

## **Scottish Water Business Stream Limited Slavery and Human Trafficking Statement**

### **1. Introduction**

Business Stream has always been committed to working in a responsible and sustainable way that serves the long-term interests of our customers, employees, suppliers, the communities we serve, and society more widely. We undertake to procure goods and services in a sustainable and ethical manner in compliance with our values, public procurement law and policy and the Modern Slavery Act 2015.

We are committed to communicating our values to our suppliers and potential suppliers, and to monitoring their performance against them. This statement is designed to inform our customers, employees, business partners, suppliers and the general public about the steps Business Stream' has taken and is taking to ensure that slavery and human trafficking is not present either in our business or in our supply chain.

Business Stream adopts a zero tolerance approach to modern slavery and human trafficking. We are committed to respecting human rights, including the rights of children. Our zero tolerance principles are built into contracts, tenders and the dialogue and capacity-building opportunities we promote with our suppliers, contractors and sub-contractors. We review our procurement processes regularly to ensure responsible and sustainable sourcing. We expect all those who work for and with us to adhere to our zero-tolerance approach to slavery and human trafficking.

Business Stream is committed to transparency in its supply chain and to protecting against the risk that internal procedures, processes and contracts make demands of suppliers, contractors and sub-contractors that may lead them to violate human rights.

Since the Modern Slavery Act 2015 came into force we have:

- sought external legal advice to ensure that we are taking the necessary steps to support compliance
- identified slavery and human trafficking risks in our business and in our supply chain
- held discussions with our Procurement and Human Resources teams to support compliance
- created an Anti-slavery Policy, which has been approved by our Board of Directors
- allocated compliance roles and responsibilities within the business
- reviewed our existing supplier due diligence processes to support compliance with our Anti-Slavery Policy
- identified Key Performance Indicators to assess our progress against

### **2. Our business**

Business Stream is Scotland's largest B2B provider of water and waste services operating in the world's first competitive water market, providing both licensed services (water and waste water retailing) and unlicensed services (value-added services) to non-household customers.

Further information about our business, organisational structure and supply chain can be found at:

<http://www.business-stream.co.uk>

### **3. Organisational Policies**

Business Stream has a number of policies in place to guard against the risks of slavery, human trafficking, forced and bonded labour and labour rights violations. These policies include:

- a. Anti-Slavery Policy
- b. Procurement Policy
- c. Recruitment Policy
- d. Induction Policy

Our Anti-Slavery Policy sets out our zero-tolerance approach to slavery and human trafficking and reinforces our commitment to acting in a transparent and ethical manner. It applies to all staff and external contractors working for or on our behalf.

The policy sets out particular roles and responsibilities within our business, identifies key risks and explains our risk management processes.

### **4. Supply chain due diligence**

Business Stream's Supply Chain is designated by category. The principle categories are:

- ICT Equipment & Services
- Marketing Services
- Facilities
- Corporate Services
- Business Solutions

#### Current Supply Chain

In the financial year 15/16, all Business Stream suppliers were issued with a letter requiring completion of a statement confirming that they comply with the principles of the Modern Slavery Act 2015. The statement specifically requires confirmation that the supplier does not, or will not in the future, support or do business knowingly with any other party involved in any act of slavery or human trafficking as defined in the Modern Slavery Act 2015.

Each new supplier is required to confirm that they comply with the principles of Modern Slavery Act 2015 and they do not or will not support or do business knowingly with any other party involved in any act of slavery or human trafficking as defined in the Modern Slavery Act 2015 before Business Stream will undertake any business with them.

#### Future Supply Chain

The Procurement process for re-tendering to include the introduction of additional questions in relation to slavery, human trafficking and transparency in our supply chain. Suppliers will now be required to demonstrate their on-going commitment to guard against slavery and human trafficking in their extended supply chain.

## 5. Key Performance Indicators (KPIs)

Our Procurement team ensures that the fundamental principles of Business Stream's Anti-Slavery policy and the Modern Slavery Act 2015 are part of current and future on-going formal supplier review meetings and KPIs.

The Procurement team continues to build transparent and open relationships with current and future suppliers to ensure that slavery and human trafficking is not occurring within their extended supply chain.

We use the following KPIs to measure how effective we have been in combatting slavery and human trafficking:

- Measure supplier resistance to completing Business Stream's supplier compliance statement
- Staff confirmation that they have read and understood our Anti-Slavery Policy
- Policy breaches are reported internally within 3 business days of occurring
- Policy breaches are assessed within a week of being reported and further investigations concluded as soon as possible thereafter

## 6. Training

Business Stream's Anti-Slavery policy is published on our CRM system and local intranet, Inflo. It is a requirement that all employees read and confirm their understanding of the content of the Anti-Slavery Policy. We provide further tailored training where it is necessary to do so (for example, where a policy breach has occurred).

## 7. Further steps

- Conduct an internal desktop review to risk-assess multiple employees who are living at the same address or being paid wages into the same bank account
- Consider a dedicated section of our new website containing details of and links to all our ethical policies
- Update template supplier terms and conditions to include specific slavery and human trafficking obligations
- Ensure that our Employee Assistance Programme and Whistle Blowing Policy and confidential phone line continue to be highlighted to all of our employees

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Business Stream's slavery and human trafficking statement for the financial year ending 31/03/2017.



Johanna Dow

Chief Executive

Scottish Water Business Stream Limited

Date: 18<sup>th</sup> September 2017