

# Modern Slavery Statement

For the year ended  
31 March 2024



Published July 2024



YorkshireWater

# How to view this document

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Our contents page links to every section within this document. Clicking on a specific section will instantly take you to it.

- 1 Click on the contents button to return to the contents page.
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There are also many other clickable links within this document which we've made easy to spot by underlining and **highlighting** them in blue.

## Accessibility matters. It's really important that everyone can navigate and understand our Modern Slavery Statement, and what it means for them.

To help with this, we've taken steps to make sure this document supports accessibility needs:

- Screen readers will recite content in a logical order, as well as spotting headers and using different text for images.
- Compatible with text-to-speech programmes and Braille displays.
- Easy navigation with contents table and bookmarked links.
- Simple text structure with clear headings, paragraphs and tables.
- Comfortable colour contrasts.



# Contents

We've created colour-coded sections to help you to navigate this report easily. Just click on the section you are interested in on the contents page, and it will navigate you to that section.

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# Board statement

**This statement sets out the steps that Yorkshire Water Services Limited (“Yorkshire Water”) has taken to reduce the risk of modern slavery within our organisation and supply chain for the year ending 31 March 2024. It highlights recent progress made to understand our risks of modern slavery and details the actions we have taken to strengthen our risk management and due diligence activities over the past year.**

We recognise the importance of making sure that we are robust in our approach to modern slavery. We continuously review our policies and procedures on this topic, seeking opportunities to refine and improve these to mitigate risks and reflect best practice.

We know that working in collaboration with others brings value to our organisation and to those we work with. This includes benefits arising from our ongoing partnerships with Utilities Against Slavery and the Supply Chain Sustainability School, which we’ll continue to develop further in the future.



**Vanda Murray,  
Chair**

Signed and approved by the Board of Yorkshire Water Services Limited on 10 July 2024.

# About Yorkshire Water and our supply chain



**Yorkshire Water is a subsidiary of Kelda Holdings Limited and we're one of 11 regulated water and wastewater businesses in England and Wales. We supply essential water and wastewater services to around 5 million people and 140,000 businesses across the Yorkshire and Humberside region. Our business employs over 3,700 colleagues and we support a further 6,000 jobs across our direct suppliers.**

Our supply chain is large and complex. Last year we spent over £1.2bn from over 1,100 suppliers, ranging from local businesses to multi-national corporations. Over 95% of our direct suppliers are registered in the UK but many of their operations and supply chains are global in nature. Currently, we have little visibility over the lower tiers of our supply chain.

We take a risk-based approach to tackling modern slavery in our supply chain. In practice, this means starting with higher-risk industries and geographies in the first tier of our supply chain and in future seeking to gain further visibility over lower tiers where the risks may be higher.



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



Collecting, treating, and safely returning to the environment **1.3bn litres** of wastewater every day.



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



Employing over **3,700 colleagues** across the region.



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



Spending **£1.2bn** on goods and services from over 1,100 suppliers each year.

**Our business is a proud member of Utilities Against Slavery, a collaborative forum for energy, water, and gas providers in the UK with the goal of eradicating modern slavery from the utilities sector.**

This group is facilitated by the Slave-Free Alliance, a social enterprise supporting organisations to protect their operations, supply chains and people from modern slavery and labour exploitation.

Recent initiatives delivered through Utilities Against Slavery include developing training sessions across the utility sector, creating a high-quality pre-qualification questionnaire to improve our due diligence practices, and developing a common industry approach to assist Utility Against Slavery members to work with suppliers to support risk management.

The group signifies the importance of cooperation across the industry to drive up standards, identify risks, and create opportunities to address the risk of modern slavery in business operations and supply chains.

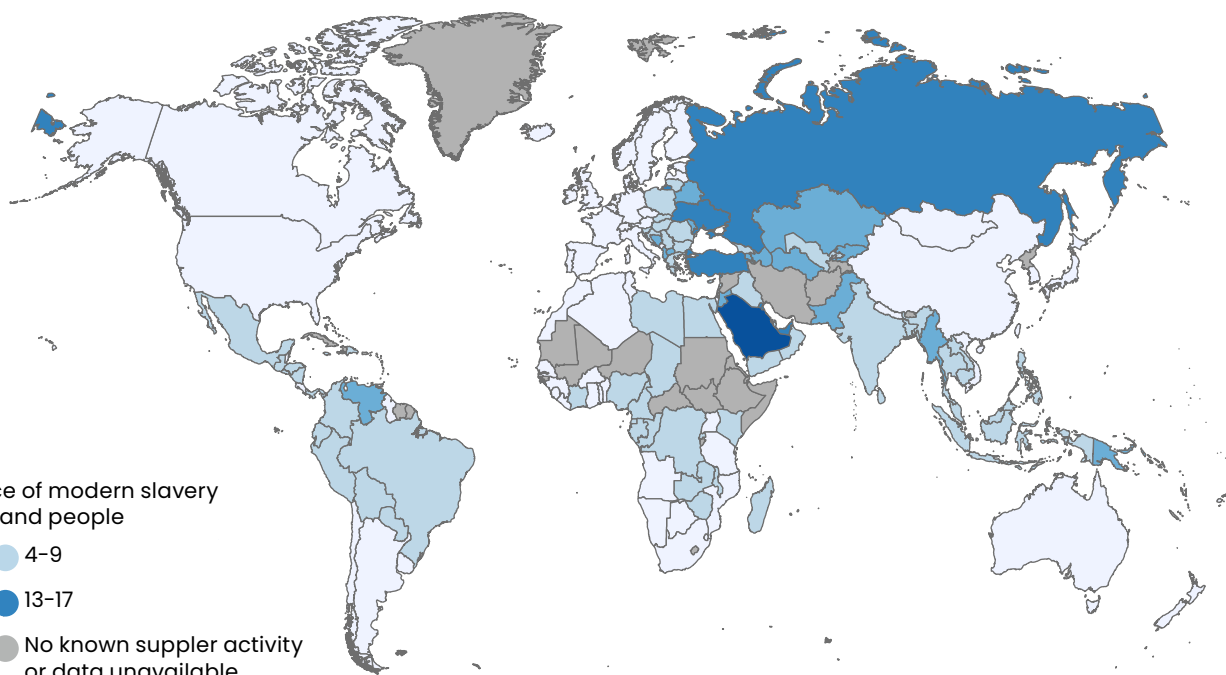
We're also a partner member of the Supply Chain Sustainability School, where our colleagues have access to online learning and workshops that we promote across our business to encourage topic-specific learning.

**Collaborative working within the utility sector**

Through our membership of Utilities Against Slavery, we lead an engagement working group for the wider utility sector. Over the last year the working group has produced outputs to raise the profile of Utilities Against Slavery and awareness of modern slavery issues, including:



- Communication materials to provide information on the group and its strategic areas of focus.
- Video briefings for members to share within their organisations which highlight relevant modern slavery news and best practice.
- An online event held during Anti-Slavery Week in October 2023 which highlighted the impact of Utilities Against Slavery and spotlighted actions utility companies are taking to tackle the risk of modern slavery.



Modern slavery prevalence in countries where our first-tier suppliers are known to have operational activities. Note that the multi-national nature of some suppliers means that the presence of a supplier in any given country does not necessarily imply Yorkshire Water receives goods or services from that location. (Data sources: internal records; online research; Walk Free Global Slavery Index 2023).

# Our policies

**Yorkshire Water's Modern Slavery Policy applies to all our colleagues and extends to anyone working on our sites, regardless of their employer. It sets out our stance on modern slavery and explains how we'll address incidents of modern slavery within our business. We expect our colleagues and supply chain to be vigilant in recognising and reporting signs of modern slavery and our Modern Slavery Policy gives guidance and support on this.**

Our Modern Slavery Policy is supported by our Code of Ethics, which reinforces the need to do the right thing by emphasising the behaviours and high standards we expect from everyone working at Yorkshire Water, both directly as an employee and indirectly as a partner.

Other policies that underpin our Modern Slavery Policy include our Human Rights policy, which recognises international human rights as set out in the Bill of Human Rights and the principles described in the United Nations Global Compact. Then our 'Speak Up' Whistleblowing policy, which offers a confidential reporting mechanism to encourage colleagues to report matters of concern including ethical and moral issues.





# Risk assessment and management

**We've assessed the risks of modern slavery within our organisation and across our supply chain to make sure our risk mitigation activities focus on the areas where we can have the greatest impact, based on the level of inherent risk and our ability to influence and manage each area.**

At present, our risk mitigation activities are centred largely on our capital delivery partners and other first tier suppliers, with a particular focus on those suppliers that are categorised as higher-risk due to the nature of the services they supply to Yorkshire Water or the geography of their operations. These include suppliers of higher-risk commodities (e.g. textiles) and those who use the services of individuals based in countries with emerging economies.

We also recognise that the risk of modern slavery may increase further down our supply chain (tiers 2 and below), where we've lower visibility and generally lower ability to influence. In future, we aim to target and extend our due diligence processes to lower-tier suppliers to give a deeper understanding of modern slavery risks in our supply chain and help us to better manage and mitigate these risks accordingly.

Area	Degree of control	Risk controls in place	Residual modern slavery risk
<b>Direct employees</b>	High	Recruitment and management policies and procedures; training courses; awareness raising.	Lower
<b>Agency workers</b>	High	Recruitment policies and procedures.	
<b>Tier 1 suppliers of goods and services, including capital delivery partners</b>	Medium	Tender questions and evaluation processes; engagement with suppliers; supplier audit programme.	
<b>Tier 2 suppliers and below (i.e. suppliers or subcontractors for higher tier suppliers)</b>	Low	Indirect influence via Tier 1 suppliers.	

# Supply chain

Over the last year, we've carried out the following activities below to reduce the risk of modern slavery in our supply chain and strengthen our approach to responsible procurement.

## 1

**Running a workshop for our priority suppliers** with the Supply Chain Sustainability School to raise awareness and promote due diligence activities to combat modern slavery.

## 2

**Categorising our procurement commodity codes by modern slavery risk** based on third-party datasets, to then refine our procurement due diligence activities to focus on higher-risk categories.

## 3

**Enhancing modern slavery due diligence activities** for higher-value tenders by engaging with bidders throughout the tender process and customising questions according to tender risk profile.

## These steps build on our existing approach to managing the risk of modern slavery in our supply chain, which includes:

- Improving the information we hold on our suppliers through the use of third party verification and accreditation services.
- Incorporating modern slavery into our Sustainable Procurement Code, which details the expectations and requirements on our suppliers.
- Conducting pre-qualification due diligence activities for new suppliers to assess their awareness and compliance with the Modern Slavery Act 2015.
- Partnering with third-party specialists to carry out ethical business audits of our higher risk suppliers.
- Supporting suppliers to create action plans to help address the risk of modern slavery within their organisations and own supply chains.



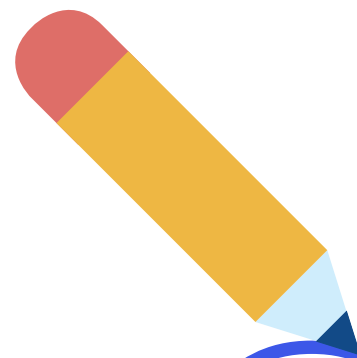
# Colleague training

**Modern slavery is included in our Code of Ethics and Safeguarding training courses which both focus on spotting the signs of slavery and forced labour and understanding how to report them. These courses are mandatory for all colleagues and completion rates are tracked by senior management on a regular basis.**

Through our membership of the Supply Chain Sustainability School (SCSS), colleagues have access to enhanced online learning courses relating to modern slavery, relevant to colleagues in areas of the business such as procurement and capital delivery. Over the next year we plan to encourage more colleagues to complete modern slavery training through the SCSS to help strengthen their knowledge of modern slavery.

During Anti-Slavery Week in October 2023, we published a series of posts and articles on our internal communication platforms to raise awareness of the issues of modern slavery and the role our colleagues can play in acting on these challenges.

# Measuring our progress



**We've established 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 table below, we give an overview of our performance for each KPI over the past year, as well as further supporting commentary.

Focus	KPI	Performance	Further details
<b>Internal</b>	Incidents of suspected modern slavery reported within Yorkshire Water's own operations.	0	This year there have been no incidents of modern slavery reported in Yorkshire Water's own operations through our Speak Up whistleblowing hotline or any other internal communication channels.
	Colleagues who've completed training relevant to modern slavery identification and prevention.	81%	Over three quarters of our colleagues have completed our Code of Ethics training, which includes a dedicated section on how to identify, report and help stop modern slavery from happening.
	Colleagues who've completed enhanced training in modern slavery identification and prevention.	9	Within the past year, nine colleagues have completed enhanced training in modern slavery identification and prevention through completion of relevant courses and workshops provided by the Supply Chain Sustainability School.
<b>External</b>	Incidents of modern slavery identified in our supply chain.	0	This year, no incidents of modern slavery within our supply chain have been reported to us by suppliers as part of their contractual obligations and no incidents have been identified through other channels.
	Percentage of supplier audit non-compliances with corrective actions implemented.	78%	Non-compliances were separated into major and minor categories. 100% of major non-compliances had corrective actions implemented, and 76% of minor non-compliances had corrective actions implemented. This gives a weighted average total of 78%.

# Next year's KPIs

As we develop and strengthen our approach to tackling the risk of modern slavery, we've refreshed our KPIs for the 2024/2025 financial year and added targets where applicable, as detailed below.

Focus	KPI	Unit	Target	Definition
<b>Internal</b>	Incidents of suspected modern slavery reported within Yorkshire Water's own operations.	Number	n/a*	The total number of incidents of modern slavery reported within Yorkshire Water's own operations, including both confirmed incidents and incidents that were reported and on investigation proved to be unsubstantiated.
	Colleagues who've completed basic training relevant to modern slavery identification and prevention.	%	100%	The percentage of currently employed colleagues who've completed our Code of Ethics training, which includes information on modern slavery.
	Colleagues who've completed enhanced training in modern slavery identification and prevention.	Number	10	The number of colleagues employed by Yorkshire Water at year-end who've completed enhanced modern slavery training relevant to their area of the business within the year. Enhanced training may include, for example, supply chain risk management for procurement colleagues and enhanced identification training for operational colleagues.
<b>External</b>	Incidents of modern slavery identified in our supply chain.	Number	n/a*	The number of confirmed incidents of modern slavery identified in our supply chain, based on incidents reported by our suppliers and also from information gathered from wider monitoring (e.g. media reports; due diligence checks).
	Third party ethical business audits of our priority suppliers.	Number	20	The number of ethical business audits of our priority suppliers carried out by a specialist third party on our behalf.

\* Although we aim for a world where modern slavery doesn't exist, we haven't set targets for these KPIs because we don't consider it appropriate to incentivise colleagues to under-report suspected incidents of modern slavery within our organisation or supply chain.

# Future areas of focus

Over the next year we'll take a continuous improvement approach, building on the work we've completed to improve our strategic approach to modern slavery in our organisation and supply chain.

We'll focus on the following priority areas:

## Supply chain engagement and visibility



We'll continue to engage with our supply chain and seek to get greater visibility over lower tier suppliers, to allow us to better assess and manage the risks of modern slavery deeper within our supply chain.

Through our partnership with the Supply Chain Sustainability School, we'll continue to promote learning and best practice with our suppliers. We'll create learning plans and pathways that focus on essential modern slavery training and knowledge. We'll hold further sessions with our supply chain to share learning and encourage collaborative thinking when it comes to approaches to risk mitigation.

We'll continue to carry out audits of our priority suppliers, focusing on suppliers in higher risk categories.

## Colleague training and development



We'll continue to provide modern slavery training to all new starters. Using our partnership with the Supply Chain Sustainability School, we'll create additional learning pathways for colleagues which will include specific enhanced training for relevant colleagues.

We'll continue to develop our programme of engagement for colleagues, including linking in with Anti-Slavery Week and holding interactive awareness raising sessions.

## Collaborative working



Through our ongoing engagement with Utilities Against Slavery, we'll continue to work towards a united approach to modern slavery risk management across the utility sector. Over the next year, the group will continue to create and share best practice and guidance and look to promote events and united messaging across the industry.

## Strengthening due diligence



We'll enhance our due diligence processes by implementing improvements targeting our higher risk areas.

# Thank you for reading



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YorkshireWater