



Foreign, Commonwealth
& Development Office

Supply Partner Handbook

NOTE - From June 2021 the Compliance & Risk team will be named as the Supply Chain Ethics & Governance team (SCEG). A separate Risk & Disputes team will work closely with SCEG on relevant parts of the Code of Conduct.

Guidance on how to become a FCDO Code Compliant Supply Partner

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*For more information on the different compliance levels for supply partners, see the **FCDO supply partner guidance** [here](#)*

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 FCDO project(s) delivery chains.

FCDO Supply Partners are at the leading edge of the UK government's programmes and must deliver development results while improving transparency and accountability across the Supply Chain Delivery.

Foreword from Commercial, FCDO



'I am delighted to be sharing with you the Supply Partner Handbook. As a commissioning organisation FCDO must at all times remain assured of the probity of the selected development partner organisations entrusted with UK public's money. FCDO 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 within our joint approach towards achievement of global development goals.

I encourage FCDO 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 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 the Code requirements and ultimately to deliver all round best value alongside robust assurance for FCDO and the UK Taxpayers'

Purpose of this handbook

The purpose of this handbook is to assist Supply Partners to demonstrate their required level of compliance to the FCDO Supply Partner Code of Conduct. The FCDO 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 FCDO SCEG team dedicated mailbox:

ethicsandgovernance@dfid.gov.uk

Where appropriate the FCDO'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 FCDO 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 FCDO 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 FCDO as outlined in the contract terms (Sections 13, 14 & 15 of the FCDO 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 FCDO 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

The FCDO requires 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. FCDO 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 FCDO 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

The FCDO 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). The FCDO 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.

The FCDO 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, the FCDO 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, the FCDO will seek to agree or may direct Supply Partners to:

- Pay the FCDO 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 the FCDO.

The FCDO 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 the FCDO 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

The UK government format for tax declaration can be viewed [here](#)

1.c) Tax Declaration (HMRC format)

A mandatory requirement of receiving any source of FCDO 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 the FCDO 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

FCDO 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. The FCDO 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 the FCDO

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

The FCDO 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 and worker passport details where these are held, 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 including disclosure of misconduct scheme checks, where appropriate
- Candidates to be informed of the supply partner's standards and expectations
- Conflict of interest declaration requirement

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

The FCDO requires that COI is managed effectively by all Supply Partner's through robust governance that provides confidence in the ongoing 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 the FCDO relates particularly to conflicts resulting from the employment of ex FCDO personnel.

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

The FCDO recommends that a COI Policy covers the following:

- Financial interests – Personnel or family members cannot stand to benefit financially from company practices
- Personal relationships – Such 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

Key Recommendations

The FCDO recommends that an ethical training plan covers the following:

- Ethical behaviour
- Confidentiality
- Respect for colleagues
- Child and vulnerable adult safeguarding
- Modern slavery
- Conflicts of interest
- Counter-fraud and anti-bribery
- Equality, diversity and inclusion

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

Key Recommendations

The FCDO 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.

2.e) Procedures setting out how, staff involved in FCDO 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 FCDO's Internal Audit Investigations Section (IAIS) at reportingconcerns@FCDO.gov.uk or on +44(0)1355 843747. The FCDO requires Supply Partners to evidence how exactly they raise awareness of and give staff access to the mailbox.

What this means for Supply Partners and how they can demonstrate compliance

Supply Partners must cascade the FCDO 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 FCDO funded programmes if previously employed by FCDO or the Crown

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 after leaving the Civil Service. For those below SCS1 level (and equivalents), they normally only apply for one year after leaving the Civil Service.

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

Supply Partners need to provide:

- Declarations of direct or subcontractor staff members proposed to work on FCDO funded programmes if previously employed by the FCDO or the Crown. Any updates to be provided annually to the SCEG team via the annual compliance declaration

More information on the International Aid Transparency Initiative (IATI) can be found [here](#)

Specific FCDO instructions on how to upload to IATI can be found [here](#)

Section 3 - Transparency and Delivery Chain Management

3. Introduction

The FCDO 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 small and medium sized enterprises (SMEs), 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 into the required format. This shows income and expenditure relationships between FCDO and the downstream delivery chain, including primary Supply Partners and their subcontractors.

Supply Partners must be aware that they are committed to publish data on the financial benefits subcontractors receive and are expected to renew 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](#) website.

3.b) Up to date and accurate records of all downstream Supply Partners provided within the required frequencies, including annual contractual spend on SME's, women-owned businesses and apprenticeships in place

The FCDO require visibility and transparency across its supply chain. At tender stage, Supply Partners present their supply chain to the FCDO and indicate what % of the programme budget is allocated to each subcontractor. The FCDO understands that these are liable to change to reflect changing programme requirements and that such changes will be undertaken in line with contractually agreed processes

What this means for Supply Partners

Supply Partners must advise the FCDO of any changes that may occur within the Supply Chain and provide assurances to the FCDO that any subcontractor is compliant with FCDO requirements. The FCDO expects that this information should be available for all downstream Supply Partners as set out in the delivery chain map. Compliance to The Code will be reviewed for the lead Supply Partner on an annual basis, and the FCDO 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:

- 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 FCDO Supply Partner Code of Conduct.

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

The FCDO reporting concerns mailbox can be found here

Reportingconcerns@FCDO.gov.uk

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 SCEG team over the life of a contract using our inSPIRE system. Supporting supply partner guidance, annual declarations and this handbook can be used to assist with this.

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

The FCDO 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, the FCDO.

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.

The FCDO requires assurance that Supply Partners and their affiliates are not involved in any tax evasion, bribery, corruption or fraud. These are to be reported at the earliest opportunity as well as during routine spot checks.

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 submitting a completed declaration and by returning their annual online Code of Conduct Compliance Declaration as submitted via the SCEG electronic inSPIRE system as well as complying with the FCDO's periodic checks.

Breaches in tax evasion, bribery, corruption and fraud must be immediately reported to the FCDO.

Any changes to previous declarations must be provided to the FCDO.

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

All Supply Partners confirm that they and their workforce are aware of the FCDO procedures to report suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit.

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

Supply Partners must cascade the reportingconcerns@FCDO.gov.uk mailbox details to all in their organisation and all in their supply chain. Supply Partners must be able to provide proof of this.

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

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

The FCDO aims to pay all Supply Partners promptly in accordance with UK Government Policy on receipt of an accurate invoice(s). The FCDO expects all Supply Partners to adhere to the same policy, where they subcontract any portion of their scope of 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 SCEG 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

FCDO Supply Partners must be committed to operating in accordance with high environmental standards, recognising that FCDO 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 FCDO 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 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

The FCDO 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

The FCDO 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 including annual net zero tracking
- 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, FCDO Supply Partners must publish annual environmental reports on performance. There are direct benefits for Supply Partners in the measuring and reporting of environmental performance including having net zero tracking in place

Supply Partners can 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

FCDO 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. FCDO 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

FCDO Supply Partners must declare at the Selection Questionnaire stage that the Supply Partner organisation or any of its representatives has 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 of this KPI must be instantly reported to the FCDO.

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

The FCDO 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.

Cyber Essentials is a Government-backed, industry-supported scheme to help organisations protect themselves against common online threats. More information can be found [here](#)

The full FCDO security policy can be found [here](#)

5.c) Data managed in accordance with FCDO Security Policy and systems in accordance with the HMG Cyber Essentials Scheme

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

The FCDO 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 FCDO 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. The FCDO endorses these in its programmes. The principles are:

- Design with the user
- Understand the existing ecosystem
- Design for scale

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More information can be found on the Principles for Digital Development [here](#)

- 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 to the Code, to adhere to the Principles for Digital Development.

More information about how to implement these principles into practice can be found on the [Principles for Digital Development website](#).

Section 6 - Safeguarding, Social Responsibility and Human Rights

6. Introduction

Safeguarding, social responsibility and respect for human rights are central to the FCDO'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 the FCDO. These practices include sexual exploitation abuse and harassment; all forms of child 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. The FCDO 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

The FCDO requires Supply Partners and subcontractors to understand obligations in relation to global and local employment legislation and commit to upholding these standards in all FCDO 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).

How Supply Partners can demonstrate compliance

- Modern Slavery Statement
- Anti-Slavery Policy
- Child Protection Policy
- Aid worker passport scheme in recruitment processes
- Disclosure of misconduct scheme adopted
- Recruitment Policy
- Code of Conduct or Ethical Behaviour Policy
- Risk and Issue Register
- Membership of The Ethical Trading Initiative (ETI)
- Completion of UK Government MSAT (Modern Slavery Assessment Tool)
- Supply chain cascade of UK Government's Modern Slavery online details www.modernslaveryhelpline.org

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 FCDO funded work**
- 2. For vetting and reporting suspected misconduct, illegal acts or failures to investigate actual, attempted or threatened sexual exploitation or abuse**

The FCDO 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
- 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 victims or survivors including available support
- Cascade of Government [Modern Slavery Helpline](#) details to direct and supply chain partner employees

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

The FCDO requires all Compliance Level 1 Supply Partners to be signatories to the UN Global Compact (UNGC) and would actively encourage all other Supply Partners, although not a contractual requirement, to consider signing up to the UN Global Compact. 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 their status as a FCDO 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 FCDO supply chain.

How Supply Partners can demonstrate compliance

- UNGC Membership

- ETI membership

6.d1) Evidence of cascade to employees of an internal policy or written outline of good practice service delivery approaches to Human Rights and Safeguarding that reflect UN Global Compact Principles 1&2 and demonstrates an appropriate level of commitment in relation to the Contract

Compliance Level 1 FCDO 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 and 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 good practice approaches to UN Global Compact principles 1 and 2 both in the community and in the workplace where FCDO funded contracts are being delivered.

6.d2) Numbers and details of organisational safeguarding allegations reported

The FCDO 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 the FCDO of any safeguarding allegations
- Sharing examples of workplace and community good practice approaches
- Membership of/signatory to the Inter-Agency Misconduct Disclosure Scheme (SCHR)