

## **Cardiff Metropolitan University**

### **Annual Modern Slavery and Human Trafficking Statement 2016**

#### **Introduction**

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<sup>st</sup> July 2016.

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.

Cardiff Metropolitan University is committed to monitoring and developing its practices to combat all forms of slavery and human trafficking.

#### **Organisational structure**

Cardiff Metropolitan University is a higher education corporation with charitable status. The university has a commercial trading subsidiary company and an overseas operating subsidiary company. The University's annual turnover in the period covered by this report is in excess of £98,000,000.

The University operates two teaching campuses and one residential campus within the City of Cardiff. It has some 1200 staff and 11000 students based in Cardiff with the student population drawn from over 130 countries. The University has a network of academic partner organisations around the world where trans-national education is delivered.

#### **Our supply chains**

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

#### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our procurement function has had an 'Ethical Supply Chains' policy in place since 2011. This policy is regularly reviewed to ensure its currency and relevance.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships by ensuring that modern slavery and human trafficking do not occur within the UK and the international workforce. The latter are employed within the applicable laws of their location and in agreement with our appointed representatives.

Policies and processes in place to ensure that relevant staff are aware, trained and competent, include the following:

- a Recruitment and Selection Policy, including the various 'right to work checks', contracts of employment and regulations on the employment of young workers;
- payment of all salaries at or above the minimum wage;
- adherence to and monitoring of the Working Time Directive;
- flexible working agreements support minimum statutory time off - occupational entitlement generally surpasses the minimum statutory threshold;
- a Job Evaluation Scheme applicable to all posts within the organisation to ensure equality of pay;
- an Employment Policy Framework which identifies the expectations of employer/employee behaviours;
- a Whistleblowing Policy under which any slavery or human trafficking issues may be raised with Senior Management or the governing body;
- Agency Workers Guidance to ensure they enjoy comparable rights to those of substantive staff;
- an Overseas Travel Policy which provides guidance on continuation of employee rights whilst working abroad;
- a Data Protection Policy which provides for the appropriate retention and disposal of personal information of all staff.

In respect of our trans-national education partners, we conduct a thorough due diligence assessment prior to the commencement of any relationship and repeat this process periodically. However, we intend to review our due diligence process to ensure they address the proper treatment of individuals in our academic supply chains.

### **Due diligence processes for slavery and human trafficking**

The University recognises that effective policies and processes need to be clearly promoted, easily understood, accessible and consistent with good practice. The University recognises the importance of due diligence and monitoring of impact and effectiveness.

### **Supplier adherence to our values**

To ensure all those in our procurement supply chains comply with our values, we have amended our standard contract terms to reinforce the obligations and expectations; we are revising our commodity profiling processes to help us identify and categorise the risks in our direct and extended supply chains and we will be developing a supply chain compliance programme.

The University is engaged with a Welsh Government initiative, the "Code of Practice – Ethical Supply Chains", which is currently out for consultation. This code of practice focusses on procurement supply chains, and Welsh Government is seeking to encourage all Welsh public sector organisations to endorse the code. The University is waiting for the imminent publication of the code to assess its suitability and acceptability - we see little point in developing our own detail processes and policies when a potentially consistent approach may be in place across the entire Welsh public sector – with an obvious opportunity for the Welsh public sector to share information and effort.

## **Training**

The University is currently reviewing the requirement for staff training across all relevant functions and is evaluating options for ensuring that suitable training is conducted by organisations in our various supply chains.

**Barbara Wilding**  
**Chair of the Board of Governors**  
**30 January 2017**