

Suspecting Modern Slavery

– a social performance case study

The situation

An operative working on one of our project sites was asked to replace their hard hat. He did not follow the safety instruction due to a lack of understanding, thought to be due to a language barrier. Further investigation showed that the operative did not appear on the site induction record and their CSCS (Construction Skills Certification Scheme) card was thought to not be valid. **What would you do?**

Given the fragmented procurement processes of the construction and infrastructure industries, and the heavy reliance on outsourced labour we must be vigilant in identifying modern slavery risks. **Would you see the individual identified above as the wrong-doer, or a possible victim of modern slavery?** Every employee has a role to play in spotting signs and reporting problems.



The individual above was walked off-site and the problem went away, but **was this the right course of action?**

Lessons learned

An investigation was carried out which unfortunately did not consider the possibility of a modern slavery situation. But let's remember... Those at heightened risk are migrant workers, sometimes with limited English language skills. They may not understand their rights, which results in them settling for what they think is normal or 'better than nothing' circumstances. Victims of modern slavery can be controlled by individuals or by gangs who threaten them with violence, debt, sexual assault or who withhold documents such as passports and ID. They may also control victim's bank accounts.

Issues to be aware of to help identify modern slavery on site are below. Consider which of these could have applied to this situation if more had been done to investigate the modern slavery risk.

- Workers who don't have written contracts of employment
- Workers who have had to pay fees to obtain work
- Workers who aren't able to prove they are legally entitled to work in the UK
- Workers showing signs of physical abuse and/or appear malnourished or unkempt
- Workers who seem to have few personal possessions or often wear the same clothes
- Workers who appear frightened or reluctant to talk to others
- Workers who are dropped off or collected for work by the same person regularly, either very early or very late at night
- A large number of people working for you listed as living at the same address may indicate high shared occupancy – often a factor for those being exploited
- Agencies charging suspiciously low rates against standard industry pricing

Everyone is key to identifying modern slavery, and it's important that everyone knows what to look out for. If you're concerned that an employee, or someone working on our behalf could be a victim of modern slavery, please report it via Speak Out (Ph: 0808 143 0100). If you're worried that the individual is in immediate danger, phone 999.

Who to contact for more information

See the information and contacts on Safety Central > <https://safety.networkrail.co.uk/safety/code-of-business-ethics/modern-slavery/> or contact the Network Rail **Ethics Team** at ethics@networkrail.co.uk. You can also speak to the **Modern Slavery Helpline** on > Ph: 08000 121 700.