

# Modern Slavery

Escalation and  
Remediation  
Policy

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## **Severn Trent – Modern Slavery Escalation and Remediation Policy**

### **Policy Statement**

*We remain committed to identifying and addressing modern slavery and labour exploitation. Through the steps we have taken, set out in our [anti-slavery and human trafficking statements](#), and supported by experts, Slave-Free Alliance ('SFA') we believe we have a low risk of modern slavery in our business and supply chain. Despite this, we are not complacent and take seriously our responsibility to investigate all potential concerns of modern slavery and poor worker welfare thoroughly and will engage with the appropriate authorities to report discovered slavery within our own business and our supply chain. We remain committed to supporting any victims of slavery identified through this process.*

*This Policy sets out the principles by which we would act in the case of a victim of modern slavery being identified and also details our escalation process on how we would deal with any concerns raised. It is based on best practice guidance on remediation in line with the International Labour Organisation ('ILO') and the UN Guiding Principles on Business and Human Rights.*

*This Policy applies to the whole of Severn Trent Plc, its subsidiaries and its supply chain.*

### **Escalation process and responsibilities**

*We are committed to taking the following steps should an instance of modern slavery be suspected or detected within our business or supply chain.*

#### **1. Concern raised**

Through training and raising awareness we have directed employees and our supply chain to voice any potential concerns through the following channels:

1. directly to the Modern Slavery Working Group;
2. through their line manager; or
3. through their HR Business Partner or the HR advice line.

Alternatively, our external independent whistleblowing provider – Safecall, is available 24/7 via telephone or their website.

**Safecall telephone: 0800 915 1571**

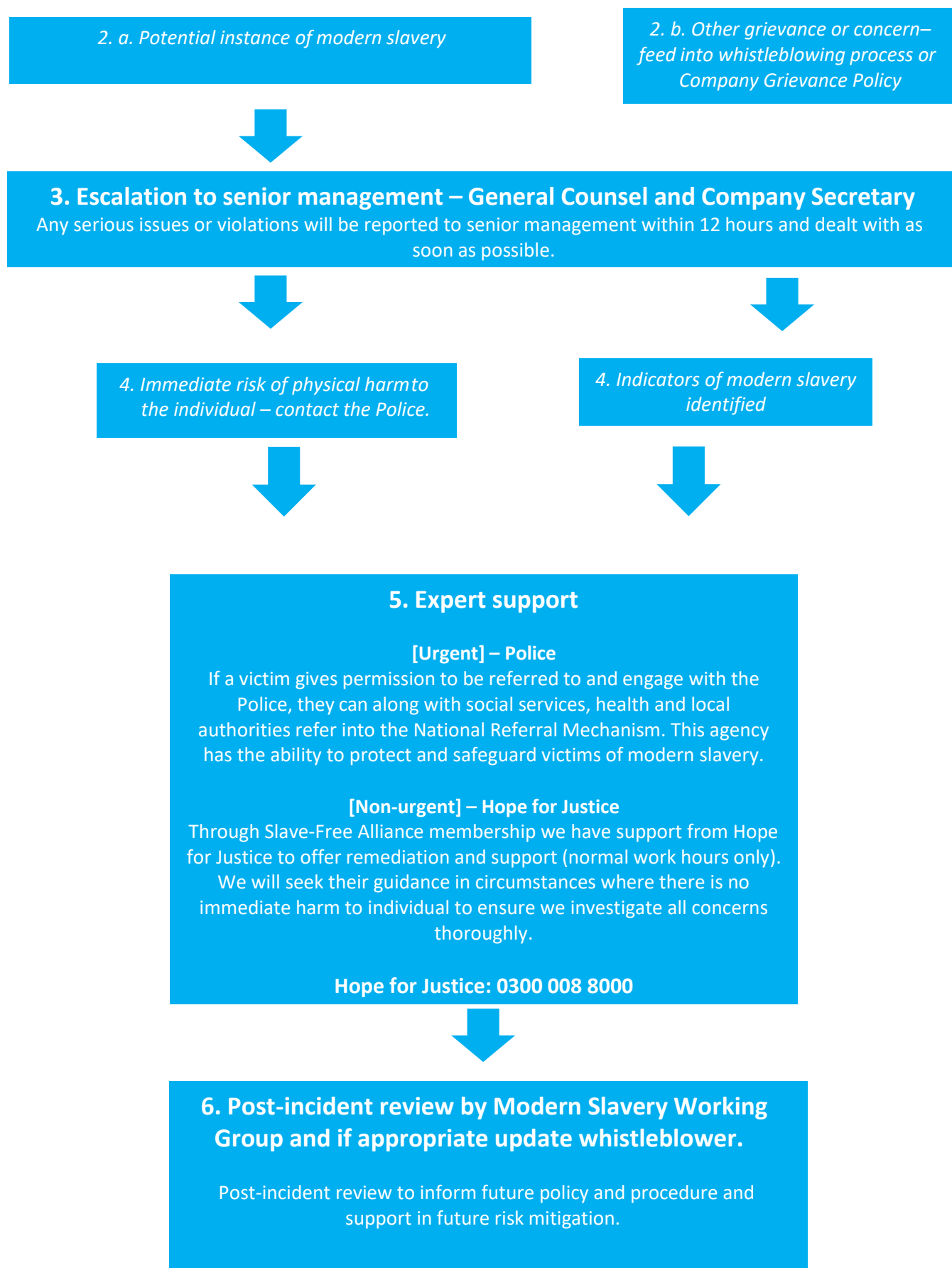
**Website: <https://www.safecall.co.uk/file-a-report/>**



#### **2. Initial assessment by Modern Slavery Working Group & Slave-Free Alliance**

Initial review of concern by Modern Slavery Working Group in order to understand scale of concern and if immediate action is needed. Guidance will be sought from expert partners Slave-Free Alliance. All instances of modern slavery will be reviewed.





*Act in line with our remediation principles.*

### Remediation principles

*We acknowledge that remediation can take many forms, and will depend on the individual's needs. This is a set of principles which we commit to acting in line with:*

- **Victim centered remediation** - Protecting any victim of slavery will be our first priority. Our approach will be victim-led, consultative and involve multiple stakeholders to ensure the best possible outcome for the victim.

We will be driven by the wishes and needs of a victim unless there is a serious risk of physical harm to that individual, or anyone else as a result of any disclosures made. We have a responsibility to protect them from physical and or serious moral harm and will work with partner agencies to ensure this, even if the victim does not want any action taken.

We will seek to support the victim throughout the process, take steps to protect confidentiality and ensure a timely response.

We acknowledge that victims have the right to pursue other forms of remedial action at any stage.

- **Treat cases individually** – We will treat each victim(s) on a case-by-case basis and take individual circumstances into account when creating a bespoke care plan.
- **Follow advice of experts** – We recognise that the specialist expertise required to assess and identify the level of support required for a victim may not be within our scope. Any concerns would be raised to either our charitable partners Hope for Justice, the National Referral Mechanisms, or the police as appropriate. In all non-urgent cases, we will first seek approval of the victim to share concerns and/or circumstances with any partner authorities, including the police. In cases where a victim does not wish to engage, we would seek advice from our charitable partners, Hope for Justice, to determine the best approach.
- **Collaborative approach with our supply chain** - In the instance of modern slavery being detected within our supply chain, we are committed to working with suppliers to help eliminate modern slavery and support those impacted. This would always be our preferred approach, however this may be reconsidered if a supplier refuses to engage with us. For cases identified in the supply chain, we will ensure the victim has agreed for information to be shared.
- **Ongoing victim support** – We are committed to adopting a victim centered approach and exploring opportunities to support victims throughout remediation. Under expert guidance we will assess what remedy we can offer the victim and use our resources to the best of our ability.
- **No repeat and adapt our approach** - If any potential cases of modern slavery are raised we will investigate them fully to understand the root cause of any exploitation. We will take action to improve our processes as well as the processes within our supply chain to eradicate the potential for reoccurrence. We are committed to building new learnings into our future strategy, continually reviewing and adapting our approach to ensure it is appropriate and effective in tackling modern slavery and providing victim centered support to those impacted. Where necessary and where requested, support will be provided to those individual(s) who raised the concern.

Signed on behalf of Severn Trent Plc and its group subsidiaries



**Liv Garfield**

Chief Executive Severn  
Trent Plc

Updated September 2024