



### Art is Freedom

Art is Freedom is a visual art and photography exhibition, featuring work created by survivors of modern slavery.

The exhibition aims to change perceptions of modern slavery, and to raise awareness of the fact that it is happening in our communities – and that anyone can be a victim.

Survivors supported by Her Majesty's Modern Slavery Response Service take part in art and photography workshops every summer, learning and refining their skills, before submitting their best pieces for the exhibition. This year our artists have chosen to focus on the theme 'My Next Chapter'.

### What is modern slavery?

Modern slavery is a serious crime. It happens everywhere. It is happening right now in London and across the UK.

It can be hard to spot. Victims of modern slavery can end up washing our cars, painting our rail, making our clothes, picking our crops, or working in houses as cleaners or nannies. Many are sold for sex in brothels or forced to commit crimes, and their every move is controlled.

"They are tricked or coerced into slavery. They are psychologically intimidated into thinking they cannot leave and would not get any help. Many are raped, beaten and starved. They may not recognise themselves as a victim."

Victims of modern slavery can be of any age, gender, nationality and ethnicity.

Find out more at [hereina.org.uk](https://www.hereina.org.uk) or scan the QR code.

With special thanks to

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Art is Freedom: An exhibition by modern slavery survivors



**'Journey To Salvation'**  
S.A, age 31, from Cameroon

"This piece is called Journey to Salvation. When I came here I thought it looked like. I pictured myself going back to church, and if I go with my daughter. In the painting it is me and my daughter. I thought in a while and I thought to myself - it doesn't matter if it's not perfect, we are pretty."

**'Freedom Of Life'**  
R.M, age 49, from the Philippines

"Happiness is a choice, but freedom of life is a difficult journey. It is also a strong determination and a state of mind where you promise yourself to be happy and have a positive attitude. Keep going and fight for your own freedom of life."



Network Rail

# Modern Slavery Statement

2023 – 2024 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 2023/24 financial year and takes us up to 31 March 2024.

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. To do this, we own, repair, and develop the railway infrastructure in England, Scotland, and Wales, working with an extensive supply chain. More information on our organisational structure can be found [here](#).

#### **Our Business in Figures:**



**40,237 Employees**



**20,000 Miles of Track**



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



**20 Managed Stations**



**£8 Billion Average  
Supply Chain Spend  
Per Year**



**>96% British Suppliers  
or British Subsidiaries**



**4,285 Total Number  
of Suppliers**



**2975 (69%) 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 track equipment to drone technology. 96 % 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 and have continued our membership with Slave Free Alliance, an anti-slavery enterprise – part of the Hope for Justice Charity, who provide us with subject matter expert advice and resource. We've also supported Hestia, a London based charity that helps vulnerable people including victims of modern slavery.

Responsibility for our modern slavery policy and programme sits with our group general counsel, reporting directly into the 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 – 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 have a joined-up approach in tackling the threat of modern slavery and help us to understand our responsibilities when responding to issues or concerns.

In order to ensure our policies are effective we regularly seek advice from third parties and have worked with Slave Free Alliance and PROTECT in recent years to benchmark against best practice and gain independent assurance. We also work with our internal audit and assurance functions to review the effectiveness of our modern slavery and whistleblowing controls.

Staff can access our policies on our intranet site or through an internal app called 'EthicsApp', which is available on all work mobile devices. Our policies can also be found on our [external website](#) for our customers and suppliers.

Our key policies in relation to preventing and reporting modern slavery are:

### **Anti-Slavery and Human Trafficking policy**

Our policy 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.

### **Commercial Policies**

Our Commercial & Procurement policy, as well as our Procurement Management and Commercial Management Frameworks, include references to modern slavery throughout. Additionally, we launched an updated Supplier Code of Conduct this year which reminds our suppliers of the need to comply with the Modern Slavery Act.

### **Speak Out policy (whistleblowing)**

Our Speak Out policy, which we updated this year, confirms that anyone can raise concerns about wrongdoing taking place in Network Rail, including instances of modern slavery. We offer various channels for people to raise concerns – 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 continued to focus our efforts on reducing the potential for modern slavery within the 5 high risk procurement categories identified as part of a risk assessment undertaken by Slave Free Alliance. Their 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

## **4. Our 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 PQQs contain modern slavery questions as standard with high-risk commercial exercises requiring additional controls to be put 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 supplier that falls into a high-risk category and exceeds the contract 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.

This year, our commercial director contacted existing suppliers delivering contracts in categories deemed to be high-risk in relation to modern slavery and with a contract value of £50m or more. The messaging asked them to submit a MSAT assessment if they hadn't already done so, and we will continue to engage with the supply chain to raise awareness and promote use of the tool.

Also, this year, one of our regional building and civils contracts 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 question sets were included, with the Ethics team supporting on scoring the supplier submissions.

## **5. Training & Awareness**

Modern Slavery is included as part of our ethical training course which all employees must complete every three years. Completing this training gives our staff a good understanding of what Modern Slavery is and how they can report concerns. The training package has been updated this year to be clear, interactive, and visually engaging, and contains an animation which explains what modern slavery is and highlights the fact that it can happen in the UK.

The training has been split into two courses – an 'all employees' course, which is mandated across the company, and an additional 'line manager essentials' course. The line manager essentials course builds on the modern slavery content covered in the companywide course and provides additional signposting and guidance to our line

managers on what to look out for and how to support our colleagues should there be a potential instance of modern slavery found on one of our sites.

This year we also wanted to bolster our training offering for our operational colleagues. We produced new guidance to cover operational leadership roles across both Network Rail and our supply chain. We added enhanced training materials into the existing Controller of Site Safety (COSS), Person in Charge of Possession (PICOP), Engineering Supervisor (ES), and Protection Controller (PC) training courses. The guidance is intended to give our operational colleagues an understanding of what modern slavery is, the signs to spot, and what tools and resources they can use should they ever come across a suspected instance of modern slavery on site. The training content has received approval and will be implemented into the next training pack update; scheduled for June 2024.

Another of our aims was to produce an additional training package aimed at our Commercial colleagues. We wanted to support them in understanding the risk of modern slavery in the supply chain and how that risk can be mitigated in their procurement exercises through due diligence, contractual terms, and supplier management. A draft training course has now been produced with the roll out planned to take place throughout Summer.

Alongside our training, we produced multiple communication campaigns this year. The first campaign focused internally on providing the contact details to our whistleblowing service and the need to speak out if wrongdoing was witnessed or suspected, with specific reference to speaking out about modern slavery and breaches of human rights.

The second campaign focused on raising general awareness of Modern Slavery, and we were pleased to be able to use our stations to reach a wide audience in collaboration with London-based charity, Hestia. Station concourse space at London Bridge, Paddington, and Waterloo stations was used to host an art exhibition produced by Hestia's clients, who are all previous victims of modern slavery. Our chief executive, Andrew Haines, was amongst those to visit the exhibition along with an estimated 3.9 million passengers that passed through the stations in that time.



*Andrew Haines, chief executive, visiting the Art is Freedom exhibition at Waterloo Station.*

## **6. Effectiveness**

We recognise that our modern slavery policy and strategy can only be effective if we educate our staff and we're pleased to report that 92 % of our entire workforce has completed our ethics training.

We also monitor and categorise all concerns of wrongdoing reported to us. Whilst we've received and investigated some concerns in relation to operational environments and working conditions, we haven't found any evidence of modern slavery taking place on our sites within the last year.

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

## **7. Looking Forward**

We look forward to making further business improvements over the next financial year. Our aim is to continue working closely with Slave Free Alliance, Hestia, and our industry working groups to improve our internal processes and controls as well as our external facing schemes. Some of the actions include:

- Launching our commercial training package for Commercial & Procurement colleagues involved in high-risk procurement exercises this Summer
- Publishing our new operational training and guidance in June
- Working with Slave Free Alliance to conduct site visits across our regions; using any findings from these as future opportunities for continuous improvement
- Continuing to recognise Anti-Slavery Day (18<sup>th</sup> October) and promote awareness of this important topic.

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 04/07/2024
- the Board of Network Rail (High Speed) Limited on 19/07/2024
- the Board of Network Rail Consulting on 23/07/2024

Signed by



**Mike Putnam, acting chair**