Modern Slavery and Human Trafficking Statement



Lawrence Bowman

Managing Director
November 2026

1. Introduction

South Western Railway Limited ("SWR") is committed to supporting the objectives of the Modern Slavery Act 2015 ("the Act") in eliminating modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SWR's slavery and human trafficking statement for the financial year 2025/26. It sets out the steps taken by SWR to prevent modern slavery and human trafficking in its business and supply chains.

2. Organisation and Scope

SWR is a publicly owned subsidiary of DfT Operator Limited (DFTO). SWR operates passenger rail services in the United Kingdom and forms part of the national rail network.

SWR directly employs over 5,000 colleagues and is supported by a diverse supply chain providing a wide range of goods and services. SWR works in close collaboration with Network Rail through the Wessex Route Alliance, a partnership designed to integrate operations and improve service delivery. In May 2025 SWR became the first train operator brought into government control as parts of plans to establish Great British Railways. This transition supports the integration of infrastructure and train services into a single, publicly owned railway system.

This statement applies to all employees, contractors, suppliers, and stakeholders working with or on behalf of SWR. It includes operations across all departments and procurement activities, particularly those involving high-risk suppliers or sectors.

3. Our commitment

SWR is dedicated to:

- Ensuring our supply chains and business operations are free from modern slavery and human trafficking.
- Conducting robust due diligence on all suppliers, contractors, and business partners.
- Maintaining ethical recruitment practices and fair treatment of employees and agency staff.
- Raising awareness and providing training to staff about the risks of modern slavery.
- Collaborating with suppliers to ensure compliance with the Modern Slavery Act 2015.

4. Policies and Procedures

SWR maintains a robust framework of policies and procedures to support the prevention of modern slavery and human trafficking.

4. 1 Policies

SWR has a Modern Slavery and Human Trafficking Policy [PE3.1][JV3.2]which reflects our commitment to acting ethically and with integrity in all business relationships. The Policy sets out our zero-tolerance approach to modern slavery and human trafficking and supports transparency in our business operations and supply chains.

SWR is also supported by a Whistleblowing Policy, which provides a clear and confidential mechanism for reporting any concerns relating to unethical, illegal or improper conduct, including suspected modern slavery or human trafficking. It applies to all full-time and part-time employees, officers, consultants, contractors, casual workers, interns, volunteers and agency workers engaged by SWR. The Policy also covers whistleblowing allegations raised by external parties, including suppliers and other business partners

SWR's Supplier Code of Conduct applies to all suppliers and business partners providing goods and services to SWR. It prohibits the use of forced, bonded, or trafficked labour, as well as any form of slavery or servitude. All suppliers are required to commit to the Code as a condition of doing business with SWR, ensuring clear expectations and accountability.

SWR's Safeguarding Policy aims to protect the safety and wellbeing of young people and vulnerable adults travelling on the network. The policy also ensures all SWR colleagues understand their safeguarding responsibilities and are equipped to act appropriately when concerns arise.

4. 2 Due Diligence and Risk Assessment

SWR assesses the risk of exposure to modern slavery and human trafficking within its business and supply chain. We recognise that the areas presenting the highest inherent risk typically include offshore manufacturing and labour-intensive services such as cleaning, security and gate line operations.

SWR undertakes employee checks to help prevent modern slavery and human trafficking within its operations. These include compliant right-to-work and identify checks for all employees, fair and transparent recruitment practices, and payroll controls to ensure workers are paid directly and in line with legal requirements. SWR may pay recruitment agencies a fee for sourcing suitable candidates; however, workers are not charged recruitment or placement fees and are not required to surrender identity documents as a condition of employment.

SWR risk-assesses prospective suppliers at the outset of the procurement process by requiring confirmation of the steps they have taken to mitigate modern slavery risks. We continue to reduce risk by procuring in compliance with the Procurement Act 2023.

We intend to continue to mitigate as much risk as possible through sourcing in compliance with the Procurement Act 2023 regulations and where commercially viable and legally permissible, we utilise established procurement frameworks, including Crown Commercial Service frameworks, which are tendered under Public Contracts Regulations 2015 or The Procurement Act 2023, and will have been subject to extensive due diligence.

As part of our tender processes, SWR [PE6.1]uses Procurement Specific Questionnaires requiring suppliers to demonstrate how they monitor and manage modern slavery risks within their own supply chains and how they ensure compliance with the Procurement Act 2023.

4. 3 Supplier Adherence to Our Values

SWR has a zero-tolerance approach to modern slavery and is committed to transparency in both its own business and its supply chains. We expect the same high standards from all contractors, suppliers and business partners.

As part of our contracting processes, we include prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Suppliers are expected to apply these same standards throughout their own supply chains and to hold their suppliers accountable.

SWR is committed to:
- acting ethically and with integrity in all business dealings and relationships;
- implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains; and
- maintaining transparency in our approach to tackling modern slavery risks.

5. Training and Awareness

SWR provides mandatory modern slavery awareness training for managers, particularly those involved in human resources, recruitment, procurement, contract management and supplier oversight. Training is designed to help colleagues identify potential indicators of modern slavery and understand how to report concerns appropriately.

6. Speaking Out

SWR encourages colleagues and external stakeholders to speak up if they have concerns about unethical or illegal practices. Our Whistleblowing Policy provides a clear, confidential and accessible mechanism for reporting concerns, including suspected cases of modern slavery or human trafficking. SWR is committed to protecting whistleblowers and ensuring concerns are taken seriously and investigated appropriately.

7. Monitoring and Continuous Improvement

SWR monitors the effectiveness of its approach through a range of measures including:
- Annual review of SWR's Modern Slavery and Human Trafficking Policy
- Mandatory modern slavery training for managers
- Supplier requirements to demonstrate how they manage and mitigate modern slavery risks in delivering contracts
- Mapping high-risk suppliers and spend categories and ensuring appropriate due diligence is undertaken during contract delivery
- 100% of directly employed colleagues have compliant right-to-work and identity checks before starting work.

8. Governance and Accountability

The SWR Board of Directors has overall responsibility for ensuring compliance with the Modern Slavery Act 2015 and oversight of this statement.

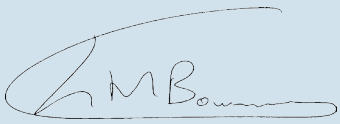
Managers at all levels are responsible for ensuring colleagues understand their responsibilities, receiving appropriate training and feel supported to raise concerns. Any suspected or actual instances of modern slavery must be escalated to senior management and the DFT OLR Legal and Compliance function.The DfT OLR Legal Function is responsible for responding to any queries relating to this statement and the Modern Slavery and Human Trafficking Policy.

9. Approval and review

This statement is reviewed annually and updated to reflect changes in legislation, organisational structures or risk profile.

It has been approved by the SWR Board of Directors.

Approved by:



Lawrence Bowman,
Managing Director
South Western Railway Limited
Date: 11/03/2026

South Western Railway

NetworkRail