk.

- Whenever a competitive-dialogue-like process is incorporated into TfL's procurements, the RP team will lead a dialogue session on human and labour rights risks in supply chains, depending on the context and need.
- All contracts include a requirement to pay the London Living Wage. In addition, RP requirements include clauses for Equality Diversity and Inclusion (EDI) – to include an EDI statement or action plan depending on the value of the contract – and to complete the self-assessment for the Good Work Standard.
- Medium and high-risk contracts include specific ethical sourcing contract schedules. These require suppliers to comply with the ETI Base Code, and to provide annual Modern Slavery and Ethical Sourcing Action Plans.
- In 2024, the schedules were updated to reflect best practice. They require suppliers to exercise HRDD and introduce more ways for TfL to monitor compliance. They will be used on a case-by-case basis for high-risk contracts.
- In-scope contracts include Electronics Watch Contract Conditions, requiring suppliers to disclose where our products and their key components are made. This is crucial to ensure that working conditions in our specific supply chains be monitored.
- A limited number of contracts also includes further requirements, depending on the need. An example is provided for our Uniforms contract below.

3. Contract management

- The RP team reviews the annual Modern Slavery and Ethical Sourcing Action Plans by suppliers.
- Certain risk categories and contracts are managed in collaboration with external organisations, including Electronics Watch and the ETI.

Our contracts vary in length and can span from a few months to over 20 years. Beyond contract management actions described in Table 3, we manage our risks for existing contracts by focusing on our key suppliers – those that are critical to our operations, strategic objectives and risk management. Our process is described in Table 4.

Table 4. Contract management with existing suppliers

- In 2022, we risk assessed our existing key suppliers using the UK Home Office Modern Slavery Prioritisation Tool (HOPT).
- In 2022-23 and 23-24, we invited the medium and high-risk suppliers identified through the HOPT to complete the UK Government's Modern Slavery Assessment Tool. Of 44 suppliers, 22 achieved a score of 70 per cent or above.
- Between 2023 and 2025, we organised three workshops through our membership with the Supply Chain Sustainability School. All suppliers scoring below 70 per cent on the MSAT were invited to participate. The workshops focused on how to implement effective HRDD in the supply chain.

3.3. Risk identification, prioritisation and mitigation: 2024-25 examples

In 2024/25, TfL conducted 2,105 procurement exercises. 63 of these were above £15m in value, representing 54 per cent of our total spend for the year. The risk of human and labour rights abuses in them was identified and addressed through our approach described in Table 3. Overall, in 2024/25 the RP team was involved in over 40 new tenders and existing contracts at medium and high risk of human and labour rights abuses. The following are some notable examples demonstrating our actions.

a. Procurement planning and tender stage

Elizabeth Line Concession

Elizabeth line services are operated under a concession agreement between TfL (who specifies the requirements and service levels) and a private sector operator (who operate the services on TfL's behalf). In 2024-25, this contract came up for re-tendering, and [was awarded to GTS Rail Operations Ltd](#) (GTS), a joint venture of Go-Ahead Group, Tokyo Metro and Sumitomo Corporation. It started in May 2025, and will last for seven years, with an option to extend it by an additional two.

There are several different human and labour rights risks connected to this contract. The operator operates the trains and the stations, which includes some maintenance responsibilities. As part of its remit it therefore has responsibility for contracting with agency cleaning and security staff providers. The operator can also choose to invest in improvements at stations, for example by installing solar panels. It is also responsible for the management of the majority of the retail estate at stations, which may expose us to a variety of risks, depending on whom they are rented out to.

At tender stage, bidders were asked to provide an initial plan on how they would address human and labour rights risks for the duration of the contract. After the contract was awarded, but before contract signature, GTS was asked to finalise its plan and incorporate the feedback provided by the RP team, including all the actions it is planning to take in the first year of the concession. This plan and actions will be updated and monitored through robust contract management and building a strong relationship with the supplier.

TfL Reseller Framework and Product Catalogue

Most of the electronic hardware procured at TfL is acquired through the TfL Reseller Framework. We identify and manage our risk in this category through our collaboration with Electronics Watch, an independent, not-for-profit organisation which helps public buyers to work together to promote and protect the rights of workers in global supply chains. The majority of in-scope products for Electronics Watch monitoring are bought through our Product Catalogue contract. Other GLA Group Functional Bodies, including LLDC, OPDC and the GLA, also use the same route to market.

The TfL Reseller Framework was reprocured and went live in November 2024 and has a contract duration of four years. It includes Electronics Watch Contract Conditions. The ITT for the Product Catalogue contract was issued in January 2025. It will be awarded in 2025-26 with a duration of four years.

The ITT stage of both the TfL Reseller Framework and the Product Catalogue contract included ethical sourcing questions, covering the bidders' ability to disclose the names and locations of production sites for the products we buy, as per Electronics Watch Contract Conditions, as well as their approach to managing risks in their supply chains. The ITT question for the Product Catalogue contract also asked bidders to assess their own leverage to effect change on the supply chain. This was included to recognise that resellers often have less leverage on the supply chain when compared to brands, and they should not be penalised for it.

Once the contract is in place, we will follow up on the requirements in the Electronics Watch Contract Conditions. For impacts of our actions to date, see Table 5.

Table 5. Human and labour rights risks and violations in our electronic hardware and low emission buses supply chains

At the end of the 2024-25 financial year, based on the factory information collected by TfL, Electronics Watch provided us with the following summary:

- The brands we buy from are Apple, Dell, HP, Lenovo, Microsoft, NEC and Siemens.
- There are 47 production sites in 15 countries in our supply chains. Electronics Watch has monitored 22 of them.
- In 2024, Electronics Watch reported 17 active cases on human and labour rights risks and violations, concerning 15 factories and two mines. The production sites are located in seven countries (Bolivia, China, Hungary, India, Malaysia, Taiwan and Thailand). Six of the investigations took place at factories in China.
- When the violations and risks of violations are taken collectively, the most prevalent issues in our supply chains were: occupational health and safety (14 production sites), recruitment and employment conditions (13 production sites), legal wages (nine production sites), discrimination in hiring and occupation (nine production sites), forced labour (eight production sites), and excessive working hours (eight production sites).
- While several of these cases are ongoing, Electronics Watch and its affiliates achieved the following:
 - o A final assembly facility in India paid overdue bonuses to a number of workers, following a coordinated intervention by members of a public buyer working group facilitated by Electronics Watch. For several of those affected, the bonus represented 8.33 per cent of their annual income.
 - o All 203 eligible migrant workers were refunded for recruitment fees paid to secure their jobs at a component supplier in Malaysia. The migrant worker whose forced repatriation triggered the investigation was further reimbursed for the balance of wages that they would have received, had they not been deported in retaliation for speaking out. This case had knock on effects for other rights-holders, with an additional 178 migrant workers being refunded for recruitment fees at a different site by the same supplier.
 - o A Collective Bargaining Agreement was signed between factory management and the sectoral union at a component manufacturer in Malaysia, following the identifications of serious violations of human and labour rights by Electronics Watch. Remediation of the outstanding issues, including recruitment fees and chemical management, continues.

- A component manufacturer in China has indicated they may be willing to agree to establish an operational grievance mechanism in the factory. The proposed mechanism, which would be managed by a credible and independent third party, would support workers to access remedy. Although the details are yet to be confirmed, the fact that this mechanism is even being considered represents a major step forward.

London Cycle Hire Scheme

Another tender that came up for renewal in 2024-25 was that for the [Santander Cycles](#). The bikes are owned by TfL, but sourced and managed by a contractor. There are currently over 12,000 bikes in total, and around 2,000 of them are electric.

This is an example of how we adapt our practice when new risks emerge. While the production of e-bikes carries human and labour rights risks related to their batteries, [a report in summer 2024](#) linked the supply chains of normal bikes to forced labour risks. Therefore, at tender stage, we asked bidders to provide an assessment of the human and labour rights risks for both and detail their risk mitigation processes.

Our contract conditions will require the winning supplier to provide an Ethical Sourcing and Modern Slavery Action Plan on an annual basis. Further, they will also require them to provide factory location information, similarly to the way our electronic hardware suppliers do, so as to comply with Electronics Watch requirements. While e-bikes are not currently covered by Electronics Watch, we decided to pursue this approach to gain more visibility in our supply chain, which is the first step to manage our risks. The contract will also require the supplier to collaborate with TfL, and third parties if needed, to address human and labour rights issues on the ground.

b. Contract management

Uniforms

In 2024, we awarded our re-tendered Uniforms contract to Cooneen at Work (CaW). We recognise that garment supply chains are characterised by high human and labour rights risks and have made sure to reflect this in the contract. In particular, our supplier is required to:

- Provide us with the names and locations of factories used for final manufacturing, and agree to them being published on the Open Supply Hub (as noted above);
- Provide us with annual third-party audit reports for each site of production via SEDEX, a data-sharing platform;
- Update us on their actions to address human and labour rights in their supply chains through an annual Modern Slavery and Ethical Sourcing Action plan.

In the first year of reporting, issues identified through social audits included social insurance, health and safety, and excessive working hours. While some of these have already been closed, we will follow up with CaW to make sure they are all addressed.

Mobile services

In 2023-24, the mobile services contract through which we buy our phones was re-tendered. Mobile phones production carries high risk of human and labour rights abuses, similarly to other electronic hardware, and is covered under our affiliation to Electronics Watch. In 2024-25, we held a number of meetings with the new supplier, Vodafone, and the brand producing our phones, Apple, to try to gather information about the factories where the phones and their components are produced. To that end, we have been collaborating with other Apple customers to jointly pursue increased transparency in a [public buyer Working Group facilitated by Electronics Watch](#).

London Transport Museum

In 2024-25, the London Transport Museum (LTM) updated its Supplier Code of Best Practice for retail suppliers. The Code now includes a section on human and labour rights in the supply chain. This sets out our desire for our suppliers to establish and maintain a human rights due diligence process, and, when requested, to provide factory data to LTM, including physical addresses and legal names of factories for key and high-risk component manufacturing. In 2025-26, LTM will begin the rolling out process, to ensure that its suppliers are clear on their ambitions.

Good Work Standard

In line with the GLA Group RP Policy, TfL continues to promote the Good Work Standard (GWS) with its suppliers, to advance good employment practices across London. More information can be found in Table 1 above, or on [their website](#). Relevant TfL suppliers are identified and encouraged to join the GWS via communication campaigns, supplier engagement events and drop-in sessions. Between April 2024 and March 2025, 10 drop-in sessions were delivered.

Over 2024-2025, eight of our suppliers became accredited to the GWS, bringing it to a total of 47 since 2021, and covering over 78,000 workers.

c. Collaboration

Addressing the human and labour rights risks in our supply chains is not something we can do on our own. It is a long-term process, which requires collaboration between several different stakeholders, including us, our suppliers, other public buyers, governments, workers, trade unions, and civil society organisations. While we engage with a variety of different stakeholders, these are the most relevant:

Electronics Watch

In addition to the activities described above, in 2024-25, we also:

- Continued to participate in the Low Emission Vehicles Programme. We held several meetings with the four main Original Equipment Manufacturers that produce electric buses used on our network, to understand where they are made. We were the first participant in the programme to receive this information about one of the bus models in our network. Although the data was incomplete, it

represents a major first step in more detailed supply chain mapping in the vehicle sector, which is behind the electronics sector in terms of transparency.

- Assessed the maturity of our HRDD processes through their new HRDD Maturity Matrix, which scores different areas of practice as Reactive, Compliance focused, Proactive, Mature, or Leader. While some of our practices have achieved a scoring of Proactive or Mature, other gaps emerged, to be addressed next year;
- Joined their Working Group on Freedom of Association and Collective Bargaining. These rights are crucial for workers to advocate for improved working conditions and realise other rights at work but are routinely violated in the electronic hardware industry. The Group aims to identify one case to pursue jointly, to test how public procurement leverage can facilitate access to remedy for such violations. If successful, the approach could be replicated and scaled up.

International Working Group on Ethical Public Procurement (IWGEPP)

TfL is represented by the CRPT at the IWGEPP, a group that brings together different stakeholders working on ethical public procurement, including practitioners, policymakers and researchers. In 2024-25, we attended meetings of the Practice sub-working group, to share and discuss the different approaches to HRDD among participants. This has been very useful in shaping our own approach to risk assessment and management.

As part of the IWGEPP, we also started organising 'clinic' sessions, creating a forum to discuss practical challenges on upcoming tenders, including on risks related to specific industries, and best approaches to contract management. Three sessions were held in 2024-25.

4. Training

In 2024-25, we hosted a workshop for suppliers scoring below 70 per cent on the MSAT, as noted in Table 4.

TfL's RP manager also attended the GLA Group Modern Slavery Delivery Group meetings, where the CRPT shared best practice and emerging risks that the Group needs to take into consideration when procuring.

5. Goals and Key Performance Indicators

Our priorities for the 2025/26 financial year include improvements to our internal processes as well as external action.

We will improve our HRDD process by:

1. Developing our ability to respond to potential risks on the ground;
2. Addressing gaps identified through the Electronics Watch HRDD Maturity Matrix; and
3. Deepening our supply chain mapping, and expanding the list of suppliers on the Open Supply Hub.

We will exercise HRDD by:

4. Re-assessing our existing key suppliers for human and labour rights risks, and identifying our salient risks;
5. Rolling out another MSAT campaign;
6. Identifying high priority areas for in-depth engagement with our suppliers;
7. Identifying opportunities to engage with workers and independent, legitimate worker representatives; and
8. Taking substantive action to address risks to freedom of association and collective bargaining in our supply chains, in collaboration with Electronics Watch and Freedom of Association Working Group.

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



Andrea Clarke, General Counsel

15 September 2025

On 21 July 2025, the TfL Board approved the TfL Modern Slavery Statement 2024/25 and authorised the General Counsel to agree the final form of the Statement. The Statement has also been agreed by Transport Trading Limited and each of its subsidiary companies covered by this Statement.