

University of South Wales Ethical Freelance Work Policy

Purpose and Principles

This policy sets out the University of South Wales' position on freelance and self-employed project work undertaken by students and graduates, and the standards we expect from any organisation, client or platform promoted through USW Careers, Startup Stiwdio or embedded within academic curricula.

Freelancing, consultancy and self-employment are recognised as legitimate and increasingly common professional career pathways for our graduates. We are committed to supporting students to develop these skills and to access opportunities safely.

However, we recognise that freelance markets are particularly exposed to unpaid work, underpricing and exploitative practice, and that students and recent graduates can be especially vulnerable to this due to limited experience, confidence or bargaining power. This is particularly true within the creative and cultural industries, where a significant proportion of our freelance graduates build their careers.

This policy should be read alongside the USW Careers Ethical Careers Policy and is underpinned by the same institutional values of equity, sustainability and inclusivity, USW's 2030 Strategic Plan, and the core principles of the AGCAS Code of Ethics. It is also aligned with the Well-being of Future Generations (Wales) Act 2015, and specifically with the Future Generations Commissioner for Wales' guide, *Working Together for Culture: A Guide for Public Bodies Working with Cultural Freelancers* and the Welsh Government's [Priorities for Culture](#) which states freelancers 'should have good working conditions'.

Written for public bodies commissioning creative and cultural freelancers, the guide's principles of transparency, fair work, genuine partnership and sustainable engagement apply equally to how USW supports its own students and graduates into freelance and self-employed work, and to how the University itself engages creative freelancer graduates (for example through paid commissions via USW Careers and Startup Stiwdio).

1. Scope

This policy applies to:

- Freelance, consultancy or self-employed work opportunities advertised, promoted or facilitated through USW Careers and Startup Stiwdio platforms, events or staff.

- Client-based, live-brief or consultancy-style projects embedded within modules, Challenge Based Curriculum (CBC) assessments, or co-curricular enterprise activity.
- Guidance and support provided to students and graduates considering freelance or self-employed work, including creative and cultural freelance practice.
- Any engagement of student or graduate freelancers, including cultural and creative freelancers, by the University itself (for example, commissioned artwork, design, or promotional work).

It does not seek to regulate private arrangements students enter into independently of the University, though the guidance and principles below are recommended in all cases.

2. Our Position on Unpaid and Exploitative Freelance Work

The University does not support, endorse or promote unpaid or exploitative freelance work. We will not knowingly advertise, facilitate or endorse opportunities that:

- Request substantial "spec work", pitches or samples produced for free as a condition of being considered for paid work.
- Offer no payment, or payment that Careers or Startup Stiwdio staff reasonably believe is substantially below accepted sector norms, having regard to the skill, time, experience and value involved
- Rely on "exposure", "portfolio-building" or "experience" as the sole form of compensation for professional-standard deliverables.
- Have scope, timelines or revision expectations that Careers or Startup Stiwdio staff reasonably consider unclear, open-ended or unreasonable for the type and scale of work, placing undue risk or burden on the freelancer.
- Fail to provide a clear brief, agreement or basis for payment before work begins.
- Show evidence of client behaviour that is coercive, discriminatory or disrespectful towards freelancers.

Where such practices are identified, whether raised by a student, graduate, member of staff, or through our own due diligence, the associated organisation or opportunity will not be permitted to advertise, attend events, or otherwise engage with USW Careers & Startup Stiwdio, in line with the exclusion criteria set out in the Ethical Careers Policy.

3. Acceptable Curriculum-Linked and Professional Project Work

This policy does not apply to genuine academic, curriculum-embedded or professional development activity that is not exploitative in nature. The University actively supports client-based and industry-facing projects where they:

- Are embedded within a module, programme or recognised extracurricular scheme, with clear academic or developmental purpose.
- Form part of assessed or credit-bearing coursework, or a recognised placement, internship or enterprise scheme.
- Are appropriately scoped, time-limited and supervised by academic or careers staff.
- Provide students with a genuine learning experience: exposure to real briefs, clients or stakeholders, feedback, and the opportunity to build a professional portfolio.
- Do not require students to produce commercial-grade deliverables for a client's ongoing commercial benefit without recognition, credit or, where applicable, payment that the supervising academic or careers staff consider appropriate, having regard to the scale, duration and commercial value of the work to the client
- Examples of acceptable activity include client-based CBC assessments, live briefs delivered in partnership with employers, structured consultancy projects run through University enterprise schemes, and mentor-supported start-up or venture projects.

Where a project moves beyond an educational exercise into work of direct, ongoing commercial value to an external organisation, staff should ensure the arrangement is fair, transparent and, where appropriate, paid, with a clear and agreed contract or heads of terms.

4. Fair Work and Pay Standards

Where freelance or project opportunities are promoted or facilitated by USW Careers & Startup Stiwdio outside of curriculum delivery, we will apply the same fair work principles as our wider Ethical Careers Policy, informed by the Social Partnership and Public Procurement (Wales) Act 2023 and the Future Generations Commissioner's guidance on engaging cultural freelancers:

- Payment should reflect the professional nature of freelance work, and should not be benchmarked solely against hourly employment wages such as the Real Living Wage, which do not account for a freelancer's unpaid administrative time, taxation, absence of employment benefits, or periods without work. Rates should normally align with recognised sector benchmarks where available (see below), or otherwise reflect a fair, transparent day/project rate appropriate to the sector and skill level.

- For creative and cultural freelance work, use of current sector pay guidance as a benchmark, including union-negotiated and industry-standard rates (for example those published by Equity, the Musicians' Union, BECTU, the Writers' Guild of Great Britain, the NUJ, Unite, or via CULT Cymru).
- A clear brief, scope and agreement (written where possible) in place before work begins, with pay differentiated fairly according to experience and skill level.
- Reasonable, clearly stated timelines and revision expectations, with preparation time, materials, travel and expenses covered where appropriate.
- Safe, legal, and respectful working conditions, free from discrimination or harassment.
- Transparency regarding intellectual property, ownership of work, and any commercial use of the output.
- Timely payment and simplified invoicing processes, recognising that late or unclear payment is itself a significant source of freelancer hardship.

USW is mindful of wider national efforts to improve payment practice, including the UK Government's Fair Payment Code (which replaced the Prompt Payment Code and is open to universities as signatories) and the principles reflected in sector payment charters such as the Fair Payment Charter used in construction. While these frameworks were not designed specifically for freelance or creative commissioning, we support their underlying principles of clear, fair and timely payment, and will consider working towards formal recognition — such as a Fair Payment Code Award — as our own payment processes develop.

5. Guidance and Support for Students and Graduates

USW Careers & Startup Stiwdio will support students and graduates to freelance and work independently with confidence by providing guidance on:

- Recognising and avoiding unpaid or exploitative work.
- Pricing, quoting and costing freelance or consultancy work appropriately, including signposting to sector and union pay benchmarks for creative and cultural freelancers.
- Contracts, terms of engagement and protecting intellectual property.
- Where to raise concerns about a client, brief or opportunity encountered through University channels.
- For creative and cultural freelancers specifically, signposting to relevant sector bodies and unions (such as Equity, the Musicians' Union, BECTU, the Writers' Guild of Great Britain, the NUJ, Unite, or via CULT Cymru).

Guild of Great Britain, the NUJ, and CULT Cymru), and to the Future Generations Commissioner's guide for engaging with public bodies.

Students and graduates who encounter unpaid or exploitative freelance opportunities are encouraged to report these to USW Careers so they can be reviewed against this policy.

6. Alignment with the Future Generations Guide for Public Bodies Working with Cultural Freelancers

USW Careers recognises that many of its freelance and self-employed graduates, particularly those from the Creative Industries, meet the definition of "Cultural Freelancers" set out by the Future Generations Commissioner for Wales: individuals and micro-businesses working within the arts, cultural and creative industries sectors on a project or contract basis. Where USW Careers or the wider University itself engages, commissions or promotes the work of cultural freelancers, it will have regard to the guide's four core principles:

- Transparency and Understanding — engaging openly, with clear communication, accessible opportunities and defined expectations.
- Fair Work — ensuring fair pay that reflects industry standards or union agreements, and transparent, inclusive and accessible recruitment, contracting and timely payment terms.
- Genuine Partnership — recognising cultural freelancers as contributors of expertise and creative insight, not simply suppliers of unpaid content.
- Sustainable Engagement — building longer-term relationships and offering professional development and partnership opportunities, rather than one-off, transactional use of freelance labour.

This alignment reinforces, rather than replaces, the standards set out in Sections 2 and 4 of this policy, and applies both to how the University supports its students and graduates into the freelance market and to how the University itself behaves when engaging creative freelancer graduates directly.

7. Transparency and Review

This policy is publicly available via the USW Careers webpages and is reviewed annually in consultation with students, the Students' Union, and academic and professional services staff.

To feedback on this policy, please contact the Head of Careers Development Services.

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