



## **Slavery and Human Trafficking Statement**

**(For the financial year ending 31 December 2017)**

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Port of London Authority's Slavery and Human Trafficking Statement for the financial year ended 31 December 2017. The statement was been approved by the PLA Board of Directors at its meeting on 13 March 2018.*

### **Introduction**

We have a zero tolerance of modern slavery of any kind. We do not believe modern slavery or human trafficking exists within our business, or area of responsibility. We are developing our approach and practices for oversight of this important area so that we can detect and eradicate any non-compliant activities that we may find.

A description of the PLA's business can be found at Annex A.

### **Procurement**

We have a supply base of approximately 1,000 companies, typically including around ten foreign suppliers in Denmark, France, Italy, Austria, Norway, The Netherlands, Ireland and Germany. These countries are not identified in the Walk Free Foundation's global slavery index as high risk.

As essentially a service provider, the supplies we buy tend to be in small volumes, principally navigational equipment such as radars, spares for boats, safety equipment, fuel, uniforms, as well as other supplies associated with the operation of our business. In addition to material purchases, we also source professional services and agency workers.

### **Our Policies on Slavery and Human Trafficking / our own Business**

We make our best endeavours, through acting with integrity and ethically in all business relations and having effective systems and controls in place, to identify and eliminate Slavery or Human Trafficking in any part of our business and supply chain.

We have a number of company wide policies that guide our organisation on processes to follow to ensure that we prevent our own direct involvement with slavery and human trafficking and also alert the correct authorities if we suspect such activity as part of carrying out our responsibilities on the river.

The policies in scope are:

- Occupational Health and Safety Policy
- Whistleblowing Policy
- Procurement Policy
- Modern Slavery and Human Trafficking Policy

We expect our suppliers to comply with our ethics and values and have a zero tolerance of slavery and human trafficking.

We are committed to protecting the human rights of employees and third parties. As a responsible, ethical organisation, we fully support the principles of the Human Rights Act and all associated legislation.

### **Risk of Slavery and Human Trafficking**

We are responsible for enabling safe navigation on the River Thames. Within their daily jobs our employees will come into contact with the crews of ships visiting the port. All employees have been made aware of the process to confidentially report suspicious crew conditions and possible human trafficking, particularly if boarding ships, but also in their day-to-day jobs on or around the river. We have issued guidelines on the reporting of any suspicious situations and, on receiving this information, pass it on to the relevant authorities.

Within our direct employee group, agency and contract staff under our direct supervision, we consider the risk of slavery or human trafficking occurring to be low.

### **Due Diligence Processes**

We monitor suppliers' compliance under the Modern Slavery Act 2015. Purchases will be made from suppliers on our list of certified and acceptable suppliers. PLA terms and conditions are referred to on all orders. The Modern Slavery Act 2015 is referred to in section 1.1, under supplier adherence to PLA policies and regulations. Our new supplier record will include a request for a copy of their Modern Slavery policy.

Supplier audits took place on our stationery and general consumables supply base during 2017. This included, but was not exclusive to, a focus on Environmental and Modern Slavery Act provisions. It is intended that further procurement audits will take place annually.

We will deselect any supplier found to have instances of Modern Slavery and/or Human Trafficking in their operations or supply chains.

### **Training**

During 2017 we briefed our senior management team on the Modern Slavery Act and alerted all staff to the requirements of the Act via an all staff notice.

We are committed to equipping our staff to apply our approach to preventing modern slavery and human trafficking. The induction process for new permanent and temporary employees is being updated to raise awareness of the policy at the start of employment.

### **Our effectiveness in combating Slavery and Human Trafficking**

We will use the following key performance indicators to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- regular audit of suppliers (% of suppliers contacted each year with regard to the Modern Slavery Act 2015);
- annual audits (focusing on high risk areas)
- records of staff training (number of staff trained / informed)
- number of reported suspicious situations
- percentage of payments to uncertified suppliers

### **Future steps**

Over the coming months we will undertake further:

- suppliers audits;
- awareness training around the risks of Modern Slavery and Human Trafficking

Robin Mortimer  
Chief Executive  
Port of London Authority  
28 March 2018

## **Annex A – Organisation structure and business**

The Thames is the UK's busiest inland waterway and the Port of London is one of its busiest ports. Created in 1909 by an Act of Parliament (The Port of London Act), the Port of London Authority (PLA) is harbour and navigation authority for the tidal Thames, which covers 95 miles, from Teddington Lock in the West to the North Sea in the East.

Operating as a 'Trust Port', we hold the Thames in trust for future generations. We have no shareholders; all profits are reinvested in the business and to the benefit of the stakeholders that we serve.

The PLA's principal operations, carried out by a team of some 360 employees are:

- Overseeing navigational safety
- Providing pilotage services
- Marine services
- Licensing river works
- Property/estates management

The PLA's main base is in Gravesend, with a small executive/harbour masters office in London. Our annual turnover is in excess of £50 million.