

## Appendix 2: Caerphilly CBC, Code of Practice Commitments 'Action Plan'

No	Code of Practice Commitments	Caerphilly CBC Action Plan	Owner(s)
1	<p>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>Appoint an Anti-Slavery and Ethical Employment Champion.</p>	<p>Head of Procurement to draft and implement a written policy on ethical employment within our own organisation and our supply chains. – <b>1<sup>st</sup> November 2017</b>. Arrange for the policy to be monitored as part of the Service improvement process – annually.</p> <p>Appoint Anti Slavery and Ethical Employment Champion in the form of the Cabinet Member for Corporate Services. – <b>1<sup>st</sup> November 2017</b>.</p>	<p>Corporate Director and S151/Head of Procurement and Customer Services</p>
2	<p>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 the organisation. We will review the policy annually and monitor its effectiveness. We will also:</p> <p>Provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.</p>	<p>Review and update current HR Policy on Whistle blowing to accommodate the ability for Staff to report Criminal activity. – <b>April 2018</b></p>	<p>Head of Legal Service and Head of HR</p>
3	<p>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>Modern Slavery and ethical employment practices highlighted as part of the PDR process for all staff involved with the buying and Procurement process and the recruitment and deployment of works. Training to be provided as part of relevant staff training plans. – <b>On going year on year as part of staff review programme</b> A copy of the Code of practice – ethical employment in supply chains to be available via the Authority's intranet and internet. – <b>1 November 2017</b></p>	<p>Director of Corporate Services and S151</p>
4	<p>Ensure that employment practices are considered as part of the procurement process. We will:</p> <p>Include a copy of our Policy on Ethical Employment (commitment 1) in all procurement documentation.</p>	<p>Update all Procurement documentation to include a copy of the code as standard documentation. – <b>1<sup>st</sup> November 2017</b></p> <p>Review terms and conditions of contract where necessary to reflect appropriate areas of the code. <b>On going as and when required</b></p>	<p><b>Head of procurement</b></p>

	<p>Include appropriate questions on ethical employment in tenders and assess the responses provided.</p> <p>Incorporate, where appropriate, the elements of the Code as conditions of contract.</p> <p>Ask bidders to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.</p>	<p>Up date procurement processes and procedures to accommodate review of abnormally low bids - <b>1<sup>st</sup> November 2017</b></p>	
5	<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> <p>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>Ensure that our suppliers are paid on time – within 30 days of receipt of valid invoice</p>	<p>Review our standard processes and procedures to ensure we do not apply undue cost and pressures to the supply chain – <b>1<sup>st</sup> December 2017.</b></p> <p>Ensure all contract stipulate 30 days payment terms on receipt of a valid invoice. To ensure were possible on all new contracts, all sub-contractors have equal payment terms. <b>1 December 2017</b></p>	<p><b>Head of Procurement</b></p>
6	<p>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>Ensure that all ITT from 1<sup>st</sup> November 2017 have the necessary request for all contractors to commit to the Code of Practice, from 1<sup>st</sup> April 2018.</p>	<p><b>Head of Procurement</b></p>
7	<p>Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:</p> <p>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>Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.</p> <p>Work with our suppliers to rectify any issues of illegal or unethical employment practice.</p> <p>Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings/reviews.</p>	<p>Review our expenditure analysis and risk assessment tools to develop new working practices. <b>March 2018</b></p> <p>Review and develop process <b>March 2019</b></p> <p>Review and develop process <b>March 2019</b></p> <p>Review and develop process <b>March 2019</b></p>	<p><b>Head of Procurement</b></p> <p><b>Head of Procurement</b></p>
8	<p>Ensure that false self-employment is not undertaken and that umbrella</p>	<p>Details to be reviewed as part of Terms and Conditions</p>	<p><b>Head of</b></p>

	<p>schemes and zero hours contracts are not used unfairly or as a means to:</p> <p>Avoid, or facilitate avoidance of, the payment of tax and National Insurance contributions and the relevant minimum wages.</p> <p>Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.</p> <p>Avoid Health and Safety responsibilities.</p>	<p>of Contract.</p> <p>Review in consultation with advice and guidance from HR.</p> <p>These elements of the code will be reflected in all new procurement documentation from March 2018.</p>	<p><b>Procurement</b></p>
9	<p>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>Not make use of blacklists/prohibited lists.</p> <p>Ensure that our suppliers do not make use of blacklists/prohibited lists.</p> <p>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>Expect our supplier to ensure that Trade Union representatives can access members and contracted workers.</p>	<p>This element of the code will be reflected in all procurement documentation from March 2018.</p>	<p><b>Head of Procurement</b></p>
10	<p>Consider paying at least the Living Wage Foundations Living Wage as a minimum and encourage our suppliers to do the same. We will:</p> <p>Consider paying at least the Living Wage Foundations Living Wage to all our staff in the UK.</p> <p>Consider becoming an accredited Living Wage Employer.</p> <p>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>Where appropriate the Authority will consider and encourage through all procurement documents from March 2018.</p>	<p><b>Head of Procurement</b></p>
11	<p>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>Ensure that the statement is signed off at senior management/board level.</p>	<p>Provide an annual statement at the end of each financial year start April 2018 and report to CMT.</p>	<p><b>Head of Procurement</b></p>

	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.	A Copy of the report will be available internally and externally via the Council website.	
12	<p><b>For Public Sector to whom the Code of Practice on Workforce Matters (2014) applies:</b></p> <p>Ensure all those undertaking work on an outsourced contract are treated fairly and equally. We will:</p> <p>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>	This element of the code will be considered as part of all outsourcing contract arrangements in consultation with HR	<b>Head of Procurement</b>