

Procedure UOPG09

University Sustainable Procurement & Ethical Investment Policy

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Introduction

Sustainable procurement is the value for money sourcing of products and services taking into account *environmental, social and ethical aspects* over the whole product or service lifecycle.

Environmentally responsible or sustainable procurement is the selection of goods and services that minimize the environmental impacts. The University is committed to carry out an assessment of the environmental impacts of its Procurement functions relating to goods and services at all the stages of its lifecycle.

Our Environmental considerations will include but not limited to:

- a). Our reduction of greenhouse gas emissions and air pollutants (created through the whole life cycle);
- b). The consumption of energy with improved energy and water efficiency;
- c). The production and reduction of waste and support for reuse and recycling;
- d). Use of renewable resources;
- e). Reduced hazardous waste; and reduced toxic and hazardous substances.

In addition to environmental concerns, sustainable procurement also incorporates Social & Ethical considerations.

The University identifies sustainable procurement as a process whereby organizations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organization, but also to society and the economy, whilst minimizing damage to the environment.

The University is committed to ensuring that we meet our social and ethical obligations by way of vetting our supply chain for their compliance and contribution to the following:

- a). Gender and ethnic equity
- b). Poverty eradication;
- c). Respect for core labour standards.

UAL see this as critical and proficient business practice, which is integral to the way we work. It helps us to make properly informed and balanced decisions when procuring goods and services needed for our requirements.

This Sustainability Policy applies to all of UAL's activities, goods and services. All staff employed by the University will adhere to the principles of this policy and supporting guidance to assist the University in meeting its sustainability objectives.

The University will only trade with responsible suppliers and subcontractors who understand the nature of the goods and services being procured, and who recognise our mutual responsibility to protect the environment and foster good relations with our employees and local communities.

The primary aim of the University is to initiate and uphold an economically

sound and sustainable practise, that is reflective of our obligation and commitment to ensuring best practise in the public sector .

Sustainable Procurement is one of the University's core values, and absolutely integral to our overall vision to transform tomorrow. We are conscious that we operate in a sector that can have a significant impact on the environment, which means we have an even greater responsibility to make sure we use resources wisely, manage our waste and emissions effectively and educate our staff and students to uphold our philosophy. Complying with environmental regulations is just the start: in our performance we aspire to excellence.

The challenge is that we have to do this in the context of an ongoing, and indeed growing, demand for the HE / FE Sector to be more sustainable and environmentally friendly.

The Arts and Design Industries are one of the building blocks of the world economy, and is helping to fuel much-needed growth and development in established and emerging markets.

The following are some key foundations for our commitment to monitor our performance:

Educate purchasers and tendered suppliers on the Universities Sustainable Procurement Policy, (providing training where applicable).

Encourage a 'whole life costing' approach to purchase, usage and disposal of goods and services

- Our commitment to do business with a high degree of integrity and ethics.
- Our compliance to the legal requirements governing our Procurement practises.
- Adherence to the United Nations Universal Declaration of Human Rights and recognise our responsibility to observe those rights that apply to our performance towards our employees and the communities in which we operate. This commitment includes activities that relates directly or indirectly to the rights and entitlements of Indigenous Peoples.
- Our obligation to be fair and transparent in all our procurement activities and accountability to those who are affected by our operations.
- We respond to inquiries from external parties and communicate with affected parties in a timely and effective manner.
- Ensure that all tendered suppliers are assessed against their environmental and ethical credentials via a supplier process We endeavour to ensure that in our projects, our suppliers, subcontractors, agents, joint ventures and other partners abide by our core principles.

In order to achieve our sustainability objectives, the University, its suppliers and subcontractors will adopt, and further develop, practices that are environmentally sound, socially responsible and ethical, based upon the following key policy principles:

Key Policy Principles

- Measure sustainable procurement process, practice and performance against University and government targets.
- Consider alternative procurement solutions, which deliver sustainable benefits, through the development of business cases. outcomes.
- Procure to support the delivery of effective and efficient educational services, underpinning improvement in HE / FE Sector and the reduction of inequalities.
- Procure from legal sources.
- Minimise pollution and adverse impacts on the environment resulting directly or indirectly from procurement decisions.
- Minimise adverse impacts on individuals, communities, cultures resulting directly or indirectly from procurement decisions.
- Drive efficiency throughout the supply chain and reduce the impact of consumption by seeking to utilise sustainable resources.
- Utilise principles of evidence-based procurement to inform procurement decisions.
- Promote transparency of sustainable procurement practice and decision making.
- Limiting the scope for unethical conduct (e.g. bribery, corruption, deception, intimidation, fraud).
- Promote the adoption of minimum labour standards and worker rights throughout our supply chains in line with principles set out in ILO conventions on human and employee rights.
- Ensure opportunity is not removed or restricted from any sector of society as a result of our processes and practices.
- Promote equitable working relationships throughout the supply chain incorporate minimum government standards and quick wins (as per OGC guidelines) into all relevant contracts.
- Provide support for the development of awareness, understanding and competency in relation to sustainable procurement across the University.

Supply Chain Health & Safety

The University aspires to achieve a positive health and safety culture throughout its business operations. This requires commitment and active co-operation by our staff, students, and suppliers, supported by sufficient resources, training and guidance.

Suppliers and subcontractors are required to work actively to prevent work place accidents and to create a healthy and safe work environment. In particular, the University must be informed of any potential risks related to the goods or services supplied.

The health and safety performance of suppliers and subcontractors will represent a key criterion used in the selection process. Wherever subcontractors seek to work for the University, their health and safety policy and performance should equal or better the standards achieved within the University.

The University believes commitment to health and safety is essential in the proper execution of any contracts and the management of our supply chain. It will therefore ensure all our suppliers and sub-contractors adhere to the necessary competencies and skills to achieve this. Health and safety will be an integral part of planning and implementation at all levels.

The University recognises the importance of effective communication and consultation with staff and the role of Trade Union-appointed staff safety representatives of health and safety in achieving this.

The University is committed to providing a safe and healthy working environment:

- materials, equipment and machinery that are safe and do not present unacceptable risks to health:
- information, instruction, training and supervision as necessary to ensure all staff and students can work safely
- the development of safe systems of work, reflecting best practice, so that staff and students will expect good health and safety practices as a matter of course.

The University Health and Safety Manual supplement this policy and is based on current best practice and standards to ensure compliance with the law. The standards set by the H&S Manual should be complied with by all our suppliers and sub-contractors at all times unless it can be demonstrated that to do so is not practicable or the practice described has been superseded. If this is the case the University Health and Safety Advisor must be notified immediately.

Suppliers and subcontractors must have in place effective Health and Safety management systems, appropriate for the nature and scale of their business and services provided, that ensure compliance with health and safety law generally, as well as standards and codes specific to their industry.

Suppliers and subcontractors shall ensure that any health and safety risks are mitigated by using appropriate risk management strategies and establishing a suitable assurance regime. Where appropriate this may be achieved by working under the direction of the University's Management Team.

Legislation compliance

Suppliers and subcontractors must ensure that all work is undertaken in accordance with relevant health and safety legislation and that suitable monitoring, audit and review systems exist to demonstrate compliance. Thus ensuring so far as is reasonably practicable the health, safety and welfare of their own employees, their sub-contractors and anyone who may be affected by their work activities.

For all contracts, compliance with the Health and Safety at Work Act and the Management of Health and Safety at Work Regulations is required.

Depending on the nature of the work being carried out, there will almost certainly be the need to comply with additional health and safety legislation, for example the Construction (Design and Management) Regulations. It is for the supplier or subcontractor to identify and demonstrate compliance with all relevant legislation both at the tendering stage and throughout the lifetime of the contract. (www.hse.gov.uk)

Co-operation and Co-ordination Requirements

The University considers that the need to co-operate and co-ordinate health and safety issues are central to successful health and safety management, therefore:

- Suppliers and subcontractors must provide the University with all relevant safety documents relating to the work that they are tendering for. This provision extends to Method Statements and Risk Assessments.
- When requested by the University, suppliers and subcontractors must attend Pre-Start Site Meetings at which health & safety and welfare matters pertinent to the work shall be discussed, agreed and formally recorded, ahead of being implemented on site.
- Suppliers and subcontractors must co-operate with and co-ordinate health and safety issues and share best practice with the University and others on our projects.

Ethical Sourcing

The University will proactively work to ensure that all Goods, Works and Services it procures are sourced ethically. The University will seek to procure products that have been certified as ethically sourced, such as those certified by a member of Fairtrade Labelling Organizations International (FLO) or the Rainforest Alliance, or other equivalent standards, where they represent value for money and do not compromise other sustainability objectives.

Within its obligations as a Best Value Organisation, and in compliance with EU and UK legislation, The University will conduct its procurement process in line with the Ethical Trading Initiative (ETI) Base Code.

The University's suppliers & sub-contractors will need to make their employees aware of our commitment to 'Ethical Sourcing' and ensure that their employees are subject to the conditions contained within the policy when engaging in University's contracts.

The Policy is designed to:

1. Establish a common understanding of Ethical Sourcing within the University as a term referring to the responsibility the University accepts for the labour and human rights practices within its supply chain.
2. Introduce the Ethical Trading Initiative (ETI) Base Code as a means of describing the operational standards Suppliers will be required to meet. The University will be using these provisions as a basis for contract conditions in upcoming tenders where ethical sourcing is a relevant consideration. The ETI Base Code can be found in Appendix 1
3. Illustrate the importance of mapping supply chains and engaging with Suppliers on the subject of ethical sourcing.
4. Use the Public Sector Procurement consortiums and/or Sedex ([The Suppliers Ethical Data Exchange](#)) as a means by which the University aims to engage with Suppliers on the subject of ethical sourcing, map relevant supply chains, and monitor and report on labour conditions in those supply chains.
5. Encourage and assist the University's Procurement team to examine their spend categories and upcoming contracts for products and/or services suitable for the application of ethical sourcing requirements.

The ETI Base Code

The University will base its Ethical Sourcing Policy on the ETI Base Code. The ETI Base Code is based on the internationally recognised standards of the International Labour Organisation (ILO), the UN agency responsible for labour standards, which the UK has signed up to.

Guiding Principles

The University's Ethical Sourcing Policy will be guided by the following mandatory principles:

1. Identify suitable applications of ethical sourcing considerations

Identify product categories and specific products and/or services where ethical sourcing considerations are relevant. Identify suitable contracts as they come up for letting or renewal.

2. Improve labour conditions in the supply chain

Promote and improve the implementation of codes of practice which cover working conditions within the supply chain.

3. Monitor & Reporting

Ensure that, where contracts are to contain ethical sourcing provisions, University Suppliers register with Sedex (or an equivalent) and, at the University's request, conduct audits of their factories and sites, using a reputable auditor, and that the results are made available to the University.

The University will:

- Aim to develop appropriate reporting and monitoring capability for relevant contracts.

- Align its internal systems to generate required reports, or use external systems, such as Sedex.
- Report on products purchased directly by the University and products purchased on behalf of University by designated Suppliers, and their sub-contractors as far as practicable.

4. Engage with Suppliers

The University will:

- Initiate any remedial action required in a collaborative and non-punitive manner.
- Enter into discussion on ethical sourcing practices with new Suppliers where relevant.
- Promote 'best value' for purchasing goods and services, encouraging contracted suppliers to provide more sustainable products/services where available
- Keep in regular contact with Suppliers to monitor any specific remedial action undertaken in accordance with the contract conditions, and maintain awareness of all products and/or services provided from high-risk countries. Use Sedex to do this where possible.

5. Deliver Benefits within Law and Best Value

Undertake all Procurement Activity in accordance with the applicable law, including European Union (EU) law, and the University's obligations as a Best Value Authority.

As a Best Value Authority, the University must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

For each contract, where the Ethical Sourcing Policy is a relevant consideration, the University (as a Best Value authority) must also be able to demonstrate that it is achieving Best Value in line with its statutory obligations.

The University will:

- Work within the parameters of EU Law, the University's Sustainability Strategies and Corporate Governance, to incorporate the requirements of The Ethical Sourcing Policy into Procurement Activities and continually measure and develop the University's Procurement performance.
- Harness best practice on Ethical Sourcing to maintain a continuous improvement philosophy. This will ensure processes and procedures are optimised according to the University's needs throughout the procurement process.
- Ensure contract award procedures are non discriminatory in line with EU law and UK law.

6. Identify suitable applications of ethical sourcing considerations

The University will:

- Use a risk-based approach, based on country, public exposure (reputational risk) and proportionality to identify relevant products and specific contracts suitable for ethical sourcing considerations.
- Map its supply chains to identify the countries in which products originate and services are carried out. Where possible, the supply chain will be mapped, and ethical sourcing considerations applied, down to the raw material sourcing stage.

7. Improve labour conditions in the supply chain

The University will:

- Work with Suppliers to place contract conditions, based on the ETI Base Code, into relevant new contracts.
- Work with the existing Suppliers as part of contract review meetings to investigate and make any necessary changes, where possible and appropriate, in existing contracts that are deemed to be high-risk. In particular, existing Suppliers should be encouraged to join Sedex (or an equivalent) on the basis of relevant supply chains.

8. Monitor Working Conditions

The University will:

- Monitor labour conditions via Sedex membership and audit reports.
- Make and maintain contact with local, regional and global NGOs (non-governmental organisations) and trade union organisations. Use these contacts to both monitor working conditions and to ensure that any remedial action undertaken is effective and sustainable.
- Review general information about working conditions, labour issues and employment law in countries from which the University sources goods or services.

9. Animal Welfare and Testing

The University will:

- Monitor products which are likely to have been tested on animals and mandate that suppliers and subcontractors should seek advice from the University before supplying them.
- Suppliers and subcontractors should also ensure high standards of animal welfare both for animals that are raised for meat and dairy products, and for animals used for work and transport.

10. Timber and timber products

In line with our commitment to minimise the environmental and social impacts of our activities, the University and its trade contractors will:

- Only procure timber from verified legal sources.
- All timber products should be certified under Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC) Schemes. Both schemes are approved for the purposes of both 'Legal Timber' and 'Sustainable Timber'. Therefore, unless there is a justifiable circumstance, or if otherwise agreed with the University, only timber and timber products that have received FSC / PEFC certification are permitted to be supplied.

11. Publications and other printed materials

The University will:

- Minimise the use of printed publications and other printed materials as much as possible and as such, favours the use of electronic publications. However, where this is not possible the supplier or subcontractor shall ensure that any organisation engaged to undertake printing in relation to the University's work, is certified to ISO 14001, registered with EMAS, or taking steps towards managing their environmental impact through other initiatives such as BS 8555.
- Organisations engaged in printing work for the University, shall have a waterless offset design and print process available, use vegetable based surfactants and fruit acids and offer an environmentally friendly option for coatings/lamination (e.g. water-based coatings, biodegradable lamination, etc).
- Wherever possible, only recycled paper should be used with a minimum of 75 per cent postconsumer waste for coated paper and 100 per cent post consumer waste for uncoated paper.
- All paper should be chlorine free. For any non-recycled portion of paper, or where only virgin fibre pulp is used, the bleaching process should be elemental chlorine free (or preferably totally chlorine free) and produced from FSC-certified timber or other sustainable forest sources.

Equality, Diversity & Inclusion in our Supply Chain

The University firmly believes that a diverse and fully engaged workforce can create real bottom line productivity benefits. There is no doubt that issues of diversity, equality and inclusion are moving from a 'nice to have' to a 'must do' for all medium and large organisations in the UK. Organisations which are mainstreaming their diversity activities are starting to fully reap the benefits from their diverse customer markets.

Diversity and Inclusion is about providing equal opportunities to all and valuing the diversity of the communities we serve. One of the main ways we

do this is by making sure our employees and suppliers alike, have a good understanding of Diversity and Inclusion.

We also want to promote an understanding of Diversity and Inclusion issues in the communities we serve.

The University aims to achieve its objectives through working in collaboration with its Diversity and Inclusion Group and Suppliers. The University is conscious that diversity and inclusion are at the heart of everything we do and underpin our vision and values.

The University is fully committed to promoting and influencing diversity and inclusion through its procurement process. The procurement process has been designed to be inclusive of all relevant equality legislation.

Incorporating compliance to 'Equality' conditions in our contracts document demonstrates our commitment to ensuring the goods and services we procure are subject to the legislative requirements and our suppliers and sub-contractors are in adherence to these obligations.

Our procurement process demonstrates our commitment to equality and inclusion to all of our suppliers and contractors. We demonstrate this in the questions we ask, in the advice we provide and by making sure that contractual arrangements actively promote equality, diversity and inclusion.

In order to move into line with the Government's Single Equality Bill, we have adopted a Diversity and Inclusion Strategy that incorporates the following:

- age;
- disability;
- gender;
- religion or belief;
- race; and
- sexual orientation.

The University's values are to be creative, inclusive and work with integrity. Working to these standards will help us and our suppliers deliver excellence and become an employer of choice.

This allows us to consider discrimination, disadvantage and unfairness in the broadest sense and, in doing so, helps us maintain an ethical supply chain and our suppliers in delivering more effectively.

The University has identified the following aims for delivering truly inclusive and accessible procurement services, processes and procedures and for working towards a supply chain that reflects the communities we serve:

- Understanding and responding to the needs of our diverse customer base.
- Adopting good governance on diversity and inclusion to support us as a well-managed business unit.

- Simplifying governance to ensure roles and responsibilities on diversity and inclusion within procurement are clearly understood by all.
- Influencing the embedding of diversity and inclusion best practice into all policies, processes and procedure to ensure we maximise the potential of all our suppliers.
- Learning from best practice and delivering inclusive services.

The University is also committed to carrying out periodic equality impact assessments in order to remove inequalities in the application of policies or implementation of processes and procedures to ensure a diverse supply chain.

The University will:

- Establish a greater understanding of the diversity of our supply chain and to increasing supplier diversity in our supply chain where possible.
- Promote and ensure good labour standards, equality, diversity and inclusion in our supply chain across SME's, BAME's, suppliers from other under-represented or protected groups and suppliers demonstrating a diverse workforce composition.
- Set out the standards that we would like our supply chain to achieve and promote within their own supply chain.
- Use our supply chain as a potential means of improving the living and working standards of people in the communities we work within.

The University will work with its supply chain to develop appropriate systems that will improve:

Awareness - to be aware of diverse suppliers and subcontractors that are available to undertake work required within our contracts and have in place strategies that will ensure that barriers preventing supplier opportunities are removed.

Monitoring - To specify and implement how suppliers and subcontractors at all levels will provide diversity data, how baseline evaluation will be undertaken and how individual members of the complete workforce will be monitored.

Involvement - Be able to demonstrate clearly a commitment to processes that will ensure that diverse supply chain involvement is optimised in our contracts. Have procedures for monitoring programmes and cater for women, black, Asian and minority ethnic, disabled and other diverse groups.

Opportunities - To ensure that diverse suppliers and subcontractors are aware of potential opportunities to supply services, receive assistance in understanding the bidding process, are offered support when deemed appropriate and to actively seek out potential tenderers from these categories where appropriate.

Communities – To ensure local suppliers and subcontractors are used where appropriate. Understand the impact our procurement activities have on local communities and

encourage a positive contribution from our suppliers and subcontractors to the local communities in which they work on our behalf.

Environmental & Green Sourcing

Environmental responsibility is a business imperative in today’s world, and interest is at an all time high from the University’s Management Team to develop methods to improve profitability while building the University’s green credentials. Sustainable sourcing, in particular, is becoming one of the primary focal points to support these efforts.

Environmental responsibility is no longer just a regulatory burden. It has become a business imperative to the University.

Soaring energy and commodities costs are pushing the University to pursue options to reduce costs. A host of products and solutions are now at our disposal to save energy, water and waste—and many more are on the way.


The University is conscious of its environmental and sustainable obligations to minimise its impact on the amount of carbon it produces, through the consumption of natural resources; and constantly review the way it operates in order to protect the environment and respect human health and safety.

As a consequence, the University relates to its supply chains to deliver the breakthrough results needed to meet these expectations. In fact, our supply chains in general and “green” sourcing in particular are quickly becoming the primary focal points for improving our procurement commitment to the University’s sustainable credentials.

For the University, Sustainable sourcing is not just about finding new environmentally friendly technologies or increasing the use of recyclable materials. It can also help drive cost reductions in a variety of ways including product content substitution, waste reduction, and lower usage.

The University has adopted a systematic approach towards a green sourcing process in its tendering / procurement activity:

Six Step Sourcing Methodology	Traditional Focus Areas		Green Focus Areas	Elements to consider Sustainable Sourcing
Step 1 Assess Opportunity	Spend Analysis focuses primarily on materials and logistics cost		Spend Analysis encompasses direct and indirect environmental costs	Environmental Regulations

Step 2 Assess Internal Supply Chain	Specification focused, map current process, identify process opportunities		Spec Review considers industry's most environmentally sound products and services	Direct Energy Cost Reduction (Energy Efficiency of Source able Items)
Step 3 Assess Supply Market	Identify potential sources of supply, perform supplier assessments/comparisons		Supply base includes vendors who specialize in more efficient, sustainable products	Indirect Energy Cost Reduction (Reduce Packaging to Reduce Transportation Costs)
Step 4 Develop Sourcing Strategy	Confirm scope, determine desired outcomes. brainstorm process enhancement		Sustainability considerations are specified in the RFP document	Substitutes of Commodity Items with Sustainable Equivalents
Step 5 Implement Strategy	Develop/implement supplier solicitation strategy, conduct supplier negotiation, award contract		Bid analysis quantifies cost/benefits of sustainability attributes	Reduced Water Consumption
Step 6 Institutionalize Strategy	Transition to new process, develop supplier relationships, implement operation changes, monitor/report performance		Sustainability attributes closely tracked and audited	Sourcing Materials with Higher Recycled Content

In addition to the above strategy, suppliers and subcontractors shall make every effort to limit the environmental impact of their business operations and shall have appropriate programmes in place to help achieve this objective.

Low carbon

The University is committed to a low carbon operation and requires its suppliers and subcontractors to support it in achieving this goal. We are keen to manage and reduce our overall carbon footprint and to fall in compliance with the Government initiative in meeting our Carbon Reduction Commitment from April 2010.

To achieve this, we are currently assessing ways in which to measure the carbon emissions associated with products or services supplied. We may give consideration to carbon emissions associated with production, storage, transportation, use and ultimate disposal or recycling.

The University may produce guidelines on carbon emissions of products and services to help suppliers and subcontractors measure their own carbon emissions on specific projects.

Energy

The University, its suppliers and subcontractors shall seek to fully exploit opportunities for resource and energy optimisation and efficiency. The supply chain is encouraged to use clean and low energy sources wherever reasonably practicable.

For example, supplying products rated in accordance with EU Energy Label Class A + and ++, Energy Saving Recommended (ESR) endorsed, or those compliant with other recognised equivalent standards, such as PC monitors that meet current 'Energy Star' requirements.

Transport

The University encourages suppliers and subcontractors to use low or zero emission transport modes including consideration to the use of rail or barge where appropriate. In addition, suppliers and subcontractors shall aim to optimise transport efficiency and minimise transport distances through effective planning and driver training. We may require our supply chain to provide evidence of actions taken to reduce transport impacts on our projects.

Waste Reduction

Suppliers and subcontractors shall support the University in its commitment to delivering zero waste projects where no waste is sent directly to landfill. Where practicable, all products will be able to be reused, recycled or recovered. Suppliers and subcontractors shall where required contribute to the development and compliance with any Site Waste Management Plan (SWMP).

Packaging

Use of primary, secondary and tertiary packaging should be minimised and made from materials that can be reused, recycled, or recovered by commonly available methods in the UK. For example, the use of polystyrene should be avoided as it cannot be easily recycled or reused. Suppliers or subcontractors shall provide the University, upon request, with all necessary information about any primary, secondary and tertiary packaging supplied with products or used.

Suppliers or subcontractors shall at their expense, where required by the University, take back any excess or non-compliant packaging relating to the products and services provided for subsequent reuse or recycling.

Further guidance on packaging can be found in Producer Responsibility Obligations (Packaging Waste) Regulations and the Packaging (Essential Requirements) Regulations.

Waste transfer

For the transfer of Inert and Non hazardous waste the following is required:

- Details of the Waste Carrier including the Carriers carrier licence
- Details of the end destination (Recycling centre, Landfill, Exemption site). This should include a copy of the waste management licence / environment permit or evidence of an exemption from these regulations.

- A waste transfer note should be completed for all waste movement and this should include details of the type of waste (include EWC code), location of waste arising and how the waste is contained.
- Producer and Carrier details and details of end destination.

Additionally for hazardous waste:

- Establish exact nature of hazardous waste, undertake any analysis required by the Waste Carrier, including WAC testing and determine any restrictions on mixing hazardous wastes.
- Register the site/premises with the Environment Agency as a location producing hazardous waste.
- Check the validity of the proposed Carrier's registration and the validity of the proposed disposal facilities' licences.
- Complete a consignment note for each load of Hazardous waste

Waste electrical and electronic equipment

Regardless of turnover or market share, any business that manufactures, rebrands and sells, or imports electrical or electronic equipment, referred to as a 'Producer', has obligations under the Waste Electrical and Electronic Equipment Regulations. Where electrical or electronic equipment or components are supplied, the supplier shall determine the extent to which the Regulations apply and comply at their expense.

In addition, where required they shall take back such items when they are no longer required by the University for subsequent reuse, recycling, recovery or remanufacture (where feasible). Items of electrical or electronic equipment will also need to comply with the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations.

Best Value

University Procurement

The University is committed to ensuring that all procurement should seek to accommodate our core commitments:

1. Excellent service delivery
2. Value the contribution of employees, the public and partners
3. Act in a fair, open, honest way with integrity, impartiality and following ethical standards and ensuring sustainability),
4. Be administered to ensure adherence to relevant UK and EU legislation, and ultimately provide best value for money.

The University's Procurement department provides value-added, customer focused services and support through the development of contemporary purchasing programs and focused contract negotiations.

These activities enable the University to obtain the maximum possible benefit from the money it spends on the goods and services it requires and facilitate the following:

- Delivery of its research and education services,
- Constantly seeking value for money, reliability, responsiveness and innovation.

The Procurement department will listen, teach, share, and develop skills and confidence of the key stakeholders within the University.

The aim of the department is to enhance economies of scale purchases within the University and externally with other organizations, supplier partnerships, and the collective expertise of all staff involved in purchasing throughout the University.

Procurement Services is seen as a centre of excellence in matters of purchasing and supply; which is intended to provide leadership and direction to ensure optimal procurement at the local level.

To achieve this, the University's Procurement activities are managed in accordance with the following principles:

1. Management and Control of Contracts

Internal arrangements shall ensure that all contracts are adequately managed and monitored with a view to achieving completion of service delivery on time, within budget, and in accordance with the specification.

1.1 All major procurements should be adequately planned and due

consideration given to the resources required to achieve completion within the desired timescale. The plan should indicate the timetable for key stages (e.g. budgetary approval), the resources that are required (e.g. staff time, consultants and funds), and the proposed management and monitoring arrangements. A lead Procurement Officer ("PO") should be allocated to any major projects.

1.2 The lead PO should ensure that effective lines of communication are established at the outset, and are maintained throughout the contract process, to ensure an adequate and regular dialogue between the client representative, stakeholders, and the service provider. This should include regular progress meetings with Contractors at which method statements, health and safety and the time, cost, and quality of work are constant agenda items.

1.3 The PO is also responsible to ensure that the contract is adequately managed and monitored by the designated staged holder / user department and that service delivery adheres to all relevant current legislation and health and safety requirements. This will include monitoring of programme, costs and service delivery against specification, and shall be proportionate to the cost and risks involved.

2. Assessing and Minimising Risk

The risk associated with all procurement shall be assessed and minimised accordingly.

- 2.1 When planning a procurement, consideration should be given to what can go wrong, how likely this is, and the likely consequences assessed accordingly.
- 2.2 Procedures established for letting and managing major contracts should be appropriate to the risks that have been identified. In particular, procedures should not be over-bureaucratic and should satisfy the three Es – economy, efficiency and effectiveness.
- 2.3 All identified risks should be managed and allocated to parties so as to minimise the potential consequences. As a general rule, risks should sit with those most able to manage them.

3. Qualified and Experienced Staff Resources

Staff engaged in procurement and contract management shall be suitably qualified and trained for the purposes.

- 3.1 When designated POs are managing major tendering exercises, as a pre-requisite, they should have the capability, qualification, experience and/or knowledge, or have access to suitably trained and informed staff, to be able to arrange the procurement in a satisfactory manner.

4. Diversity, Social, Economic and Environmental Wellbeing

All major procurement shall recognise the impact on the diverse social, economic and environmental wellbeing within the University and the community it serves.

- 4.1 Wherever possible, consideration shall be given to carrying out procurements in such a way as to maximise the benefit to the local economy and diversity of the area.
- 4.2 Procurement shall be arranged in such a way that it encourages a range of providers. These should be capable of meeting the current and future needs of the University while still providing value for money.

5. Environmental Obligations

All major procurement shall have due regard to the issue of sustainability and early decisions shall be taken to ensure that projects are packaged so as to encourage delivery in the most efficient manner and achieve what end users want and can afford.

- 5.1 The environmental policies of the University should be considered and, where applicable, adequately addressed when writing specifications, evaluating tenders and throughout the delivery of the contract.

- 5.2 Specifications of service/work requirements should focus on service delivery and, wherever possible, clearly define the goals or outcomes required. When planning procurement, due consideration should be given to accommodating innovation and flexibility within the subsequent contractual arrangements.
- 5.3 Where a mixture of quality/price is used in evaluation, robust quality/price tender evaluation models should be prepared that sufficiently reflect the level of quality that can be afforded. When preparing quality/price evaluation models, consideration should be given to the costs that are expected to be incurred throughout the entire life of the project (i.e. whole-life costing).
- 5.4 Wherever appropriate, consideration should be given to establishing longer-term arrangements, such as using framework agreements or entering into partnerships with other organisations. These organisations should be given an early opportunity to submit their proposals for adding value to the project by using the initiatives and resources at their disposal for new methods of service delivery.

6. High Professional Standards and Best Practice

All procurement procedures shall be operated in a professional manner and ensure the highest standards of transparency, probity and accountability.

- 6.1 A PO should be appointed for each project or program at the outset with the responsibility for ensuring the professionalism and integrity of all procurement procedures.
- 6.2 All procedures shall be operated in accordance with the University's Financial Standing Orders, codes of practice, best practice and standards set by relevant professional organisations.
- 6.3 Electronic procurement arrangements should be used where appropriate.
- 6.4 Wherever possible, model or standard terms and conditions of contract should be used that have been produced by the Head of Procurement and approved by the University's Legal Officers
- 6.5 All procedures shall be auditable and be able to demonstrate sufficient probity and accountability for all decision-making processes.

7. Continuous Improvement

Where contracts are going to run for a number of years, the contract should be sufficiently flexible to provide for continuous improvement throughout the period of the contract.

- 7.1 Terms of contracts should include mechanisms for measuring the

extent to which performance has achieved the specified goals or outcomes and, wherever possible, require service providers to seek to improve on the specified goals and outcomes accordingly. Contracts should incorporate the concepts of Best Value.

- 7.2 Contract monitoring procedures shall provide for sufficient review of performance and for feedback to other and subsequent procurement

exercises. Such reviews should highlight lessons to be learned (e.g. to repeat what went well and avoid what went wrong) and consider how innovation and new technology can assist future contracts.

- 7.3 Consideration shall be given in a regular and timely manner to how new technology may improve efficiency. The potential gains in efficiency (e.g. reductions in time and cost, for University staff, consultants and contractors) shall be evaluated, together with any associated risks.

Supply Chain Response to this Policy

The Tender Process

Application of this policy will be managed through our pre-qualification and tendering process. The University will inform prospective suppliers or subcontractors when specific action is required in relation to this Policy.

The University reserves the right to assign suitable sustainability objectives it wishes to achieve from a particular tendering process. These will be communicated to all prospective bidders at an appropriate time. However, although for the most part our sustainability objectives will be clearly stated, we will often encourage suppliers or subcontractors to be innovative in their response to how they would meet them.

The evaluation criteria used by the University during the ITT stage is subjective the nature of the services or goods being tendered.

Integrating the Policy into management processes

All suppliers and subcontractors must manage the environmental and social impacts of their business operations and supply chains. In particular integrate the requirements of this Policy into their business management processes as appropriate. Steps to achieve this may include but not limited to the following:

- Production of written procedures, work instructions or improvement plans to facilitate implementation of all applicable elements specified in this Policy;
- Identification of person(s) responsible for ensuring implementation of each procedure and/or work instruction;
- Gathering and analysis of performance data in relation to each procedure and/or work instruction; and

- Maintenance of accurate, complete, up-to-date and accessible information records for each procedure and/or work instruction, as appropriate.

Use of sub-contractors and third parties

The use of sub-contractors or other third party organisations by the main Contractor to supply products or services to the University are not permitted; other than those specified in the initial tender submission or by prior written approval from the University

Supply of information

All suppliers and subcontractors must be willing to provide information to University on matters pertaining to their social, environmental and ethical trade credentials. The supplier or subcontractor should be prepared to disclose the locations of all production and warehouse locations fully to the University. If the University considers that any information provided warrants further investigation, the preferred course of action would be determined solely by the University, without prejudice to its contractual rights.

Appendix 1 - ETI Base Code

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. CHILD LABOUR SHALL NOT BE USED

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. LIVING WAGES ARE PAID

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

- 6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- 6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. NO DISCRIMINATION IS PRACTISED

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. REGULAR EMPLOYMENT IS PROVIDED

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Annual review of sustainable procurement (06/02/14)

In January 2014, the Head of Sustainability recommended that UAL engages with the Chartered Institute of Procurement & Supply (CIPS) and the Bristol Business School to appraise existing UAL suppliers (academic and non-academic) in terms of their economic, social and environmental risks. Proactively appraising UAL's supply chain to ensure suppliers are as low risk as possible will enable UAL to demonstrate to the sector that the organisation is a responsible buyer.

For 2012/13, UAL spent nearly £86M with external suppliers. Risks associated with UAL's supply chain extend beyond their financial robustness and corporate management. Were a key supplier cease trading within contract, be unable to fulfil UAL requirements, or be publicly exposed for unethical practices the risk to UAL's reputation would be significant. Employment practice indicators, data protection law, Human Rights, corporate citizenship and good environmental management are issues that the University will be asked to respond to in a way that satisfies our the student community.

The three pillars of sustainability are economics, social networks and the physical environment. For clarity, although the CIPS Sustainability Index has over 100 sustainability related indices the Index should be seen as providing a general health-check of our supply chain. Before the annual review, UAL did not perform any such checks between contract renewals. Using the CIPS Sustainability Index has significantly and rapidly improve the UAL Environmental Management System in the area of Business Engagement & Procurement.

The value-for-money indicator that students apply to UAL fees is a live issue. Students are increasingly asking not only how fees are apportioned but also how suppliers are chosen. Students want to know that 'their' money is spent according to a set of minimum requirements for the responsible sourcing of services. It should also be noted the student community is mobilising in this subject area. There is an active and increasingly vocal campaign demanding HEIs divest from suppliers who support unethical practices, particularly industries associated with fossil fuels. Strategic relationships with other institutions (such as Ravensborne) will be appraised for their financial, social and environmental risk or at least encouraged to use the Sustainability Index themselves. It will be impossible to differentiate unethical practices performed by others from the UAL brand.

What is the CIPS Sustainability Index?

The CIPS Sustainability Index allows UAL suppliers to obtain a score of their performance in the areas of economic, social and environmental sustainability which in turn provides a single view of their sustainability credentials. The CIPS Sustainability Index is an initiative led by the University of West England, who are highly experienced and have a specialised research facility in Purchasing & Operations. The Index is underpinned by sound and independent academic research. To provide support specialist Knowledge Providers have helped shape the Index and include organisations such as Experian, ATKINS and the Carbon Trust. The Chartered Institute of Procurement & Supply is the leading professional institute for procurement professionals. Buying organisations that use CIPs now total over 100 and include Brunel University London, Reading University and Exeter University. Non-HEI customers include Tarmac, ARUP and BAA Heathrow. 25,000 suppliers are in the process of completing the Index and between HEIs there is a 23% shared supplier rate, meaning it is highly likely that the UAL supplier base has already completed the Index.

A simple benchmarking report has been provided UAL concerning key suppliers that have returned the Index to the University of West England. In addition alerts have been provided to UAL if a supplier scores below 20% in real time between annual assessments. This could be particularly useful if the financial robustness of a supplier become a significant risk. The CIPS Sustainability Index will be provided to UAL free of charge and will be supported by Professor Andrew Douglas (Professor of Strategy & Operational Management at the University of West England). Suppliers will bear costs associated with completing the Sustainability Index.

In February 2015, the Sustainability & Environment Project Board will recommend to the Board of Governors the minimum CIPS Index threshold that external suppliers should reach to work with UAL. This will be made clear in all tenders or frameworks UAL releases to the marketplace.

****The review and recommendation to use the CIPS Sustainability Index was discussed at the Sustainability & Environmental Project Board on 7th February 2014.**

Ethical Investing

The University does not directly hold any equity funds in fossil fuel companies. The majority of our funds are held as deposits with major UK Financial institutions. Where appropriate and should any assets become available for investment, assets will be invested in accordance with our Sustainable Procurement & Ethical Investment Policy and we will not knowingly invest in companies whose activities include practices which directly pose a risk of serious harm to individuals or groups, or whose activities are inconsistent with the mission and values of the University. The University will consider, as appropriate the following issues with ethical Fund Managers when discussing the investment of funds:

1. Sustainable environment practices
2. Conscientiousness with regards to human rights
3. Responsible employment practices
4. Sensitivity towards the communities in which businesses operate
5. Best corporate governance practice

The Sustainability & Environment Project Board is attended by the Director of Finance. Should any investment opportunities arise, the Board is able to lobby the Finance Committee to ensure this policy is adhered to. Investments will be captured in the annual UAL Financial Statement