

St Andrew's Healthcare

Code of Conduct for Suppliers of Goods and Services

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Who we are

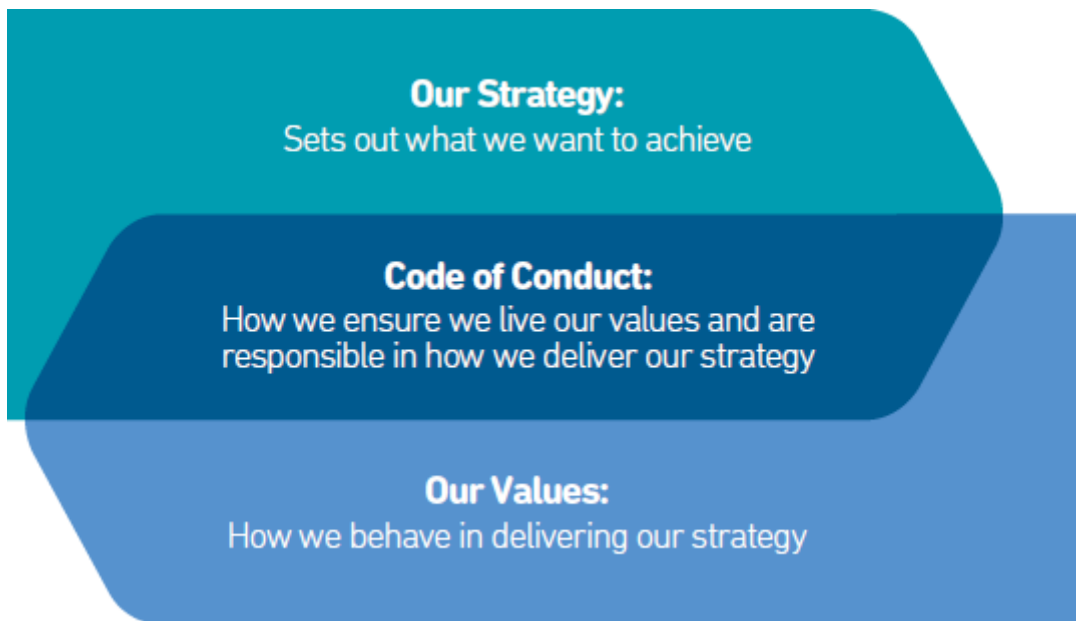
St Andrew's Healthcare provides specialist mental healthcare for people with complex mental health needs. We are a charity, and so any profit we make is reinvested into patient care; we have no shareholders or owners to pay dividends to, which means that we can always put our patients first.

Our headquarters and largest service is in Northampton, and we also provide services in Birmingham, Essex and Nottinghamshire. We provide treatment and care for over 800 patients who face challenges of mental illnesses, developmental disorders, brain injuries and neurological conditions. Over 90% of our patients have been detained under the Mental Health Act 1983, and of those, around 50% are "forensic" patients who have come to us via the criminal justice system for care and treatment in a hospital environment. NHS England and Clinical Commissioning Groups (CCGs) from the area where the patient lives commission places for patients with us, where it is appropriate to do so.

In order to meet our patients' needs and support their journey towards achieving hope and purpose in their lives, we have a positive, welcoming, diverse and inclusive workforce made up of over 3,400 permanent employees and 980 workers who are engaged via our internal "bank" system. Over 90% per cent of our permanent staff (and 95% of our "bank" staff) are directly involved in clinical care and support for our patients.

The Charity was set up in 1838, and our purpose remains the same now as it was then – "to promote the healing of sickness, the relief of suffering and the relief of those experiencing mental disorder".





Our values:

Compassion • Accountability • Respect • Excellence



Our vision and mission set out what we stand for as an organisation and what we want to achieve. Our values describe how we should behave as we go about achieving our vision and mission.

Why we need a Code of Conduct for our suppliers

This Code sets out simple rules for our suppliers to follow, that will help us to act honestly, fairly and responsibly in everything that we do together, for the benefit of our patients.

St Andrew's Healthcare relies on its suppliers' and other business partners' integrity in all its dealings. We are committed to the fair treatment of the businesses who supply goods and services to St Andrew's Healthcare – and expect them to operate honestly, fairly and responsibly, in line with our values.

We believe in developing long-lasting relationships with suppliers who meet our high standards of business ethics.

Who this code applies to

All St Andrew's Healthcare suppliers must comply with this Code. This includes suppliers that are:

- Providing services to or on behalf of St Andrew's Healthcare
- Third parties sub-contracted by a supplier
- Aspiring suppliers to St Andrew's Healthcare and by their subcontractors in the supply chain.

Any queries regarding this Code should be referred to the buyer of the relevant Procurement category.

We expect our suppliers to communicate this Code of Conduct to their employees, their parent company, subsidiaries and subcontractors who are associated with supplying goods or services to St Andrew's.

What we expect from you

Economic sustainability focuses on bringing economic benefit to the patients, the Charity and communities in which the Charity operates. From an ethical perspective, commercial transactions should be economically beneficial to all parties involved. We pursue legally compliant ways to make the most reliable purchasing decisions based on cost, product and quality, so that we can deliver quality goods and service at competitive prices to our patients and service users. Supplier relationships should be based on the principle of fair and honest dealings, whilst promoting fair and sustainable development. Our requirements for suppliers are:

1. Financial ethics

- Suppliers must ensure that they have policies in place to prevent fraud, money laundering, bribery and corruption.
- Suppliers must support fair trade and ethical sourcing practices relevant to the commodity or service provided.
- Suppliers must have reasonable and lawful payment policies with their own suppliers and subcontractors.
- Suppliers must consider the principles of the Whole Life Costing and Life Cycle Analysis in design, manufacture and recycling/disposal of products.

2. Corporate social responsibility (CSR)

We expect our suppliers to be good corporate citizens; by upholding the values of this Code and supporting key corporate social responsibility policy areas, such as sustainability, prompt payment and skills development.

3. Diversity and inclusion

We are committed to the promotion of diversity and inclusion. We aim to ensure that we have a diverse workforce and that no-one connected to us receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We expect all suppliers to share this commitment and have suitable policies, procedures and training in place to ensure compliance by its directors, staff, agents and subcontractors.

4. Improper payments/bribery

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact Ten Principles and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits to St Andrew's Healthcare employees in order to influence the employee's conduct in representing St Andrew's Healthcare.

5. Conflicts of interest

We expect suppliers to ensure that no conflict of interest arises in connection with the tendering for, or providing, goods and services to the Charity. Any possible conflicts must be disclosed to the Charity as early as possible, including any connection between bidders or with employees and officers of the Charity. We expect suppliers to ensure that any goods, services or solutions offered to the Charity are done so on terms that will not restrict competition or unfairly disadvantage the Charity or other potential suppliers in the future (e.g. offering technical solutions which only operate using the supplier's own goods or services).

6. Management of risk

The Charity wants to work with suppliers who can demonstrate the effective management of risk and uncertainty to the delivery of their products and services. The Charity expects risks to be managed effectively by those parties best placed to do so, meaning that ownership and responsibility for risk must follow control. The Charity expects that relevant information on material supply chain risks and uncertainties is shared as required between parties to ensure potential exposures are identified and understood, and can be effectively managed.

7. Value

The Charity expects contracts to offer sustainable value throughout their life, including when changes are needed. Whilst we accept our suppliers make a profit margin in return for the risk they are accepting, we expect suppliers not to exploit an incumbent or monopoly position, an urgent situation or an asymmetry of capability or information to impose opportunistic pricing. We expect suppliers to work in good faith to resolve any disputes promptly and fairly during the life of a contract through good relationship management and, where appropriate, contractual dispute resolution mechanisms.

8. Data protection and information security

All suppliers, partners, third parties and any agreed sub-contractors must adhere to St Andrews Healthcare's data protection and information security policies and procedures, and any necessary additional controls based on the nature of the engagement, or service procured from the external party/parties. These third parties must ensure that they have robust information security practices in place, particularly if the nature of engagement includes technology (including facilities management technology, HVAC systems, etc.) or data.

9. Reputation

We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. We also want working with St Andrew's Healthcare to be seen as reputation enhancing for the supplier. However, reputation can quickly be lost. We expect suppliers to be protective of St Andrew's Healthcare's reputation, and ensure that neither they, nor any of their partners or subcontractors, bring the charity into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust placed in St Andrew's Healthcare.

10. Business Continuity Planning

Suppliers are expected to have identified the risks of disruption to their normal business operations and to have in place contingency planning arrangements to maintain the supply of goods and services until full business operations are reinstated. These contingency arrangements may include disaster recovery arrangements, business continuity plans and emergency planning which should be regularly tested and updated as required.

11. Continuous improvement

We expect our suppliers to use recognised industry practices in the delivery of goods and services to, or on behalf of, St Andrew's Healthcare. We also expect suppliers to continuously improve these goods and services and bring world-class innovation, ideas and expertise to help the charity address its strategic challenges and to support our provision of mental healthcare services.

Sustainable Procurement

Recognising that sustainable businesses should acknowledge the planet's finite resources, St Andrew's Healthcare expects its suppliers to support sound environmental management principles and reduce their impact on the environment within which they operate. This includes:

1. Suppliers must assist the charity in the understanding and reduction of supply chain impacts on our environment, and risks related to the security of raw material supply. We expect suppliers to be open and transparent in assisting St Andrew's Healthcare in reporting publicly on product or service utilisation and any environmental impacts.
2. Suppliers must have a written environmental/sustainability policy appropriate to the size and nature of the supplier's operations that, where applicable, addresses the prevention, mitigation and control of serious environmental and health impacts from operations including raw material usage, greenhouse gas emissions, water, waste, air quality and biodiversity.

3. Where appropriate, based on the size and nature of the suppliers' operations, suppliers must have an effective internal environmental management programme/system with adequately trained staff responsible for managing the organisation's environmental performance and communicate data on key environmental indicators internally and externally.
4. Suppliers must comply with all legislation, regulations and standards related to the protection of the environment and the handling of dangerous and hazardous materials.
5. Suppliers must keep dangerous and/or hazardous materials to a minimum.
6. Suppliers must ensure that every manufacturing facility complies with environmental laws, including all laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal.
7. Suppliers must validate that all input materials and components were obtained from permissible harvests consistent with international treaties and protocols in addition to local laws and regulations.
8. Suppliers are expected to support the development of sustainable technologies.

Social

The UN Guiding Principles on Business and Human Rights state that all enterprises hold an equal responsibility to respect human rights. St Andrew's Healthcare expects suppliers to respect the human rights of their patients, service users, employees, workers and volunteers, and to comply with all relevant legislation, regulations and directives in the countries and communities in which they operate.

Vulnerable patients

Some contracts deliver services to patients and service users with particular needs such as physical or mental disabilities, medical conditions or other factors that place them in a vulnerable position. Suppliers should ensure that these patients and service users are treated at all times with courtesy and that their dignity, safety, security and well-being is treated as a priority concern.

Respectful treatment

Our patients, service users, employees, workers and volunteers have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in any other place in connection with St Andrew's Healthcare (i.e. events, corporate entertainment, exhibitions, etc.), and we expect our suppliers to provide the same commitment, including to their own employees.

Professional behaviour

We expect suppliers to be prepared to invest in their relationships with St Andrew's Healthcare and establish trust with our employees and with other suppliers involved in delivery. We also

expect suppliers to be able to speak out when employees, volunteers or other suppliers are not upholding the values embedded in this Code. We also expect suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of our behaviours or a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose, e.g. in its contractual stipulations or measures.

Labour

St Andrew's Healthcare takes a zero tolerance approach to slavery and human trafficking and will not tolerate such activities either within the supply chain or within any part of the charity. St Andrew's Healthcare will continue to support the requirements of the Modern Slavery Act 2015 and any future legislation. Accordingly:

1. Suppliers must prohibit the use of all types of slavery and forced and bonded labour and give workers, whether local or migrant, the right and the ability to leave employment when they choose.
2. Suppliers must ensure that child and underage labour is not used.
3. Suppliers must ensure that wages meet legally mandated minimums and industry standards without un-authorized deductions.
4. Suppliers must ensure that working hours are in accordance with local regulation and industry practice and voluntary overtime is at manageable levels.
5. Suppliers must not discriminate against any group on religious, social, age, sexual orientation, gender or ethnic grounds or any protected classes covered under international human rights standards or such other ground as may be recognised under national law.
6. Suppliers must not hinder the right of workers to legally organise and join associations such as labour unions.
7. Suppliers must provide clear and uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting mental, physical or verbal abuse.
8. Suppliers must provide evidence that they have implemented due diligence procedures to manage ethical issues within their supply chain, including all labour-related processes to ensure they comply with laws on slavery and human trafficking.
9. In addition to the requirements of the UK Equality Act 2010, St Andrew's Healthcare general principles are that suppliers and their supply chain, contractors and service providers must ensure they have robust procedures to ensure they provide disability accessible products, services and opportunities.

Health and Safety

St Andrew's Healthcare requires its suppliers to comply with all applicable statutory health and safety regulations and codes and to work proactively to reduce the risks of injury and ill-health to their employees, and others who may be affected by their acts or omissions. To this end, suppliers shall:

1. Provide a working environment for their employees that is so far as is reasonably practicable, safe and without risks to health.
2. Work to continually reduce the risk of accidents, injuries and work related ill health to their employees and others who may be affected by their acts or omissions.
3. Ensure that all products supplied shall meet all applicable safety standards and approvals for their safe use, maintenance and disposal.
4. Require any sub-contractors appointed by the supplier for the supply of goods and services to the Charity to apply the same health and safety standards referenced above.

Management System

Suppliers with whom St Andrew's Healthcare has regular and recurring dealings should have good management and governance processes in place to ensure compliance with this Code of Conduct. Furthermore, suppliers must make reasonable efforts to monitor their supply chain, ensuring their suppliers are aware of, and compliant with, the aims of this Code of Conduct. Suppliers must ensure that their systems and procedures are sufficient to mitigate any potential negative impact on St Andrew's Healthcare brand and our reputation.

Compliance

The overall objective of this Code of Conduct is to drive improved performance throughout St Andrew's Healthcare supply chains, by building trusting and open relationships with our supply base. St Andrew's Healthcare requires suppliers to comply with all aspects of this Code and to be able to demonstrate to St Andrew's Healthcare how these requirements are being met. St Andrew's Healthcare reserves the right, upon reasonable notice, to check compliance with the requirements of this Code of Conduct for Suppliers of Goods and Services. St Andrew's Healthcare encourages its suppliers to implement their own binding guidelines for ethical behaviour.

We will not purchase goods or services from a supplier who does not meet the requirements of this Code of Conduct as detailed within this document.

Data Privacy Notice for Suppliers

This privacy notice explains how we ('we' or 'us' is the St Andrew's Healthcare group of charities) will use the information you provide, or which we collect, in connection with any sourcing activity and any subsequent agreement(s) with us. Failure by you to supply such information may result in us being unable to enter into a commercial relationship and/or agreement(s) with you.

By participating in any sourcing activities or entering in to any agreements with us, you agree that we may use your information in accordance with this notice. The data user in relation to your information is the St Andrew's Healthcare group member who may enter into a services agreement with you.

The information that we collect from you may include information relating to an employee, director or any other person who exercises control over an entity ("Controlling Person") who enters into a services agreement with us. For a trust, a Controlling Person may include a settlor, a trustee, a protector, beneficiaries and classes of beneficiaries. We may also collect information relating to individuals connected with a director, an entity or a Controlling Person, such as any guarantor, a director or officer of a company, partners or members of a partnership, or beneficial owner, trustee, settlor or protector of a trust, account holder of a designated account, payee of a designated payment, your representative, agent or nominee, or any other persons or entities with whom you have a relationship that is relevant to your relationship with the St Andrew's Healthcare group of charities ("Connected Person"). Prior to providing information to us relating to a Controlling Person, a connected person or any other person, you shall ensure that they have consented to us processing their information as set out in this notice.

We may collect, use and share the information you provide to us, subject to local data privacy laws, for reasons connected to our charity and relationship with you, including to:

- (a) approve, manage, administer or effect the services agreement between us
- (b) meet the compliance obligations of the St Andrew's Healthcare group of charities
- (c) conduct financial crime (which includes money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions, and any act or attempt to circumvent or violate any law relating to these matters), risk management activity (which will include making further enquiries as to the status of a person or entity, whether they are subject to a sanctions regime, or confirming their identity and status)
- (d) if applicable, collect any amounts due and outstanding from you
- (e) conduct credit checks and obtaining or providing credit references (where you are a potential tenant of the St Andrew's Healthcare group of charities)
- (f) enforce or defend our rights
- (g) verify your identity.

In carrying out these purposes we may transfer and disclose your (or any Controlling Party ('s) or Connected Person ('s)) information to:

- (a) any member of the St Andrew's Healthcare group of charities
- (b) any sub-contractors, agents, advisers or service providers of the St Andrew's Healthcare group of charities (including their volunteers, employees, directors and officers)
- (c) any regulatory authorities of the St Andrew's Healthcare group of charities
- (d) credit reference agencies and other companies for use in credit decisions, fraud prevention and to pursue debtors

Accessing your information

Data privacy laws may allow you to make a written request for a copy of the personal data we hold about you and to ask us to rectify, erase or block any inaccurate data. You should make a request to your usual St Andrew's Healthcare contact who will be able to direct your query. There may be a small fee charged for providing this information to you.