

Slavery and Human Trafficking Statement - 2016

It's part of our Blueprint



KeldaGroup



This statement focusses specifically on Kelda Group's compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to assure there is no slavery or human trafficking occurring within the organisation or its supply chains. As highlighted in our [Code of Ethics](#), it is a fundamental policy of the Kelda Group to conduct its business with honesty and integrity and in accordance with the highest standards of ethics, equity and fair dealing.

Kelda provides water and sewerage services to domestic and business customers across the UK and employs more than 3200 people. Kelda Group is a holding company for the following subsidiaries:

- Yorkshire Water Services Ltd, which provides water and sewerage services to 4.7 million people and around 130,000 businesses in the Yorkshire region. Its activities are regulated by the Water Services Regulation Authority, OFWAT;
- Kelda Water Services (KWS) Limited, which manages the Group's non-regulated water and waste water contract operations in the UK. KWS is made up of KWS (Defence), KWS (Alpha) and KWS (Grampian). KWS (Defence) supports nearly 1100 Ministry of Defence sites across England and Wales with water and waste water services;
- Loop Customer Management Limited, which specialises in cost effective customer relationship management;
- Safe-Move, a non-regulated business which provides search information to solicitors and conveyancers and;
- KeyLand Developments Limited, which is responsible for managing, developing and disposing of the Group's property assets

Kelda's organisational structure and Group relationships are summarised [here](#).

The [Kelda Group 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. We have recently updated the Policy to reflect our responsibilities around slavery and human trafficking.

Risks to the Kelda Group associated with the Act are managed in accordance with the [Kelda Group Risk Management Policy](#). Specific materiality assessment is carried out across the supply chain by individual Procurement teams as required.

Kelda employs solely within the UK and how we treat our employees is managed consistently across the Group by the Human Resources Directorate. Our Living Wage accreditation ensures all direct and indirect employees are paid a wage that is over and above the statutory wage levels set by the UK Government. A Living Wage clause is included in contracts that comprise indirect employees to ensure they also receive at least the Living Wage, including where working for a subcontractor. Any breach of these clauses can lead to termination of the contract. Accreditation is externally assured by the Living Wage Foundation.

Kelda's HR team have reviewed HR policies and procedures in light of the Act. We have developed a new employee guideline document on human trafficking, modern slavery and forced marriage to ensure our colleagues have access to the information and support they require.

The Kelda Group Sustainable Supply Chain Policy can be found [here](#). Kelda Group contract templates do not currently expressly mention and request compliance with the Act. Due to the nature and extent of such laws we do not mention them all specifically in our templates. However, these are covered by the Applicable Law definition and associated wording.

Applicable Law means:

- i) *any statute or regulations or other law, regulation or by-law or any rule, code, judgment, decision or direction having the force of law; and*
- ii) *any regulation, rule, code, direction, determination, guidance or other document which does not have the force of law but which a supplier of the Goods (acting in accordance with all of its obligations in this Agreement) would comply with as a matter of customary good practice, of England and Wales or any relevant part thereof, or of the European Union (to the extent relevant and applicable) or any public body, authority, local or national agency, department, inspectorate, ministry, official or public or statutory person (whether autonomous or not) which has appropriate jurisdiction.*

In addition, Kelda Group is meeting its supply chain commitments on slavery and human trafficking by undertaking the following steps during the 2016/17 financial year:

- For all Terms & Conditions, inclusive of Purchase Order terms, including specific clauses that reflect our obligations under the Modern Slavery Act 2015
- Including relevant pass/fail criteria for all Procurement led tender processes and new vendor requests
- Up-skilling the Yorkshire Water Procurement & Contract Management Team on the implications of the act in order that they can support the wider business on its implementation
- Communicating to all high-risk suppliers providing an overview of the legislation, stating our intent & future expectations
- For those contracts deemed to be of high risk, including the specific Right to Audit against the obligations of the Modern Slavery Act 2015



Richard Flint, Chief Executive

