Supply Partner Handbook

Guidance on how to become a DfID Code Compliant Supply Partner
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Introduction

In 2017, the Department for International Development conducted a comprehensive supplier review. Following the review, the Supply Partner Code of Conduct (The Code) was introduced into our contractual terms and conditions. The purpose of The Code is to ensure the highest standards of ethical and professional behaviour is practiced through DfID project(s) delivery chains.

DfID Supply Partners are at the leading edge of the UK government’s reform plan and must deliver development results while improving transparency and accountability across the Supply Chain Delivery.

Foreword from Nick Ford, Head of Procurement and Commercial, DfID

‘I am delighted to be sharing with you the Supply Partner Handbook. As a commissioning organisation DfID must at all times remain assured of the probity of the selected development partner organisations entrusted with UK public’s money. DfID has a responsibility to scrutinise and check compliance against the Supply Partner Code of Conduct. This document has been created to support and assist Supply Partners with their returns, as well as driving a constructive and engaging conversation with those who we do business with in our joint approach towards achievement of global development goals.

I encourage DfID Supply Partners to use this handbook to become familiar with their Code responsibilities as they relate to their own organisation and how these responsibilities apply to their delivery chain partners. The Procurement and Commercial Department is committed to helping supply partners to meet or exceed their compliance commitments and this Guide has been developed with a view to helping commissioned partners to fully meet Code requirements and ultimately to deliver all round best value alongside robust assurance for DfID and the UK Taxpayers’
Purpose of this handbook

The purpose of this handbook is to assist Supply Partners in the completion of their returns under the DFID Supply Partner Code of Conduct. DFID understands that the terms and conditions that govern Supply Partner working relationships can often be complicated. Hence, this handbook has been created to provide Supply Partners with the tools needed to become a code compliant supply partner.

The structure of this handbook is aligned to The Code with each section corresponding to the equivalent sections of The Code. Clear reference has been made to The Code supplemented with an overview of the clause or Key Performance Indicator (KPI), compliance guidance and some useful tools recommended. Each section of the handbook has been hyperlinked below:

Section 1: Value for Money and Governance
Section 2: Ethical Behaviour
Section 3: Transparency and Delivery Chain Management
Section 4: Environmental Issues
Section 5: Terrorism and Security
Section 6: Safeguarding, Social Responsibility and Human Rights

Please read and consider the handbook guidance and raise any specific questions not covered to the DFID dedicated mailbox:

suppliercompliance@dfid.gov.uk

Where appropriate the DFID’s Remedies for Default will be followed in accordance with the terms and conditions of the contract clause 40 and except in exceptional circumstances, opportunity for rectification with agreed time frames will be provided. Supply Partner’s should be aware that failure to adequately adhere to Code requirements could ultimately lead to termination, partial termination, suspension, or partial suspension of contracts in place with DFID in accordance with terms and conditions of the contract clauses 43-45.
Section 1 - Value for Money and Governance

1. Introduction

Value for Money and financial transparency are essential requirements of all DFID commissioned work. All Supply Partners must seek to maximise development results, whilst driving cost efficiency, throughout the life of commissioned programmes. This includes budgeting and pricing realistically and appropriately to reflect delivery requirements and levels of risk over the life of the programme. It also includes managing uncertainty and change to protect value in the often-challenging environments that we work in.

Key Performance Indicators:

1. a) Economic and governance policies in practice

Supply Partners must provide assurance across the whole life of the contract that they will deliver against the agreed project contract terms. Progress updates on financial reporting, handover, and payment are required by DFID as outlined in the contract terms (Sections 13, 14 & 15 of the DFID T&Cs).

What this means for Supply Partners

Supply Partners are required to have appropriate governance in place (Policies, Standard Operating Procedures, Guidelines and Business Processes) that clearly outlines their approach to company and financial management for all DFID programme(s) being delivered.

The Code also applies to Supply Partners’ subcontractors and requires their verification of compliance throughout their delivery chain network. The main Supply Partner is accountable for ensuring code compliance throughout their delivery chain.

How Supply Partners can demonstrate compliance

DFID require validation that a Supply Partner’s financial and VfM commitments, relevant to each contract, are managed / monitored whilst ensuring expectations remain achievable and are being achieved in accordance with the agreed contract structure over the life of the contract. DFID requires assurance through the submission of relevant economic policies that
outline the methodology applied to demonstrate compliance with this KPI. Relevant policies include:

- Financial governance policies
- Summary of corporate governance procedures
- Code of Conduct (a supply partner’s own company code of conduct, not to be confused with the DfID Supply Partner Code of Conduct)
- Organisation chart
- Governance Policy
- Quality management manual, process or certification
- Internal controls designed to prevent and minimise opportunity for fraud and corruption
- Processes around review and identification of any instances of fraud or misuse
- Reporting routes and methods for irregularities

1.b) VFM being maximised over the life of a contract

DfID requires validation that value for money is maintained across the life of all contracts whilst ensuring Supply Partners are generating a reasonable amount of profit as declared in a tender(s). DfID will periodically review actual profit level against the projected profit and may seek adjustments in line with Clause 20 of the T&Cs.

- **Projected Profit Margin** - is the profit which the Supply Partner expects to achieve over the term as set out in the schedule of costs.
- **Actual Profit Margin** - is the actual profit achieved during the relevant period.

Confirmation of annual profit level fluctuations since tender submission is required to ensure that each project is delivered against the forecasted profit margin outlined in the tender.

DfID works in challenging environments and therefore Supply Partners must demonstrate that they manage uncertainty and change in ways that protect the value generated through programme funds. Lessons learned within Supply Partners help to maximise the value and optimise spend through the life of a contract.
What this means for Supply Partners

In the primary contract, DfID and the Supply Partners forecast the profit margin for the programme as part of the financial model. Supply Partners must then report on the programme budget and adherence to the agreed profit level, every year (or every 6 months, on request), confirming their profit position against their stated profit. If the profit is exceeded over the life of the Contract, DfID will seek to agree or may direct Supply Partners to:

- Pay DfID an amount equal to the difference between the projected profit margin and the actual profit margin; or
- Redirect an amount equal to the difference between the projected profit margin and the actual profit margin back into the programme being delivered as part of the Services; or
- Adjust the charges they invoice to DfID.

DfID recommends that main Supply Partners gather key financial information from their subcontractors. We recommend that Subcontractor profit margins are reported on and budget templates also submitted.

Any issues that arise at programme implementation must be identified and resolved by the Supply Partner with all issues documented and resolutions reported. Risk registers should be maintained throughout the life of a contract and Supply Partners should be prepared to discuss and share these with DfID at all times. Lessons learned identified throughout the life of the contract should be shared to ensure continuous improvement.

How Supply Partners can demonstrate compliance

- Full financial reports clearly indicating profit margin
- Budget template
- Organisational risk register
- Lessons learned log
- Procedures for handling identification and resolution of issues
- Trackers or matrices which record issues, timelines, corrective actions and resolution for programmes
- Descriptions of any bespoke systems or technology in place that supports in tracking issues through to resolution
1.c) Tax Declaration (HMRC format)

A mandatory requirement of receiving any source of DfID funding requires all Supply Partner(s) to ensure that they assume responsibility for complying with all applicable tax requirements, both in the UK and abroad. Supply Partners (including their subcontractors) must confirm that they adhere to the appropriate regulatory requirements and ensure that the correct taxes have been paid in relation to the country it operates in.

What this means for Supply Partners

Supply Partners need to:

- Share audited accounts from the last financial year to confirm compliance
- Ensure that they are complying with the correct tax regulations
- Alert DfID if there is a change in their compliance level

Recommendation – How Supply Partners can demonstrate compliance

- Financial Statements from the past two years
- Annual Report – To include delivery chain partners
Section 2 - Ethical Behaviour

2. **Introduction**

DfID Supply Partners (including delivery chain partners/subcontractors) act on behalf of the UK Government and interact directly and indirectly globally with our key stakeholders and beneficiaries from country governments, other aid donors (including their delivery partners), multiple stakeholders and beneficiaries of aid. DfID requires assurance that Supply Partners delivering our programmes or component parts of our programmes ensure that all engagement with our key stakeholders and beneficiaries meet the highest standards of ethical and professional behaviour that upholds the reputation of the UK Government.

**Key Performance Indicators:**

2.a) **Recruitment policy**

Supply Partner recruitment policies must demonstrate alignment with good practice and compliance with key legislation relating to international principles on labour and ethical employment. Supply Partners must also provide accurate references and assurances for direct employees and those working within the supply chain.

**What this means for Supply Partners**

Supply Partners need to:

- Have robust recruitment policies
- Meet standards set by DfID

**How Supply Partners can demonstrate compliance**

- Provide a copy of their recruitment policy
Any updates to the policy content should be advised at the earliest opportunity as well as in annual declarations made.

### Key Recommendations

DFID recommends that a recruitment policy includes the following:

- Recruitment to be conducted in a fair and transparent manner and must be subject to open competition.
- Recruitment decisions must be evidence based. Evidence may include CV’s, covering letters, competency based testing, personality profiling and interviews.
- All staff involved in the recruitment process must be vigilant in monitoring their own unconscious bias and should undertake diversity and inclusion, fair recruitment and selection and unconscious bias training.
- Supply partners must endeavour to pro-actively remove any barriers to disabled candidates.
- Comprehensive pre-employment checks
- Candidates to be informed of the supply partner’s standards and expectations
- Conflict of interest declaration requirement
- Candidate documentation to be treated with privacy and confidentiality in accordance with GDPR

### 2.b) Ongoing conflict of interest (COI), mitigation and management

DFID requires that COI is managed effectively by all Supply Partner’s through robust governance that provides confidence in the probity of commissioning decisions and integrity of all Supply Partner personnel (including subcontractors) that mitigates any risks of programme management being seriously undermined.
Robust COI policies and procedures embedded within Supply Partner recruitment process can ensure that COI risks are mitigated. A key area of concern for DfID relates particularly to conflicts resulting from the employment of ex DfID personnel.

DfID will undertake periodic spot checks as well as both routine and reactive deep dive reviews that evaluate adherence to contract terms for COI in the delivery of DfID programmes.

What this means for Supply Partners

All Supply Partners must have in place policies and procedures that cover:

- Circumstances where there may be potential, perceived or actual COI
- Compliance with HMG approval requirements under the business appointment rules

How supply partners can demonstrate compliance

- Provide a copy of their Conflict of Interest Policy
- Actively manage potential, perceived and actual conflicts of interest
- Disclose potential, perceived and actual conflicts of interest

Key Recommendations

DfID recommends that a COI Policy covers the following:

- Financial interests – Personnel of family members cannot stand to benefit financially from company practices
- Personal relationships – Relationships should be reported. Relationships alone are not conflicts of interest but examples where there is a substantial amount of influence and interest must be reported on
- Political interests – The intended reputation of the business must always be in sight. A policy should cover the tolerance level on political activities of employees which could give rise to a perception of political bias at corporate level
- The acceptance of certain gifts or hospitality
2.c) Refresher ethical training and staff updates

All Supply Partners must ensure that staff and any other Supply Partner representatives have completed appropriate induction and/or annual ethical training, with appropriate training logs held. All training should cover subjects such as ethical behaviour, confidentiality and conflict of interest, respect for colleagues, inclusion and diversity, safeguarding including child & vulnerable adult protection, and modern slavery.

What this means for Supply Partners

Supply partners need to:

- Have training procedures in place

How Supply Partners can demonstrate compliance

- Retain a record of ethical training logs
- Internal training procedures for new recruits/joiners
- Demonstration of training provided
2.d) Workforce whistleblowing policy

Supply Partners and their delivery chain partners must have whistleblowing policies and procedures in place. As a Supply Partner it is good practice to create an open, transparent and safe working environment where workers feel able to speak up. The existence of a whistleblowing policy shows a Supply Partner’s commitment to listen to the concerns of workers. Clear policies and procedures and easy access for dealing with whistleblowing, demonstrates that an organisation welcomes information being brought to the attention of management.

How Supply Partners can demonstrate compliance

Supply Partners need to have:

• A robust Whistleblowing policy in place
2.e) Procedures setting out how, staff involved in DfID funded business, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance

Supply Partners (including subcontractors) must report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to DfID’s Internal Audit Investigations Section (IAIS) (previously known as the Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@dfid.gov.uk or on +44(0)1355 843551. DfID requires Supply Partners to evidence how exactly they raise awareness of and give staff access to the mailbox.

Key Recommendations

DfID recommends that a whistleblowing policy covers the following:

- An explanation of what whistleblowing is, particularly in relation to the organisation;
- A clear explanation of the organisation’s procedures for handling whistleblowing, which can be communicated through training;
- A commitment to training workers at all levels of the organisation in relation to whistleblowing law and the organisation’s policy;
- A commitment to treat all disclosures consistently and fairly;
- A commitment to take all reasonable steps to maintain the confidentiality of the whistle-blower(s) where it is requested (unless required by law to break that confidentiality);
- Clarification that any so-called ‘gagging clauses’ in settlement agreements do not prevent workers from making disclosures in the public interest;
- A commitment to emphasise in a whistleblowing policy that victimisation of a whistle-blower(s) is not acceptable. Any instances of victimisation will be taken seriously and managed appropriately.
What this means for Supply Partners and how they can demonstrate compliance

Supply Partners must cascade the DfID mailbox details to staff and representatives (including subcontractors) of their company and be able to demonstrate compliance with this KPI.

2.f) Declarations of direct or subcontractor staff members proposed to work on DfID funded programmes, employed by DfID or the Crown in the preceding two years.

Supply Partners (including their subcontractors) must provide proof of compliance with the HMG approval requirements under the business appointment rules. Business appointment rules cover appointments which Crown servants propose to take up after their last day of paid service. For those at SCS1 level and above (and equivalents), the rules apply for two years after leaving the Civil Service. For those below SCS1 level (and equivalents), they normally apply for one year after leaving the Civil Service.

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<td>Supply Partners need to provide:</td>
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<tr>
<td>• Declarations of direct or subcontractor staff members proposed to work on DfID funded programmes if previously employed by DfID or the Crown in the preceding two years. To be provided annually to the compliance team</td>
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Section 3 - Transparency and Delivery Chain Management

3. Introduction

DFID requires full delivery chain transparency from all Supply Partners (including their delivery chain partners), and they must adhere to wider HMG policy initiatives including the support and capacity building of micro, small and medium sized enterprises (MSMEs), prompt payment, adherence to human rights and modern slavery policies and support for economic growth in developing countries.

Key Performance Indicators:

3.a) IATI compliance for supply partner and delivery chain supply partners

The International Aid Transparency Initiative (IATI) provides accessible clear data on aid spending everywhere in the world. IATI is a standard for data that allows organisations in receipt of aid money to openly track and publish their financial activity.

What this means for Supply Partners

Every quarter, Supply Partners must compile financial data in the required format. This shows income and expenditure relationships between DFID and the downstream delivery chain, for primary Supply Partners and for their delivery chain subcontractors.

Supply Partners must be committed to publishing data on the financial allocations subcontractors receive and are expected to update their publication at least on a quarterly basis, within a month after the end of each quarter.

The link to the IATI data set must be made available on the IATI Registry: https://iatiregistry.org.
3.b) Up to date and accurate records of all downstream Supply Partners provided within the required frequencies, including annual contractual spend on MSME’s, women-owned businesses and apprenticeships in place

DfID require visibility and transparency across its supply chain. At tender stage, Supply Partners present their supply chain to DfID and indicate what % of the programme budget is allocated to each subcontractor. DfID understands that these are liable to change to reflect changing programme requirements.

What this means for Supply Partners

Supply Partners must advise DfID of any changes that may occur within the Supply Chain and provide updated assurances to DfID that any subcontractor is compliant with DfID expectations. DfID expects that this information should be available for all downstream Supply Partners as set out in the delivery chain map. Compliance with The Code will be reviewed for the lead Supply Partner on an annual basis, and DfID expects the delivery chain mapping and compliance level allocation to be refreshed in line with this cycle.

How Supply Partners can demonstrate compliance

The following documents can be used to demonstrate compliance:

- Annual compliance declaration
- Updated list of downstream partners
- Updated delivery chain map
3.c) Policies and practices for the management of delivery chain partners and affiliates aligned to the DfID Supply Partner Code of Conduct.

Supply Partners and their downstream partners must be compliant with the DfID Supply Partner Code of Conduct.

What this means for Supply Partners

Supply Partners are contractually obliged to adhere to The Code. Supply Partners are also responsible for managing sub-contractors to ensure they sustain their compliance with The Code throughout the life of a contract.

How Supply Partners can demonstrate compliance

Supply Partners must provide full returns to the Compliance team over the life of a contract. Supporting templates and this handbook can be used to assist.

3.d) Tax evasion, bribery, corruption and fraud statements of assurance provided

DfID has a zero-tolerance policy on tax evasion, bribery, fraud and corruption. We expect all our Supply Partners (including subcontractors) to comply with this approach when carrying out their duties for, and on behalf of, DfID.

Our policy is proportionate to the risks we face and is based on the six Ministry of Justice principles: proportionate procedures, top level commitment, risk assessment, due diligence, communication, monitoring and review.

DfID requires assurance that Supply Partners are not involved in any tax evasion, bribery, corruption or fraud. Whilst live contractual arrangements are in place, should any incidence of such activity arise, directly or within the supply chain then this must be reported to PCD compliance at the earliest opportunity.
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What this means for Supply Partners

Supply Partners are contractually obliged to provide assurances that they have not been involved in any activity that would be grounds for exclusion. Supply Partners must report breaches in compliance and policies must be put in place to prevent recurrences.

How Supply Partners can demonstrate compliance

Supply Partners must provide assurance by annually submitting their completed Code of Conduct Compliance Declaration as well as complying with DfID’s periodic spot checks. Breaches in tax evasion, bribery, corruption and fraud must be immediately reported to DfID.

Any changes to previous declarations must be provided to DfID.

3.e) All delivery chain partner employees working on DfID Contracts fully aware of the DfID reporting concerns mailbox

All Supply Partners must confirm that they and their workforce are aware of DfID procedures to report suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance via DfID’s Internal Audit Investigations Section (IAIS)

What this means for supply partners and how they can demonstrate compliance

Supply Partners must cascade the reportingconcerns@dfid.gov.uk mailbox details to all staff working on DfID programmes in their organisation and in their supply chain organisations. Supply Partners must be able to provide proof of this.

3.f) HMG prompt payment policy adhered to by all delivery chain partners

DfID expects all subcontractors to be paid promptly. In most circumstances this means within 30 days of receiving a valid invoice.

DfID aims to pay all Supply Partners promptly in accordance with UK Government Policy on receipt of an accurate invoice(s). DfID expects all Supply Partners to adhere to the same policy, where they subcontract any portion of their scope of DfID funded work.
What this means for Supply Partners

If you subcontract any portion of your scope of work, you must pay your suppliers promptly.

How supply partners can demonstrate compliance

Supply Partners must provide full returns to the Compliance team and comply with any spot checks requested. An overarching annual declaration of adherence is acceptable, on behalf of all funded contractors in the delivery chain.
Section 4 - Environmental Issues

4. Introduction

DfID Supply Partners must be committed to operating in accordance with high environmental standards, recognising that DfID activities may change the way people use and rely on the environment, or may affect or be affected by environmental conditions.

Supply Partners must demonstrate they comply with international, national and local laws and evidence that they have taken sufficient steps to protect the local environment and community they work in, and to identify environmental risks that are imminent, significant or could cause harm or reputational damage related to DfID operations.

4.a 1) Steps in place to identify environmental risks (e.g. by maintaining a risk register) Ensuring legislative requirements are being met

Supply Partners must comply with all local laws and regulations. This includes laws regarding environmental issues and standards. Specific environmental risks and requirements will be stipulated in the body of the contract Terms of Reference (TOR).

Supply Partners must aim to identify and mitigate any environmental risks that relate to the operation of their programme(s). Requirements against The Code’s Environmental Issues KPIs will be highlighted on a contract by contract basis and will be linked to the content of the TOR’s. The detail set out will provide clarity where this applies on a country or HQ basis.

What this means for Supply Partners

DfID expects all Supply Partners to contribute to the programme environmental risk register, as required, and to maintain their own risk register for involvement on the programme.

How Supply Partners can demonstrate compliance

Supply Partners must create and maintain a Risk and Issues register (including environmental category).
4.a 2) Formal context-specific environmental safeguarding policies in place to ensure legislative requirements are being met

An environmental policy is a written statement and should be signed by senior management. An environmental policy forms the foundation of environmental improvements being made or contributed to by a Supply Partner and is agreed by senior management. It sets out key aims and principles.

What this means for Supply Partners

Supply Partners must have an environmental safeguarding policy in place and report on any environmental risks and proposed mitigation actions through a Risks and Issues Register.

How Supply Partners can demonstrate compliance

Supply Partners must create and maintain an environmental policy and compliance report.

Key Recommendations

DIID recommends that an environmental policy covers the following:

- A commitment to continually improve environmental performance
- A commitment to effectively manage significant environmental impacts
- The environmental expectations that a Supply Partner has in relation to its partners and subcontractors
- A commitment to comply with all local environmental legislation
- The monitoring and review of progress made on environmental issues
- A commitment to educate and train employees on the impacts of environmental issues.

4.b) Published annual environmental performance reports

In order to commit to the highest possible environmental standard, DIID Supply Partners must publish annual environmental reports on their performance. There are direct benefits for Supply
Partners in the measuring and reporting of environmental performance. Supply Partners may benefit from lower energy and resource costs and gain a better understanding of exposure to the risks of climate change.

What this means for Supply Partners

All environmental KPIs are specific to the contract and are referenced in the Terms of Reference. These KPIs must be reported on annually as per the individual contract arrangement.

Supply Partners will be required to report on environmental performance. You can do this through your Code of Practice / UN Global Compact activities, or you can provide a separate report.
Section 5 - Terrorism and Security

5. Introduction

DFID Supply Partners must implement due diligence processes to provide assurance that UK Government funding is not used in any way that contravenes the provisions of the Terrorism Act 2000, and any subsequent regulations pursuant to this Act. DFID Supply Partners must maintain high levels of data security in accordance with the Data Protection Act 1998 and any subsequent regulations pursuant to this Act, or new Act and with the General Data Protection Regulation (Directive 95/46/EC).

5.a) Status declaration regarding the reporting of terrorist offences or offences linked to terrorist activities or financing

DFID Supply Partners must declare via the Selection Questionnaire stage that the Supply Partner organisation or any of its representatives have not been convicted in the previous five years of "terrorist offences or offences linked to terrorist activities".

What this means for Supply Partners

Once Supply Partners have made this declaration, they must conduct due diligence on all firms or individuals connected to the business to gain assurance that they have not been convicted of any terrorist offences. All breaches or findings against this KPI must be instantly reported to DFID.

5.b) Certification at or above the level set out in the tender submittal

DFID must be informed if the status of a Supply Partner changes following their initial declaration.

What this means for Supply Partners

Supply Partners are required to confirm on an annual basis that their declaration response and status relevant to the Terrorism and Security questions at tender submission have not changed.
5.c) Data managed in accordance with DfID Security Policy and systems in accordance with the HMG Cyber Essentials Scheme

Information security is the preservation of confidentiality, integrity and availability of DfID information. It may also include the authenticity, accountability, non-repudiation and reliability of DfID information depending on circumstances.

DfID requires the security of its information to be maintained in order to ensure that information for its business needs can be relied on and meets statutory, regulatory and HM Government policy obligations.

What this means for Supply Partners

Supply Partners (including subcontractors) must declare, as part of the declaration of compliance to The Code, that their data is managed in accordance with the DfID Security Policy.

How Supply Partners can demonstrate compliance

- Information Security Policy
- HMG Cyber Essentials scheme certification (for UK based organisations only) for Level 1 and 2 subcontractors and evidence that you are following the requirements of the scheme for level 3 subcontractors.

5.d) Adherence to the best practice global Principles for Digital Development

The 9 Principles for Digital Development are a set of guidelines intended to help practitioners applying digital technologies to development programmes. DfID endorses these in its programmes. The principles are:

- Design with the user
- Understand the existing ecosystem
- Design for scale
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- Build for sustainability
- Be data driven
- Use Open Standards
- Open Data, Open Source, and Open Innovation
- Reuse and Improve
- Address Privacy and Security
- Be collaborative

What this means for Supply Partners

Supply Partners must make a statement, as part of the declaration of compliance with The Code, to adhere to the Principles for Digital Development.

More information about how to implement these principles into practice can be found here.

Section 6 - Safeguarding, Social Responsibility and Human Rights

6. Introduction

Safeguarding, social responsibility and respect for human rights are central to DfID’s expectations of its Supply Partners. Supply Partners must ensure that robust procedures are adopted and maintained to eliminate the risk of poor human rights practices within their complex delivery chain environments funded by DfID. These practices include: sexual exploitation abuse and harassment; all forms of child or vulnerable adult abuse; inequality or discrimination on the basis of race, gender, age, religion, sexuality, culture of disability.

Supply Partners must place an emphasis on the control of these and further unethical and illegal employment practices, such as modern slavery, forced and child labour and other forms of exploitative and unethical treatment of workers and aid recipients. DfID expects a particular emphasis on management of these issues in high risk fragile and conflict affected states (FCAS), with a focus on ensuring remedy and redress if things go wrong.

6.a) Provision of a current internal document demonstrating good practice and assuring compliance with key legislation on international principles on labour and ethical employment

DfID requires Supply Partners and subcontractors to understand obligations in relation to global and local employment legislation and commit to upholding these standards in all DfID-funded projects.

What this means for Supply Partners

Supply Partners must provide current internal documentation (policy, standard operating practices or other), demonstrating compliance with key legislation on international principles on labour and ethical employment (including the UK’s Modern Slavery Act 2015, where applicable).
6.b) Organisational procedures in place directly, and within the delivery chain:

1. To prevent actual, attempted or threatened sexual exploitation and abuse or other forms of inequality or discrimination by employees or any other persons engaged and controlled by the Supply Partner to perform any activities relating to DfID funded work

DfID is committed to applying the highest possible principles in relation to safeguarding. We expect our partners to join us in applying these principles in their work and through their delivery chains.

How Supply Partners can demonstrate compliance

- Retaining board minutes and Senior Management Team (SMT) agendas on regular review of policies and procedures (including details of learning and updated policy as a result of an incident)
- Mandatory Training on safeguarding recorded and signed by staff members and held in personnel folders/files

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<td>• Modern Slavery Statement</td>
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<td>• Anti-Slavery Policy</td>
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<td>• Completion of the cross Government Modern Slavery Assessment tool</td>
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- Complaints procedures in place and used - a recent redacted case would demonstrate this. Signs/posters displayed in the organisation’s offices illustrating how to complain
- Review of protocols for victims or survivors including available support

2. For reporting suspected misconduct, illegal acts or failures to investigate actual, attempted or threatened sexual exploitation or abuse

DfID is committed to applying the highest possible principles in relation to safeguarding. We expect our partners to apply these principles in their work and through their delivery chains.

How Supply Partners can demonstrate compliance

- Retaining board minutes and SMT agendas on regular review of policies and procedures (key here is any learning and updated policy as a result of an incident)
- Mandatory Training on safeguarding recorded and signed by staff members and held in personnel folders/files
- Complaints procedures in place and used - a recent redacted case would demonstrate this or signs/posters displayed in the organisation’s offices illustrating how to complain
- Review of protocols for survivors including available support

6.c) Membership of the UN Global Compact (UNGC)

DfID requires all Level 1 Supply Partners to be signatories to the UN Global Compact (UNGC) and would actively encourage all other Supply Partners to consider signing up to the UN Global Compact, although it is not a contractual requirement. Other support organisations can provide support and guidance with mitigating risk within your supply chain, i.e. Ethical Trading Initiative (ETI).

More information about both the UNGC and ETI can be found here.

https://ethicaltrade.org/about-eti
http://www.unglobalcompact.org.uk/about-the-uk-network/
Supply Partners are advised to refer to being a DFID supplier within their letter of commitment when following the application process for the UNGC. When submitting an application it may also be helpful to support this by sending an email to info@unglobalcompact.org informing of proposed participation within a DFID supply chain.

**How Supply Partners can demonstrate compliance**

- UNGC Membership
- ETI membership

**6.1 & 3 Evidence of cascade to employees of an internal policy or written outline of good practice service delivery approaches to Human Rights and Safeguarding reflecting UN Global Compact Principles 1&2 demonstrating an appropriate level of commitment in relation to the Contract**

Level 1 DFID Supply Partners must be signed up to the UN Global Compact. Principles 1 and 2 of the Compact prohibit human rights violations and any support to businesses that are complicit in such violations.

Principles 1&2 are as follows:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

**How Supply Partners can demonstrate compliance**

- By outlining, via an internal document, good practice approaches to UN Global Compact principles 1&2 both in the community and in the workplace where DFID funded contracts are being delivered Examples of how supply partners may populate a statement of compliance with UN Human Rights principles 1 &2 are set out in Annex 2 of The Code
6.d2) Numbers and details of organisational safeguarding allegations reported

DFID requires all Supply Partners to provide full details of organisational safeguarding allegations that have been reported. Supply Partners must have clear procedures in place for safeguarding allegations to be reported and must promote a culture whereby employees feel comfortable and can easily report allegations to senior management.

How Supply Partners can demonstrate compliance

- Retaining board minutes and SMT agendas on regular review of policies and procedures (key here is any learning and updated policy as a result of an incident)
- Complaints procedures in place and used - a recent reported case would demonstrate this or signs/posters displayed in the organisation’s offices illustrating how to report an incident
- Full disclosure to DFID of any safeguarding allegations