



Oxfordshire County Council
Equalities Impact Assessment

Ethical Procurement Policy

09/05/2024

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Section 1: Summary details

Directorate and Service Area	Resources Directorate Procurement and Contract Management Hub
What is being assessed (e.g. name of policy, procedure, project, service or proposed service change).	Ethical Procurement Policy
Is this a new or existing function or policy?	This is a new policy.
Summary of assessment Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community? (following completion of the assessment).	The purpose of the Ethical Procurement Policy is to outline the Council's position on various aspects of ethics in procurement as well as to provide appropriate detail on how the Council approaches such matters and how it expects its suppliers and potential suppliers to approach such matters. The Ethical Procurement Policy includes a large section on modern slavery and also covers other areas such as expectations for suppliers, responsibilities of staff, fair employment practices in the supply chain, as well as reporting and whistleblowing.
Completed By	Becky Spencer
Authorised By	Melissa Sage
Date of Assessment	28/05/2024

Section 2: Detail of proposal

<p>Context / Background</p> <p>Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.</p>	<p>The purpose of the Ethical Procurement Policy is to outline the Council’s position on various aspects of ethics in procurement as well as to provide appropriate detail on how the Council approaches such matters and how it expects its suppliers and potential suppliers to approach such matters. The Ethical Procurement Policy includes a large section on modern slavery and also covers other areas such as expectations for suppliers, responsibilities of staff, fair employment practices in the supply chain, as well as reporting and whistleblowing.</p> <p>The Ethical Procurement Policy is intended to sit alongside the Council’s Modern Slavery Policy, currently also under development (and which latter covers all aspects of Modern Slavery including those unrelated to procurement). The Ethical Procurement Policy is required in addition because it includes many topics that would not fit within a modern slavery policy but are nonetheless required to ensure we are transparent about how OCC approaches ethical issues when procuring with public funds.</p>
<p>Proposals</p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p>	<p>The Council is recommended to have an Ethical Procurement Policy because it will promote responsible procurement decision-making and ensure that ethics are considered when planning purchases and managing contracts on behalf of local residents. The Procurement Hub team decided that one holistic policy that considers a wide range of ethical procurement topics was better than a piecemeal approach involving multiple policies. This is because, with one policy, we can be fully transparent about our stance across this important subject matter, without making the audience work hard to search for this information.</p> <p>This policy represents an important cornerstone of risk management and provides a mechanism for setting appropriate ethical expectations. It is likely that our residents expect the Council to act responsibly and ethically when it spends public money on procurements and contracts..</p>
<p>Evidence / Intelligence</p> <p>List and explain any data, consultation outcomes, research findings, feedback from service</p>	<p>This Policy has been compiled following a review of relevant sections of the following legislation and code of practice:</p> <ul style="list-style-type: none"> • The Bribery Act 2010 • The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 • The Equality Act 2010 • The Human Rights Act 1998

<p>users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different individuals, communities or groups and our ability to deliver our climate commitments.</p>	<ul style="list-style-type: none"> • The Modern Slavery Act 2015 • The Public Contracts Regulations 2015 • Whistleblowing: Guidance for Employers and Code of Practice 2015 <p>And a review of relevant peer policies (other public sector ethical procurement policies) to ensure alignment with structure, content and mechanisms for review and implementation.</p>
<p>Alternatives considered / rejected</p> <p>Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.</p>	<p>The implications of not approving this policy include but are not limited to potential future harm to the Council's reputation or its ability to deliver considered ethical and responsible procurements and well-managed contracts, should unethical behaviour or decision-making occur either within the council or its supply chain.</p> <p>The Council aims to take an ethical and responsible approach to procurement. By doing so we create a fairer Oxfordshire and can influence others around us to follow suit.</p>

Section 3: Impact Assessment - Protected Characteristics

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			

Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
Marriage & Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Pregnancy & Maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			

Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			

Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
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Section 3: Impact Assessment - Additional Community Impacts

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Rural communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fairer and more diverse choice of local businesses to include within the supply chain, which is likely to help support rural communities and areas of deprivation			
Armed Forces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			
Areas of deprivation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fairer and more diverse choice of local businesses to include within			

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (* Job Title, Organisation)	Timescale and monitoring arrangements
				the supply chain, which is likely to help support rural communities and areas of deprivation			

Section 3: Impact Assessment - Additional Wider Impacts

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Staff	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Implementing ethical procurement principles is likely to encourage a fair, safe and ethical culture within the Council as a whole and as such this approach can positively impact on recruitment and retention of Council employees.			
Other Council Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ethical procurement principles would encourage a fair approach to recruitment and retention of supplier employees as well as a fair approach to purchasing within the supply chain, from a diverse range of businesses / traders			

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Social Value ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Our Ethical Procurement Policy directly intersects with our Social Value Policy as we have chosen ethical measures to include within our sets of TOMs. Therefore our social value policy partly helps to deliver the aims of the Ethical Procurement Policy and vice versa.			

¹ If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area

Section 4: Review

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review Date	28th May 2024
Person Responsible for Review	Melissa Sage, Head of Procurement
Authorised By	Melissa Sage