

Modern Slavery Statement

Introduction

Hinkley Point C (HPC) is being constructed on the Somerset coast by NNB Generation Company (HPC) Limited (“HPC”), a subsidiary of EDF Energy Limited (EDF) and is one of the largest construction sites in Europe. When generation begins, it will provide low carbon electricity to 6 million homes.

HPC is not mandated to prepare a standalone modern slavery statement – it also reports as part of the EDF Group statement. However, HPC is mindful that due to scale of the project (in the region of 10,000 workers arrive at HPC each day) and the number of different organisations who make up our supply chain, we recognise the heightened risk of instances of modern slavery or human trafficking. The safety and wellbeing of the workforce is of paramount importance to HPC - we have zero tolerance for modern slavery or human trafficking across our business and within our supply chain. The publication of this statement demonstrates the project’s commitment to controlling the risk of modern slavery or human trafficking in all its forms across the project.

Our People

The project has a duty to all of our people, whether or not they work directly for HPC or form part of the ever-changing 10,000+ people who work on the HPC site daily, to protect them from the risks of modern slavery.

Contractual protections and worker checks

Workers on site are either employed by HPC or contracted to our project by one of our named contractors. As part of the HPC Common Framework Agreement, minimum terms and conditions incorporating modern slavery checks are applied to all workers’ contracts. HPC also takes significant steps to ensure that all staff are legally allowed to work within the UK through the pre-employment checks carried out by the HPC personnel security team during the onboarding process. These checks include identity, criminal record, right to work and capability confirmations.

All of our people are expected to work within our guidelines on ethical behaviour, which is set out in the Worker Code of Conduct appended to all of our contracts and communicated to all workers when they attend the mandatory induction process prior to joining our project.

Training

The project induction includes training on modern slavery and information about our “SafeCall” confidential worker hotline service, which allows people to anonymously inform us of potential modern slavery issues at HPC. The modern slavery training session, delivered to all on-site workers during the induction process, explains what modern slavery is and how it is present in the construction industry today. The training highlights ways to spot modern slavery on site and explains the steps that should be taken if a worker has concerns that someone is at danger of being exploited. The HPC commitment of “Zero Harm” is the site’s over-riding priority in ensuring that all workers on site are safe and feel protected, which includes being safe from modern slavery related threats.

In addition to the HPC induction process, each Tier 1 Contractor must have their own, separate induction process for any staff working directly with them or via a subcontractor. Both inductions are open to attendance by trade union representatives with a view to supporting recruitment to the trade unions and offering further protection for the workers.

Stewards, Mental Health First Aiders and Accommodation Providers

At HPC, in addition to trade union safety representatives, there are approximately 60-70 stewards to assist in monitoring modern slavery issues. The stewards provide a clear point of support and present a continuous opportunity for workers to be able to raise any issues or concerns. Negative mental health can also be regarded as an indicator of modern slavery and our network of more than 400 mental health first aiders are trained to provide support in these instances.

The project is proud to be supported by a number of trade unions. Our contractors and subcontractors must not prevent or discourage workers from joining or forming trade unions. We do not tolerate any form of blacklisting of any worker under The Employment Relations Act 1999 (Blacklisting) Regulations 2010.

Our Supply Chain

To ensure that our suppliers are committed to the same values as we have as a project, our Tier 1 contractors (ie the organisations with whom HPC contracts directly) are subject to detailed assessments at onboarding stage to satisfy us that they are committed to complying with both anti-modern slavery legislation as well as our own modern slavery policies and procedures. We expect our supply chain to adhere to Working Time Regulations 1998 and any other relevant legislation.

Our supply chain due diligence commences when suppliers are invited to submit tenders for contracts. As a part of this procedure, we issue a pre-qualification questionnaire (“PQQ”) to potential suppliers. The PQQ includes questions that help us identify any potential risks relating to modern slavery within a supplier’s organisation, whilst also presenting us with the opportunity to communicate our expectations in relation to modern slavery and explain the thresholds our suppliers are required to meet. HPC are committed to ensuring that our suppliers engage with our commitment to have a supply chain free from modern slavery and take action to ensure this is maintained within their own supply chains.

On HPC, two independent contractors have been engaged to carry out monthly audits on the contractors that work on our construction site and report back to HPC. The monthly audit reviews the payroll records of workers employed by our contractors, to mitigate the risk of modern slavery or human trafficking on site. These audits highlight who is working for a specific contractor, how many hours they are working, and their payroll and allowance records, to ensure that people are being paid in line with the HPC Industrial Relations Agreements. Payroll records for more than 9,000 site operatives were subject to audit last year.

Risk Assessment and Management

Risk exposure to modern slavery is ever evolving. We are dedicated to adapting our business and working with our supply chain accordingly. The current socio-economic and political landscape, including conflicts across the globe, have led to new potential opportunities for human traffickers to traffic vulnerable people into the UK to work. Therefore, we must ensure that our policies remain up to date to manage this increased risk.

Governance

Internal management of the project’s anti-modern slavery control measures is governed by our Modern Slavery Forum. This forum is comprised of representatives from the Employee Affairs Unit, Supply Chain, Community Engagement, Compliance and Legal. This forum maintains a “risk register”, setting out how modern slavery risks may eventuate and the measures in place to control them.

Policy

In addition to the policy on and approach to induction process, on-site worker welfare management, and systematic monthly audits as outlined above, HPC also operates a direct hire policy for site construction operatives, which means that site construction workers must be employed directly by one of the named contractors and cannot be employed through an agency. This ensures that records of payments to workers, and the terms and conditions of their contracts, are visible during the audit. It also makes sure that workers have the necessary qualifications to work on site. Agencies can be used to find staff to work but, once identified, they are then hired directly by the contractor.

Next steps

Training

We have worked with the modern slavery charity “Unseen” to develop a refresher online training session in order to keep the importance of modern slavery, the means by which it can be spotted and how to report any concerns at the forefront of the minds of all those who work on the project.

Audit

An audit into the effectiveness of the control measures set out in the project’s modern slavery risk register in controlling the relevant risks will be undertaken on an annual basis by the project’s Internal Controls Lead. We continue to engage with other large organisations in the sector to benchmark our control measures against best practice and to share learning about key developments to help us mitigate any form of modern slavery occurring on the project.

Modern Slavery statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HPC's slavery and human trafficking statement for the financial year ending 31 March 2024.

Signed: 

Date: 25.06.24

Stuart Crooks, Managing Director
NNB Generation Company (HPC) Limited