



Utilities Against Slavery Annual report 1 April 2025 – 31 March 2026

Executive summary

Utilities Against Slavery (UAS) was established in March 2020 to develop a coordinated, industry-focused approach to addressing 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 has 16 members, an increase on the previous year, representing electricity, gas and water providers, supported by the social enterprise Slave-Free Alliance and led by an independent chairperson.

Three UAS Strategy Groups, responsible for Supply Chains, Training, and Collaboration/Engagement, have once again successfully delivered activity towards achieving UAS objectives.

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

- A supplier engagement webinar with over 150 attendees, which demonstrated how businesses and their suppliers can collaborate to address modern slavery risks.
- The Engagement work group has published two video briefings for utilities companies on how to conduct modern slavery supplier and site assessments.
- Cadent Gas has produced a film designed to help utility engineers identify the signs of Modern Slavery. The valuable training resources film has been made available to UAS members.
- UAS has collaborated with the Sustainability Supply Chain School (SCSS) to develop a procurement learning pathway accessible to UAS Members.

Following the publication of UAS supplier and site assessment guidance documents, several members have carried out assessments, providing participants with a deeper understanding of modern slavery risks and the effectiveness of mitigation controls. Importantly, key learnings taken from these assessments were shared with the wider UAS membership.

The Chair's report describes the group's development 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, advanced. Next year, we will further engage the Supply Chain Sustainability School and explore opportunities to collaborate with the British Standards Institution (BSI).



Background

The utility industry is a significant employer worldwide, with a supply chain that encompasses tasks ranging from the most complex engineering solutions to basic activities, such as excavation and materials distribution. It is therefore inevitable that utilities are targets 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 members of the Slave-Free Alliance leadership team. Slave-Free Alliance is wholly owned by global anti-slavery charity Hope for Justice. The group comprises 16 utility companies, collectively employing more than 100,000 people, with a supply chain spend of around £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).
- An independent Chair who ensures that UAS delivers its strategic and operational objectives to the satisfaction of its members.
- Support from SFA
 - Human rights experts – who provide specialist knowledge for the group and support engagement.
 - Coordinator – supports training and leads logistics of the group.
 - Steering committee – supports the 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 those meetings and the group's broader direction.

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 achieve 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, continue to be an asset to UAS.



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

UAS group meetings continue to provide an effective platform for presenting issues in the utilities sector and evolving trends. In addition to sharing regular news updates, SFA has delivered several specific presentations, including on rare earth and conflict minerals, setting modern slavery-specific key performance indicators, and delivered a briefing on modern slavery risks associated with the UK car wash sector.

Externally, the British Standards Institute (BSI) presented a preview of its soon-to-be-launched new International Standard, ISO 37200, for “Managing the risk of modern slavery”, and there is appetite amongst the UAS members for a workshop to explore this further.

Sharing best practices amongst the group's members.

Following the publication of the UAS supplier and site assessment guidance documents, several members have carried out assessments. These provided opportunities to assess nuanced areas of the utilities sector and operations, including overhead cabling operations, offshore cable-laying, and alliance-structure construction projects.

In addition, the assessments provided participating UAS members with a deeper understanding of modern slavery risks and were upskilling opportunities for staff. Key learnings taken from these assessments were shared with UAS members.

Working collaboratively on jointly agreed strategic workstreams.

Training

Over the past year, the training development highlights include;

- Development of role-specific training for procurement, through engagement with UAS procurement professionals and category managers to determine the most relevant training content, focusing on key risks and challenges.
- A training needs survey has been undertaken with future training to focus on human resources, onsite teams and health and safety roles.
- Identified and curated existing content and established a plan for a series of training pathways, incorporating:
 - Content from the Supply Chain Sustainability School (SCSS)
 - Additional targeted materials identified through stakeholder engagement
- Worked with SCSS to develop the learning pathway, with a review link scheduled for release in early 2026
- Developed a supplier training package (PowerPoint and accompanying guide) to the final stages of development, ready for release in early 2026.

Cadent Gas has produced a short film designed to help utility engineers identify the signs of Modern Slavery. The film is intentionally brand-neutral and has been made available to all UAS members. In addition to the 2800 Cadent Gas engineers, it is hoped that many more engineers employed across



UAS will gain a greater understanding of the physical, social and property-based indicators associated with modern slavery.

Engagement

Utilities Against Slavery once again supported the UK Government's Anti-Slavery Week in October 2025 by holding a supplier engagement webinar. The session, attended by over 150 attendees, included a case study with a recruitment company in the utilities sector, focusing on how businesses and their suppliers can collaborate to address modern slavery risks. The session also covered how SMEs can interpret and implement the UK Government's Transparency in Supply Chains guidance.

The Engagement work group has published two bite-sized video briefings for utilities companies on how to conduct modern slavery supplier and site assessments. Further videos will be produced in 2026, including one focusing on key performance indicators.

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. These actions have been completed and have provided UAS with a clearer understanding of collaborative opportunities and further requirements for assessing a monitoring risk in UAS supply chains.

Areas of work to be progressed in the forthcoming year include developing common standards for higher-risk-category suppliers and audit/assurance frameworks to complement them.

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

UAS actively supported Slave-Free Alliance's annual conference, with presentations by UAS members and a strong UAS contingent of conference delegates, providing opportunities to network with delegates from other business sectors.

Future steps

- An important priority in this coming year is to develop bespoke UAS common standards for suppliers, which complement the UK government's statutory guidance for transparency and supply chains (TISC). This work will help utility companies better understand their risks and the steps they need to take in their higher-risk supply chains. It will also provide a benchmark to measure performance and offer further steps for continuous improvement.
- UAS will continue to engage externally, notably with the Supply Chain Sustainability School, to increase and support engagement with our supply chains.
- Develop further modern slavery training resources to support human resources, onsite teams and health and safety roles.