

**Contents**

<b>1. Introduction .....</b>	<b>2</b>
<b>2. Implementation.....</b>	<b>2</b>
<b>3. Ongoing Actions .....</b>	<b>4</b>
<b>4. Concluding Thoughts .....</b>	<b>5</b>

## 1. Introduction

In line with PPN 05/21, a human rights-based approach to procurement has been adopted by Northern Ireland 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. Implementation

### Risk-based Assessment

NIW took a meaningful and pragmatic approach to implementing PPN 05/21, engaging often with the Northern Ireland Human Rights Commission to ensure the approach we were taking was robust and effective.

We have further developed our risk-based assessment tool, which is completed at procurement strategy stage based on information gathered from our colleagues, pre-market engagement and market knowledge. This is now being expanded, to be used by our Contract Management team at contract award stage, when we have a better understanding of the origin of the goods and services to be delivered.

### 23/24 Tenders Assessed -

Human Rights Risk Level	Record Count
High	1
Medium	1
Low	5

### Company eLearning

During 23/24, a cross-functional working group was established to update our modern slavery statement and policy. This group (made up of colleagues from HR, Commercial and Legal) identified the need for company-wide training to assist colleagues in identifying potential human rights' violations and/or instances of modern slavery and how to report this. The Commercial Team developed an eLearning module, which was reviewed by both the working group, senior

management, and the NI Human Rights Commission. This is now available via each employee's learning path in our purchase to pay system.

#### [NI Human Rights Commission - NI Business and Human Rights Index](#)

Supported by the European Network of National Human Rights Institutions (ENNHRI), the NI Human Rights Commission commissioned researchers from Queen's University Belfast School of Law to assess Northern Irish business approaches to the implementation of the UN Guiding Principles on Business and Human Rights.

The aim was to engage businesses in NI to embed human rights at the heart of their future strategies, and to better inform future policy and legislative initiatives regarding business and human rights in NI. NI Water was selected to be included in the snapshot assessment, on the basis of the Belfast Telegraph's Top 100 Companies ranking.

NI Water engaged fully on this project, liaising directly with the Commission, and signposting the researchers to relevant information e.g., NI Water's modern slavery statement and policy, as well as the case studies published on how the Commercial Team risk assess human rights in our supply chain.

QUB researchers will present their report at an in-person event, date to be confirmed. NI Water look forward to attending the launch of the report and will continue to work with the NIHRC on embedding best practices.

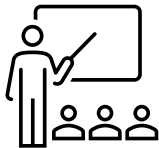
### 3. Ongoing Actions



Risk-assess contracts on a case-by-case basis in accordance with PPN 05/21



Maintain NI Water’s modern slavery statement and related policies



Engage regularly with the Northern Ireland Human Rights Commission



Continued membership of the Utilities Against Slavery, part of the charity Slave-Free Alliance



Monitor training needs for the Commercial Team and wider business and review processes to identify any opportunities for continuous improvement

#### 4. Concluding Thoughts

NI Water continue to support PPN 05/21 and ensure 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.