

Carmarthenshire County Council's Action Plan for meeting the Commitments in the Welsh Government's Code of Practice – Ethical Employment in Supply Chains

Code of Practice Commitment	Action Required	Target date for Implementation	Carms Responsibility / Plan
<p>1. Produce a written policy on ethical employment within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation and we will review it annually and monitor its effectiveness. As part of this we will:</p> <p>1.1. Appoint an Anti-Slavery and Ethical Employment Champion.</p>	<p>1. Review relevant Policy and expand if necessary.</p> <p>Direct Employment - Include in Recruitment Policy a statement about ethical employment.</p> <p>Indirect Employment (Via suppliers) – Draft Ethical Employment Policy</p> <ul style="list-style-type: none"> • Include employment guidance on Internet • Ask Executive Board for commitment <p>1.1 Request Executive Board to nominate an Anti-Slavery and Ethical Employment Champion</p>	<p>2018</p> <p>Agreed in corporate safeguarding meeting (1st Feb) – that CCC will produce a separate Ethical Employment Policy.</p>	<p>Procurement & Policy/HR</p> <p>Champion – Suggested this is an Executive Board Member – to be considered by Executive Board.</p> <p>(Suggested by Welsh Govt often this is the Member with the remit for Anti-poverty).</p>
<p>2. Produce a written policy on whistle-blowing to empower staff to raise suspicions of unlawful and unethical employment practices, and which places a responsibility on staff to report criminal activity taking place within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation. We will review the policy</p>	<p>2. Review current Policy and expand if necessary to include employment & supply chain / procurement issues.</p>	<p>2018.</p> <p>On-going review.</p>	<p>HR</p> <p>Procurement - Review how we cascade this to our supply chain via tender documentation. Incorporate into Contract Management Process.</p>

<p>annually and monitor its effectiveness. We will also:</p> <p>2.1. Provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.</p>	<p>2.1 will review existing complaints procedure.</p>		
<p>3. Ensure that those involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.</p>	<p>Identify staff and source appropriate training</p>	<p>Await modules from Welsh Govt.</p> <p>Await advice on Modern Slavery Training sessions.</p>	<p>L&D:- e-learning modules</p> <ul style="list-style-type: none"> • Welsh Government producing e-learning module • Seek existing modules we could utilize (Sustainability School might be one source). • 'Train the trainer' Modern Slavery sessions scheduled for early April which would be useful for some CCC officers to attend (who to be determined). <p>Consideration needs to be given to staff without IT access.</p>
<p>4. Ensure that employment practices are considered as part of the procurement process. We will:</p> <p>4.1. Include a copy of our Policy on ethical employment (Commitment 1) in all procurement documentation.</p>	<p>4.1 to 4.4 will be met by continuing to ensure that all procurement activity £25,000 and above is undertaken via the Corporate Procurement Unit.</p>	<p>2018 – On-going</p>	<p>Procurement</p> <p>Look through Code guidance for question suggestions.</p> <p>Update guidance Procurement Guidance section of the Intranet for ALL Procurement activity (including</p>

<p>4.2. Include appropriate questions on ethical employment in tenders and assess the responses provided.</p> <p>4.3. Incorporate, where appropriate, elements of the Code as conditions of contract.</p> <p>4.4. Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</p>			<p>below £25k) – Consider updating clause in CPR's to cover this.</p>
<p>5. Ensure that the way in which we work with our suppliers does not contribute to the use of illegal or unethical employment practices within the supply chain. We will:</p> <p>5.1. Ensure that undue cost and time pressures are not applied to any of our suppliers if this is likely to result in unethical treatment of workers.</p> <p>5.2. Ensure that our suppliers are paid on time – within 30 days of receipt of a valid invoice.</p> <p>5.3. Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</p>	<p>5.1 This will be highlighted by the relevant Category Manager when working with the Service area concerned.</p> <p>5.2 This is already a Key Performance Indicator for the Council which is monitored annually.</p> <p>5.3 This will be addressed as and when required as part of the procurement process.</p>	<p>On-going review</p>	<p>Procurement</p> <ul style="list-style-type: none"> • Category Management • Contract Management

<p>6. Expect our suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain.</p>	<p>We will publicise this Code of Practice and ask all suppliers to the Council to sign up.</p>	<p>Once Council have signed up</p>	<p>Procurement New Suppliers – Consider including as a condition of contract – Revising T&C's currently.</p>
<p>7. Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:</p> <p>7.1. Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and / or services where there is a risk of modern slavery and / or illegal or unethical employment practices within the UK and overseas.</p> <p>7.2. Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.</p> <p>7.3. Work with our suppliers to rectify any issues of illegal or unethical employment practice.</p> <p>7.4. Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings / reviews.</p>	<p>7.1 We will undertake an annual review of all third party expenditure and identify those products and/or services at potentially high risk.</p> <p>7.2 As and when required.</p> <p>7.3 As and when required.</p> <p>7.4 We will incorporate this into our contract management processes and monitor all high risk suppliers.</p>	<p>On-going</p>	<p>Procurement</p> <ol style="list-style-type: none"> 1. Workshop session with the Category teams to determine where there might be potential issues in the supply chain. 2. Look at forward work plan to identify any potential issues. 3. Identify potential areas where issues could potentially come from
<p>8. Ensure that false self-employment is not undertaken and that umbrella schemes</p>		<p>On-going</p>	<p>Procurement (in conjunction with HR)</p>

<p>and zero hours contracts are not used unfairly or as a means to:</p> <p>8.1. Avoid, or facilitate avoidance of, the payment of tax, National Insurance contributions and the relevant minimum wages.</p> <p>8.2. Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.</p> <p>8.3. Avoid Health and Safety responsibilities.</p>	<p>Clear expectation from Welsh Govt for a commitment on this one.</p> <p>We will incorporate this into our contract management processes and monitor all high risk suppliers.</p>		<ul style="list-style-type: none"> • Look at content of specifications in tender exercises.
<p>9. Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of discrimination. We will:</p> <p>9.1. Not make use of blacklists / prohibited lists.</p> <p>9.2. Ensure that our suppliers do not make use of blacklists / prohibited lists.</p> <p>9.3. Not contract with any supplier that has made use of a blacklist / prohibited list and failed to take steps to put matters right.</p> <p>9.4. Ensure that Trade Union representatives can access members and contracted workers.</p>	<p>We will incorporate this into our contract management processes and monitor all high risk suppliers.</p>	<p>On-going</p>	<p>Procurement</p> <ul style="list-style-type: none"> • Understand what our obligations are regarding existing contracts.

<p>10. Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same. We will:</p> <p>10.1. Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.</p> <p>10.2. Consider becoming an accredited Living Wage Employer.</p> <p>10.3. Also encourage our suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.</p>	<p>Would need to be considered via the Pay Policy Approving Panel</p>	<p>On-going review</p>	<p>HR</p>
<p>11. Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains. We will:</p> <p>11.1. Ensure that the statement is signed off at senior management / board level.</p> <p>11.2. Publish the statement on our website. If this is not possible, we will provide a copy to anyone within 30 days of a request being made.</p>	<p>CMT /Executive Board</p>	<p>2018</p> <p>Option – to produce a statement of where we are upon sign up.</p>	<p>Procurement & HR</p> <p>Needs referring to CMT (for info), corporate governance group, then to executive board – Monitored by P&R scrutiny.</p> <p>Consider mechanism for reporting this via wider and existing reporting streams (well-being etc.).</p>

<p>12. Ensure all those undertaking work on an outsourced contract are treated fairly and equally. We will:</p> <p>12.1. Ensure that public sector staff who are transferred as part of a public service which is outsourced to a third party retain their terms and conditions of employment.</p> <p>12.2. Ensure that other staff working on an outsourced public service are employed on terms and conditions that are comparable to the transferred public sector staff.</p>	<p>This already underway in two tier HR report to Welsh Govt.</p>	<p>On-Going</p>	<p>HR</p> <p>Outsourcing services – Procurement liaise with HR</p> <p>Procurement and HR to review existing Tupe documents used in tender exercises with an aim of reviewing content.</p>
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