

27 August 2026

Dear

ATISN 27288 – Procurement Policy (2)

Information requested

Thank you for your request which I received on 30 July 2026. You asked for:

Thank you for your response to my previous Freedom of Information request (ATISN 27215).

Having reviewed the policies and guidance identified in your response, I would like to make the following follow-up request under the Freedom of Information Act 2000. Please provide copies of the following recorded information held by the Welsh Government:

1. Any guidance, procedures, manuals, checklists or instructions provided to Welsh Government procurement or contract management staff explaining how they should identify, assess or verify ethical or human rights risks within supply chains, including (but not limited to) modern slavery, forced labour, ethical employment and other international human rights considerations.
2. Any guidance, procedures or instructions describing what evidence procurement officers may request or require from suppliers to demonstrate compliance with the Welsh Government's ethical procurement policies, beyond completion of standard procurement questionnaires.
3. Any procedures, guidance or instructions describing how the Welsh Government verifies or obtains assurance that suppliers' declarations relating to ethical employment or human rights are accurate.
4. Any internal audit reports, assurance reports, evaluations or reviews, produced since 1 January 2023, which assess whether the Welsh Government's ethical procurement policies are being implemented effectively in practice.

If no recorded information is held for any part of this request, please confirm that this is the case.

Our response

Please see our response at Annex 1.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex 1

Request 1

Any guidance, procedures, manuals, checklists or instructions provided to Welsh Government procurement or contract management staff explaining how they should identify, assess or verify ethical or human rights risks within supply chains, including (but not limited to) modern slavery, forced labour, ethical employment and other international human rights considerations.

Please find below information which is provided as guidance to procurement or contract management staff when undertaking a procurement process for Welsh Government:

The Welsh Government Standard Template Specifications includes the following:

Name	Reference(s)
Internal Specification Template	23. ETHICAL SUPPLY CHAINS(*mandatory) [CPS GUIDANCE – Please discuss this section with your CPS Lead and familiarise yourself with the policy document attached below. In the PSRA did you identify potential ethical supply chain issues? These must be addressed more specifically here. Supply chains that can typically affected by poor employment practices are construction, clothing, food and where people are the main resource, such as facilities management and catering. This list is not exhaustive and a discussion with your CPS Lead during your sustainability risk assessment should help to highlight any potential issues.] 23.1 The Client is committed to ensuring that fair and transparent employment practices are in place throughout the supply chain for the Services. The Client's policy in relation to Ethical Employment Practices in Welsh Government Supply Chains is attached below. The Client will work with the successful Bidder to monitor and to ensure that fair employment practices are in operation. https://gov.wales/ethical-employment-supply-chains-code-practice
Mini Competition ITQ template	18. Ethical Supply Chains The Client is committed to ensuring that fair and transparent employment practices are in place throughout the supply chain for the Services. The Client's policy in relation to Ethical Employment Practices in Welsh Government Supply Chains is attached below. The Client will work with the successful Bidder to monitor and to ensure that fair employment practices are in operation. https://gov.wales/ethical-employment-supply-chains-code-practice

The Procurement Strategy Risk Assessment (PSRA) templates contain the following references to ethical or human rights within supply chains:

Name	Reference(s)
Over FTS Procurement Strategy (Note: There are two versions for use under either The Public Contracts Regulations 2015 (PCR15) or The Procurement Act 2023 (PA23))	1.11 SUB-CONTRACTING Are we likely to have sufficient influence with successful supplier to be able to influence their sub-contracting arrangements to follow WG policy and best practice? Notes - Sign up to Code of Practice for Ethical Employment in Supply Chains 3 - Actions 3.14 EMPLOYMENT Is there the potential for contractor's employees to be exploited? e.g. Modern slavery low pay, antisocial hours, migrant workers, language issues etc. The Living Wage Foundation Living Wage and fair employment practices must be considered and, if applicable, included within the specification and as evaluation criteria. 3.16 OUTSOURCING Is there potential for people involved in delivering the service to be working in developing world countries and therefore at risk of unethical work practices (e.g. IT recycling, mathematical modelling, call centres; manufacture or production of products or raw materials).
Under FTS Procurement Strategy and Risk Assessment	3 - Actions 3.15 EMPLOYMENT Is there the potential for contractor's employees to be exploited? e.g. Modern slavery low pay, antisocial hours, migrant workers, language issues etc. The Living Wage Foundation Living Wage and fair employment practices must be considered and, if applicable, included within the specification and as evaluation criteria. 3.17 OUTSOURCING Is there potential for people involved in delivering the service to be working in developing world countries and therefore at risk of unethical work practices (e.g. IT recycling, mathematical modelling, call centres; manufacture or production of products or raw materials).
Lower Value Procurement Strategy	Is there the potential for contractor's employees to be exploited? e.g. Modern slavery low pay, antisocial hours, migrant workers, language issues etc.

	Is there potential for people involved in delivering the service to be working in developing world countries (e.g. IT recycling, mathematical modelling, call centres; manufacture or production of products or raw materials).
Mini competition Over Threshold Procurement Strategy & Risk Assessment Template v2 March 2024	Actions: This is the opportunity to identify which wider social value considerations the Framework offers and will be included at call off stage. ➤ <i>Modern Slavery risk - low pay, antisocial hours, migrant workers, language issues</i>
Procurement Strategy Risk Assessment: Infrastructure Criteria	Fair Work • Modern Slavery • Zero hours contracts • Living wage • False self-employment

Request 2

Any guidance, procedures or instructions describing what evidence procurement officers may request or require from suppliers to demonstrate compliance with the Welsh Government's ethical procurement policies, beyond completion of standard procurement questionnaires.

Welsh Government does not prescribe a standard list of evidence, beyond the relevant questions in the Single Procurement Document (SPD), that suppliers must provide to demonstrate compliance with its ethical procurement policies. Any need for additional evidence is considered on a case-by-case basis, taking account of the ethical and human rights risks associated with the procurement and the nature of the contract.

All bidders are required to answer the following SPD questions relating to the Modern Slavery Act 2015:

Modern Slavery Act 2015	The buyer may only select you to tender if you are a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act") and you comply with the annual reporting requirements contained within Section 54 of the act.
Modern Slavery Act	Are you a relevant commercial organisation
Modern Slavery (compliant)	If you have answered "yes" to the previous question are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?
Modern Slavery (compliant)	If you answered 'yes' please provide an explanation and a URL.

The Procurement Strategy and Risk Assessment (PSRA) template provides guidance on identifying ethical procurement risks. It is completed for the following procurement routes:

- Call off over the Agreement on Government Procurement (GPA) threshold
- Open procedure £25k - GPA
- Open procedure over GPA
- Quick Quotes below £25k-GPA

For procurements using the PSRA, procurement staff and internal contract managers consider relevant ethical and human rights issues as part of the risk assessment. The procurement manager then determines whether any additional evidence should be requested from suppliers and what evidence would be proportionate to the risks identified.

Welsh Government procurement staff are also made aware of the importance of ethical procurement practices and are expected to be CIPS qualified or working towards the qualification relevant to their role. Fully qualified staff are encouraged to obtain Chartered status, which requires completion of the CIPS Ethical Procurement and Supply training and test each year.

Request 3

Any procedures, guidance or instructions describing how the Welsh Government verifies or obtains assurance that suppliers' declarations relating to ethical employment or human rights are accurate.

Supplier's declarations relating to ethical employment or human rights are checked for accuracy on an individual contract basis, depending on the outcome of the PSRA, the completed SPD question set (provided in the response for question 2 above) and the nature of the contract being procured, and relevant advice would be provided.

Request 4

Any internal audit reports, assurance reports, evaluations or reviews, produced since 1 January 2023, which assess whether the Welsh Government's ethical procurement policies are being implemented effectively in practice.

We do not have records of any internal audit reports, reports, evaluations or reviews, produced since 1 January 2023, which assess whether the Welsh Government's ethical procurement policies are being implemented effectively in practice.