

CARDIFF UNIVERSITY'S PREVENTION OF MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

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.

Cardiff University is committed to improving its 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 31/07/2022. 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.

POLICIES

The University regularly reviews 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 Policy, including the various 'right to work checks', 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 minimum statutory time off – occupational entitlement generally surpasses the minimum statutory threshold;
- Job Evaluation Scheme applicable to all posts within the organisation to ensure equality of pay;
- Employment Policy Framework which identifies the expectations of employer/employee behaviours;
- Whistleblowing Policy under which any slavery or human trafficking issues may be raised with senior management, the governing body or externally. Any allegations raised under this policy would be investigated and appropriate action would be taken against any member of staff found to have acted in breach of relevant University policies;

- Agency Workers Guidance to ensure agency workers enjoy comparable rights to those of substantive staff.

The University's Dignity at Work and Study Policy provides a commitment to an inclusive environment in which all members of the University community are treated with dignity and respect. Issues of harassment, bullying and discrimination can be raised under this policy, which is supported by a network of wellbeing advisers. Student Services have also developed advice pages signposting support for sexual violence and forced marriages

In 20/21 the University updated its Procurement Policy & Guidance to align this with the Welsh Procurement Policy Statement. The policy has been updated to state that consideration must be given in every procurement as to how the specification, terms and evaluation methodology can help procure a solution that contributes social value - including ensuring our supply chain is free from Modern Day Slavery.

The revised Procurement Policy also includes a specific section on Modern Day Slavery reflecting the commitments made in this statement and providing a clear statement that the University expects the same high standards from all contractors, suppliers and other business partners, and as part of the contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

The revised policy provides a requirement that all staff and members of the University community must look out for signs of modern slavery in our supply chain, particularly in high-risk commodity areas, and challenge or report concerns. Staff and members of the University community must report all suspicions or observations to the Procurement Director who will investigate further.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING IN OUR SUPPLY CHAIN

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.

Our tendering processes include qualification questions regarding bidders' policies and procedures that ensure we only work with organisations who 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.

Our 2020-23 Procurement Strategy places a focus on Responsible and Sustainable Procurement and continues to support us in the delivery of our Modern Slavery commitments.

Our Strategy action plan was developed in 2020/21 and continued to be further developed and implemented in 2021/22. The plan focuses on further developing our Responsible and Sustainable element of our procurement policy and encompasses

the development of a set of standards and expectations of suppliers by embedding fair employment practices into our supply chain, training staff and including Responsible and Sustainable objectives in our annual objective setting and reporting.

In the financial year 20/21 the University's Code of External Funding practice was also updated to make a specific reference to check for Human Rights allegations and those relating to Modern Day Slavery as part of the 'due diligence' testing.

In the financial year 2021/22 the structure of the procurement team has been revised to support the revised Procurement Policy and Action plan updated in 2020/21 and a new structure for the team has been implemented during 2021/22 to enable Cardiff University to manage process more effectively. In addition, during the financial year 2021/22, the supply chain was reviewed and the supplier base reduced by 63% in order to better manage and reduce risk and support improved oversight of the supply chain.

In addition the University is working with WRAP Cymru to carry out a gap analysis of the University's current policies and practices against those recommended by WRAP to support sustainable public sector procurement in Wales. This work continues into the financial year 2022/23 and will assist the University to understand and address potential areas for improvement relating to the prevention of modern-day slavery.

COLLABORATION

The University collaborates 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.

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.

TRAINING

Senior Procurement Services staff attended webinars and presentations including training from the Slave Free Alliance and the Chartered Institute of Purchasing and Supply (CIPS) 'Ethical Procurement and Supply'.

In 2021/22 the procurement team received training from our internal training provider on a range of compliance topics including Modern Day Slavery, identification of high-risk countries and industries and the obligations of working in these environments for procurement staff.

Signed:



Patrick Younge, Chair of Council