

An aerial photograph of a railway track under maintenance. Several workers in orange high-visibility clothing are on the ground, some near a yellow maintenance vehicle. The tracks are laid on gravel, and there are concrete sleepers. A metal fence is visible on the left side.

Network Rail Modern Slavery Statement

2021-2022 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 2021/22 financial year and takes us up to 31 March 2022.

The statement has been broken down into the following sections:

1. Structure, Business & Supply Chains
2. Policies
3. Risk Assessment, Prevention & Mitigation
4. Due Diligence Processes
5. Training & Awareness
6. Effectiveness
7. Looking Forward

1. Structure, Business & Supply Chains

Our purpose is to get people and goods where they need to be and to support our country's economic prosperity. In order to do this, we own and operate Britain's railway infrastructure and work with an extensive supply chain. Our organisational structure can be found [here](#).

Our Business in Figures:



42,181 Employees



20,000 Miles of Track



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



20 Managed Stations



**£7.4 Billion Supply
Chain Spend Per Year**



**97% British Suppliers
or British Subsidiaries**



**4,388 Total Number
of Suppliers**



**3206 (73%) 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 security services to innovative technology. 97% of our suppliers are British based companies or subsidiaries and are managed by our Commercial & Procurement (C&P) professionals.

We regularly collaborate with our industry partners to share best practice and tackle wider issues. Currently, we're members of the Department for Transport (DfT) and Rail Safety and Standards Board (RSSB) modern slavery working groups. Additionally, this year we've become members of Slave Free Alliance, an anti-slavery enterprise – part of the Hope for Justice Charity, who will be supporting us in continually improving what we do. This will not only ensure we have subject matter expert advice on hand but will also provide extra opportunities to share knowledge and best practice with reputable companies across a range of sectors.

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' refers to:

- Network Rail Infrastructure Limited (NRIL)
- Network Rail (High Speed) Limited - a subsidiary of NRIL that works with HS1 Limited
- Network Rail Consulting (NRC) – a consulting subsidiary of NRIL that shares expertise with rail owners and operators

2. 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 issues or concerns and help us to have a joined-up approach in tackling the threat of modern slavery.

We regularly seek advice from third parties on the effectiveness of our policies and have worked with PROTECT and Slave Free Alliance in recent years to benchmark and gain assurances.

Staff can access our policies on our intranet or through an internal app on work devices. They can also be found on our [external website](#)

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 on 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.

Code of Business Ethics

Our Code of Business Ethics sets out the standard of behaviour 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, and how to raise concerns.

An updated version of 'the code' was published in February 2022. The updated version aligns our corporate values with the ethical behaviours we expect of our staff and partners.

The launch of the revised document saw a companywide communications campaign rolled out, which included intranet articles, internal magazine adverts, graphics across our estate's tv screens, and senior leader endorsement messages.

Commercial Policies

Our Commercial & Procurement policy and Procurement Management Framework include references to Modern Slavery throughout. Additionally, our Code of Conduct (which is being refreshed this year) ensures that our suppliers comply with the Modern Slavery Act.

We also place additional contractual requirements on our suppliers by informing them they must have their own due diligence procedures in place and include anti-slavery and human trafficking provisions in their contracts with suppliers.

Speak Out policy (whistleblowing)

Anyone can raise concerns about wrongdoing taking place in Network Rail and our policy confirms this. We offer various channels to do so – including a confidential 24/7 reporting service called 'Speak Out' which allows for reports to be made anonymously and contains a specific 'modern slavery' category.

3. Risk Assessment, Prevention & Mitigation

This year we've focussed our efforts on reducing the risk within the 5 high risk procurement categories which were identified as part of a risk assessment undertaken last year. The assessment looked at our procurement categories and identified where risk could exist combined with how much leverage we had over each category's industry and supply chain.

The five high risk categories identified are:

- **Contingent Labour** – temporary labour working on the railway under our direction
- **Facilities (Soft Services)** – office and station services including waste management, cleaning, and catering
- **General Civils** – infrastructure construction other than station redevelopments
- **Infrastructure Support Services** – support services for our infrastructure maintenance including track and vegetation clearance
- **Track** – track renewal projects and associated maintenance services

Regular updates on our current risk landscape and what we're doing to reduce the threat of modern slavery are monitored through quarterly risk meetings and our working group, which gives us opportunities to escalate concerns or delays in improvement actions up to senior leaders.

In terms of prevention, we're aware that our operational staff are our 'eyes and ears' and should be considered our final line of defence. For this reason, we've ensured that training has been embedded within our frontline operational safety packs as well as our upcoming 'vulnerable persons' training, which is aimed at supporting our station staff in spotting the signs of modern slavery and providing a safe environment for potential victims. We also make it a requirement for all of our labour providers to be members of the Confidential Reporting for Safety (CIRAS) service, which provides additional opportunities for staff to raise concerns.

4. Due Diligence Processes

For high-value procurement activities a competitive tender process is required. This includes the use of a Pre-Qualification Questionnaire (PQQ) and further questions at the Invitation to Tender (ITT) stage. All PQQ's contain modern slavery questions as standard with high-risk commercial exercises having additional strong controls in place.

Internal assessments are carried out to understand which procurement events fall into the high-risk categories, and additional questions can be included within ITTs to understand how a supplier intends to manage any modern slavery risks within their supply chain over the life of the contract.

Any high-risk supplier which exceeds the cost threshold of £50m will also be asked to submit a Modern Slavery Assessment Tool (MSAT) response. The MSAT is an industry-wide tool, created by the Cabinet Office, that provides us with a risk rating for the supplier in question and accompanying improvement actions for how the rating can be upgraded moving forward. The feedback will form part of our post contract management plan with suppliers and will ensure that, as an industry, we can continue to share knowledge and push for sector-wide continuous improvement.

We started to trial the MSAT this year, asking 20 suppliers to provide a submission. At the end of the year, we'd received 7 responses, including submissions from some of our largest labour providers, and have agreed to continue embedding this as a control within our post-contract processes. Within the next year we'll aim to have MSAT responses in place for any supplier with a contract worth over £50 million that falls within our medium or high-risk categories.

This year, our contingent labour contract came up for renewal, which allowed us to put our controls into practice on one of our most high-risk tender exercises. Both PQQ and ITT questions were utilised, with the Ethics team supporting on scoring the supplier submissions. A request for MSAT responses was then issued to the successful providers as part of our MSAT trial.

Finally, we utilise approved supplier assurance providers including the Rail Industry Supplier Qualification Scheme (RISQS), owned by the Rail Safety and Standards Board (RSSB), which we use for our immediate suppliers. The assurance providers help 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 three years, with the aim of increasing collaboration to address modern slavery risk in the rail industry.

5. 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.

This year also saw us introduce additional awareness for our operational colleagues. Targeted training slides were embedded within our Safety, Health, Environment and Quality (SHEQ) cascade packs. These cascades are delivered each month and attendance is compulsory for our trackside colleagues.

Alongside the new operational training, we've launched a comprehensive communications campaign to help raise awareness. Early in the year we published a news article based on the real-life experiences of a colleague who uncovered, and consequently supported, a victim of modern slavery outside of work. Our colleague, having gone through the Ethics eLearning, spotted the signs of modern slavery whilst interviewing for a nanny vacancy at their home. This led to them raising the alarm to the authorities and supporting the victim throughout the process. The article not only praised our colleague for her bravery and intuition, but also highlighted the very real risk of modern slavery within the UK.

This story was followed later in the year with a refresher campaign using the tagline ‘modern slavery is closer than you think’. The campaign used our own variations of Government-designed posters and was published across multiple internal platforms. This included: a company-wide intranet story, adverts on office and depot TV screens, posts on our ‘All Company’ Yammer page, and an update included on colleagues online pay slips. Our communications also included a QR code to take users directly to our Speak Out service, making it even easier to flag any concerns.



Example of operational comms produced this year

Moving forward, with the support of Slave Free Alliance, we’re planning on creating a training package aimed at our Commercial colleagues. The training will support them in understanding the risk involved in their procurement exercises, what checks and contractual controls we should implement during the pre-contract stage, and how to manage the contract and discuss continuous improvements with the supplier throughout the life of the contract.

6. 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 96 % of our entire workforce have completed our ethics training – this exceeds our target of 90 % . Moving forward, we’ll be looking to make sure that completion of the training is mandated with a regular frequency.

We also monitor and categorise all concerns reported to us (either via our ‘Speak Out’ service or any other channel). We haven’t received any Speak Out cases reporting Modern Slavery in the last year. Following our comms campaigns, we did however receive a request for information from an employee on our approach to tackling modern slavery.

This year has also seen us roll out dashboard reports for all areas of business ethics, which includes regional training completion rates and reports of modern slavery. Each region

within the business now receives a periodic update to help spot trends, analyse our business more effectively, and improve the way we work with the wider business to monitor and manage modern slavery risks.

7. Looking Forward

In the next financial year we're committed to making further business improvements. We'll be working closely with Slave Free Alliance to continually improve our processes and controls, with progress monitored through the working group and our risk and governance framework. Some of the actions include:

- Embedding a bespoke training package, including accompanying guidance and supporting tools, for Commercial & Procurement colleagues involved in high-risk procurement exercises
- Developing a victim-centric communications campaign. Producing messaging that directly speaks to potential victims on site as a final line of defence
- Adding a regular frequency to our mandatory training package to ensure staff knowledge is continually refreshed
- Embedding the MSAT work stream; making sure high-risk suppliers are obligated to complete a submission and that the response and associated improvement actions are included within post contract management to help measure supply chain risks and how they're being addressed.

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 30 June 2022
- the Board of Network Rail Consulting on 01 July 2022
- the Board of Network Rail (High Speed) Limited on 22 July 2022

Signed by

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

Sir Peter Hendy CBE
Chair
16 August 2022