

A photograph of three rail workers in orange high-visibility uniforms and hard hats working on a railway track. One worker is using a shovel, another is using a power tool, and a third is standing nearby. The background shows railway infrastructure and a clear sky.

Network Rail Modern Slavery Statement

2020-2021 Financial Year

Introduction

This is our annual statement to show the steps we've taken to manage the risk of modern slavery occurring within our organisation or supply chain. It covers the 2020/21 financial year and takes us up to 31 March 2021.

The statement has been broken down into the following sections:

- Structure, Business & Supply Chains
- Policies
- Risk Assessment, Prevention & Mitigation
- Due Diligence Processes
- Training & Awareness
- Effectiveness
- Looking Forward

Structure, Business & Supply Chains

Network Rail is one of Britain's biggest employers. We own and operate Britain's railway infrastructure and work with an extensive supply chain. More information about our organisational structure can be found [here](#).

Our Business in Figures:



43,800 Employees



20,000 Miles of Track



**30,000 Bridges,
Tunnels & Viaducts**



20 Managed Stations



**£7 Billion Supply
Chain Spend Per Year**



**96% British Suppliers
or British Subsidiaries**



**4,242 Total Number
of Suppliers**



**3,308 (78%) Number of
Small & Medium Sized
Enterprises (SMEs)**

Our supply chain plays a huge part in helping us run a safe and efficient railway. We're dependent on our suppliers to help us deliver rail services across Britain including thousands of small & medium sized enterprises (SMEs) who supply us with vital services ranging from catering to innovative technology. 96 % of our suppliers are British based companies or subsidiaries managed by our 180 strong central Commercial & Procurement function, with more colleagues based regionally.

We regularly collaborate with our industry partners to share best practice and tackle wider issues. Currently, we're members of the Rail Safety and Standards Board (RSSB) modern slavery working group and have also recently joined the Department for Transport (DfT) modern slavery working group. Additionally, this year we've partnered with Slave Free Alliance, an anti-slavery enterprise – part of the Hope for Justice Charity, who have reviewed our current approach to tackling modern slavery and produced recommendations and improvements for us to take forward in the year ahead.

Responsibility for our modern slavery policy and programme sits with Network Rail's group general counsel, reporting directly into our chief financial officer, who sits on the Board of Directors.

Throughout the statement, 'we' and 'Network Rail' mean Network Rail Infrastructure Limited (NRIL) and Network Rail (High Speed) Limited (a subsidiary of NRIL that works with HS1 Limited).

Policies

We have several policies that help us manage our modern slavery risk. They enable us and our suppliers to be aware of our responsibilities when responding to any issues or concerns and help us to have a joined-up approach in tackling modern slavery.

Staff can access our policies on our intranet or through an internal app on work devices. You can also view them on our external website [here](#).

Our key policies in relation to modern slavery are:

Anti-Slavery and Human Trafficking policy

The latest version of this policy was published in May 2020 and includes information about what modern slavery is, our commitments as an employer, our expectations of any third parties we work with, the warning signs to look out for, and how to report concerns.

Speak Out policy (whistleblowing)

Anyone can raise concerns about wrongdoing taking place in Network Rail. We offer various channels to do so – including a confidential 24/7 reporting service called 'Speak Out'. Reports can be made to the Speak Out service anonymously.

Code of Business Ethics

Our Code of Business Ethics sets out the standard of behaviour that is expected of our staff, contractors, and suppliers. It has a section dedicated to modern slavery which includes information about our commitment to act responsibly, how to spot the signs of potential victims of modern slavery, and how to raise concerns.

The document was last updated in August 2019, giving modern slavery greater focus, and the next update will be published later in the year.

Commercial Policies

The way we carry out procurement exercises has been updated throughout 2020 and includes references to modern slavery. Additionally, our Code of Conduct ensures that our suppliers comply with the Modern Slavery Act.

Separate to our policies, we also place additional requirements on our suppliers by informing them that they must have their own due diligence procedures in place for their supply chains and use reasonable endeavours not to purchase raw materials, resources or products from organisations using forced labour.

Risk Assessment, Prevention & Mitigation

This year saw us working with the anti-slavery organisation, Slave Free Alliance. We asked them to consider our current approach to tackling modern slavery, assess our risk, and review our processes.

The review made some recommendations which we'll use to improve our approach in tackling the threat of modern slavery. We're pleased that Slave Free Alliance felt we had made good progress, stating:

“Network Rail’s commitment to addressing modern slavery, which is supported by a clear pathway of accountability and support from their board, places them in a strong position to further develop their approach to understanding and mitigating risks in their business and supply chain.”

The review found that the likelihood of modern slavery existing within our own workforce had been significantly reduced due to our rigorous recruitment process. However, due to its size and complexity, the biggest risk for us sat within our supply chain. Five procurement categories were identified as being high risk, all of which involve the supply of labour, and an action plan has now been created to make sure that we have strong defences in place moving forward.

The five high risk categories identified with Slave Free Alliance are:

- Contingent Labour
- Facilities (Soft Services)
- General Civils
- Infrastructure Support Services
- Track

To help oversee the progress of the action plan we've since widened the remit of an existing modern slavery working group. We'll also keep modern slavery as part of our corporate risk process so we can monitor our actions and their associated risks on a quarterly basis. The working group includes representatives from Business Ethics, Legal, Commercial, Sustainability, and operational colleagues.

Due Diligence Processes

For high value procurement activities, a competitive tender process is required. This includes the inclusion of a Pre-Qualification Questionnaire (PQQ) and further questions at the Invitation to Tender (ITT) stage. Both question sets contain modern slavery questions as standard and we'll be looking to strengthen these further for 'high risk' areas moving forward.

The Rail Safety and Standards Board (RSSB) own the Rail Industry Supplier Qualification Scheme (RISQS). RISQS helps suppliers sell to the British rail industry by formally recognising them as capable providers of products and services. Network Rail has now been a member of the RSSB modern slavery working group for two years, with the aim of increasing collaboration to address modern slavery risk in the rail industry.

This year, as part of the working group, we published a good practice guide to help provide suppliers with practical ways to improve their own processes whilst highlighting our expectations of them as a rail industry. The guide can be found [here](#).

Our Speak Out service is also an important resource in allowing staff to raise concerns around modern slavery and this year we added 'modern slavery' as a specific reporting category.

Training & Awareness

We have two ethics training courses which are both mandated across the company. One of these courses focuses on modern slavery and gives our staff a good understanding of what it is and how they can help prevent it.

Over the next year we'll be improving the training offered to those in roles deemed as 'high risk'. This will include Commercial staff who interact with our supply chain, and some of our frontline colleagues who can help spot the signs of modern slavery.

This year, we've also launched comms campaigns to help raise awareness. In summer 2020 we published a news story on our staff intranet about our 2019/20 modern slavery statement and went on to use the article to provide practical tips on how staff can spot the signs of modern slavery and help victims.

Effectiveness

We recognise that our modern slavery policy and strategy can only be effective if we educate our staff and communicate with our supply chain successfully. That's why we're pleased to report that 93 % (c41,000 people) of our entire workforce have completed our ethics training. We want our staff to feel empowered to act, so our ethics training gives our staff an awareness of what modern slavery is, the warning signs to look out for and how to raise a concern to help any potential victims.

We also monitor and categorise all concerns reported to us (either via our 'Speak Out' service or any other channel). Later this year, we'll roll out dashboard reports for all areas of business ethics (including any reports of modern slavery). The dashboards will help us to spot trends, analyse our business more effectively, and improve the way we work with our senior leaders to monitor and manage modern slavery risks.

Looking Forward

In the next financial year we're committed to making further business improvements by putting in place an action plan to deliver recommendations from the Slave Free Alliance review and monitor our progress through the working group and risk and governance framework. Some of the actions include:

- Carrying out a training needs analysis to determine the level of training required throughout differing roles and departments
- Developing enhanced risk assessments for future procurement exercises, particularly for high risk categories

- Including modern slavery within post contract management; reviewing contractual conditions and developing ongoing compliance and audit processes to help measure supply chain risks and how they are being addressed.
- Improving supplier communications to promote our commitment to tackling modern slavery

We remain committed to continuously improving what we do in this area to reduce the risk of modern slavery and we'll report back next year on our further progress.

This statement was approved by the Board of Network Rail Infrastructure Limited on 01 July 2021 and the Board of Network Rail (High Speed) Limited on 19 July 2021.

Signed by

A handwritten signature in dark ink, appearing to read "Peter Hendy", written over a light blue grid background.

Sir Peter Hendy CBE
Chair, Network Rail

3 September 2021