



# Bristol Water

## Modern Slavery Statement 2019

Pursuant to section 54 of the Modern Slavery Act 2015



BRISTOL  
**WATER**

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This statement is made by Bristol Water Group Limited (07671099) and its wholly owned subsidiaries, including Bristol Water plc (02662226).

References to 'we', 'our', and 'Bristol Water' are to all of these companies.

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# ABOUT BRISTOL WATER

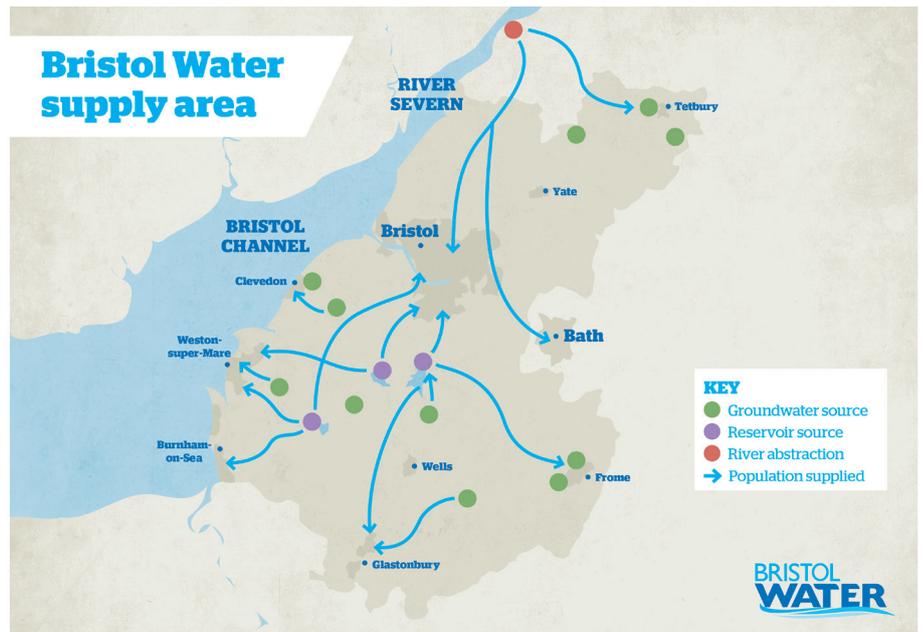
Bristol Water was founded in 1846 by people who were passionate about the wellbeing of society and serving our community. This is manifested in our culture and values. We expect to be accountable for our contribution to social wellbeing and this is an essential element of our corporate governance.

We are a water supply company operating in the Bristol and West of England region. Our supply area extends from Tetbury in the north, to Glastonbury and Street in the south, and from Weston-super-Mare in the west to Frome in the east. We serve a population of 1.2 million people in an area of 2,400 km<sup>2</sup> (1,000 miles<sup>2</sup>).

In addition to our water supply business, we also have a fisheries and recreations team operating at Chew Valley Lake and Blagdon Lake.

We employ over 500 people year round at our company and rely on many suppliers to help deliver our services.

As a regulated business that provides an essential service, we understand the higher standards expected of us by the public in



relation to our business ethics, conduct, and corporate compliance. For this reason we aim to go beyond the requirements of the Modern

Slavery Act 2015, to actively promote the issues, and join initiatives to tackle modern slavery in our supply chains and in our communities.



We believe in being and are empowered to be:

- Proud of our part in the community and serving our customers.
- Respectful of each other's wellbeing. We are inclusive and do not tolerate disrespectful behaviour.
- Supportive of each other to build a strong team.
- Accountable for our actions and consequences.
- Professional in our work and operate transparently.
- Ambitious to be more than a small water company, we will always challenge ourselves to be and do better.
- Trustworthy to conduct our business with the highest integrity.

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## CORPORATE GOVERNANCE

This policy is approved by Bristol Water's Board of Directors. Responsibility for compliance with this statement is company-wide and the Legal, Property, and Compliance team

monitor compliance.

This statement has been created with input from the Legal, Property, and Compliance team, Procurement, HR, and Resourcing.

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## RISK ASSESSMENT

We consider that within Bristol Water's operations and supply chains there is a low risk of Modern Slavery Act violations. This assessment is based on the fact we are an entirely UK based business and the majority of our supply chain is UK based too. The industries we work in and

engage with are generally low risk; nonetheless, we have made efforts to undertake further analysis in the areas that are slightly higher risk – detailed below.

Our risk assessment will be reviewed and updated in the next 12 months.

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## POLICIES AND PROCEDURES

This statement is supported by a range of policies and procedures that are all aimed to ensure we operate responsibly and ethically in all aspects of our business, including:

- Business Conduct and Ethics Policy
- Human Resources Corporate Policy Statement
- Recruitment, Selection, & Appointment Policy
- Procurement Corporate Policy Statement
- Procurement Policy

- Anti-Fraud, Bribery and Corruption Policy
- Raising Concerns Policy

All of these policies are approved by a member of the Executive Management Team or Bristol Water's Board.

The Business Conduct and Ethics Policy has recently been revised and approved by the board. This policy forms part of our contract with goods and services providers and explicitly requires compliance with the Modern Slavery Act 2015 and Human Rights legislation.

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## PROCUREMENT

All of Bristol Water's operations are in the UK, and the vast majority of suppliers we engage with are UK based.

We expect our suppliers and contractors to understand their responsibilities under the Modern Slavery Act. Our standard terms and conditions contain a modern slavery and human trafficking clause and all suppliers and contractors are asked to confirm their compliance with the Modern

Slavery Act both during the Invitation to Tender (ITT) and as a condition to their contract. In addition, our standard contractual terms for service providers requires compliance with our Business Conduct and Ethics Policy.

Our procurement process is conducted in accordance with appropriate EU and UK regulatory legislation, acts, codes of conduct and laws.

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## OUR SUPPLY CHAIN

Analysis of the contractors, goods, and service providers registered on our system has helped us identify the following risk areas. Risk has primarily been identified by industries that are nationally or internationally associated with modern slavery:

- Construction
- IT Hardware and Equipment
- Clothing and Workwear
- Chemicals
- Pipes and Fittings
- Cleaning and Maintenance

We will conduct due diligence assessments with suppliers in these areas. We also intend to develop a 5 year plan that will look further into our supply chains and develop additional ethical and sustainable procurement practices.

In addition, we are currently reviewing our Network Maintenance Supply Chain. At time of publication we are out to tender for new contracts covering 4 areas of Network Maintenance. Those suppliers who are appointed to these contracts will be expected to comply with our anti-slavery policies and we will work with them as part of our 5 year plan as above.

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## RESPONSIBLE RECRUITMENT

We are committed to responsible recruitment, ensuring our ethical standards are embedded and processes are transparent. All workers, whether Bristol Water staff or agency workers, are vetted to ensure they have the right to work in the UK.

Where possible we try to limit the use of temporary workers and hire permanent member of staff. However, where we do hire a temporary worker and engage

an external recruitment agency we will use an approved list of preferred suppliers, all of whom have signed up to our terms and conditions.

Bristol Water pays fair wages; the majority of employees receive over the living wage. Where agency workers are used they will receive favourable pay comparable to a full-time equivalent for the entirety of their employment.

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## TRAINING AND AWARENESS

All employees are trained to recognise modern slavery both in their work and day-to-day lives. The company intranet is often used to promote news stories from the local area concerning modern slavery so that our

employees have continuous awareness. In the next 12 months, we will undertake more detailed training awareness for the Procurement team and key contract managers within Bristol Water.

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## WORK WITH ANTI-SLAVERY PARTNERSHIP

In 2018 Bristol Water joined a multi-agency task force seeking to tackle modern slavery in the Bristol area, led by Avon and Somerset Police. We intend to continue supporting

the Partnership and promote our activities with the wider water industry. It is our ambition to demonstrate best practice in our industry.

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## MONITORING AND REPORTING

A Compliance Report is sent submitted at every ordinary meeting of the Bristol Water Board

of Directors, which will include any activity undertaken in accordance with this statement.

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## RAISING CONCERNS

It is important that any misconduct or wrongdoing by Bristol Water, or anyone associated with us, is reported and dealt with appropriately. We encourage anyone with concerns to speak out, and will offer all appropriate legal protection to maintain confidentiality and prevent any

negative consequences for the individual resulting from a report made in the public interest. All employees are trained on our Raising a Concern Policy. Concerns can be raised by emailing [compliance@bristolwater.co.uk](mailto:compliance@bristolwater.co.uk) or through Protect: [www.protect-advice.org.uk](http://www.protect-advice.org.uk) or 020 3117 2520.

Steps taken in 2018/19	Further Actions for 2019/20
Launched our Values, which underpins every aspect of business and our role in the community.	Further embed the Values in a culture of continuous improvement.
Engaged with multiple departments to create this statement and ensure it is a true reflection of this business, our policies, and priorities.	Create a formal process to regularly review our plans throughout the year.
Reviewed the most recent risk assessment to confirm there had been no significant change.	Conduct a new risk assessment that is supported by analysis of our supply chain and due diligence on selected higher-risk contractors.
Updated the Business Conduct and Ethics Policy.	Distribute the policy to all staff as a mandatory read.
Reviewed our supply chain and identified higher risk suppliers.	Further analysis into higher-risk suppliers, including due diligence assessments for selected suppliers. Develop a 5 Year Plan to conduct due diligence across our suppliers.
Reviewed our recruitment process, including creating list of approved agencies and standard terms and conditions with those agencies.	
Promoted the issue of modern slavery internally by posting articles on the company intranet.	Update the e-learning course on modern slavery and distribute it to all staff.
Joined the Anti-Slavery Partnership.	Continue to work with the Partnership and support multi-agency work to tackle modern slavery in the Avon and Somerset area.
Updated the Raising a Concern Policy in accordance with industry best practice.	Create a new e-learning course on the policy and distribute it to all staff. Detailed training for Procurement teams and key contract managers.



**ANTI-SLAVERY  
PARTNERSHIP**

This statement was approved by the Board of Bristol Water Group Limited on 28 March 2019

Paul Malan  
Director  
Bristol Water Group Limited

28 March 2019

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