



Cardiff
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University

Prifysgol
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Caerdydd

CARDIFF METROPOLITAN UNIVERSITY ETHICAL SUPPLY CHAINS POLICY

INTRODUCTION

Cardiff Metropolitan University has a responsibility to manage its resources in a sustainable manner. The University 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 reduce recycle reuse schemes
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 as:

“the optimum combination of whole-of-life costs in terms of not only generating efficiency savings and good quality outcomes for the organisation, but also benefit to society, the economy, and the environment, both now and in the future.”

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

¹ <https://gov.wales/sites/default/files/publications/2019-06/easy-read-a-guide-to-the-wellbeing-of-future-generations-act.pdf>

² <https://gov.wales/sites/default/files/publications/2019-09/wales-procurement-policy-statement.pdf>

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

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

in Supply Chains: Code of Practice⁵ whilst supporting the university's Sustainability strategies⁶ to contribute to a fairer society (link).

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 endeavour to ensure that where possible and legal our suppliers are committed to paying the Real Living Wage.

On key-outsourced contracts the university requires all staff who are directly employed on our contracts 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 voluntarily sign up to the Welsh Government Code of Practice.

We will 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.

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'), work collaboratively to address ethical procurement and seek to adopt and implement a suitable software solution to support this activity.

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 videos⁹

⁵ <https://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://gov.wales/sites/default/files/publications/2019-09/code-of-practice-guide-to-implementing-the-living-wage-through-procurement.pdf>

⁸ <http://www.hepcw.ac.uk/>

⁹ <https://www.youtube.com/watch?v=Dh7xovOblvU>

Continue to provide 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 now be detailed in all our tendering documentation.

Continue to 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 ensure that any person who is employed at the University is employed on the same grade as a University employee in the same role.

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 2015¹¹. As a consequence, whilst promoting certain internationally recognised standards, the University Ethical Supply Chains 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 Ethical Supply Chains policy.

INTERNAL SUPPLY CHAIN

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

Has developed an Employment Policy Framework identifies the expectations of employer and employees

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

Reviewed its Whistleblowing Policy¹³ and Procedure and has been updated to reflect these commitments.

¹⁰ <https://www.cardiffmet.ac.uk/about/structureandgovernance/Pages/Whistleblowing.aspx>

¹¹ http://www.legislation.gov.uk/uksi/2015/102/pdfs/uksi_20150102_en.pdf

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

¹³ <https://www.cardiffmet.ac.uk/about/structureandgovernance/Pages/Whistleblowing.aspx>

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