OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Modern Slavery Statement 2021-2022

Approved by	• SMT, 16 August 2022 • Audit and Risk Committee, 13 September 2022 (via delegated authority from Board, 22 June 2022) • Noted by Board, 22 September 2022
Changes from previous version	• N/A - new document
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Senior owner	Head of Performance & Governance
Document owner	Corporate Performance and Governance Manager

Period covered by this statement

Old Oak and Park Royal Development Corporation's (OPDC) financial year end occurs on 31 March. This statement covers the financial year 1 April 2021 – 31 March 2022.

Introduction

OPDC has not previously produced a statement because we are not required to due to our level of turnover. To reflect good practice, however, and in conjunction with the Responsible Procurement Team based at Transport for London (TfL) and the Greater London Authority (GLA), we are committing to completing an annual statement, starting 2021-2022.

The Statement is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015, by setting out the steps that we have taken to address the risks of slavery and human trafficking in our supply chains. It outlines the policies and processes that we have in place; and the steps taken to identify, prevent and mitigate the risks.

This is OPDC's first annual statement to be published under the Act and relates to the period 1 April 2021 through to 31 March 2022.

This statement is for:

- Old Oak and Park Royal Development Corporation (OPDC)

Our organisation and supply chains

OPDC is a Mayoral Development Corporation (MDC), established by the Mayor of London, with a statutory objective to secure the regeneration of our area, which spans land across three London boroughs: Ealing, Brent, and Hammersmith & Fulham. Our area includes the vast Park Royal industrial estate, the Old Oak development area around the new High Speed 2 Old Oak Common station and the protected 67 hectares of parkland at Wormwood Scrubs. We are the statutory Local Planning Authority (LPA) for development in this area and we have land assembly, housing, and infrastructure delivery powers, including purchase powers.

OPDC is accountable to both the Mayor and our Board, who are appointed by the Mayor. Chaired by Liz Peace CBE, the Board includes: three elected leaders from our host boroughs, industry experts, community engagement specialist and business representatives. There are two committees that support our Board: the Planning Committee and the Audit & Risk Committee.

The Mayor allocates our annual budget and we work closely with City Hall to ensure we are delivering the Mayor's priorities. The London Assembly, made up of 25 elected members, scrutinises our work and ensures that our policies, actions, and strategies are in the public interest.

The main procurement function at OPDC is managed by Transport for London (TfL) as part of a shared service agreement. OPDC's Chief Operating Officer is responsible for overseeing the service delivered to OPDC by TfL. At TfL, managing the supply chain is the direct responsibility of the Chief Procurement Officer, who reports to TfL's Chief Capital Officer, who in turn reports to the Commissioner of TfL.

The shared service agreement allows OPDC to take a common approach and joint action across the GLA Group (which includes: the GLA, OPDC, the London Fire Brigade, the London Legacy Development Corporation and TfL) to address the risks of modern slavery in our supply chains.

The OPDC annually procures about £4,398,018 worth of products and services, of which the OPDC, in 2021-22, spent £2,334,685 on goods and services with 152 suppliers.

Our supply chains are generally simple and involve predominantly UK companies. Nevertheless, we do source goods and services from further afield from time to time, and we recognise the importance of taking appropriate steps to reduce the risk of modern slavery in our supply chains.

Policies in relation to modern slavery

In March 2021, the Mayor published the refreshed [GLA Group Responsible Procurement Policy](). Its overarching goal is to enhance social value, while prioritising five objectives:

- improving supply chain diversity
- embedding fair and inclusive employment practices
- enabling skills, training, and employment opportunities
- promoting ethical sourcing practices (including tackling modern slavery)
- improving environmental sustainability.

The Policy reflects best practice and demonstrates how our procurement activities through TfL meet legislative requirements, including the Modern Slavery Act 2015. It commits us to promoting ethical sourcing and addressing the risk of modern slavery by:

- adopting the nine provisions of the Ethical Trading Initiative (ETI) Base Code,[1] 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

[1] www.ethicaltrade.org/eti-base-code.

- 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.

TfL hosts the GLA Group’s Central Responsible Procurement Team (CRPT), within its Procurement and Supply Chain function, to support the implementation of the policy. The team will shortly publish a Responsible Procurement Implementation Plan for the Mayoral term 2021-24. The plan will set out the actions that we will prioritise in order to deliver the policy’s commitments.

Spend categories that present risks of human rights abuses

The principal spend categories for the OPDC and its companies identified as having the highest risks of human rights abuses are as follows:

Category	Corresponding source countries	Identified risks
Construction	United Kingdom	Multi-tiered supply chains involving the use of labour agencies that 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, catering, and maintenance services	United Kingdom	Agency and sub-contracted labour leading to potential 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; a worker’s visa or permit being tied to a single employer; and financial penalties for early contract termination may take place.
Corporate clothing	South Asia, 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 an employer, and structural integrity of factories.

Due diligence and its effectiveness

Through robust procurement and governance processes, including the use of a responsible procurement (RP) checklist for each tender in developing an approach to the market, TfL procurement staff can identify categories and contracts that 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 with 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.

TfL obtain assurances directly through suppliers as part of the tendering process and then via online platforms such as the Supplier's Ethical Data Exchange (Sedex), where independently verified audit reports of factories are assessed as part of the contract management processes.

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 Modern Slavery Assessment Tool (MSAT) campaigns and sharing best practice from TfL's representation on 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 TfL 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.

Training and awareness-raising

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, TfL delivers training for procurement and contract management professionals to refresh knowledge and awareness of RP.

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. It will work with OPDC to ensure this best practice is highlighted to our staff and improvements to practices made as needed.

Reporting

The Responsible Procurement Programme co-ordinates the TfL and GLA Group, which includes OPDC, 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.

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. OPDC suppliers will be risk assessed and those deemed high and medium risk will be invited to complete the MSAT.

Goals for 2022-2023

In 2022-2023 we will continue to improve and refine our approach to managing the risk of slavery and human trafficking in our supply chain. We will pursue the following goals:

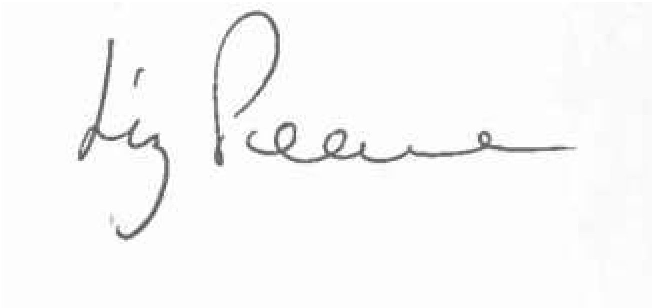
Raise awareness: continue to raise awareness of modern slavery to staff across OPDC and across our supply chains:

- the Responsible Procurement (RP) team will complete a session with OPDC staff, with a particular focus on modern slavery risks and awareness raising.
- OPDC to commit to 100% of staff completing the RP e-learning module by April 2023
- for OPDC staff to retake the above e-learning module every two years

Increase capability: further upskilling of OPDC staff, 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.

Risk assessment: undertake a risk assessment of OPDC's key suppliers using the Cabinet Office Risk Assessment Template to identify medium and high-risk suppliers. All OPDC key suppliers and those suppliers assessed to be medium/high risk to complete Government MSAT to achieve a minimum MSAT score of 70 per cent by January 2024.

Approval of this statement: Liz Peace, CBE, OPDC Chairman

Signature: 

Date: 11 October 2022

Approval of this statement: David Lunts, Chief Executive Officer

Signature: 

Date: 11 October 2022