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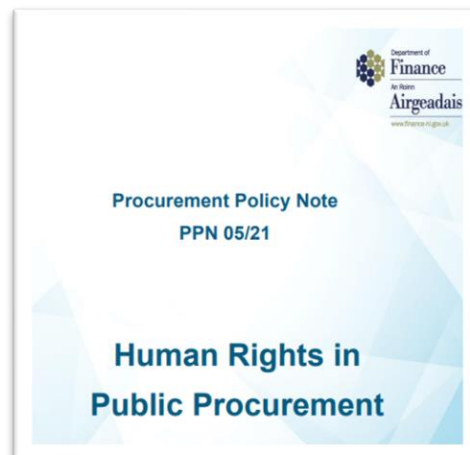
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1. Context

Public Procurement decisions can have consequences on the human rights of people employed to deliver goods and services contracts.

In line with PPN 05/21, a human rights-based approach to procurement has been adopted by NI Water to both prevent human rights violations and abuses and to take an active role in respecting, protecting, and fulfilling human rights.

NI Water have a zero-tolerance approach to modern slavery and human rights abuses, and 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 mitigate against these risks in our own business or in any of our supply chains.



2. Approach to Implementation

NIW took a meaningful & pragmatic approach to implementing PPN 05/21, establishing a working group internally, made up of Commercial, Procurement & Contract Management SMEs. This working group engaged early and often with the Northern Ireland Human Rights Commission to ensure the approach we were taking was robust and effective.

After conducting lengthy desktop research & meeting with other companies & utilities (e.g., Electronics Watch, Scottish Water), the working group developed a risk-based assessment tool; this covers areas such as employment conditions, interaction with end users & supply chain. This is completed at procurement strategy stage based on information gathered from our colleagues, pre-market engagement and market knowledge. This tool then generates a score to give a risk rating of low, medium, or high. Different levels of mitigating requirements will be requested from bidders depending on the risk rating generated, in line with the PPN.

PPN 03/21 – Case Study: Human Rights in NI Water

Key steps in our implementation summarised below:



Established a Working Group

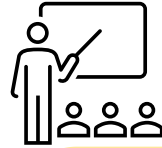
Joined NI Human Rights Commission’s Business & Human Rights Forum

Developed a Risk Assessment tool, to support procurement strategy in assessing the market



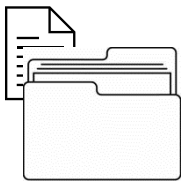
Met w/other UK water companies to learn lessons & knowledge share

Sense-checked our risk-based approach w/NI HRC



Developed & conducted Awareness & Roll Out Training for staff, incl. CIPS Ethical Procurement (completed annually)

Became a member of Utilities Against Slavery (part of Slave-Free Alliance)



Procurement & Business processes incl. tender documents updated to reflect PPN requirements

NI Water’s standard Terms & Conditions reference the applicable Human Rights & Modern Slavery legislation



Stress tested Risk Assessment tool against previous tenders

Continue to work w/Utilities Against Slavery on engagement, training & supply chain best practice



Developing the Risk Assessment tool to follow through into Contract Mgmt. & assessing the supplier(s)

Continue to gather feedback from the business & markets

3. Next Steps

What will we do now?

- Work with our supply chain to educate them on the new requirements and the reasons why we are doing this
- Assess training needs for the Commercial Team
- Ongoing review and continuous improvement of new processes

4. Concluding Thoughts

NI Water are committed to supporting PPN 05/21 and ensuring that opportunities for Human Rights violations within our supply chains are prevented. Our risk-based approach outlined above has been endorsed by the Northern Ireland Human Rights Commission.