

The background of the slide features a blue-tinted image of a high-voltage power line tower. In the foreground, on the right side, is a blurred silhouette of a person wearing a hard hat, looking towards the tower. The overall theme suggests a focus on energy infrastructure and safety.

National Grid Modern Slavery Supplier Toolkit

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1. A message from our CPO

At National Grid, our vision is to be at the heart of a clean, fair and affordable energy future. Delivering this future means putting people first—whether they are working within our organisation or across our supply chain. Our Fair Transition Principles guide how we approach this: with a commitment to responsible business practices, decent work, and inclusive growth. We know that an energy transition, to be effective, must also be a fair—free from exploitation and underpinned by respect for human rights.

While modern slavery has no place in our business or supply chain, we also recognise that many of our suppliers, particularly small and medium-sized enterprises, may not have the dedicated resources or in-house expertise to address these risks alone. That's why we're committed to walking this journey together. This toolkit is designed to offer practical support—not just principles. If something doesn't look right, we want you to feel confident that you can act, and that National Grid will be there to support you when you do.

The toolkit includes essential information to help you recognise warning signs, take appropriate steps, and understand your role in the escalation process. You'll find quick-reference guides, definitions, checklists, and case studies. Where deeper knowledge is needed, we've signposted trusted external resources. The escalation process sets out what to do at each stage and—crucially—how National Grid can support you. This is a shared responsibility, and we believe the only effective response is a collaborative one.

Simon Harnett
Chief Procurement Officer

See our latest Modern Slavery Statement [here](#)



2.Executive Summary

Key messages

3. Immediate Actions in Case of Danger to Individuals

1. Ensure Immediate Safety:

- a. **Remove the Victim from Danger:** If safe to do so, discretely move the victim to a secure, private location away from the potential perpetrator(s) and public areas.
- b. **Do Not Confront:** Avoid direct confrontation with the suspected perpetrator(s) to prevent escalating the situation.

2. Contact Emergency Services:

- a. In the UK, dial **999** for immediate police assistance. Clearly state that you are reporting a modern slavery incident with an imminent threat to a victim.
- b. In the USA, dial **911** for immediate police assistance. Inform them that there is a modern slavery situation involving a victim under immediate threat of harm.








3. Notify Key Contacts:

- a. Internal Incident Lead: Contact the Incident Lead or designated internal emergency contact within National Grid to inform them of the situation and actions taken.

4. Document Key Details:

- a. Take note of essential information, including descriptions of the scene, individuals involved, and any statements made by the victim or others.
- b. Ensure that all documentation is handled securely and shared only with authorised personnel.

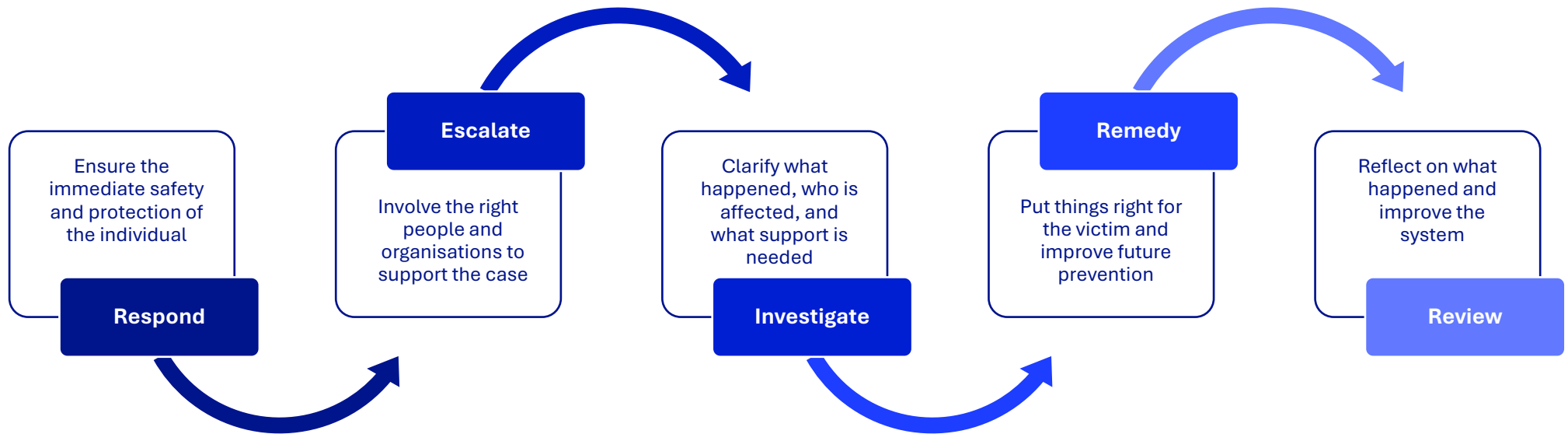
4. Definitions and Signs

Definitions		Additional Information
Modern Slavery:		A term that covers serious forms of exploitation where people are controlled, abused, or forced to work. This includes forced labour, human trafficking, debt bondage, and servitude.
Forced Labour:		When someone is made to work against their will, often through threats, violence, or punishment.
Human Trafficking:		The movement or control of people through force, fraud or coercion, often for labour, sex work or other forms of exploitation.
Debt Bondage:		When someone is forced to work to repay a debt, often under unfair or impossible terms that trap them in exploitation.
Child Labour:		Work that is dangerous or harmful to children, or that interferes with their education and development.
Exploitation:		Taking advantage of people through unfair, abusive or illegal work conditions, often for financial gain.
Vulnerability:		Personal or situational factors that make someone more likely to be exploited—such as language barriers, migration status, poverty, or lack of legal protections.

Signs of modern slavery		
Appearance		<ul style="list-style-type: none"> • Signs of physical or psychological abuse • Look malnourished or unkempt • Appear withdrawn
Possessions		<ul style="list-style-type: none"> • Have no travel documents/passports • Few or no personal possessions • Always wear the same clothes • Clothes not suitable for their work
Manner		<ul style="list-style-type: none"> • Reluctance to seek help • Avoid eye contact • Appear frightened or hesitant to talk
Isolation		<ul style="list-style-type: none"> • Restricted freedom of movement • Rarely allowed to travel alone • Seem under control/influence of others
Living conditions		<ul style="list-style-type: none"> • Living in dirty, cramped or overcrowded accommodation • Living and working at the same address
Time		<ul style="list-style-type: none"> • Unusual travel times • Dropped off/collected for work on a regular basis, either very early or very late at night • Work excessive hours

5. Escalation Process

Tell story



6. Modern Slavery Incident Response Checklist

Stage	Before moving to the next stage, ensure:	How National Grid can support:
1 Respond	<ul style="list-style-type: none"> ✓ The victim has been moved to a safe, private location. ✓ Basic facts have been gathered and documented accurately. ✓ Emergency services have been contacted if the victim is in immediate danger. ✓ Discretion has been maintained to protect the victim's privacy. 	<ul style="list-style-type: none"> • Work with you to coordinate immediate next steps, especially where the incident has occurred on your site. • Provide guidance on how to manage the situation safely and with dignity. • Help you access emergency support (e.g. helplines, safeguarding services) if required.
2 Escalate	<ul style="list-style-type: none"> ✓ You have identified your internal point of contact. ✓ You have shared the concern with your National Grid contact (e.g. Category Manager). ✓ Relevant authorities or agencies have been notified if required. ✓ You have documented all communications and actions taken so far. 	<ul style="list-style-type: none"> • Alert senior contacts at National Grid who can assist in managing the case. • Support you to navigate contact with external authorities or NGOs. • Clarify expectations around your role and responsibilities in the escalation process. • Offer a sounding board if you're unsure what to do next.
3 Investigate	<ul style="list-style-type: none"> ✓ You have contacted relevant NGOs or third-party services where appropriate. ✓ A basic support plan for the victim is in place and documented. ✓ Records of actions and evidence are being maintained securely and appropriately. ✓ You are actively cooperating with National Grid in gathering facts. 	<ul style="list-style-type: none"> • Provide templates and guidance for documentation and record-keeping. • Support you in accessing victim support services, including trusted third parties. • Offer advice on how to handle sensitive information and evidence correctly. • Involve you in planning next steps to ensure the case is managed ethically and in line with expectations.

4	Remedy	<ul style="list-style-type: none">✓ A written remediation plan has been developed and agreed (including next steps, responsibilities, and timeframes).✓ The victim's immediate and longer-term needs are reflected in the plan.✓ You have committed to any required changes in your own processes or practices.✓ All actions are documented and ready to implement.	<ul style="list-style-type: none">• Review your remediation plan and provide input where needed.• Help you identify and implement policy or practice changes.• Provide access to training, tools or templates on tackling modern slavery.• Engage with you on systemic improvements and ways to prevent future risks.
5	Review	<ul style="list-style-type: none">✓ A debrief or review has taken place involving relevant stakeholders.✓ Key findings and lessons learned have been documented.✓ Internal processes have been updated where necessary.✓ Learnings have been shared with National Grid.	<ul style="list-style-type: none">• Facilitate a joint review conversation to reflect on what went well and what could be improved.• Share our own learning and examples from other cases.• Support you in updating internal practices, policies or training based on the case.• Encourage continuous improvement and collaborative learning.

Appendix A: Considerations & Resources

Topic	Considerations	Resources
Immediate Safety	<ul style="list-style-type: none"> Do not confront perpetrators. Move the individual to a safe, private location. Ensure no third parties (especially exploiters) can overhear. A safe space should include: <ul style="list-style-type: none"> Warmth Food and drink A change of clothing Access to phone and contacts Washing facilities 	Modern Slavery Helpline (08000 121 700) Salvation Army 24-hour support (0800 808 3733) GLAA Emergency Guidance
Safeguarding & Immediate Remediation	<ul style="list-style-type: none"> If no third-party support is available, consider: <ul style="list-style-type: none"> Advancing wages (to an account the victim controls) Food/canteen vouchers Temporary hotel accommodation Issuing pay by cheque (or cash only as last resort) Avoid any actions that could expose the victim to further control or harm 	National Referral Mechanism (NRM) Unseen Survivor Support Map
Use of Translators	<ul style="list-style-type: none"> Use only trained, independent interpreters. Speak directly to the victim, using the interpreter only to translate. This builds trust and allows observation of non-verbal cues like body language and tone. 	Unseen Modern Slavery NRM Guide
Whistleblower Protection	<ul style="list-style-type: none"> Remove identifying details when documenting whistleblower reports. <ul style="list-style-type: none"> Keep the circle of knowledge small. Reassure staff that no retaliation will occur. Where possible, use anonymous channels. 	National Grid Speak Up Line Modern Slavery Helpline – anonymous reporting

Documentation & Evidence Gathering	<ul style="list-style-type: none">• Collect and store securely:<ul style="list-style-type: none">○ Application forms○ Contracts and payslips○ Contact/emergency details○ Sickness/absence and disciplinary records○ CCTV footage (where relevant)○ Entry/exit logs○ ID documents• All evidence should be stored in line with data protection rules.	Stronger Together Templates & Checklists GLAA Employer Resources
Engaging Support Services	<ul style="list-style-type: none">• Know when and how to contact:<ul style="list-style-type: none">○ The police (if there's immediate risk)○ The Modern Slavery Helpline (for advice and referrals)○ Local safeguarding boards○ Relevant NGOs (e.g. Unseen, Hope for Justice)• Provide emotional and logistical support until help arrives	Unseen UK Hope for Justice Gangmasters & Labour Abuse Authority (0800 432 0804)
Spotting the Signs	<ul style="list-style-type: none">•	Spot The Signs - Unseen GLAA Spot the Signs Toolkit

Appendix B: Information Gathering

Gathering as much information as possible from the first contact with a potential victim can identify the level of risk, who may be involved in the exploitation, and any urgent enquiries or actions that need to be undertaken. The below is a list of suggested questions to help ensure key information is attained. This list is not exhaustive and is intended to be used as guidance. Some may need to be elaborated on, depending on the response from the potential victim.

The below questions are provided as a guide only and are not exhaustive

Topic	Purpose	Questions
Recruitment:	<i>Understand how the person entered the job and whether deception or coercion was involved.</i>	<ul style="list-style-type: none"> • How did you hear about the job? • Did you have to pay anyone to get it? • Were you asked to hand over documents? • Was travel or accommodation arranged? What was promised? • Who recruited you? Was an agency involved?
Work Conditions:	<i>Compare reality with what was promised and look for signs of control or abuse.</i>	<ul style="list-style-type: none"> • Is your job what you expected? • What are your working hours and breaks? • Are you treated fairly by supervisors? • Can you talk freely with colleagues? • Does anyone control your actions at work?
Pay:	<i>Check whether the person receives and controls their wages.</i>	<ul style="list-style-type: none"> • How much are you paid and how often? • Is this what you were promised? • Do you get a payslip? • Do you have your own bank account and access to it? • Are deductions taken from your pay? By whom? • Do you get holiday or sick pay?
Accommodation & Food:	<i>Identify signs of debt bondage or control linked to housing or meals.</i>	<ul style="list-style-type: none"> • Who do you live with? Who owns the accommodation? • Do you have your own space and facilities? • How much do you pay and to whom? • Can you leave freely? • Who provides your food? Do you have enough?

Travel:	<i>Understand how the person gets to work and whether it restricts their freedom.</i>	<ul style="list-style-type: none">• How do you get to work?• Who arranged the transport?• Do you have to use it?• Can you travel independently if you choose to?
Risk:	<i>Assess whether urgent action is needed to protect the individual.</i>	<ul style="list-style-type: none">• Are you afraid for your safety or someone else's?• Have you been hurt or threatened?• Is anyone putting pressure on you or your family?• Do you know others who are also being controlled or harmed?

Appendix C: Case Studies

- Industry relevant



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