Modern Slavery Statement

Financial Year 2025/2026

1. Background

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Northern Ireland Water's anti-slavery and human trafficking statement for the 2025/26 financial year. This statement sets out the steps that Northern Ireland Water take to ensure that modern slavery is not taking place in our supply chain or in any part of our business.

2. Organisation structure, business and supply chains

Northern Ireland Water, formed in April 2007, is a government owned company and non-departmental public body, owned entirely by the Department for Infrastructure. Northern Ireland Water is responsible for the supply and distribution of drinking water and the provision of sewage services for approximately 740,000 domestic, agricultural, and business customers throughout Northern Ireland. Northern Ireland Water supplies these services to a population of 1.9 million.

The company directly employs around 1,400 people in operational, support and professional disciplines, and engages a small number of agency workers each year. NI Water recognises three Trade Unions – Unite the Union, GMB and NIPSA – and engages with them on a regular basis through formal and informal negotiation and consultation forums, on a range of issues of importance to our workforce.

Northern Ireland Water's supply chains can be divided into three categories:

- Capital works
- Supplies
- Services

All capital works are provided by contractors based in the UK and comprise the provision of equipment, materials, and labour. Just over half of supplies and services contractors are based in Northern Ireland, with the remainder being based predominantly in Great Britain and Europe. Northern Ireland Water has circa 800 procurement routes (frameworks or contracts) for supplies and services and circa 65 for capital works. Over 99.5% of Northern Ireland Water's expenditure with its supply chain is covered by a formal contract for the provision of its goods, services and works requirements.

Northern Ireland Water is subject to the Utilities Contracts Regulations 2016 (as amended), Procurement Act 2023 and NI Public Procurement Policy. All requirements exceeding £65,000 in value are publicly tendered.

3. Northern Ireland Water's Modern Slavery Policy

Northern Ireland Water does not condone modern slavery in any form and supports the principles set out in the Modern Slavery Act. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls that seek to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our internal employee policies include a Modern Slavery Policy, a Grievance Policy and our Speak Up Policy, which sets out whistleblowing arrangements for the business, and is open to all permanent and short-term employees of the Northern Ireland Water Group. It also applies to external consultants, contractors and agency personnel while working in the Northern Ireland Water Group.

These policies are available to all staff on our intranet. All policies are reviewed and approved every two years, or more frequently if required.

4. Business and supply chain due diligence

Our employees

Regarding its own business, Northern Ireland Water strives at all times to comply with employment law applicable in Northern Ireland. The nationality and “right to work” documentation of all employees are scrutinised as part of the recruitment process. These checks are also completed by our recruitment agency partners, who employ our agency assignees.

Our supply chain

Northern Ireland Water has comprehensive procurement and contract management policies and procedures in place, and these are regularly reviewed. All Northern Ireland Water’s supply chain contracts include an obligation to comply with all applicable laws, including new legislation introduced during the contract period.

All goods and services contracts awarded by Northern Ireland Water since 2016/17 have required contractors in scope of the Modern Slavery Act to include a link to their Modern Slavery Statement in the tender documents. If no such link or statement is provided, a contractor must create one within six months of being awarded a contract. Failure to do so would amount to a breach of contract. In addition, contractors are required to comply with relevant employment, equality, health and safety law and human rights standards and adopt fair working practices for all workers engaged in the delivery of our contracts including the use of real living wage.

In relation to capital works tenders and existing capital works contracts all contractors are contractually obliged to conform to the requirements of the Modern Slavery Act.

Annual checks are carried out on contractors in scope of the Modern Slavery Act to ensure that their statements are updated and still available on their website.

5. Risk assessment and mitigating actions

As all Northern Ireland Water's business is undertaken within Northern Ireland, Northern Ireland Water considers risks are most likely to arise from its supply chain rather than from its business operations.

The introduction of *Public Procurement Note 05/21 Human Rights in Public Procurement* re-enforced the work that Northern Ireland Water were already undertaking in eradicating modern slavery in our supply chain. Northern Ireland Water have developed a risk assessment tool which is completed at procurement strategy stage to identify potential risks with supporting mitigations then included in tender documents. These requirements are reviewed on a regular basis throughout the life of the contract.

6. KPIs to measure effectiveness of steps being taken

We have Key Performance Indicators in place to measure our performance and effectiveness in combatting modern slavery, including:

- Tender participation stage questions
- Appropriate contractual arrangements
- Investigations into any potential breaches as per NI Water policies
- Commercial Contract Management System reporting on modern slavery checks & Human Rights risk assessments.

7. Training on modern slavery

Modern slavery training is available to Northern Ireland Water staff and agency assignees, which gives an understanding of modern slavery, how to identify where this may be taking place, and how to report any concerns staff may have. This will help us to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Ethical Procurement Training is completed annually by all Chartered Institute of Procurement and Supply registered Procurement Team members. This training enables individuals and organisations to hone their skills and knowledge, and ultimately to demonstrate their commitment to ethical procurement and sustainable supply chains.

8. Enquiries

Any other individual who wishes to raise concerns in relation to modern slavery may telephone our 'Waterline' number 03457-440088 and ask for the matter to be brought to the attention of the Legal Department. Any e-mail communication could be sent to waterline@niwater.com.

Signed: 

Name: Sara Venning

Chief Executive Officer
Date Signed: 27 October 2026
Date of Board Approval: 27 October 2026