

Modern Slavery Statement

For the year ended 31 March 2022

Published September 2022



1. Board Statement

At Yorkshire Water, we aim to put people at the heart of everything we do and conduct all our activities in accordance with the highest standards of ethics.

We strongly oppose any form of modern slavery activity within our business and supply chain and are fully committed to playing our part in helping eradicate it. We believe that working collaboratively with our suppliers and other organisations to build knowledge and engagement will not only benefit their own operations but also play a vital part in preventing modern slavery.

This statement, which relates to the financial year ended 31 March 2022, sets out the steps that Yorkshire Water Services Limited (Yorkshire Water) has taken during the year to identify, prevent, and mitigate the risk of modern slavery in our operations and supply chain in accordance with the Modern Slavery Act 2015. We will continue to work hard to strengthen our approach in collaboration with our partners, colleagues, suppliers, and peers, to ensure it remains effective in mitigating this risk in future.



Vanda Murray, Chair

Signed and approved by the Board of Yorkshire Water Services Limited on 5 July 2022.



2. About Us

Yorkshire Water, a subsidiary of Kelda Group Limited, is one of 11 regulated water and wastewater businesses in England and Wales. We provide essential water and wastewater services to around 5 million people and 120,000 businesses. We are proud to play water's role in making Yorkshire a brilliant place to be – now and always.

Our approach to managing the risk of modern slavery in our business and supply chain continues to develop. Over the past year we have collaborated with other UK utility companies through our membership of the Utilities Against Slavery working group. This group, in partnership with Hope for Justice, aims to share best practice and raise awareness of the risks of modern slavery in the utility sector.

We are committed to improving our knowledge and understanding of the risk of modern slavery to our business. Over the last year we have made good progress towards this goal – as detailed later in this statement – but recognise we must continue to build on our improvements to date to ensure we remain vigilant on this issue.



Collecting, treating, and supplying around **1.3bn litres** of water every day



Investing over £1m every day to maintain and enhance Yorkshire's network of pipes, pumps, and networks



Collecting, treating, and safely returning to the environment **1bn litres** of wastewater every day



Employing **3,922 colleagues** across the region



Managing **£1bn of water bills** every year and providing customer service when it's needed



Spending £800m on goods and services from over 1,200 suppliers each year



3. Supply Chain

Yorkshire Water has a complex supply chain ranging from large international corporations to small local businesses. Each year we procure around £800m of goods and services from over 1,200 suppliers. We aim to achieve this in a sustainable and ethical manner, ensuring we do what is right for our customers, colleagues, suppliers, community, and the environment.

Yorkshire Water supplier contracts emphasise, where relevant, the requirement for compliance with the Modern Slavery Act 2015 and include an associated right to audit.



Specific actions we have implemented to reduce the risk of modern slavery in our supply chain and support our approach to responsible procurement include:



Assessing all new suppliers' awareness and compliance

with the Modern Slavery Act 2015, leading to a pass or fail outcome as part of our pre-qualification due diligence assessments.



Partnering with a third-party specialist

to undertake on-site assessments of our higher risk suppliers and identifying areas of improvement around policies, management, colleague terms and conditions, and sub-contractor transparency.



Sharing on-site assessment findings

with individual suppliers to encourage engagement and promote continuous improvement in supplier business practices.

4. Our Policies

Yorkshire Water has a suite of policies and procedures available to all colleagues in the company that help us to mitigate the risk of modern slavery.

Our Code of Ethics applies to all colleagues and includes a specific section on modern slavery that covers the standards and behaviours that we expect and the way in which we do business.

In addition, our colleagues can obtain further information and support on this subject through our guidance on human trafficking, modern slavery and forced marriage.

This guidance is underpinned by our:



Human Rights Policy

Recognises international human rights as set out in the Bill of Human Rights and the principles described in the UN Global Compact.



'Speak Up' Whistle blowing Policy

Aims to encourage all colleagues and contractors to 'speak up' and raise matters of serious concern, including any ethical or moral issues in any part of our business.

Kelda Group, of which Yorkshire Water is part, has a Living Wage accreditation, which means we ensure all direct employees (excluding apprentices) are paid a wage that is above the statutory wage levels set by the UK government. We also include a Living Wage clause in all relevant supplier contracts to ensure that qualifying contractors also receive at least the Living Wage, including where working for a subcontractor.

5. Measuring Our Progress

Last year we established several Key Performance Indicators (KPIs) to allow us to monitor and report on the effectiveness of our actions to mitigate the risk of modern slavery.

In the following table, we provide an overview of our performance for each KPI over the past year, as well as further supporting commentary.

KPI	Performance	Commentary
Incidents of modern slavery reported within Yorkshire Water’s own operations	0	<p>We have an internal whistleblowing hotline for our colleagues and contract partners to report any concerns they may have about unethical or unlawful behaviour happening within our business.</p> <p>This year, no incidents of modern slavery within Yorkshire Water’s own operations were reported through the hotline or any other internal communication channels.</p>
Relevant colleagues trained on preventing modern slavery and trafficking	<p>30% of all colleagues completed our new mandatory training</p> <p>(100% of relevant colleagues in our Commercial Services team completed further modern slavery training)</p>	<p>In January 2022 we commenced roll out of our new mandatory company-wide training to raise awareness of modern slavery across Yorkshire Water. This formed part of our Code of Ethics training for all colleagues to raise awareness of the signs of modern slavery and how to report any concerns. 30% of our 3,922 colleagues had completed this training by 31 March 2022. We will continue to promote this training with the aim that it is completed by all colleagues by 31 March 2023.</p>

KPI	Performance	Commentary
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Many of our colleagues visit homes and premises across Yorkshire as part of their jobs. To ensure we equip these colleagues with the skills they need to engage with the risks and complexities of modern slavery, we produced a short guidance document on modern slavery targeted specifically at operational colleagues. This complemented the mandatory Code of Ethics training by giving further information on the signs of modern slavery and what to do if they see anything of concern. We also promoted awareness of modern slavery on the UK’s Anti-Slavery Day, which takes place in October each year, to support and develop understanding of this issue and the impact it has on victims.

Recognising that some non-operational roles require more in-depth knowledge of modern slavery than others, we identified 41 relevant colleagues in our Commercial Services team to receive further training on modern slavery via an e-learning module developed by the Supply Chain Sustainability School. Of these colleagues, 100% completed the module, which included content on UK legislation, indicators of modern slavery, and what to do if a colleague is concerned for someone’s safety or wellbeing.

Suppliers aware of the Modern Slavery Act and its requirements	51% (99% of respondents)
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We aim to engage suppliers on the issue of modern slavery through the inclusion of standard clauses in all our contracts. Last year we surveyed our current suppliers to gauge their knowledge and understanding of this topic. While not all suppliers responded to our survey, 99% of respondents (51% of all our suppliers) told us they are aware of the Modern Slavery Act 2015 and its requirements.

Going forward, we will be improving our procurement processes and data systems to provide more detailed insights into our suppliers’ awareness of this topic and help us to identify areas of focus for more targeted supplier training in future.

KPI	Performance	Commentary
<p>Suppliers who have a modern slavery policy</p>	<p>43% (84% of respondents)</p>	<p>We encourage all our suppliers to produce a modern slavery policy, regardless of their annual turnover or number of colleagues. 84% of suppliers who responded to our latest survey confirmed they have a modern slavery policy. This indicates that a minimum of 43% of all our suppliers have a modern slavery policy, although we note that the true number is likely to be higher once non-respondents are accounted for.</p> <p>While the Modern Slavery Act 2015 requires all organisations with a turnover in excess of £36m to publish a modern slavery statement, a modern slavery policy can be created and implemented by suppliers of any size. We will continue to work with suppliers to promote the importance of modern slavery policies with a view to increasing this figure in future.</p>
<p>Incidents of modern slavery reported in the supply chain</p>	<p>0</p>	<p>We take a proactive approach to monitoring our supply chain for reported incidents of modern slavery, as well as requiring suppliers to disclose to us any reported cases each year.</p> <p>This year, no incidents of modern slavery within our supply chain have been reported to us by suppliers as part of their contractual obligations. However, we acknowledge our wider checks in relation to modern slavery incidents in our supply chain are not exhaustive at this time.</p> <p>Over the next year we plan to strengthen our reporting processes to enhance our vigilance in identifying modern slavery risks within our supply chain. Should any reported incidents occur, we would seek to remedy the situation, understand its root cause, and work with our suppliers to reduce the risk of re occurrence.</p>

Next year's KPIs

As part of our drive for continuous improvement, we have reviewed and refreshed our KPI metrics for the 2022/23 financial year as detailed below.

Focus	KPI	Details	Unit
Internal	Incidents of modern slavery reported within Yorkshire Water's own operations.	We will report on all incidents of modern slavery reported within Yorkshire Water's own operations, including both potential and confirmed incidents.	Number
	Relevant colleagues trained on preventing and identifying modern slavery.	We will continue to report on our training programme for relevant colleagues across the business.	%
External	Suppliers aware of the Modern Slavery Act 2015 and its requirements.	We will report on the percentage of our suppliers aware of the Modern Slavery Act 2015 and its requirements.	%
	Suppliers who have recently published a modern slavery statement or policy	We will report on the percentage of our suppliers who have a published modern slavery statement or a policy	%
	Incidents of modern slavery reported in our supply chain.	We will continue to report the number of incidents of modern slavery in our supply chain, based on incidents reported by our suppliers and also from information acquired from wider monitoring (e.g., media reports; due diligence).	Number

6. Areas of Future Focus

Modern slavery is a serious and complex crime. We will continue to develop our strategic approach and report on our progress to minimise the risk of modern slavery in our organisation and supply chain. Over the next year, we aim to build on our improvements to date and will focus on the following priority areas:



Onsite supplier risk assessments

Building on our work in this area to date, we will continue with a programme of onsite risk assessments across our higher risk suppliers and use risk assessment findings to establish supplier action plans to address identified modern slavery risks.



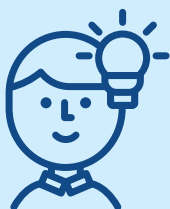
Training and development

We plan to expand on our approach to modern slavery training to ensure our colleagues and key suppliers are equipped to understand the risks of modern slavery within our business and the wider water sector. In addition to specialised training targeted at particularly relevant colleagues, we aim to work in partnership with the Supply Chain Sustainability School to provide training, tools, and resources for all our colleagues and suppliers to access.



Supplier engagement

We will continue to engage with our supply chain to share best practice, enhance knowledge and awareness, and build on our data collection processes to ensure we are collecting and monitoring information that can help us manage the risk of modern slavery in our supply chain. In particular, we will collaborate with our major construction partners to share experience and work together to reduce the risk of modern slavery within this sector.



Develop traceability of key supply chains

We will work with our key suppliers to develop more detailed insights into the risks of modern slavery in our supply chain.



Supplier onboarding

We will continue to undertake due diligence as part of our supplier selection, onboarding, and monitoring processes to help us to ensure our supply chain reflects our commitment to combatting modern slavery in all its forms.