



Supplier Code of Conduct



Why it matters to us all: A message from our Executive Director of Finance

At Aspire, we value the business relationships we have with our suppliers and seek to build a partnership approach with suppliers, treating our suppliers and partners fairly and paying promptly as set out in our terms. We want to work with suppliers who share our values and social purpose and support us in delivering the ultimate vision of Building Better Futures.

Our aim is to encourage and work with suppliers to achieve the highest standards within our supply chain and we are committed to ensure that together we can achieve wider social, economic and environmental benefits.

This Supplier Code of Conduct sets out some basic principles of how we will conduct business in an open, honest and transparent manner and the behaviours and practices we expect of our suppliers and partners. Our 'People First' philosophy means that we put our customers and colleagues firmly at the centre of everything we do so we can delight our customers and do a great job in building better futures for those in our communities. We expect our suppliers to commit to a focus on customer satisfaction and delivering positive outcomes for our customers.

We understand that different aspects of this Code will be more relevant to some than others, depending upon the nature and scale of the supplier. We will work with suppliers of all sizes to provide support and to develop suitable targets which are appropriate to the nature and scale of the goods and services they offer.

As a minimum, we expect our suppliers to comply with all applicable laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

We will continuously review and develop this Code to reflect changing standards in social, environmental and digital best practice.

In addition, we will improve the systems and processes that will simplify and improve the way we work with our supply chain.

We require suppliers to report any breaches of this Code to us immediately. If any breach of this Code amounts to a breach of the contract between us, then either of us may have the right to terminate it.



Andrew Palmer
Executive Director of Finance

Who must comply with this Code?

For the purposes of this Code, the term 'supplier' shall include any supplier, business partner or contractor carrying out works of any kind with or on behalf of Aspire.

All Aspire's suppliers are required to comply with this Code and must ensure that all of their workers (contractors, employees, workers, agents, representatives, etc.) are aware of this Code and will comply with it.

The Supplier's Commitment:

The supplier agrees that:

- It will comply with the requirements in this Code.
- It has appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.
- Any breach of this Code may allow Aspire to terminate its relationship with the supplier with immediate effect.

Policies referred to in this document

Aspire's policies can be found on our website at <https://www.aspirehousing.co.uk/policies>

Relevant policies must be read by all of our suppliers. In signing this Code of Conduct, the supplier confirms that they have read and understood all relevant Aspire policies and any relevant procedures applicable to the work or service provision they are engaged to carry out.

Updating this Code

Aspire has the right to modify this Code from time to time.

1. Laws and Regulations

Suppliers will comply with all applicable laws, rules, regulations and requirements in the provision of products and services manufactured and provided to Aspire.

It is the supplier's responsibility to maintain and enforce these standards within its own organisation and supply chains.

2. Underage Labour

Suppliers shall ensure that no child labour has been used in the production or distribution of goods and services to Aspire.

A child is any person under the minimum employment age taking account of the laws of the country where the product(s) (or parts of) or services are sourced from.

Further information can be found here - <https://www.gov.uk/child-employment>

3. Modern Slavery/Forced Labour

Aspire is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

We expect that our suppliers comply with all applicable anti-slavery and human trafficking laws including, but not limited to, the Modern Slavery Act 2015. We expect you to require the same standards of your own sub-contractors, suppliers and business partners.

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured or compulsory labour or any form of human trafficking. All work must be conducted voluntarily and without threat of any penalty or sanctions. It is your responsibility to ensure that any of your sub-contractors also comply with the above requirements.

Suppliers are required to report to Aspire any incidents of slavery or human trafficking found in its business or supply chain immediately, in writing.

Aspire's Modern Slavery Statement can be found here -

<https://www.aspirehousing.co.uk/about-us/modern-slavery-statements/>

Suppliers must respect the human rights of all people involved in their operations and supply chains. Workers must be treated fairly, lawfully and with dignity, and suppliers must not tolerate intimidation, abuse, coercion, harassment, inhumane treatment or any practice that undermines workers' rights. Suppliers should have appropriate arrangements to identify, prevent and address adverse human rights impacts connected with the goods, works or services they provide to Aspire.

4. Working Hours

Suppliers must ensure working hours comply with national laws and standards as set out in The Working Time Regulations 1998. Where an individual is working in excess of the maximum number of working hours permitted under law, the suppliers will ensure that the individual has voluntarily signed an opt out agreement.

Further information can be found here - <https://www.gov.uk/maximum-weekly-working-hours>

5. Wages and Benefits

Suppliers must compensate all workers and employees with wages and benefits that (as a minimum) meet the minimum wage as set out in the National Minimum Wage Act 1998 and the HMRC expenses and Benefits Guide (2022)

Further information can be found here - <https://www.gov.uk/national-minimum-wage>

6. Discrimination

Aspire employs people from a wide variety of backgrounds, origins, experiences and cultures. As per our Equality, Diversity and Inclusion Policy, we see diversity as a strength. We seek to promote a culture that appreciates and respects the diversity of our workforce and respects and observes the individual human rights of those who work with us.

Suppliers must not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any other employment practice based on any of the following characteristics: age, gender, sexual orientation, race, ethnicity, colour, disability, religion or belief, political affiliation, union membership, national origin, gender reassignment, marriage or civil partnership, or pregnancy and maternity.

Suppliers must value diversity and promote an inclusive workplace which respects and observes the individual human rights of all employees and commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment, (be it physical, mental, sexual or verbal) must be prohibited and not tolerated.

7. Healthy and Safe Working Conditions

Aspire is committed to actively managing the health, safety and wellbeing of all persons affected by what we do, be they employees, contractors, volunteers, customers or members of the public.

Suppliers must comply with all UK health and safety laws, codes and guidance in order to manage and protect the health and safety of their workers, Aspire's customers and colleagues, and members of the public.

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities. Clear procedures must be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to.

Suppliers must comply with Aspire's Health and Safety policies, procedures and safety management practices.

8. Interaction with others

Suppliers must ensure that all their workers are at all times professional, polite, and courteous in their interactions with others. This includes with any of Aspire's colleagues, volunteers, and customers, with each other, and with any members of the public that they interact with.

This includes not discriminating against, harassing or otherwise mistreating any such individuals based on any of the characteristics described in paragraph 6 of this Code.

9. Competence and Conduct of Supplier Staff

Aspire is committed to ensuring that all colleagues and staff employed or engaged by contracted service providers who are involved in the delivery of services on our behalf have

the appropriate skills, knowledge, experience and behaviours to deliver high-quality, safe and effective services.

Our suppliers are required to take appropriate and proportionate steps to recruit, train, develop, support and manage their staff so that they meet relevant competence and conduct requirements, maintain up-to-date capabilities for their roles, and act with professionalism, integrity and respect.

We expect suppliers to have effective arrangements in place for learning and development, performance review and the management of poor performance, and to embed standards of conduct that align with our own expectations and regulatory obligations, including those relating to the competence and conduct of individuals involved in the management and delivery of services.

10. Safeguarding

Aspire is committed to safeguarding the welfare of children, young people and vulnerable adults.

Suppliers have a dual role to play in this:

- Appropriate due diligence on relevant workers; and
- Reporting of safeguarding concerns that are identified whilst working on behalf of Aspire

Safeguarding and promoting the welfare of children, young people and vulnerable adults is defined as:

- Protecting children, young people and vulnerable adults from abuse or neglect
- Preventing impairment of the health or development of children, young people and vulnerable adults.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child, young person or a vulnerable adult by inflicting harm or by failing to act to prevent harm.

Vetting checks

Suppliers will carry out appropriate due diligence checks to ascertain whether its workers who will have contact with Aspire's customers or have access to their homes or personal information would pose any risk to their wellbeing or safety.

If the supplier obtains any information that suggests that one of its workers in such a role may in fact be unsuitable to work in a job that gives access to Aspire's customers, their homes or their personal information, it must notify Aspire without delay and take immediate steps to ensure that the individual does not interact with Aspire's customers (whether supervised or not) or have access to their homes or personal information.

Disclosure and Barring Service (DBS) checks

Where a supplier's workers may have contact with Aspire customers, access to customers' homes, access to personal information, or involvement in services where safeguarding risks may arise, the supplier must ensure that appropriate pre-employment and ongoing suitability checks are completed before the individual undertakes work on behalf of Aspire.

This includes obtaining the appropriate level of Disclosure and Barring Service (DBS) check where the role is eligible and where the nature of the work requires it.

The level of DBS check required must be proportionate to the role, the level of contact with customers, whether the work is supervised or unsupervised, and any relevant legal or regulatory requirements. Where workers are engaged in regulated activity, or where barred list checks are required, suppliers must ensure that the appropriate enhanced DBS and barred list checks are completed before work begins.

Suppliers must keep accurate records confirming that relevant checks have been completed, including the date and level of check, and must provide written assurance to Aspire on request. Suppliers must not allow any worker to undertake unsupervised work with customers, enter customers' homes, or access customer information where required vetting checks have not been completed or where the outcome raises a safeguarding concern.

If a supplier becomes aware of any information that may affect a worker's suitability to carry out work for or on behalf of Aspire, the supplier must notify Aspire without delay and take immediate steps to manage any risk, including removing the individual from relevant work where appropriate.

Reporting safeguarding concerns relating to Aspire customers

Any safeguarding concerns relating to Aspire customers should be reported immediately to the supplier's contact within Aspire and/or to Aspire's safeguarding lead; the Director of Communities, as referenced in our corporate safeguarding policy.

Any criminal offences must be reported immediately to the Police.

11. Business Integrity

Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes the Aspire Anti-Bribery and Corruption policy, or in any way act in contravention of any applicable laws relating to the prevention of bribery.

Suppliers will not offer, give or accept anything of value that may be viewed as, or has the effect of, improperly influencing business decisions.

Suppliers must make Aspire aware of any potential conflicts of interest as soon as they are known.

12. Information and Cyber Security

We expect high standards of information and cyber security, regardless of whether information is ours, or people outside Aspire. Everyone has a shared responsibility to keep Aspire's and our customers' information safe, and all IT systems which process digital information secure.

Suppliers must have established information security policies and procedures in place which should be provided to Aspire as part of the tendering process and provide sufficient information security and data protection training for all staff.

Where required, suppliers should have implemented IT security controls, e.g. AV, patching, network security, and have implemented physical security controls, e.g. barriers, CCTV, access control, monitoring where appropriate.

Suppliers should have implemented risk management protocols, such as internal audits and risk audits where appropriate.

13. Privacy

Suppliers must comply with relevant data protection and privacy laws, including but not limited to the Data Protection Act 2018, and make Aspire immediately aware of any personal data breaches in relation to any of Aspire's colleagues or customers by emailing dpo@aspirehousing.co.uk

Suppliers must not sub-contract any data processing activities without first requesting the consent of Aspire by emailing dpo@aspirehousing.co.uk

Suppliers must protect the personal information of our colleagues and customers and seek permission from Aspire before communicating anything externally, including on social media channels, regarding its relationship with Aspire that is not in the public domain by emailing communications@aspirehousing.co.uk

Suppliers must respect Aspire's intellectual property rights and use appropriate non-disclosure or confidentiality agreements to protect this where appropriate.

It is the responsibility of the Supplier to ensure that any sub-processors you use comply with all of the above requirements of section 12.

14. Environmental Sustainability

Suppliers are expected to support Aspire's environmental objectives by taking reasonable and proportionate steps to reduce waste, prevent pollution, use resources efficiently, minimise carbon emissions, and comply with all applicable environmental laws, regulations and standards.

Where relevant to the goods, works or services provided, suppliers should be able to explain the environmental controls, policies, accreditations or improvement plans they have in place.

15. Community Involvement

Aspire is committed to supporting the communities in which we operate, and we encourage our suppliers to do the same, fostering social and economic development and contributing to the sustainability of our local communities.

Suppliers must consider how to bring social value to our communities and are encouraged to seek opportunities to address local socio-economic issues in the communities in which they operate.

Suppliers are encouraged to work with Aspire in supporting the delivery of our community programmes and ensure that social value is a consideration of all contractual relationships.

16. Awaab's Law and Housing Safety Hazards

Suppliers must support Aspire in meeting its responsibilities under Awaab's Law by reporting any damp, mould, condensation, water ingress, emergency hazard or other significant housing safety concern without delay.

This includes concerns identified during works, inspections, repairs, maintenance, surveys or customer-facing services, or where a customer raises an issue directly with the supplier. Reports should include the property address, the issue identified, any immediate risk, photographs where appropriate, and any action already taken.

Where there is an emergency or imminent risk of harm, suppliers must take immediate steps to make the situation safe where competent and authorised to do so, and notify Aspire immediately.

Suppliers must ensure relevant workers know how to identify and report potential Awaab's Law or housing safety issues and keep records of concerns, reports and actions taken.

17. Compliance with this Code

Suppliers must be able to demonstrate compliance with this Supplier Code of Conduct. This includes documented evidence and the right of Aspire or a designated firm to conduct audits, including facility and health and safety inspections, review of supplier records business practices and conducting employee interviews.

18. Reporting Concerns

Contractors and suppliers must report any concerns identified during service delivery or observed while present in the community, using the agreed reporting channels. This includes anti-social behaviour, nuisance, incidents on or near site, safeguarding issues, or any concerns relating to the wellbeing of residents, staff, or the public.

Suppliers must remain vigilant, recognising that concerns may arise even when works are not being undertaken, and escalate such matters promptly so that Aspire can take appropriate action.

Suppliers are required to report any compliance issue with this Code immediately. Failure to do so will constitute a breach. Suppliers must also provide details of the corrective actions they will take, with appropriate timelines, as soon as reasonably practicable.

SIGNED

By [insert name], [insert job title, department]

For and on behalf of

Aspire Housing

SIGNED

By [insert name, job title]

For and on behalf of

[insert third-party organisation name] **(The Supplier)**