Translink Modern Slavery Statement 2022-2023

1. ORGANISATIONS COVERED BY THIS STATEMENT

This Statement is prepared on behalf of the Northern Ireland Transport Holding Company ("NITHC") and its private limited subsidiary companies, including (but not limited to) Ulsterbus Limited, Citybus Limited and Northern Ireland Railways Company Limited, collectively referred to as "Translink".

Translink's financial year end occurs on 31 March. This Statement covers the financial year 1 April 2022 – 31 March 2023.

2. OBJECTIVE

Translink fully supports the aims of the Modern Slavery Act 2015 (the "Act") and is committed to tackling slavery and human trafficking where it can. The objective of this Statement is to set out the actions Translink is taking to comply with the Act.

3. ORGANISATION STRUCTURE, BUSINESS AND SUPPLY CHAINS

3.1. Translink is Northern Ireland's primary public transport provider. It provides integrated bus, coach and rail services across Northern Ireland.

3.2. Translink is also a major employer in Northern Ireland with approximately 4,200 jobs provided across the region. Recognised as an industry leader, Translink continues to deliver strong performance despite challenging economic times.

3.3. The Translink group consists of a Public Corporation, NITHC (established under the Transport Act (Northern Ireland) 1967), which owns and controls seven private limited subsidiary companies, some of which are covered by this Statement.

3.4. Translink's supply chains fall into a number of different departments, as follows:

- Engineering and Fleet Maintenance
- Corporate Services
- Infrastructure, Capital Development and Estate Services
- Fleet Procurement

3.5. Should the Act apply to bidders, Translink requires those bidders to declare that their Policies and Procedures are fully compliant with the Act.

4. POLICIES RELEVANT TO MODERN SLAVERY

4.1. As a Centre of Procurement Expertise, Translink is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

4.2. Translink's commitment to conducting business ethically and responsibly, is reinforced through various company policies, including:

- Whistleblowing Policy
- Anti-Fraud, Theft and Bribery Policy
- Fighting Bribery in Public Procurement Guidelines
- Procurement Policy and Procedures (in line with NI Public Procurement Policy)
- Employee Charter
- Recruitment Procedures and Code of Practice

Translink's suppliers must also adhere to the Department of Finance Supplier Code of Conduct.

5. RISK ASSESSMENT, PREVENTION AND MITIGATION

5.1 Translink has a zero-tolerance policy to slavery and human trafficking. To ensure all those in Translink's supply chain comply with Translink's values, Translink has in place a process to mitigate potential risk by ensuring that all suppliers sign up to Translink's contract terms, which include Anti-Slavery conditions.

5.2. Translink is committed to:

- Identifying and assessing potential risk areas in Translink's supply chains at the Procurement Strategy stage.
- Mitigating the risk of slavery and human trafficking occurring in Translink's supply chains by supplier assessment at the tendering stage.
- Protecting whistleblowers.
- Promoting anti Modern Slavery within our recruitment processes by ensuring compliance with relevant legislation.
- Having policies and procedures in place to support employees such as Dignity at Work, Equal Opportunities.

5.3. Translink recognises the source countries and associated sector risks in its supply chains as follows:

Category	Country	Potential Risks	Measures to Mitigate Risk
Batteries	Germany	Low tier suppliers in insecure countries - Democratic Republic of Congo	Supplier has modern slavery statement. Modern slavery clause will be included at renewal stage.
Construction	United Kingdom	Unethical working practices. Unreasonable terms of employment. Withholding passports. Tax evasion via cash payments to workers.	NEC4 contracts used for all projects which include appropriate cover.
Facilities Management	United Kingdom	Low skilled or migrant labour. Unreasonable terms of employment.	Standard terms and conditions, inclusive of modern slavery condition.
Fleet	United Kingdom Spain Belgium	Lower tier suppliers in high risk countries - China, Turkey, India and Thailand within the supply chain for raw materials.	Specific modern slavery contract clauses included within Fleet Procurement Contracts addressing lower tier suppliers throughout the supply chain.
Tyres	Spain (raw materials sourced from Far East)	Major risk is raw material supply 95% of rubber resin manufactured in Asia (top 3 countries - Thailand, Indonesia, and Malaysia).	Contract includes specific modern slavery clauses addressing lower tier suppliers.
Vehicle Body Panels (aluminium)	United Kingdom Turkey	Employees paid low wages. Working conditions very poor. Employees exploited and political instability in region.	Supplier has modern slavery statement. Modern slavery clause will be included at renewal stage. Alternative sources will be key objective of Supplier Relationship Management Process.
Vehicle Glass	United Kingdom Turkey	Employees paid low wages. Working conditions very poor. Employees exploited and political instability in region.	Contract includes modern slavery clause.
Uniforms and PPE	China Sri Lanka Bangladesh India Italy	Underpayment or deduction of wages. Excessive overtime. Poor labour practices. Poor/unsafe working conditions.	Standard terms and conditions inclusive of modern slavery condition. Tender / contractual documentation inclusive of confirmation of supplier modern slavery policies / Statement.
Footwear	Italy United Kingdom	Underpayment or deduction of wages. Excessive overtime. Poor labour practices. Poor/unsafe working conditions.	Footwear - standard terms and conditions inclusive of modern slavery condition. Tender / contractual documentation inclusive of confirmation of supplier modern slavery policies / Statement.

6. BUSINESS AND SUPPLY CHAIN DUE DILIGENCE

6.1. Regarding its own business, Translink complies with relevant employment laws applicable in Northern Ireland.

6.2. Translink has strict recruitment processes in place, ensuring reference checks for all employees are carried out and proof of eligibility to work in the UK is confirmed prior to commencement of employment. Suitability checks to work with children, via Access NI, are also conducted for bus drivers and shunters prior to commencing work in this area.

6.3 Suppliers wishing to be considered for Translink contracts, with total values of >£50k, must confirm the following as part of the tender pre-qualification process:

- That none of the organisation's Directors or Executive Officers have been in receipt of enforcement/remedial orders in relation to offences under the prevention of modern slavery legislation.
- That the organisation has appropriate procedures and protocols in place to eliminate modern slavery and human rights abuses, unethical employment practices and blacklisting from its business activities.
- That the organisation has appropriate procedures and protocols in place to support payment of the National Living Wage.
- That, if requested to do so by Translink, these procedures and protocols will be provided for independent checks to be undertaken.

7. TRAINING AND COMMUNICATION

7.1. Translink's Procurement team undertakes CIPS Ethical Procurement training on an annual basis.

7.2. Translink proposes to introduce an awareness campaign to highlight and educate employees on the issues of Modern Slavery.

7.3. This Statement is contained within Translink's Corporate Records Centre. It is available to all employees via Translink's intranet and will be communicated via employee briefings.

8. APPROVAL

This Statement has been approved by NITHC's Board on 20 September 2023 and will be reviewed annually.

Signed: 

Chris Conway, Group Chief Executive

Date: 20 September 2023