



Cardiff
Metropolitan
University

Prifysgol
Metropolitan
Caerdydd

Ethical Supply Chains Policy

POLICY COVERSHEET

Key Details

POLICY TITLE	Ethical Supply Chains Policy
DATE APPROVED	06 March 2024
APPROVING BODY	Academic Board
VERSION	7
PREVIOUS REVIEW DATES	2013, 2015, 2017, 2019, 2021, 2022
NEXT REVIEW DATE	2025/2026
OUTCOME OF EQUALITY IMPACT ASSESSMENT	No major change
RELATED POLICIES / PROCEDURES / GUIDANCE	Future Generations Act, Wales Procurement Policy Statement, Modern Slavery Act, Equalities Act, Welsh Government Ethical Employment Supply Chains: Code of Practice, University Sustainability strategies, Fair Trade Policy, Code of Professional Conduct and Whistleblowing Policy.
IMPLEMENTATION DATE	Immediate
POLICY OWNER (JOB TITLE)	Head of Procurement
UNIT / SERVICE	Procurement
CONTACT EMAIL	purchasing@cardiffmet.ac.uk

Version Control

VERSION	DATE	REASON FOR CHANGE
1.0	2011	First version
2.0	2013	Minor reviews and amendments to reflect WG and University policies
3.0	2015	Minor reviews and amendments to reflect WG and University policies
4.0	2017	Minor reviews and amendments to reflect

		<i>WG and University policies</i>
5.0	2020	<i>Minor reviews and amendments to reflect WG and University policies</i>
5.1	2022	<i>Procurement review</i>
6.0	2023	<i>Minor reviews and amendments to reflect WG and UK and University policies</i>

Policy Hub

For further information on policies:

- 1 You can go to the Secretariat pages on InSite at <https://outlookuwicac.sharepoint.com/sites/Secretariat>;
- 2 You can go to the Policy Hub at cardiffmet.ac.uk/about/policyhub; or
- 3 Contact policies@cardiffmet.ac.uk.

ETHICAL SUPPLY CHAINS POLICY

Mae'r ddogfen hon hefyd ar gael yn Gymraeg / This document is also available in Welsh.

1 INTRODUCTION

The University has a responsibility to manage its resources in a sustainable manner and recognises it has an obligation in ensuring social, economic and environmental sustainability. In delivering value for money the Procurement function will seek to leverage this responsibility to ensure that those organisations in our external supply chains and our sub-contractors recognise, adopt and apply in their operations appropriate social, economic and environmentally responsible business practices.

These appropriate practices include:

1. the driving out of corruption, exploitation, discrimination, servitude, forced or compulsory labour
2. ensuring fair payments practices
3. appropriate employment rights and conditions
4. safe working conditions
5. encouraging inclusion and diversity
6. minimising waste, reducing energy consumption, carbon emissions and promoting the circular economy principles of promote to reduce recycle reuse
7. ensuring equality of treatment

We recognise that our suppliers operate in a wide range of industries, environments and cultures and will interpret ethical supply in different ways.

We believe in supporting the founding principles that organisations and standards such as the International Labour Organisation's 'Centenary Standards Initiatives', the United Nations 'Global Compact' or the Ethical Trading Initiative's Base Code promote.

Our policy objectives focus upon promoting these standards and practices within the context of addressing the Well-being of Wales Future Generations Act 2015¹ and the Wales Procurement Policy Statement², the latter which defines 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 and eliminating negative environmental impacts and maximising the cultural well-being of people and communities in Wales".

¹ <https://www.futuregenerations.wales/about-us/future-generations-act/>

² <https://www.gov.wales/procurement-policy-statement-html>

2 ETHICAL POLICY OBJECTIVES

This policy seeks to address these objectives by ensuring that we meet our commitments under the Modern Slavery Act 2015³; the Equalities Act 2010⁴; and the Welsh Government's Ethical Employment in Supply Chains: Code of Practice⁵ whilst supporting the University's Sustainability strategies⁶ to contribute to a fairer society.

The Code of Practice is designed to ensure that workers in public sector supply chains are employed ethically and addresses, modern slavery and human rights abuses, blacklisting, false self-employment, unfair use of umbrella schemes and zero hours contracts and paying the Living Wage.

In delivering these objectives Procurement will:

- research all tiers in its supply chains in all major commodities to the best of its ability and utilise this market knowledge to identify opportunities for ethical development and the elimination of unfair practices.
- encourage all our suppliers and their sub-contractors to pay the Living Wage. The University is an Accredited Real Living Wage employer and we endeavor to ensure that where possible and legal our suppliers are committed to paying the Real Living Wage.
- on key-outsourced contracts the university requires suppliers whose staff are directly employed on contracts working at the university to be paid the Living Wage and maintains parity of pay.
- use the Welsh Governments' Fair Work Practices question⁷ as standard in all its tendering activities to help leverage its importance.
- encourage all our suppliers to sign up to support the Welsh Government Code of Practice and embed its principles throughout their own organisation and supply chains.
- utilise the Selection Questionnaire at above and below the thresholds that govern public sector procurement. This will help to ensure that range of both mandatory and discretionary exclusions may be applied for social and environmental grounds.

³ <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

⁴ <https://www.legislation.gov.uk/ukpga/2010/15/contents>

⁵ <https://www.gov.wales/ethical-employment-supply-chains-code-practice-guidance-and-training>

⁶ <https://www.cardiffmet.ac.uk/about/sustainability/Pages/Policies,-Strategies-and-Plans.aspx>

⁷ <https://www.gov.wales/ethical-employment-supply-chains-example-questions-conditions-and-policies>

- investigate any supplier bid that appears to be abnormally low to ensure that the supplier is meeting their obligations for environmental, social and labour laws, and is not seeking to gain an unfair advantage by using practices such as false self-employment.
- ensure that all our Terms and Conditions of contracts continue to address our ethical commitment and allow us to terminate any contract for breaches of the human rights act or any formal investigation relating to employment rights or offences under the Modern Slavery Act, should it be necessary to do so. In applying the above principles, we recognise however that in certain circumstances, working with supplier to help alleviate the problem may be the better approach.
- develop a new series of KPIs to address our ethical commitments as part of the contract management process. This will be rolled out to our key service partners and training will be provided to relevant teams such as Estates, Facilities and Commercial Services.
- continue to ensure that all our supply contracts continue to highlight the importance of inclusion, diversity and respect for the protected characteristics identified in the Equalities Act 2010, i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- through membership of the Higher Education Purchasing Consortium, Wales⁸ ('HEPCW') and UK University Purchasing Consortia⁹ work collaboratively to address ethical procurement utilising shared knowledge, sustainable practices, risk assessment tools and continued professional development.
- mandate the use of the NETpositive Supplier Engagement Tool¹⁰ as a condition of award for all successful suppliers. The tool is designed to support and develop the supply chain, which is crucial to embedding sustainability in the procurement process. It has been funded by HEPCW and is widely used in Higher Education to enable a way of offering suppliers an opportunity to generate their own, bespoke Sustainability Action Plan.
- continue to roll out training on ethical employment to university staff, via corporate induction and the promotion of the Code of Practice Ethical Employment in Supply Chains training video.¹¹
- maintain a mechanism via which our suppliers or members of the public may report anything they believe may be unfair or inappropriate employment or working practices in any aspect of the University's supply chains. A link to the University's Whistleblowing policy¹⁰ will be detailed in all our tendering documentation.

⁸ <https://www.hepcw.ac.uk/>

⁹ <https://www.ukupc.ac.uk/>

¹⁰ <https://netpositivefutures.co.uk/>

¹¹ <https://www.youtube.com/watch?v=Dh7xovOblvU>

- maintain a fair payment timescale to ensure that all our suppliers are paid within 30 days of receipt of a valid invoice.
- ensure that any contracts which are let to recruitment agencies, employ agency workers in an ethical employment manner, avoiding false self-employment. We ensure that any person who is employed at the University is employed on the same grade as a university employee in the same role.

3 FAIR TRADE ACCREDITATION

The University recognises that to stipulate brand names as selection or award criteria in its tendering activity is likely to be contrary to the anti-restrictive obligations set out in the Public Contracts Regulations 2015. Therefore, whilst promoting certain internationally recognised standards, this policy deliberately avoids the use of any commercial brand or trade names.

Whilst the University has therefore, achieved and maintained 'Fair Trade University' accreditation, this is governed by a separate Fair-Trade policy¹² that covers this accreditation requirement and is supplementary to this policy.

4 INTERNAL SUPPLY CHAIN

The University recognises that the priorities set out in this policy apply in turn to our own organisation and therefore, the University:

- Has developed a Code of Professional Conduct¹³. This Code makes clear to employees the actions and behaviour expected of them when representing the University. The University strives to always maintain the highest standards of employee conduct and ethical behaviour.
- Has in place a job evaluation scheme to ensure equality of pay.
- Ensures Employment terms and conditions are easily accessible on the University's intranet site.
- Has in place Agency Workers Guidance which has been implemented to ensure agency workers understand their rights.
- Requires all new staff to complete an induction programme on Equality and Diversity which provides a module on all aspects of equality of treatment as well

¹² <https://www.cardiffmet.ac.uk/about/policyhub/Pages/default.aspx>

¹³ <https://www.cardiffmet.ac.uk/about/policyhub/Pages/default.aspx>

as broader aspects of modern slavery and ethical employment in external supply chains.

- Reviewed and updated its Whistleblowing Policy¹⁴ and Procedure which has been updated to reflect these commitments.

¹⁴ <https://www.cardiffmet.ac.uk/about/policyhub/Pages/default.aspx>