

Cardiff Metropolitan University

Draft Annual Modern Slavery and Human Trafficking Statement, 2022-2023 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 2022. 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 1,523 Full Time Equivalent staff (excluding casual staff) and TBC students based in Cardiff with the student population drawn from over 124 nationalities. Over TBC 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 £153M.

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 either via directly via for university staff or externally via 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; 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 2020 and 2022 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 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 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 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 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 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, laboratory and cleaning equipment, and stationery
- Foodstuffs and beverages
- Clothing and workwear
- ICT 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 access and utilise a range of 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 HE and 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.

- 610 suppliers are registered on the tool.
- 80% of these suppliers are SMEs.
- 88% of these suppliers have ethical labour standards and policies in place.
- 96.77% of our suppliers classified as “high risk” are aware of their obligations with regards to modern slavery.
- 67% 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. The team have recently completed the updated e-learning module on Modern Slavery on the Professional HE Services e-learning portal. Team members have also received new training on the Net Positive action planning tool which was refreshed and re-launched in this period.

The University has in previous years developed a training resource for equality and diversity which included training on ethical employment and modern slavery and all new staff are required to complete this module. This will be replaced with a new HE Guide to Modern Slavery course.

As part of University's annual agent conference modern slavery guidance is constantly re-enforced by the International Student Recruitment Team.

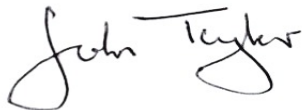
During the period of this report

- We have continued to ensure we pay the real living wage in re-tendered contracts for key outsourced contracts, where these outsourced staff work at the University, for example in the recently re-tendered security and grounds maintenance contracts.
- We have awarded new call off contracts for desktop devices and laptops from a UK wide HE agreement known as the National Desktop and Notebook Agreement. All suppliers awarded a place on this framework are following Electronics Watch terms and conditions and complying with factory disclosures.
- Continued to develop our sustainable development documentation for prospective bidders including awarding a range of fair-trade cotton sportswear items as part of a new contract for sportswear.
- Reviewed and updated our policies and procedures to implement Welsh Government updated Procurement Policy Statements and Procurement Policy Notes.
- Implemented contract award requirements for all successful suppliers to register and create an action plan of the NETpositive social action planning tool.
- Reviewed employees bank accounts to highlight duplicate accounts for unrelated staff and sequential bank account numbers.

Priorities for the forthcoming year

- Review the updated Welsh Government Sustainable Risk Assessments tool and adopt and implement this in procurements, where appropriate for high-risk, medium risk categories.
- Implement additional themes from the National Themes Outcomes and Measures (TOMs) in our procurements, where appropriate.

- Prepare for the Social Partnership and Public Procurement Bill (Wales) which will become law in October 24, review, plan and update policies and procedures internally.
- 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 adopt the UKUPC Sustain Supply Chain Code of Conduct
- Launch the new HE “A Guide to Modern Slavery” course for university staff.
- Continue to monitor employees bank details for duplicate and sequential accounts 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 in March 24.



John Taylor
Chair of Board of Governors
January 2024

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