

PERIOD COVERED BY THIS STATEMENT:

01 April 2023 to 31 March 2024

1. Introduction

This statement is made by Great British Nuclear (GBN) in accordance with Section 54 of the Modern Slavery Act 2015.

GBN is committed to preventing modern slavery and human trafficking within our business and supply chain.

2. Organisation Structure

GBN is an executive arm's-length body, sponsored by the Department for Net Zero & Energy Security. We are responsible for delivering the government's long-term nuclear programme and supporting the government's ambition to deliver up to 24GW of nuclear power in the UK by 2050.

Our teams operate across England, Wales and Scotland, with our main headquarters in London and Warrington. We work closely with Government and industry partners to lead and coordinate the delivery of the government's new nuclear programme.

Our core values Trust, Care, Collaboration, Challenge and Drive are fundamental to how we conduct and govern our business.

Additional information about Great British Nuclear can be found [online](#).

3. Business

GBN's primary purpose is to facilitate the design, construction, commissioning and operation of nuclear energy generation projects, in line with policies published by His Majesty's government.

The three main elements of GBN's role are as follows:

- **Advisory:** Providing the government with expert advice on achieving the up to 24GW target. While policy making remains with the department. GBN advises on how these objectives can best be delivered and financed.
- **Enabling Developers:** Assisting private sector developers in advancing their projects. Currently, a few projects are in progress with more expected as industry confidence in the new nuclear programme grows.
- **Project Delivery:** Overseeing the projects we manage directly, including the SMR technical selection programme which is currently underway.

4. Supply Chains

GBN manages a contract portfolio across 35 suppliers.

All current contracts are categorised as low risk in terms of modern slavery.

a. GBN due diligence processes in relation to slavery and human trafficking in our business and supply chains:

GBN is committed to working with partners who share our dedication to eradicating modern slavery. Our expectations are outlined in the Crown Commercial Services Supplier Code of Conduct which mandates compliance with all applicable human rights legislation, including the Modern Slavery Act 2015 and *PPN 02/23: Tackling Modern Slavery in Government Supply Chains*. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.

Our approach to due diligence and assessing modern slavery risk within our supply chain aligns with to *PPN 02/23: Tackling Modern Slavery in Government Supply Chains*, and guidance from our sponsoring department, Department for Energy Security & Net Zero. We employ a risk-based assessment categorising contracts as High, Medium or Low. This informs necessary actions to mitigate the risk of modern slavery and human trafficking.

New Procurement Actions:

For each new procurement process, GBN will:

- Utilise the Risk Assessment of Modern Slavery (RAMS) tool, to identify contracts at high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location.
- Design new procurements according to the associated risk level including applying the Social Value Model where appropriate.
- Consider the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire.
- Apply tender response questions related to modern slavery in a proportionate manner.
- Include specific terms and conditions to strengthen contractual protection where necessary.

Existing Contract Actions:

As part of our contract management process, GBN will:

- Continually collaborate with suppliers post-award to address modern slavery risks and monitor progress.
- Implement action plans to mitigate identified risks.
- Understand the supply chains of those contracts to assess specific risks.
- Work with suppliers on high and medium risk contracts to mitigate risks through strengthened contract management.
- Repeat this risk assessment annually for high-risk contracts and periodically for medium risk contracts.

Actions When Modern Slavery is identified:

- If GBN identifies a victim of modern slavery, we will notify law enforcement agencies. Where we believe someone is in immediate danger, and they are in the UK, we will contact the police via emergency services.
- We will work with suppliers to address instances of modern slavery, agreeing on action plans and contract management activities.
- As a last resort, we may terminate the contract after considering the potential impact on vulnerable and at-risk victims.

b. GBN business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk:

During the reporting period, no contracts were identified as high-risk, and no issues were flagged.

5. GBN Recruitment

GBN's workforce comprises of skilled practitioners and experts, predominantly seconded from other companies or provided by consulting firms or manpower agencies, making the risk of modern slavery low. Those organisations are subject to the same risk assessment and procedures as all other suppliers.

Additionally, everyone working at GBN undergoes background screening, identity verification, and, where necessary, appropriate security clearance, prior to onboarding in line with standard public sector recruitment protocols.

6. GBN Policies on Slavery and Human Trafficking

- Anti-Slavery and Human Trafficking Policy
- Speak Up and Whistleblowing Policy

7. GBN Training on Modern Slavery

GBN encourages procurement staff to complete the following training to enhance their understanding of modern slavery:

- **Government Commercial College Training:** A package on tackling modern slavery in the supply chain using a Personal Protection Equipment case study, available to all procurement and supply chain practitioners.
- **Home Office: Training Resources:** Tools to raise awareness, identify signs and increase confidence in reporting modern slavery. Available at:

<https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

Additional guidance is available from Crown Commercial Services and the gov.uk website:

- <https://www.crowncommercial.gov.uk/social-value/modern-slavery>
- [PPN 0223 - Tackling Modern Slavery in Government Supply Chains - Guidance \(4\).pdf](#)

8. Planned Activities for 2024 to 2025

Key Performance Indicators: GBN will measure its effectiveness in preventing slavery and human trafficking in its business and supply chains, using the following performance indicators:

- Percentage of managed procurements with a modern slavery risk assessment.
- Number of contracts considered medium or high-risk and how many of these have completed the Modern Slavery Assessment Tool (MSAT).
- Percentage of workers trained in modern slavery awareness.

Assurance: GBN will conduct spot checking of completed RAMS and/or MSAT for quality assurance.

Training initiatives: Mandatory modern slavery awareness training will be rolled out to everyone at GBN.

This statement was approved on 17 September 2024 by the GBN Board of Directors.

Signed on behalf of GBN by:



Simon Bowen

Chair of the GBN Board