

CARDIFF UNIVERSITY'S PREVENTION OF MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024/2025

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 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 July 2025. 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 Cardiff University has committed its support.

POLICIES

The University regularly reviews its policies and procedures. This is to ensure that they adhere to the University's commitment to acting ethically and with integrity in all its business relationships. This thereby facilitates the implementation and enforcement of 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 the University Secretary and Chief Operating Officer or Provost and Deputy Vice Chancellor. 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.
- [Responsible Procurement Policy](#) to ensure environmental, social and governance (ESG) considerations are given to our purchasing decisions.
- [Supplier Code of Conduct](#) which has been rolled out to strategic suppliers from January 2025 and will be adopted wider in 2025/2026 e.g. will be included in all tender exercises.

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 2020/21 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 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 Director of Procurement who will investigate further.

The Procurement Policy is further supported with the introduction of the Responsible Procurement Policy and Supplier Code of Conduct. The aim of the Responsible Procurement Policy is to drive responsible purchasing decisions and the aim of the Supplier Code of Conduct is for suppliers to commit to responsible business practices from themselves and their supply chain partners.

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 cost 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/or indirect supply chains.

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

Our Procurement Strategy action plan was developed in 2020/21. The plan focused 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. These have resulted in the Responsible Procurement Policy and Supplier Code of Conduct.

In the financial year 2020/21 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 2022/23 the structure of the procurement team was revised to support the Procurement Policy and Action plan, and a significant restructure of the team was implemented during 2023 to enable Cardiff University to manage processes more effectively. Following the review of the supply chain during the financial year 2021/22 there was a supplier base reduction of 63%. A further exercise in 2022/23 resulted in an additional reduction of 5% and another 10% in 2023/24. This allows the Procurement team to better manage, reduce risk and support improved oversight of the supply chain. This work will continue, particularly in relation to our tail-end, low value spend.

In addition, during the 2021/22 and 2022/23 financial years, the University worked with the Waste and Resources Action Programme (WRAP) Cymru to carry out a gap analysis of the University's policies and practices against those recommended by WRAP to support sustainable public sector procurement in Wales. This assisted in understanding and addressing potential areas for improvement relating to the prevention of modern-day slavery, such as introducing a Sustainability Risk Assessment to identify the environment, social and governance risks (ESG) associated with our tender requirements at pre-tender stage. A follow up review was conducted in 2025 where our overall original maturity score of 27% (Level 2 – Emerging) increased to 65% (Level 3 – Established) but scoring 75% (Level 4 – Leading, the highest maturity level) in the categories of Measurement, Capabilities and Policy & Strategy.

As part of our Responsible Procurement Policy, Procurement Services have developed a Responsible Procurement Risk Assessment tool which outlines the ESG risks for each of our categories of spend such as modern slavery, working conditions/ health and safety, and equality, diversity and inclusion.

COLLABORATION

The University collaborates with other Higher Education purchasing consortia and external organisations on risk assessment and due diligence processes to share good

practice and avoid duplication of effort for both the universities and suppliers. These include all Higher Education Consortia Wales and GW4 member Universities.

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'.

During 2022/23 the procurement team received training from our internal training provider and participated in webinars 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.

The University's Commitment to the Prevention of Modern-Day Slavery and Human Trafficking is also communicated as part of the Compliance and Risk Presentation at University Induction to all new staff.

During 2023/2024 the whole procurement team and 114 internal stakeholders received training in relation to the Responsible Procurement Policy and how to practically apply it in their purchasing decisions.

Signed:

Patrick Younge Chair of Council