

Ethical Employment in Supply Chains Policy

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Carmarthenshire
County Council



Ensuring Equality of Opportunity

All employees are required to adopt a positive, open and fair approach and ensure this policy is adhered to and applied consistently to all irrespective of race, colour, nationality, ethnic or national origins, disability, religion and belief or non-belief, age, sex, gender reassignment, gender identity and gender expression, sexual orientation, pregnancy or maternity, marital or civil partnership status.

In addition, the Welsh Language Standards ask us to 'ensure that the Welsh language is treated no less favourably than the English language' and this principle should be adopted in the application of this policy and procedure.

If you have any equality and diversity concerns in relation to the application of this policy and procedure, please contact a member of the Procurement Team who will, if necessary, ensure the policy/procedure is reviewed accordingly.

If you require this publication in an alternative format please contact the Corporate Procurement Unit.

Overview

The aim of this policy is to set out clearly the context for ethical trade and employment practices for Carmarthenshire County Council within our own organisation and our supply chain. We are committed to ensuring a high standard of practice to eradicate acts of modern day slavery and human trafficking within our business and multi-tier supply chain. This Policy has been written by the Corporate Procurement Unit and will be embedded throughout the Council.

The Modern Slavery Act 2015 was introduced to criminalise slavery, forced servitude and human trafficking in the UK, we acknowledge our responsibility to the Act and expect our suppliers to observe best practice and continue to seek improvements throughout their supply chains.

We have signed up to the Welsh Government's **Code of Practice on Ethical Employment in Supply Chains** to show our continued commitment to the development of more ethical supply chains in delivering our contracts. In signing up to the Code the Council has agreed to comply with the 12 commitments designed to eliminate modern slavery and support ethical employment practices. These commitments are embedded into this policy.

Our Commitment & Approach

This policy will be communicated throughout Carmarthenshire County Council. The Corporate Procurement Unit will monitor and review this policy's effectiveness and the Council has appointed an Anti-Slavery and Ethical Employment Champion.

In line with the *Code of Practice* Commitments we pledge to comply with the following:

Employment practices

- The production of a whistle-blowing policy - Our existing whistle-blowing policy has been updated to reference the Welsh Government's Code of Practice on Ethical Employment in Supply Chains and encourages workers to 'blow the whistle' where it is reasonably believed malpractice has taken place or is likely to take place.
- Ensure employment practices are mainstreamed in the procurement process - We will require that a copy of this policy is included in all tenders.
- We will ensure that false self-employment is not undertaken and that umbrella schemes and zero hour contracts are not used **unless specifically requested by the employee** - We will mitigate any risk of unethical employment by assessing the eligibility of all self-employed claims against HMRC guidelines and ensure that umbrella schemes and agencies are registered with appropriate regulation bodies. In addition to this, the People Management team will review casual working arrangements on a regular basis, to ensure that workers are afforded the rights to be recognised with employee status, where appropriate.
- We will ensure that workers are free to join a trade union without discrimination - Our policies ensure that staff are able to join trade unions without discrimination.
- The Council pays our employees the Foundation Living Wage (non-statutory) as a minimum and we will encourage our suppliers to do the same.
- We will ensure that all those undertaking work on an outsourced contract are treated fairly and equally - In accordance with the "Transfer of Undertakings (Protection of Employment) Regulations 2006" employees' rights are protected when the organisation or service they work for transfers to a new employer. Outsourced contracts are also subject to the Welsh Government Code of Practice on Workforce Matters (Two Tier Code). The County Council will continue to observe these regulations.

Training

- The delivery of a training programme on modern slavery and ethical employment – Alongside our colleagues in Learning and development we will identify the training needs of staff, and provide appropriate, ongoing training in order to ensure an understanding of modern slavery and human rights abuses, including human trafficking. We will adopt the Welsh Government's eLearning module as part of this process.

Procurement Tendering & Contract Management

- Questions on ethical employment practices will be included in tenders as appropriate and incorporate appropriate contract conditions.
- Information on the Welsh Government's Code on Ethical Employment in Supply Chains will be provided in new tenders and suppliers will be encouraged to sign up to the Code when appropriate.
- Work with suppliers to ensure that working arrangements do not compromise ethical employment practices - We will work with our suppliers to ensure that they do not compromise ethical employment practices. We will ensure that suppliers are paid in good time.
- Assess expenditure to identify and address issues of modern slavery, human rights abuses and unethical practice - We will review supplier expenditure, and work with our departments to identify high risk suppliers. We will work with suppliers to rectify issues of illegal or unethical employment practice. We will monitor employment practices of high risk suppliers.
- We will ensure that, where appropriate, tender specifications contain clear, effective ethical procurement criteria, which encompass economic, social and environmental factors.

Process

We will also communicate the Welsh Government's *Code of Practice on Ethical Employment in Supply Chains* to our existing suppliers with the expectation they sign up to the Code as far as is reasonable and practical.

Measuring & Reporting

This policy will be monitored and measured, and progress on its implementation will be reported at the Policy and Resources Scrutiny Committee.

We will produce an annual written statement of our progress on ensuring that slavery and human trafficking are not taking place in the organisation and supply chain - The annual statement will be submitted to the Executive Board and CMT for Approval, It will be signed off by the Anti-Slavery and Ethical Employment Champion and published on the County Council's website.