



LLDC's Modern Slavery Statement September 2021

London Legacy Development Corporation Modern Slavery and Human Trafficking Statement

This Statement sets out the steps that the London Legacy Development Corporation (LLDC, the Corporation) has taken to address the risks of slavery and human trafficking in our supply chains pursuant to section 54 of the Modern Slavery Act 2015. Our aim is to inform our partners, suppliers, staff and the public about LLDC's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains and the steps taken to identify, prevent and mitigate the risks. It outlines the policies and processes we have in place, the areas we have identified as high risk and the actions we have taken to mitigate such risks and the plans we have in place to strengthen our commitment to the Act.

While LLDC is not a "commercial organisation" as defined by the Act, so has no requirement to publish a statement, LLDC recognises that it is good practice to ensure that the Corporation is compliant with the Act.

LLDC's structure, business and supply chains

London Legacy Development Corporation is a Mayoral Development Corporation, established on 1 April 2012, under the provisions of the Localism Act 2011, with the vision of creating a dynamic new metropolitan centre for London. LLDC is owned by the Mayor of London and is part of the Greater London Authority (GLA) group.

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

LLDC's policies in relation to slavery and human trafficking

The GLA has a Responsible Procurement Policy which LLDC has signed up to and reflects best practice to ensure that procurement activities meet all relevant legislative requirements including the Modern Slavery Act. The policy states that "we are committed to responsible and ethical business practice and expect similar standards from our suppliers and throughout our supply chain. We respect international principles of human rights including, but not limited to, those expressed in the UN Declaration of Human Rights, United Nations Guiding Principles, and the UK Government Modern Slavery Act 2015; and the relevant legislation in all of the countries where we procure our goods and services." The policy is available [here](#).

As part of LLDC's standard Selection Questionnaire for OJEU procurements, prospective suppliers who are relevant commercial organisations as defined in the Act are asked to demonstrate compliance with the Act to LLDC.

LLDC has updated its Whistle Blowing Policy to include modern slavery and people trafficking as a matter regarded as malpractice.

LLDC has worked with the London Stadium operator, LS185, which is owned by LLDC, to develop their own Modern Slavery statement, available [here](#). The Modern Slavery

Statement also covers subsidiaries in the LLDC Group: Stratford East London Holdings Ltd, Stratford Waterfront Management Company Ltd and Stratford East London Developments Ltd.

Risk analysis on where there is a risk of slavery and human trafficking taking place

The principal categories that LLDC deems as carrying material risks of human rights abuses are construction, catering and facilities management services such as cleaning and stewarding and security services. Further risk and opportunity assessments to identify other contracts and areas of spend, where there may be a high risk, will be undertaken in the coming year.

LLDC's due diligence processes in relation to slavery and human trafficking in its business and supply chains

LLDC continues to undertake due diligence into its supply chain processes to address the risk of modern slavery, human trafficking, forced and bonded labour and other human rights risks in the supply chain. Progress has been made with our major construction contracts on East Bank and as a priority in the coming year, attention will be paid to modern slavery risks in catering, facilities management services and stewarding, wherever lower pay is prevalent and where demand for unskilled labour in the supply chain may be met by third party agencies. Contractors will be encouraged to recruit directly wherever possible and to undertake regular audits of third-party agencies to check for the signs of human rights abuse.

LLDC's standard contracts include clauses that oblige contractors to comply with the Modern Slavery Act. This text is from LLDC's standard low value goods and services contract: "The Supplier shall in the performance of the Contract (at no additional cost to the Legacy Corporation) comply, and ensure that any sub-contractors comply, in all respects with relevant and binding UK laws or any other regulation or by-law (including, without limitation, with the Modern Slavery Act 2015 and the Anti-Slavery Policy) from time to time in force which is or may become applicable during the period the Contract is in force.

LLDC has implemented changes to strengthen LLDC's NEC3 contracts, including on East Bank, in relation to compliance by the contractor and their sub-contractors with the Modern Slavery Act and ensure that contractors meet the requirements of a Certified Ethical Labour Scheme. The relevant clauses have been inserted into new contracts and bidders' Modern Slavery Statements are assessed as part of East Bank procurements. LLDC's Project Management Partner is responsible for ensuring that contractors are monitored in implementing these requirements. LLDC continues to work in partnership with GLA responsible procurement colleagues and have reported that other organisations are considering using similar contractual clauses as LLDC to embed the certified labour scheme in supply chains.

LLDC contributed to the GLA Group's brief to procure an assurance provider to work across the group to develop a robust assurance process for the Group, and sat on the evaluation panel to select the successful provider. The provider has developed a handbook for use with key suppliers to ensure Modern Slavery risks are being mitigated in high-risk areas e.g. construction sites, cleaning workforce, track labour, and other sectors to include on-the-ground, empirical evidence of modern slavery prevention measures. Recommendations in the handbook have informed the action plan below.

LLDC has signed up to the Gangmasters and Labour Abuse Authority's (GLAA) Construction Protocol. The GLAA is an arm's length body of the Home Office who are authorised to investigate and prosecute offences of labour market exploitation. Joining gives LLDC access to a network, best practice and expert knowledge.

Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate

The annual exercise we undertake with employers on the Park in relation to payment of the London Living Wage and the non-exploitative use of zero hours contracts is now extended to include questions about the businesses compliance with the Modern Slavery Act and their related due diligence work with supply chains. The responses are analysed and further information or monitoring visits will be requested by LLDC where required.

Mace, LLDC's East Bank project management partner's approach to monitoring modern slavery compliance in the supply chain includes ensuring that contactors sign up to a certified ethical labour scheme (e.g. Clearview and Hope for Justice) and join SEDEX, who specialise in mapping supply chains and identifying risks of where modern slavery is most likely. Mace report the status of all on site contractors at East Bank in relation to Modern Slavery to the Modern Slavery Group: The assessment by SEDEX has found that all of the contractors on site have a low risk rating for modern slavery so no further investigations are recommended. On site awareness raising and communications around modern slavery have been implemented at Stratford Waterfront.

Training

Key employees in the Programme Management Office and Procurement team have received guidance from the GLA Group's Responsible Procurement team who have expertise in this field. Key employees have also joined webinars on the subject. Training on Modern Slavery for relevant employee was undertaken in 2018/19 and a Modern Slavery update was given to an all staff briefing, a further briefing will be given in 2021 along with a roll out of the emerging Home office e-learning tool for public sector procurement.

Our key goals

LLDC reconfirms its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working in them.

We will continue to work with our partners and suppliers to undertake supply chain due diligence and mitigate the risks to human rights in our supply chains. We will also ensure that these issues are considered as part of transition plans setting out how LLDC's functions will be undertaken when the Corporation comes to the end of its operations. As LLDC acquires knowledge and develops capability across all higher-risk spend categories, the intention is to codify and communicate for wider use in the GLA Group those due diligence processes that are found to be the most successful.

In the coming year LLDC will pursue these key goals:

- Continue to deliver the Mayor's Responsible Procurement Policy.
- Ensure compliance with contractual requirements relating to modern slavery for our major construction contracts.
- Complete a further risk and opportunity assessment to identify other contracts and areas of spend, where there may be a high risk of poor working conditions, human rights abuses or negative impacts on security and crime.
- Complete an annual audit to ensure that key employers on the Park comply with the Modern Slavery Act.
- Run an online analysis of key suppliers' modern slavery compliance through The Transparency in Supply Chains Platform ([Tisc](#)) and follow up where compliance scores are low.
- Key suppliers to be risk assessed using the Cabinet Office Risk Assessment Template, by Nov 2021.

- Undertake an exercise asking key suppliers to complete the Government's Modern Slavery Assessment Tool, by the end of 2021 and develop an improvement plan based on recommendations by April 2022, link [here](#).
- Active membership of the Gangmasters and Labour Abuse Authority (GLAA)
- Further raise internal awareness of Modern Slavery through ongoing training and communication, in line with approval and publication of this statement and the roll out of the emerging Home office e-learning tool for public sector procurement.
- Enhanced modern slavery work through the construction management partner (Mace) with tier 1 contractors on Stratford Waterfront site, including: promoting a confidential speak up line for employee and operatives to report issues (including modern slavery concerns); wider workers surveys including by mobile phone and in native languages; Modern Slavery Workshops to raise awareness with direct, contracted and sub-contracted workers; audits with contractors; and rolling out Clearview recruitment labour certification.
- Consider enhancing Modern Slavery requirements for construction procurements at the Invitation to Submit Outline Proposal phase.
- Ensure modern slavery requirements are built into re-procurement of operator contracts from 2022.

Progress against these actions will be reported to the Audit Committee at least twice a year.

This Statement was approved by LLDC's Board in September 2021