



## Utilities Against Slavery Annual report 1 April 2024 – 31 March 2025

### Executive summary

Utilities Against Slavery (UAS) was established in March 2020 to develop an industry-focussed coordinated approach to collaborate on the issue of modern slavery and drive meaningful change within the utilities sector. The group has agreed on the following objectives:

- To develop a common understanding of the critical issues common to all members.
- To share best practices amongst the group's members.
- To identify and work collaboratively on jointly agreed strategic workstreams.
- To develop training materials to share with our supply chain and other stakeholders.
- To engage with other sectors to share good practices and identify common challenges.

Utilities Against Slavery now has 14 members representing electricity, gas and water providers, supported by the social enterprise Slave-Free Alliance and led by an independent chairperson. In April 2023, three UAS Strategy Groups were introduced, responsible for Supply Chains, Training, and Collaboration/Engagement workstreams, with nominated leads and agreed objectives to progress the aims of UAS.

The strategy groups have been pivotal in delivering our objectives. Notable highlights include.

- Facilitating an interactive session for senior procurement and supply chain specialists during the UK Anti-Slavery Week, resulting in new workstreams established by UAS to strengthen modern slavery due diligence across the utilities sector.
- Developing new utilities-specific modern slavery training and awareness resources, including a toolbox talk and multilingual modern slavery posters.
- Developing a more consistent approach to identifying and managing the risk of modern slavery in UAS supply chains, for example, identifying common systems and processes used across the utilities sector for mapping and assessing complex supply chains.

Over the past year, specific guidance has been published for UAS members. Responding to modern slavery guidance followed after members participated in a responding to modern slavery workshop, held during a UAS members strategy day. After the publication, one of our members held a response to modern slavery incident exercise using the guidance, which received positive feedback.

Other guidance published includes considerations when undertaking modern slavery supplier and site assessments.

This report describes the development of the group over the year and highlights the key activities undertaken by Utilities Against Slavery and its members. Importantly, as a group, we continually seek to evolve, and this report also sets out our priorities and activities for the forthcoming year.

Collaboration within the group and externally has been and will continue to be progressed. Next year, we will engage with the UK Modern Slavery Commissioner's office and the Supply Chain Sustainability School.



## Background

The utility industry is a massive employer worldwide with a supply chain that embraces tasks ranging from the most complex engineering solutions to basic activities, such as excavation or materials distribution. It is, therefore, inevitable that utilities are a target for exploitation. It is also an industry that has a unique opportunity to identify the potential for acts of modern slavery and take action to support the eradication of this criminal activity.

Utilities Against Slavery was established in March 2020 and is supported by Slave-Free Alliance leadership team members. Slave-Free Alliance is wholly owned by global anti-slavery charity Hope for Justice. The group has a membership of 14 utility companies (Appendix 1), collectively employing more than 100,000 people with a supply chain spend in the region of £15bn.

## Current Operating Model and Governance

Key features of the operating model include:

- Utility sector businesses comprising SFA members and non-SFA members (which pay an annual subscription).
- Independent chair, who ensures that UAS delivers its strategic and operational objectives to the satisfaction of its members.
- Supported by SFA
  - Human rights experts – who provide specialist knowledge to the group and support engagement.
  - Coordinator – supports training and supports logistics of the group.
  - Steering committee – supports chair in governance and strategic direction.
  - Strategy groups – Engagement, Supply Chain and Training.

In line with Utilities Against Slavery's governance procedures, the Terms of Reference and steering group membership were reviewed in March 2025.

The group's mission remained unchanged, summarised as raising awareness, sharing best practices, and ongoing collaboration. Objectives were expanded to include 'developing training material to share with our supply chain' and 'cooperating with other sectors to share good practice'. The terms of reference are included in Appendix 1.

The steering committee meets regularly, generally a week before the whole group meetings, to discuss the contents of meetings as well as the broader direction of the group.

Group meetings continue to be held on a six-week cycle, alternating between a two-hour session incorporating presentations or workshops and a 30-minute update session.

## Working Towards Achieving UAS Objectives

Since the previous Chair's report, UAS has taken positive steps to achieving the group's agreed objectives. The introduction of working groups in 2023 has been pivotal in driving and delivering activity towards achieving UAS goals.



UAS is supported by Slave-Free Alliance, whose leading human rights experts, who work nationally and internationally across a broad range of business sectors, have been an asset to UAS.

### **Developing a common understanding of the critical issues common to all members.**

Since UAS has been established, there has remained a strong appetite to identify and address modern slavery risks across the utilities sector and its supply chains. While many of the issues are addressed through the strategy groups, UAS group meetings have provided an effective platform for issues in the utilities sector and evolving trends to be presented. Over the past 12 months, presentations have covered remediation, supplier due diligence, issues relating to the sourcing of solar panels, and modern slavery specific supplier and site assessments.

As a result of these presentations, new workstreams have been identified and undertaken by UAS, including the development of UAS responding to modern slavery guidance, modern slavery supplier assessment guidance, and modern slavery site assessment guidance.

UAS supported UK Anti-Slavery Week by facilitating an interactive event for procurement and supply chain specialists to identify challenges relating to assessing modern slavery risk across the sector's supply chain. As a direct result of this session, a series of actions have been identified and are being progressed to bring common solutions for supply chain challenges.

### **Sharing best practices amongst the group's members.**

UAS are an open and engaging group of practitioners who share a common commitment to address the risk of modern slavery across the utilities sector and its supply chains. They are supported by Slave-Free Alliance, which, over the past year, has shared many examples of good practice on various themes, including government and legislative guidance, supplier mapping and risk assurance systems guidance, community engagement and CCLA benchmarking.

### **Working collaboratively on jointly agreed strategic workstreams.**

#### **Training**

Over the past year, the Training strategy group has made meaningful progress in developing tailored resources to educate employees on human rights and modern slavery while strengthening support for human rights due diligence. A key achievement has been the development of the "Spot the Signs" poster, designed to be customised for different organisations. To ensure broader accessibility, the poster has been translated into Gujarati, and efforts are underway to secure translations in additional key languages.

Recognising the need for targeted education, the group introduced a 10-minute toolbox talk for frontline and site-based employees, providing essential guidance in a concise format. Building on this success, the team has been actively developing an expanded 30-minute session, scheduled for delivery in 2025.

Over the past year, one of the group's primary focus areas has been the development of role-specific training to equip employees across various business functions with the tools to implement human rights due diligence effectively. To tailor this training to specific needs, the group surveyed UAS



members, identifying priority roles and content requirements. As a result, a pilot training program for procurement teams is being developed.

*‘The group has strengthened its commitment to education and awareness, laying the foundation for continued progress in the year ahead.’* Katie Metcalf SSE, UAS Training workgroup lead

## Engagement

The Engagement strategy group has continued to support the wider Utilities Against Slavery team over the year by providing opportunities for members to engage with their own businesses through the production of video briefings. Focused on relevant topics, the video briefings offer valuable information in an easy-to-follow format.

*‘The Engagement working group has successfully delivered several outputs, including video briefings and an Anti-Slavery week event that have helped Utilities Against Slavery work towards their aims, providing supporting information and helping to raise awareness of modern slavery within member businesses. I’m proud to be a member of the Engagement working group and wider Utilities Against Slavery, helping to strengthen the utility sector’s approach to tackling modern slavery.’* Amanda Parker, Yorkshire Water, UAS Engagement workgroup lead

## Supply Chain

Following UAS’s senior leadership supply chain event, several activities were identified to support UAS members and develop consistent ways of working across utilities’ supply chains.

The work themes identified include.

- Supply chain mapping and risk assessment
- Technology sector focus
- Supplier assessment and engagement
- Upskilling procurement colleagues working within high-risk categories
- Delivering a consistent approach to supplier learning requirements
- Identify and progress collaborative opportunities

Some activities have already been completed, while others are ongoing or being progressed.

### **Engaging with other sectors to share good practices and identify common challenges.**

Several UAS members attended Slave-Free Alliance’s annual conference, which provided an excellent opportunity to network with delegates from other business sectors.

### **Future steps**

- The training strategy group plans to develop further role-specific training modules for the coming year.
- The Engagement strategy group will continue supporting the wider group by working closely with the other groups to support initiatives. Further video briefings will be produced to highlight hot topics and provide best practice guidance, and plans for Anti-slavery week include a session targeting suppliers to share common challenges and provide advice and support.
- UAS will develop common principles to begin mapping beyond tier 1 suppliers.
- UAS will be provided briefings on labour exploitation risks in extracting rare earth components.



- UAS will develop a UAS modern slavery code for suppliers.
- UAS will explore the feasibility of common supplier selection questions and contract clauses.
- As a group, we will continue to engage externally, including the UK Modern Slavery Commissioner's office and the Supply Chain Sustainability School.