

Supply Chain Code of Conduct



We are fortunate enough to work alongside some of the best suppliers in the country who thankfully share our vision. What we expect of you is set out in this supply chain code of conduct. All our suppliers are expected to hold standards as high as those of Places for People. We only work with businesses whose values are consistent with our own.



This document sets out what is expected of you and what you can expect from us in return. We appreciate that you will have your own organisational values and culture to guide you, but in working with us we expect that you align with and respect our values.



The supply chain code of conduct sets out the main principles, standards, and ethical practices that we expect all suppliers to follow to align with Places for People values which are set out below. The document is broken down into core corporate social responsibility themes and outlines the key priorities for each:

- **SPIRIT values**
- **Safeguarding**
- **Modern slavery**
- **Human rights, diversity and equality**
- **Blacklisting**
- **Health, safety and wellbeing**
- **Social value**
- **Environmental**
- **Sustainable development**
- **Data handling**
- **Information security**
- **Prompt payment**
- **Open and fair competition**
- **Bribery and corruption**

We have developed the supply chain of conduct in conjunction with Unseen UK, a leading charity committed to the abolishment of modern slavery. By partnering with Unseen, we will continue to grow our knowledge and push forward with our strategy to test our own thinking and work proactively with our supply chains to combat modern slavery and exploitation. Our work with Unseen also includes supply chain risk assessments and modern slavery training for both our procurement specialists and the wider organisation.

We will work collaboratively with our suppliers to actively identify and manage the collective risk of slavery and exploitation in our supply chains.

We recognise the key role suppliers play in meeting our objectives and continually improving the services delivered to our customers. In delivering our commitments we must ensure the highest standards of ethical and professional behaviour and relationships with our suppliers are critical to this.

The supply chain code of conduct sets out the behaviours we expect of each other and through this we are aiming to build open relationships with our suppliers to support a drive towards improved performance. We expect this to operate in a reciprocal way whereby Places for People employees and our suppliers will treat each other with fairness and respect and work jointly to build trusting, collaborative and constructive working relationships focused on delivering for our customers.

Working together



In the interests of being open and transparent and building collaborative relationships with our suppliers, we have outlined below some of the main ways we will share information and expect to interact with you:

- As an organisation we operate across a range of markets and must comply with various regulations. Our policies and procedures, including the expectations of our supply chains, are key to meeting our legal obligations as well as driving the right behaviours among our colleagues and suppliers to ensure we meet the needs of our clients and customers. These will remain under regular review and continue to evolve in line with risk management, mitigation, and due diligence findings. All relevant changes will be clearly communicated to our suppliers in a timely manner.
- You should be familiar with the terms and conditions of your signed contract with us, including obligations relating to standards, insurance, and reporting / monitoring. If you don't have a specific contract from us, your supply of goods and/or services will be subject to our standard conditions of contract which can be viewed [here](#). All suppliers must comply with the terms and conditions applicable to their work with us.
- Our Modern Slavery Statement is available to view on the Places for People website [here](#). Suppliers should familiarise themselves with this statement and review it periodically to stay up to date on how the organisation is working to ensure that slavery is not taking place in any part of our business, including our supply chains.
- All Places for People colleagues are required to undertake safeguarding and modern slavery training on a regular basis. This also includes enhanced training undertaken by the Procurement team. Our aim is to promote awareness and ensure an understanding of slavery and exploitation risks across all parts of the organisation, empowering colleagues to be alert to the relevant risks and feel confident about what to do if they have a concern. We encourage our suppliers to deliver Modern Slavery training programmes throughout their business as part of any due diligence approach to proactively combat the risks of slavery and exploitation in our supply chains.
- In proactively tackling the risk of modern slavery and exploitation, we conduct periodic audits / site visits with suppliers and expect you to engage positively with this process if/when your business is selected. We are keen to actively engage with our supply chains by understanding what our suppliers are doing to address these risks and how we can work with you collaboratively to support continual improvement. The audit is intended to assess areas including (but not limited to) your modern slavery risk management including procedures for reporting, monitoring and escalation, staff training records, and relevant policies, and procedures in areas such as recruitment and Human Resources.
- We may at any time conduct 'spot checks' and ask for evidence of meeting your obligations in working with us, particularly in the areas outlined in this document. For example, this may include (but is not limited to), evidence of legal compliance, policies, and procedures.

SPIRIT values

What we do and how we do it is important to the success of achieving our vision of creating and managing living places that are sustainable — economically, socially and environmentally.

Places for People embrace SPIRIT values which underpin the behaviours, practices, and approach which we want to see demonstrated by all our suppliers as part of their work with us. They clearly illustrate what we expect from you as a supply chain or joint venture partner.

Open and fair competition

Places for People believe in open and fair competition and comply with competition laws and expect suppliers to do the same.

Suppliers should not engage in any anti-competitive practices including price fixing, bid rigging, market sharing or cover pricing.

Health, safety and wellbeing

An essential element of our business model is the provision of high standards of health, safety, and wellbeing across all our activities.

As part of this model, we expect all suppliers to work with us to uphold these values and standards, and implement systems that protect all employees, customers and others who are affected by our business activities. Specifically, suppliers of applicable services and disciplines must hold and maintain Safety Schemes in Procurement (SSIP) accreditation which is a mandatory requirement for working with the Places for People.

Working together, to agreed standards, will ensure that we create an environment that is safe and conducive to good health and wellbeing and prevents accidents, injuries, and work-related illnesses.

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S

Support

Always there to help customers and colleagues

P

Positive

A 'can do' attitude; encouraging others to achieve

I

Integrity

Always delivering on promises; being open and honest

R

Respect

Treating people fairly and with understanding

I

Innovative

Open to new ideas; not afraid of failure

T

Together

Believing more can be achieved by working well with others

Safeguarding

Simply put, safeguarding is the protection of children and adults from risk of harm, abuse or neglect. Everybody has the right to live free from abuse and we all share a responsibility for promoting and protecting the safety of children, young people and adults at risk, irrespective of our individual roles and responsibilities.

Safeguarding is of paramount importance for Places for People and we are committed to raising awareness and empowering everyone we engage with to create safer environments and identify and report concerns promptly and effectively.

As part of our commitment to safeguarding, Places for People intend to:

- make Places for People an environment where everybody feels welcome and safe, by embedding respect and equality within our culture, codes of conduct, policies and procedures
- ensure colleagues can utilise their unique knowledge of our customers and those engaging with our services to highlight early indicators of abuse, neglect or exploitation
- be alert to the safeguarding needs of all children, young people and adults at risk who are in receipt of or utilise our services.

All our suppliers are expected to uphold these values and share this commitment.

Partnerships and commissioned services

Safer procurement procedures are an essential part of safeguarding. We are committed to actively promoting safeguarding within all partnerships and commissioned services by:

- actively communicating our safeguarding policies and procedures to partners and service providers on a regular basis and to review our safeguarding policies at least annually
- ensuring that contractual agreements outline respective safeguarding responsibilities and how any safeguarding issues should be handled / addressed
- Working together to promote the safety and welfare of children, young people and adults at risk.

Whilst we do not expect our suppliers to have a detailed understanding of safeguarding, we do expect a commitment to the following requirements and may request evidence from you to support this:

- **Safer recruitment**
To ensure that you have processes in place for checking DBS or PVG (Scotland) and have adequate processes in place for assessing and managing risk. A Basic DBS check is required for those working without supervision on Places for People premises / sites and may have infrequent, unsupervised contact with customers. An Enhanced DBS check is required for those who have frequent, unsupervised access to the inside of a person's property or frequent, unsupervised contact with customers.
- **Professional boundaries**
To ensure that you have processes and standards in place to uphold and maintain professional boundaries with customers.
- **Reporting**
To ensure that you have processes in place to record, monitor and report on any safeguarding and boundaries concerns. You may also be asked to investigate any safeguarding or boundaries concerns about a member of your staff and share the findings with us.
- **To notify us immediately via email of any safeguarding concerns**
This does not negate from you taking responsibility in reporting or managing any safeguarding issues but will allow us to work collaboratively to support our customers and colleagues. Please report any instances or issues regarding safeguarding to the Places for People Safeguarding Team at: safeguardingincidents@placesforpeople.co.uk

Human rights, diversity and equality

As we do, we expect all our suppliers to conduct their business to a high ethical standard and comply with legislation relevant to the business. This especially applies to:

- **Respect for our people and communities**
Treat everyone equally and value diversity, appreciate the skills and abilities of others, put something back into the community, seek to employ local people where possible and consider the concerns of the wider community.
- **Discrimination**
Support equal pay for work of equal value, oppose discrimination or intimidation including all forms of threats of physical or psychological abuse.
- **Child labour**
Comply with child labour laws and do not employ anyone under the age of 16 including compliance with any associated laws concerning ongoing education /training and working hours. Where the mandatory school leaving age in the local country is higher than 16, suppliers must comply with this accordingly.
- **Compensation and working hours**
Comply with national laws and regulations regarding working hours, wages, and benefits.
- **Exploitation**
Mitigating the risk of labour abuse and supporting worker wellbeing through a suite of clear and accessible policies and procedures including (but not limited to) those relating to responsible recruitment, right to work checks, escalation and grievance, anti-bribery / corruption and confidential reporting / whistle-blowing.
- **Communications**
Be honest and transparent; use different ways of communicating considering peoples' needs, language and literacy.
- **Small and medium-sized enterprises (SMEs)**
Opening up opportunities for small organisations in contract delivery areas. This includes SME, third sector organisations and supported factories and businesses. Ensuring that disadvantaged groups are represented in the supply chain through working with these smaller organisations.

Modern slavery

Places for People are committed in our mission to achieve business operations that are free from involvement with slavery and exploitation. We strive to understand and identify any risk of slavery and exploitation in our business operations, including our supply chains, and we expect our suppliers to work with us collaboratively in doing the same.

Our efforts to mitigate these risks begin with our legal obligations and Places for People complies with the Modern Slavery Act 2015. We publish an annual Modern Slavery Statement and take steps to ensure that slavery is not taking place in any of our supply chains, or in any part of our own business. We expect all our suppliers to share our values and commitment to eradicating modern slavery and be compliant and committed to the Modern Slavery Act 2015. If you are legally required to publish an annual Modern Slavery Statement based on your organisation's turnover, profit or headcount, you must do so as a minimum, and we will request a copy to be updated annually. However, even where you are not legally required to do so, we expect you to put in place a Modern Slavery Statement, policy or alternative evidence that demonstrates your commitment to ensuring that slavery is not taking place in your business.

Places for People consider that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- labour abuse, including colleagues paying for employment and/or tied accommodation to employment
- being owned or controlled by an employer through mental or physical abuse or threat of abuse
- being dehumanised, treated as a commodity or being sold as property
- being physically constrained or to have restrictions placed on freedom of movement.

We do not enter into partnership with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced compulsory labour.

As such, we expect that neither you or any of your officers, employees, agents, suppliers or subcontractors:

- has committed an offence under the Modern Slavery Act 2015
- has been notified that you are subject to an investigation relating to an alleged offence or prosecution under the Modern Slavery Act 2015

We are committed to collaboratively working with you to prevent occurrences of modern slavery. As such, the below sets out our expectations as to how we achieve this objective together:

- we expect you to have a documented reporting process for employees to report any modern slavery concerns and ask that you promote / display the Unseen UK Modern Slavery and Exploitation Helpline to support this. Details of this can be found here, www.modernslaveryhelpline.org/
- you will notify us immediately via email if you become aware or have reason to believe that you or any of your officers, employees, agents, suppliers or subcontractors have breached or potentially breached the obligations as set out above. Such notice shall set out full details of the circumstances concerning the breach or potential breach
- you shall implement and maintain appropriate due diligence procedures for any of your agents, suppliers and subcontractors to ensure that no Modern Slavery offence shall occur in its supply chain
- we will commit to working collaboratively with you regarding the above, providing support, advice and guidance where issues are identified to help prevent Modern Slavery in the supply chain
- Please report any instances or issues regarding modern slavery to the Places for People Safeguarding Team at: safeguardingincidents@placesforpeople.co.uk

Blacklisting

Blacklisting is the practice of systematically denying individuals employment based on information, accurate or not, held in any form of database.

Suppliers should not compile, use, sell or supply a list that has been compiled with a view to being used by employers or employment agencies for the purposes of discrimination in relation to the treatment of workers.



Social value

As one of the largest property management, development and leisure businesses in the UK we have a responsibility to ensure our products and services make a positive impact on people, places and the planet. Our purpose is to create and manage living places that are sustainable — economically, socially and environmentally.

For Places for People social value is about building capital for our customers and communities. Getting the greatest possible benefit from the goods and services we buy is one of the ways we achieve these outcomes. We expect our supply chain to work in partnership with us to deliver positive outcomes for our customers.

The Social Value Act 2012 places a requirement on Places for People to consider the wider economic, environmental and social benefits that can be obtained from our supply chain. But it's not just legislation which drives our social value ambitions. Delivering social impact is at the centre of all our work. We recognise that delivering social impact improves the lives of our customers but it also helps us to achieve our business goals and drive growth.

As a supplier you will work in partnership with our social value function, Places Impact, to deliver the commitments you have made through the tender process or otherwise. We expect our suppliers to play to their strengths and deliver social impact in ways that fit with your business but which contribute to one or more of our four priority social value themes.

- Providing opportunities to access education and employment**
 Suppliers can provide apprenticeships, work-placements and training for our customers. Engagement with schools and colleges to promote career pathways or improve employability for our young people.
- Supporting better health and wellbeing**
 Interventions which improve health outcomes in our neighbourhoods such as improving green spaces or supporting a local food bank.
- Strengthening financial and digital inclusion**
 Supporting initiatives which improve digital literacy or help our customers to manage their finances such as supporting customers to reduce their fuel bills or reducing the impact of the 'poverty premium'.
- Building strong and resilient communities**
 Supporting local voluntary and community organisations either financially or in-kind through refurbishment projects. Combatting homelessness or helping customers to sustain their tenancies.

Environmental

Environmental issues are now high on the political agenda and are supported by a range of new policies, legislation and other requirements. At the same time, energy, transport and waste costs have already risen and are likely to continue to rise in the long term.

Places for People is a large and diverse organisation that operates throughout the United Kingdom. We recognise that our operations have a range of impacts on the environment and we are working to minimise them wherever possible.

Across the organisation, we are reducing our environmental footprint and forming new partnerships to find ways to help address climate change. We work with our colleagues, partners, and suppliers to help them reduce their own impacts and the impacts from the products and services they supply to us and our customers.

We will continually strive to improve our environmental performance and we expect our suppliers to support us by:

- ensuring compliance with existing and future legislation and having processes in place to ensure they comply
- identifying, measuring and reducing any harmful environmental effects which may arise from business activities through clear environmental objectives and targets
- understanding and minimising the CO2 emissions which arise from activities, services and products supplied to us, including but not limited to waste, energy and transport
- minimising, re-using and recycling materials wherever practicable and working towards zero waste to landfill
- providing environmental training for colleagues, and encouraging them to apply good environmental practice, both at work and at home.

As we are an ISO14001 and ISO50001 certified organisation, we believe in supporting and encouraging our suppliers to implement an Environmental and/or Energy Management System which is comparable with the requirements of the ISO14001 and ISO50001 standard.

Sustainable development

Places for People has identified that it has a leading role to play in terms of sustainable development and neighbourhood management. Our approved Sustainability Strategy has also been developed in line with the United Nations Sustainable Development Goals relevant to our organisation.

We recognise that the goods, services and works supplied to our organisation have a major social, economic and environmental impact, both locally and globally. Places for People will therefore strive to:

- challenge the need for consumption of goods and services as a precursor to use and promote the use of recycling and reuse of materials wherever possible
- consider costs / benefits of environmentally preferable goods and services as alternatives, where possible taking the total cost of ownership (including environmental factors) into account
- gather environmental management data on goods and services including CO2 emissions
- determine the environmental and corporate risks to the organisation in developing a sustainable supply chain whilst being committed to working with our supplier base
- identify commodities and suppliers that are strategic to Places for People in our delivery of a sustainable supply chain
- work with suppliers to reduce the environmental impacts of goods and services supplied to Places for People.

We expect our suppliers to work in partnership with us to support our commitment to delivering an enhanced approach to sustainability, including sustainable procurement practices. In doing so, where requested suppliers will:

- support our sustainability programmes and initiatives through the provision of relevant data and management information, including where required by law such as CO2 emissions reporting
- attend strategic workshops aimed at exploring best practice approaches to sustainable procurement
- provide evidence and help us to understand your strategy for continuously improving your approach to sustainability including policies, procedures and steps taken to date
- work in collaboration with us to identify opportunities to introduce more environmentally friendly and sustainable goods, services and/or processes and support the adoption of these, where possible and practical.

Data handling

Processing data on behalf of Places for People means our suppliers have several direct legal obligations under the UK General Data Protection Regulations (GDPR) or its successor legislation, as follows:

- **Processing instructions**
Processing of personal data can only be carried out on instruction from Places for People (unless otherwise required by law). By acting outside your instructions or processing for your own purposes, you will step outside your role as a processor and become a data controller for that processing.
- **Processing contracts**
You must enter a processing agreement with Places for People and comply with your obligations as a processor under the agreement.
- **Sub-processors**
You must not engage another processor (i.e. a sub-processor) without prior authorisation from Places for People. You must put in place a contract with sub-processors with terms that offer an equivalent level of protection for the personal data as those in the contract between you and Places for People.
- **Security**
You must implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing confidential and personal data, including protecting against accidental or unlawful destruction or loss, alteration, unauthorised disclosure or access.
- **Notification of data breaches**
If you become aware of a personal data breach, you must notify Places for People without undue delay. We expect to be notified immediately, so that we can meet the GDPR notification timelines and report to the ICO within 72 hours of a breach. You must assist Places for People in complying with its obligations regarding personal data breaches.
- **Accountability obligations**
You must comply with UK GDPR accountability obligations.
- **International transfers**
You must not make any transfer outside the UK without prior authorisation from Places for People.

Information security

Places for People takes responsibility for the protection of personal and confidential information seriously and we have implemented an Information Security Management System (ISO27001) to ensure that our information assets are handled responsibly and securely. We expect, support and encourage our suppliers to do the same, by applying effective information security controls which are comparable with the requirements of the ISO27001 standard.

Any confidential information must not be obtained or sought by our suppliers outside of what is reasonably expected within their agreed business relationship with Places for People. In addition, our suppliers must never disclose confidential information without prior written permission from us. We expect that any permitted disclosure of information shall be provided only on a need-to-know basis and in accordance with applicable regulations, data privacy laws and prevailing industry practices.

Places for People have training in place so that everyone understands their responsibilities for information security. We expect our suppliers to regularly raise awareness of data handling responsibilities with their employees and have training programs in place.

Prompt payment

Places for People has committed to promptly pay all of our suppliers within 30 days, in full accordance with regulation 113 of The Public Contracts Regulations 2015.

A further consequence of regulation 113 is that any suppliers to Places for People must ensure that they promptly pay any sub-contracted suppliers who perform or undertake any element of sub-contracted work relating to goods, services or works supplied to Places for People, within the mandatory 30-day period. This is not only a legal requirement under The Public Contracts Regulations 2015, but also a mandatory requirement for any supplier working with Places for People, to support prompt payment of its wider supply chain.

Bribery and corruption

Bribery is offering, providing or receiving something of value as an inducement or reward for something improper. Corruption involves any of these activities: bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and money laundering.

Suppliers must never offer, give, or receive bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage. The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including Bribery Act 2010.

Places for People's employees and board members will not accept inappropriate offers of gifts and hospitality in line with the organisation's Gifts, Hospitality and Personal Interests Policy.

Suppliers should encourage their own suppliers to adhere to the ethical standards, human rights, health and safety standards and environmental standards upon which this code is based. If you have a serious concern that something may not be consistent with this code, please let us know. We encourage you to raise any concerns or questions you have in confidence. Please contact the strategic Procurement team at Places for People.

