

Commitment		Leading	Target date and comments	Status and Comments
1	Produce a written policy on ethical employment for our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation and review it annually and monitor its effectiveness.	PG/DE	<b>February 2018.</b> Policy will complement and in part incorporate the recently devised University Modern Slavery statement	Subject of discussion at HEPCW with a collective approach under consideration
1.1	Appoint an Anti-Slavery and Ethical Employment Champion	PG/DE	<b>January 2018</b>	The Director of Operations has been nominated
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 annually and monitor its effectiveness.	PG	<b>February 2018.</b> Small addition and amendments to The Public Interest Disclosure policy to make reference to ethical employment practices.	Complete
2.1	Provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.	PG	<b>February 2018</b> Addendum to University's Third Party Complaint Procedure	Complete
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.	DE	<b>April 2018.</b> Staff involved in the buying/procurement process to be identified and flagged on HR system.  Annual Development Review process used as a check on currency of employees training	Procurement resource being appointed to lead on this aspect
4 4.1	Ensure that employment practices are considered as part of the procurement process. We will: <ul style="list-style-type: none"><li>• Include a copy of our Policy on ethical employment (Commitment 1) in all procurement</li></ul>	DE	<b>March 2018.</b> A/C's payable to review all documentation to determine what classifies as "Procurement Documentation"	

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4.2 4.3 4.4	<p>documentation.</p> <ul style="list-style-type: none"> <li>• Include appropriate questions on ethical employment in tenders and assess the responses provided</li> <li>• Incorporate, where appropriate, elements of the Code as conditions of contract.</li> <li>• Ask bidders to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</li> </ul>	DE DE DE	<p>Standard documentation sets to be refreshed to incorporate appropriate questions (A/C's Payable)</p> <p><b>March 2018.</b> Create a standard operating practise in relation to the receipt of "abnormally low quote or tender" to introduce a supplementary question set</p>	Procurement resource being appointed to lead on this aspect
5 5.1 5.2	<p>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> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Ensure that our suppliers are paid on time – within 30 days of receipt of a valid invoice.</li> </ul>	DE DE DE	<p><b>February 2018.</b> Create an ethical mission statement to reiterate and emphasize the importance WGU places on ethical employment practises from our suppliers</p> <p>A/C's Payable team already processes in place that have define target payments for ensuring Suppliers Terms of Trade are met</p>	Procurement resource being appointed to lead on this aspect  Deemed complete
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.	DE	<b>March 2018.</b> Align procurement policies, processes and practice to ensure that when we write tender documents in the future we can provide a weighting that favours suppliers employing ethical employment practices	Procurement resource being appointed to lead on this aspect

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7	Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:	DE	WGU already identifies spend (in excess of £25k) made from outside of Procurement Consortia. Therefore, so long as Consortia spend is regulated WGU have a retrospective tool available to identify spend with non-compliant organisations	
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.	DE	<b>November 2017.</b> This will require a new protocol / practice being introduced to be carried out on an annual basis.	Procurement resource being appointed to lead on this aspect
7.2	Investigate any supplier identified as high risk by direct engagement with workers wherever possible.	DE	<b>December 2017.</b> Adopt and adapt the OXFAM supplier questionnaire. Issue questionnaire to all current suppliers within the 17/18 Financial year.	Procurement resource being appointed to lead on this aspect
7.3	Work with our suppliers to rectify any issues of illegal or unethical employment practice	PG	<b>April 2018.</b> Develop and introduce principles and processes that provide interface and channels of communication with suppliers, fostering an open and transparent approach, preventing and/or identifying and where appropriate, rectifying any illegal and/or unethical employment practices	Ongoing

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7.4	Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings/reviews.	PG	<b>April 2018</b> and ongoing. Work with the FD on prioritising appropriate monitoring and actions with regard to high risk suppliers	Ongoing
8  8.1  8.2  8.3	<p>Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:</p> <ul style="list-style-type: none"> <li>• Avoid, or facilitate avoidance of, the payment of tax and National Insurance contributions and the relevant minimum wages.</li> <li>• Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities</li> <li>• Avoid Health and Safety responsibilities.</li> </ul>	DE  DE  PG  PG	<p>The advent of IR35 requirements has meant that WGU assess all cases of claimed self-employment and put these through a series of standard tests</p> <p><b>June 2018.</b> Work with Finance colleagues to ensure any systems processes or schemes put in place do not disadvantage workers or groups of workers</p> <p><b>June 2018</b> and ongoing. Work with Health and Safety Colleagues to ensure that the University and any suppliers adhere to and do not avoid its Health and Safety responsibilities</p>	Deemed complete
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:	PG	The University's Recognition agreement with its recognised Trade unions provides parameters for trade union	

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9.1 9.2 9.3 9.4	<ul style="list-style-type: none"> <li>Not make use of blacklists/prohibited lists.</li> <li>Ensure that our suppliers do not make use of blacklists/prohibited lists.</li> <li>Not contract with any supplier that has made use of a blacklist/prohibited list and failed to take steps to put matters right.</li> <li>Expect our suppliers to ensure that Trade Union representatives can access members and contracted workers.</li> </ul>		<p>recognition, duties and activities for trade union representatives and members.</p> <p><b>By June 2018</b> the University will ensure it produces a set of standards for suppliers and contractors around trade union memberships and activities.</p>	Ongoing
10 10.1 10.2 10.3	<p>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> <ul style="list-style-type: none"> <li>Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.</li> <li>Consider becoming an accredited Living Wage Employer.</li> <li>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.</li> </ul>	PG PG PG DE/PG	<p><b>August 2018.</b> The University will implement the Living wage Foundation's Living wage as a minimum and become an accredited Living Wage Employer.</p> <p>Where appropriate, the University will encourage suppliers based both in the UK and overseas to pay a fair wage</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:	DE/PG	<b>September 2018</b> and annually thereafter.	

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11.1	<ul style="list-style-type: none"> <li>Ensure that the statement is signed off at senior management/board level.</li> </ul>	DE/PG	<b>November 2018</b> Audit Committee and Annually thereafter	
11.2	<ul style="list-style-type: none"> <li>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.</li> </ul>	DE/PG	<b>November 2018</b> and annually thereafter	