

Annual Modern Slavery and Human Trafficking Statement

2023-2024 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 2024. In addition, this statement sets out the University’s undertakings in respect of the Welsh Government Code of Ethical Employment in Supply Chains: Code of practice 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 and an Academic Board.

The University operates two teaching campuses, one residential campus and two business services sites 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 1,545.2Full Time Equivalent staff (excluding casual staff) and 11,281 students based in Cardiff with the student population drawn from over 125 nationalities. Over 20,000 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 £145M.

# 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.

The University’s modern slavery “champion” is the Chief Officer Resources and all concerns about modern slavery should be reported to the Chief Officer directly or via [whistleblowing@cardiffmet.ac.uk](mailto:whistleblowing@cardiffmet.ac.uk)

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

The University is committed to ensuring, where possible, 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; reference to Equality, Diversity and Ethical Supply Chains are noted within contractual agreements and links to relevant policies is made available to Transnational Education (‘TNE’) partners through the Collaborative Provision handbook, which is 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 2024 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 and the Wales procurement Policy Statement.

The University’s workplace policies and procedures are regularly reviewed and updated to ensure they reflect the intent of the Welsh Government’s Ethical Employment 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.

The University’s policies are available on the Policy Hub which is publicly available for visitors and suppliers. Associated People Services policies and guidance are available on the University’s intranet.

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 policy has been updated and reviewed to make it straightforward for workers to make disclosures without fear of retaliation. Guidance on whistleblowing is also provided on the staff intranet.
* **Code of Professional Conduct -** Our code makes clear to employees the actions and behaviour expected of them when representing the University. We strive to always maintain the highest standards of employee conduct and ethical behaviour.
* **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, 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 of Practice 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 and Sustainable Procurement.

# 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.

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. Training our agents is part of their induction process, contract management and as part of the University’s 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 continues 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 ask questions that are appropriate and relevant to the risk category. The Welsh Government’s Code of Practice Fair Working Practices question is asked as standard and where the profile of the commodity is higher risk, we ask additional more detailed probing questions to reflect the nature and risk of that procurement.
* 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 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 is a member of Electronics Watch

The University currently 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 and external agencies

Office supplies, particularly furniture, electrical white goods, textiles, sports equipment

* Laboratory and cleaning equipment, and medical equipment
* Foodstuffs and beverages
* Clothing and workwear
* Digital, services, computing and Audio-visual equipment
* Construction

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 share a common range of suppliers across the sector and adopt a common approach to the sharing of tools, resources and outputs helping to reduce duplication. Much of our impactable spend is channelled through collaborative agreements and all HE consortia and frameworks have adopted the Sustain Supply Chain Code of Conduct.

We access and utilise a range of other UK public sector consortia agreements, which provides extra confidence that responsible procurement has been fully embedded in all stages of the supply chain ensuring a more standardised approach across the public sector for the external supply chain.

The University continues to utilise the NETpositive Futures social value action planning tool that was first licenced by HEPCW in January 2021. The tool supports suppliers in developing social action plans to support their business and helps them to understand the positive contribution their business can make.

The tool has enabled us to gather data on the social value actions that are being delivered by our suppliers. A commitment to use the tool is a contractual requirement in all our tender awards. Modern Slavery forms a core requirement of these action plans and some data on modern slavery from NETpositives is provided below.

* 617 suppliers are registered on the tool.
* 82% of these suppliers are SMEs.
* 82% of these suppliers have ethical labour standards and policies in place.
* 98% of our suppliers classified as “high risk” are aware of their obligations with regards to modern slavery.
* 60% of the suppliers completing the modern slavery assessment in the tool achieved over an 80% rating.

# Training

Continual professional development on all aspects of social value, responsible procurement and modern slavery remains a key priority for the Procurement team members. as and when new guidance and material is released.

During the period of this report the university has developed a new set of training materials, guidance documentation including videos for university staff on the intranet, highlighting the need for all staff to be aware of modern slavery and the many forms it could present. To supplement this training material the existing course content that includes modern slavery awareness training for new staff was also amended and updated.

As part of University’s annual agent conference modern slavery guidance is constantly re-enforced by the International Student Recruitment Team and also re-in-forced during visits to agent offices.

# During the period of this report

# In addition to the new training materials and guidance

* Continued to develop our sustainable development documentation for prospective bidders including requirements for fairtrade or ethically sourced cotton as part of tendering requirements for graduation gown hire and sport clothing
* Reviewed and updated our policies and procedures to implement Welsh Government updated Procurement Policy Statements and Procurement Policy Notes.
* Reviewed, updated and amended the existing commodity coding risk analysis for all responsible procurement risk categories including Modern Slavery
* Reviewed employees bank accounts to highlight duplicate accounts for unrelated staff and sequential bank account numbers and addresses.

# Priorities for the forthcoming year

* Implement additional themes from the Wales National Themes Outcomes and Measures (TOMs) in our procurements, as appropriate.
* Develop and/or signpost training materials for the student population.
* Address any new requirements on responsible procurement that will be implemented in the new Procurement Act 23 and the corresponding Wales Procurement Policy Statement when that will become statute.
* Continue to work with our supply base and encourage more suppliers to engage with the NETpositive tool as part of the contract award stage and ensure that we follow up on action planning to ensure year on year progress.
* Continue to roll-out guidance for suppliers on modern slavery in all our tendering documents and use the UKUPC Sustain Supply Chain Code of Conduct in risk appropriate procurements.
* Continue to monitor employees bank details for duplicate and sequential accounts and addresses and to add to the frequency of these checks, on a quarterly basis.
* Continue to re-enforce training to international agents at the next agents partner conference.

# Signed by Chair of Board of Governors