

Cardiff Metropolitan University

Annual Modern Slavery and Human Trafficking Statement, 2020-2021 financial year

Introduction

At Cardiff Metropolitan University, we are committed to protecting and respecting human rights, and have a zero-tolerance approach to slavery and human trafficking in all its forms. This statement is issued by the Chair of the Board of Governors pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Cardiff Metropolitan University's slavery and human trafficking statement for the financial year ending 31 July 2021. 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.

The Modern Slavery Act 2015 recognises that 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.

Organisational structure

[Cardiff Metropolitan University](#) is a higher education corporation established under the Education Reform Act 1988 (as amended) and a registered charity. The [University structure and governance](#) is managed through a Board of Governors which has responsibility for educational character and mission and oversight of activities. It is managed by the President & Vice-Chancellor who is supported by a senior executive team, Management Board and Academic Board.

The University operates two teaching campuses, one residential campus and one business services site within the City of Cardiff. The academic structure comprises five Schools: Cardiff School of Sport & Health Sciences, Cardiff School of Management, Cardiff School of Art and Design, Cardiff School of Technologies and Cardiff School of Education and Social Policy.

The University has 1,443 staff (excluding casual staff) and 12,000 students based in Cardiff with the student population drawn from over 130 countries. Over 10,000 further students are placed with global partners.

The University has a commercial trading subsidiary company and an overseas operating subsidiary company. The University's turnover for the financial year covered by this report was £122.3m.

Our supply chains

The University considers its supply chains to be worldwide, comprising those involved directly and indirectly in supplying the University with goods and services; those that relate to students studying both in Cardiff and with its academic partners around the world; and those that relate to its own employees whether in Cardiff, elsewhere in the UK or overseas.

It is recognised that it is possible for instances of modern slavery to occur in any supply chain, including those within our own operations. The University's priority is to maintain a scrutiny on those supply chains that are considered higher risk but will endeavour to investigate all its supply chains as and when reasonable opportunities arise.

Our policies and practices for the prevention and mitigation on modern slavery, human trafficking and ethical employment

Cardiff Metropolitan University is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its own operations and that all those employed in the University's activities are treated fairly and appropriately. The [University's policies and procedures](#) demonstrate its commitment to acting ethically and with integrity in all its business relationships.

The University further recognises that effective policies and processes need to be clearly promoted, easily understood, accessible and consistent with good practice. All staff policies are available on the University intranet; guidance for procurement suppliers is available on the University internet site; and links to relevant policies is made available to Transnational Education ('TNE') partners through the Collaborative Provision handbook, which has circulated to partners annually.

The University has had an [Ethical Supply Chains](#) policy in place since 2011. This policy is regularly reviewed and was updated again in 2020 to ensure it continues to reflect relevant good practice. The University's procurement activity also embraces the principles set out in the Welsh Government Ethical Employment in Supply Chains Code of Practice.

The University's workplace [policies and procedures](#), are regularly reviewed and updated to ensure they reflect the intent of the Code of Practice, demonstrating the University's commitment to acting ethically and with integrity in all its business relationships, ensuring modern slavery and human trafficking does not occur within its UK and international workforces. The latter are employed within the applicable laws of their location and in agreement with appointed representatives.

Staff have access to a Policy Hub as well as an A-Z of Human Resource policies and guidance via the internal staff portal, to ensure easy access to their employment terms and conditions and the most up to date policies.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - We encourage all our staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Code of Professional Conduct** - Our code makes clear to employees the actions and behaviour expected of them when representing the University. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Recruitment/Agency workers** - Our Recruitment Policy sets out workplace rights at the University. We are rigorous in checking that all new recruits have the right to work in the UK. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.
- **Pay Policy** - The University is accredited by the Living Wage Foundation, which certifies that all staff are paid a real living wage. Contracted workers engaged at the University are expected to be paid the living wage as defined by the Living Wage Foundation, and the University evaluates suppliers' approach to Fair Work Practices, including the Living Wage, in line with statutory guidance.

- **Supplier/Procurement code of conduct** - We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

The University also has policies covering matters such as Anti Bribery, Anti Money Laundering, Counter Fraud and Corruption, and Ethical Investment

Trans-national education supply chains

In respect of its trans-national education partners, the University conducts a thorough due diligence assessment prior to the commencement of any TNE relationship and repeats this process periodically throughout all TNE partnerships. Using resources such as the Human Freedom Index, this process highlights the importance of ethical employment practices which subsequently become a contractual obligation upon the partners.

During the period covered by this report, the University has reviewed and updated the contracts used with overseas recruitment agents to ensure these agents conduct the activity they undertake on behalf of the University in an ethical and appropriate manner. This reinforces the training our agents receive as part of their induction process and as part of the University's annual recruitment agents conference.

The University's internal supply chains

The University undertakes various clearances during its recruitment activity, including 'right to work checks' and its staff induction process includes guidance and training resources relating to equality and diversity, such as unconscious bias.

The University's external supply chain

To identify and mitigate risk, modern slavery is addressed as a key part of all the procurement processes, as outlined below;

- The Procurement team use commodity profiling procedures to map the external supply chain commodities to a risk profile, to identify those categories that are of high risk.
- In tendering at the selection stage, a Selection Questionnaire is used as standard for both above and below the UK procurement thresholds to ensure both mandatory and discretionary exclusion grounds are applied. Any bidder that confirms conviction relating to Human Trafficking will be excluded unless they can clearly demonstrate self-cleansing.
- At award stage Procurement ask appropriate questions regarding the bidder's company and internal policies and supply chain management.
- Procurement continue to promote the Welsh Government's Code of Practice and ask all suppliers to sign up to and support the Code whilst signposting bidders to guidance documentation and videos to assist them and in turn link to our own internal policies.
- We continue to ask questions that are appropriate and relevant to the risk category which includes the Code of Practice Fair Working Practices question and where the profile of the commodity is higher risk, we ask additional more detailed questions.
- Our contract terms and conditions require suppliers to take all reasonable measures to ensure that there are no forms of slavery in their direct and indirect supply chains and to provide the University with reports on the measures and outcomes in respect of this matter.
- Sustainable development which includes modern slavery is a key part of the University contract management process and a series of Key Performance Indicators have been

- developed in this period for use in high-risk category areas.
- As a Real Living wage employer, we commit to ensuring that all our key out-sourced contractors whose teams work at the University are paid the Real Living Wage.

The University utilises the Higher Education Procurement Academy commodity risk profile to validate its own risk analysis, which has identified the following commodities as high risk of modern slavery:

- Recruitment of staff by key contractors such as cleaning and security
- Office supplies, particularly furniture, equipment, and stationery
- Foodstuffs and beverages
- Clothing and workwear
- ICT and Audio-visual equipment

The University is a member of the [HEPCW](#) and along with other universities continues to work collaboratively on all aspects of responsible procurement, which includes modern slavery and recognises that it is of greater benefit to do so. We use UK consortia agreements, where suitable, which provides extra confidence that responsible procurement has been fully embedded in all stages of the supply chain and tries to provide a standardised approach across the HE sector for the external supply chain.

In January 2021 the University along with other HEPCW members adopted the [NETpositive Futures](#) social value action planning tool. By using the tool suppliers are supported to develop a NETpositive social value action plan to support their business and helps them understand the positive contribution their business makes. HEPCW is assisting its members in this work by targeting our many shared/common suppliers.

By using the tool, it will enable us to gather data on the social value actions that are being undertaken by our suppliers. Modern Slavery forms a core requirement of these action plans and 2021 will form a baseline year for the University. Headline data from NETpositive is provided below.

Headline figures

659	SUPPLIERS REGISTERED	
2117	ACTION PLANS COMPLETED	
82% OF WHICH ARE SMES		
5401	4473	1897
ACTIONS COMMITTED TO	ACTIONS IN PROGRESS OR COMPLETED	PIECES OF EVIDENCE OF ACTION
100%	AWARE OF MODERN SLAVERY	
64%	MADE A PUBLIC COMMITMENT TO TAKING ACTION AGAINST MODERN SLAVERY	
63%	AWARE OF THE SUSTAINABLE DEVELOPMENT GOALS	

Modern Slavery actions

	IN PROGRESS	COMPLETED	NOT STARTED	WITH EVIDENCE
Develop a robust approach to removing Modern Slavery from your supply chains	21	16	30	21
Provide Modern Slavery training for staff	17	12	37	17
Engage with your suppliers about Modern Slavery	20	14	31	20
Publish a Modern Slavery Statement	10	25	30	23
Plan a response to the discovery of Modern Slavery in your business operations	15	12	25	12

Training

The Procurement team continue to update their knowledge and training on all aspects of Modern Slavery. The University has in previous years developed a training resource for equality and diversity which included training on ethical employment and modern slavery. This training resource will be revisited with a view to expanding the training to existing staff members. One of our key external partners, Glen Cleaning Group, who provide cleaning services at the University has developed and shared their “in-house” video training for all those staff who work on our contract in a concerted effort to implement high levels of vigilance in protecting their teams.

Priorities for the forthcoming year

- Continue to work with our supply base and encourage more of our suppliers to engage with the NETpositive tool
- Develop and expand the usage and knowledge of the NETpositive tool, which has been delayed by the global pandemic
- Work collaboratively with HEPCW and its members to encourage our shared supply base to proactively use the tool and avoid duplication of effort
- Identify suppliers by risk category, who have not already been contacted by HEPCW and engage and promote the NETpositive tool
- Ensure guidance for suppliers on modern slavery is contained within all our tendering information “packs”
- Review inhouse training for new starters on modern slavery and ensure this can be rolled out to existing staff members
- Continue to review all terms and conditions
- Continue to review commodity risk profiles and add to appropriate questions for tendering
- Ensure the updated contract management process is rolled out to key commodity areas
- Continue to train procurement and other key staff on modern slavery training and guidance

John Taylor
Chair of the Board of
Governors January 2022

Details of the University structure and governance is available at:
<http://www.cardiffmet.ac.uk/about/structureandgovernance/Pages/default.aspx>

This document is available in alternative formats upon request – Tel: 029 2041 6072