



Slavery and Human Trafficking Statement

Year End 31 March 2018

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Signed: 

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(NIW Director/ Company Secretary)

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6	Wording amended	Ditto
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1 Introduction & Background

As a government owned company with an annual turnover exceeding £36,000,000, the requirements of the Modern Slavery Act 2015 ("Modern Slavery Act") apply to Northern Ireland Water Limited ("NI Water").

2 Objective

The objective of this document is to set out the actions that NI Water is undertaking to comply with the Modern Slavery Act and forms NI Water's Slavery and Human Trafficking Statement.

3 Who should have knowledge of this statement

All NI Water's Directors and employees should have knowledge of this statement.

In particular, employees whose role encompasses procurement, contract management or HR policy/procedure/advice must be trained in the requirements of the Modern Slavery Act.

NI Water will make this statement available on its website.

4 Roles and Responsibilities

Roles and responsibilities within NI Water are set out in the table below:

Role	Responsibility
Board of Directors	<ul style="list-style-type: none"> Accountable for NI Water's compliance with the Modern Slavery Act. Approving this statement. Ensuring all NI Water employees understand their responsibilities with regard to the Act. Appointing a senior employee at Level 3 as Compliance Manager who shall be responsible for ensuring compliance with the Act.
Executive Committee	<ul style="list-style-type: none"> Providing support and guidance to the Compliance Manager.
Compliance Manager	<ul style="list-style-type: none"> Responsible for producing this statement pursuant to s. 54 of the Modern Slavery Act and overseeing NI Water's approach to compliance with the Modern Slavery Act.
Procurement Level 3s	<ul style="list-style-type: none"> Responsible for ensuring procurement policies, procedures and practices comply with the Modern Slavery Act and for implementing any procurement actions in this statement.
Contract managers	<ul style="list-style-type: none"> Responsible for ensuring all contractors in scope of the Modern Slavery Act continue to meet their obligations under the Act once appointed.

HR level 3s	<ul style="list-style-type: none"> Responsible for ensuring all HR employment policies, procedures and practices comply with the Modern Slavery Act and for implementing any HR actions in this statement.
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5 Organisation structure, business and supply chains

NI Water, formed in April 2007, is a government owned company and non-departmental public body, owned entirely by the Department for Infrastructure.

NI Water is responsible for the supply and distribution of drinking water and the provision of sewage services for approximately 780,000 domestic, agricultural and business customers throughout Northern Ireland. NI Water supplies these services to a population of 1.7 million.

The assets managed include approximately:

- 26,980kms of In Operation Water Mains
- 1,401 In Operation Waste Water Pumping Stations
- 23 In Operation Major Water Treatment Works
- 15282kms of In Operation Sewers
- 468266 Manholes
- 1077 In Operation Waste Water Treatment Works

Further information is available on the NI Water website <http://www.niwater.com/>

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

- Capital works
- Supplies
- Services

All capital works are provided by contractors based in Northern Ireland 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.

NI Water has circa 400 procurement routes (frameworks or contracts) for supplies and services and 65 for capital works.

Over 99.5% of NI Water's expenditure with its supply chain is covered by a formal contract for the provision of its goods, services and works requirements.

NI Water is subject to the Utilities Contracts Regulations 2016 and NI Public Procurement Policy. All requirements exceeding £50,000 in value are publicly tendered.

6 NI Water's slavery and human trafficking policy

NI Water does not condone slavery or human trafficking in any form and supports the principles set out in of the Modern Slavery Act.

NI Water has an anti-slavery and human trafficking policy in place.

7 Business and supply chain due diligence

Regarding its own business, NI Water strives, at all times, to comply with employment law applicable in Northern Ireland. The nationality and work permits of all employees are scrutinised as part of the recruitment process.

NI Water has comprehensive procurement and contract management policies and procedures in place and these are regularly reviewed.

All NI 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 since 2016/17 have required Contractors in scope of the Modern Slavery Act to include a link to their slavery and human trafficking 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 NI Water carried out an exercise to identify those goods and services contractors that were in scope of the Modern Slavery Act and these contractors have been asked to 'self declare' if they are within scope of the act and, if so, to confirm that they have a slavery and human trafficking statement in place. This is an ongoing exercise.

In relation to capital works tenders and existing capital works contracts all contractors are required to comply with all applicable legislation through the NEC form of contract. It therefore follows that all such contractors within scope of the Modern Slavery Act are contractually obliged to conform to the requirements of that act. NI Water will review this contractual regime and consider what further requirements/ audits may usefully be considered on capital works. The NEC is a pragmatic suite of standard form contracts and this approach is considered appropriate for dealing with all Legislation, including the Modern Slavery Act.

8 Risk assessment and mitigating actions

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

NI Water will undertake a risk based approach to mapping its supply chain so that NI Water can come to an informed view of the risk of exploitation and plan to mitigate those risks.

9 Measuring the effectiveness of NI Water's policy

Once NI Water has undertaken its risk assessment and established mitigating actions, NI Water will establish key performance indicators (KPIs) to measure the effectiveness of its approach.

NI Water's management will report to the Board of Directors.

10 Staff training

The statement is included in NI Water's repository of policies and procedures, which is available to all staff via NI Water's intranet (Source).

NI Water had designed training regarding the supply chain provisions of the Modern Slavery Act which was to be delivered to NI Water's employees through on-line interactive training, however this proposed training is subject to review.

11 Learning from experience

As NI Water develops its expertise in this area, it will seek to learn from other organisations and its own experience.

If there are instances of non-compliance with NI Water's policy, NI Water will undertake a root cause analysis and undertake corrective actions.

12 Whistle blowing and grievance procedures

NI Water has a whistle blowing policy available to its employees, external consultants, contractors and agency personnel. NI Water has comprehensive grievance procedures available to its employees.

13 Enquiries

Any other individual who wishes to raise concerns in relation to slavery or human trafficking should write to the NI Water Legal Department in the first instance, which will allow an independent enquiry to be commissioned. The address to write to is:

Legal Department
 NI Water
 Westland House
 Old Westland Road
 Belfast
 BT14 6TE

Alternatively members of the public could ring 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.

14 Glossary

Term	Meaning
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Contractor	Organisation providing supplies, services or capital works to NI Water
KPIs	Key performance indicators
Level 3	A senior manager reporting to a Director.
NI	Northern Ireland
NIPPP	Northern Ireland public procurement policy
Procurement route	A legal agreement between NI Water and a contractor for supplies, services or capital works