

# **CARDIFF UNIVERSITY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018**

## **INTRODUCTION**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking. In order to achieve this we are committed to understanding modern slavery risks and ensuring that there is no modern slavery in our own business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31/07/2018. In addition, this statement sets out the University's undertakings in respect of the Welsh Government Code of Practice on Ethical Employment in Supply Chains to which the University has committed its support.

## **ORGANISATIONAL STRUCTURE**

We are an ambitious and innovative university with a bold and strategic vision located in a beautiful and thriving capital city. Our world-leading research was ranked 5th amongst UK universities in the 2014 Research Excellence Framework for quality and 2nd for impact. We provide an educationally outstanding experience for our students.

Driven by creativity and curiosity, we strive to fulfil our social, cultural and economic obligations to Cardiff, Wales, and the world. We have an annual turnover of £518M.

## **POLICIES**

The University is reviewing its policies and procedures to ensure that they adhere to the University's commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to minimise the risk of slavery and human trafficking taking place anywhere in the University's supply chains.

Policies and processes in place include the following:

- Accredited Living Wage Employer;
- Recruitment and selection processes including contracts of employment and regulations on the employment of young workers;
- Adherence to and monitoring of the Working Time Directive;
- Flexible working agreements to support statutory time off-occupational entitlement, which generally surpasses the minimum threshold;
- Job Evaluation applicable to all posts within the organisation to ensure equal pay for equal work;
- A Cardiff Professional and Cardiff Academic framework which identifies expected behaviours within the organisation;
- Whistleblowing Policy under which slavery or human trafficking issues may be raised
- Agency Workers Guidance to ensure agency workers enjoy comparable rights to those of substantive staff;

## **OUR SUPPLY CHAINS**

The University meets its needs for goods, services and works in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment.

To mitigate supply chain risks, the University has begun the process of requesting copies of Modern Slavery Statements from all relevant suppliers.

The principal categories which carry material risks are office supplies, laboratory consumables, ICT equipment, Catering and some estates services, such as cleaning and security services.

## **COLLABORATION**

The University works with a number of collaborative professional buying organisations such as The University Caterers Organisation (TUCO) and is a member of the Higher Education purchasing Consortium Wales (HEPCW).

The University also works with the Higher Education Procurement Association (HEPA) and institutions across the sector, being a member of HEPA's Responsible Procurement Group.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

The University recognises the importance of due diligence and monitoring of impact and effectiveness.

Our revised tender documentation has been updated to include questions regarding bidders' policies and procedures to identify and eradicate forced labour in their own operations. To ensure all those in our procurement supply chains comply with our values, our contract terms require our suppliers to take all reasonable measures to ensure that there are no forms of slavery in their direct and indirect supply chains.

To carry out a more detailed analysis of risk in our supply chain, four steps have been outlined below:

### ***Step One: Identifying organisations within our supply chain***

Organisations within our first tier supply chain for the supply of goods, services and works have been identified. Depending on the size and complexity of the supply chain there may be a number of levels to identify the primary provider and it is not a straightforward task.

The above information has been used to assess the potential risk of each supplier in the supply chain, based on the nature of their business and the processes they have in place, in order to identify and focus on those who represent the greatest risk.

### ***Step Two: Identifying risk***

Modern slavery risk for any supply chain can be analysed according to various criteria, such as country, commodity and characteristics of the industry. We have assessed risk with regards to our first tier suppliers and have identified the suppliers and categories that pose the greatest risk. The principal categories which carry material risks are:

Office supplies;

Laboratory consumables;

Catering;

ICT equipment;  
Estates facilities management services, such as cleaning and security services; and  
International agents and partnerships.

A Modern Slavery Risk Register is being produced that will capture high risk suppliers by category, the risks associated with each category, risk mitigation actions, residual risk and further improvement actions.

***Step Three: Engaging with your suppliers***

A significant proportion of suppliers that pose the greatest risk to the University have been contacted to establish basic requirements and assess the competence of that business to manage its workforce legally and ethically.

The University is currently collaborating with other Higher Education purchasing consortia and other organisations on risk assessment and due diligence processes to share good practice and avoid duplication of effort for both the universities and external suppliers.

***Step Four: Ongoing management***

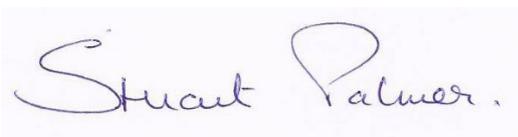
The University will implement an approach to working with high risk suppliers, to monitor that the standards agreed are being complied with and to establish action plans to improve performance, where necessary.

A continuous improvement approach will be adopted to promote joint ownership of corrective action plans and the raising of standards. Formal review meetings will be held between the University and supplier to review progress.

**TRAINING**

Senior Procurement Services staff attended webinars and presentations and have successfully completed the Chartered Institute of Purchasing and Supply (CIPS) 'Ethical Procurement and Supply' online training.

Plans are being developed for training for staff in high-risk categories.

A handwritten signature in blue ink that reads "Stuart Palmer". The signature is written in a cursive style with a large initial 'S'.

**Professor Stuart Palmer**  
**Chair of Council**

Approved at Cardiff University Council 26 November 2018