



**Brighton & Hove
City Council**

Supplier Code of Conduct

Organisation: Brighton & Hove City Council

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Introduction

Be it generating and retaining wealth within our communities, contributing to the achievement of environmental commitments, or mitigating against the risk of abuse and discrimination within our supply chain, it is our responsibility to procure in an ethical, fair, responsible, and sustainable way and that our supply chains align with our policy objectives.

Successful supply chains are built on shared goals, trust and values. These are relationships that are developed and deepened over time through collaboration, transparency and continuous improvement. We believe that this Code of Conduct (the “Code”) will be mutually beneficial and improve the outcomes of all parties’ objectives.

Brighton & Hove City Council (the Council) is working towards a culture of high standards whereby supply chain activities are operated in an ethical and sustainable way, and in accordance with all applicable laws. The Code is based on the principles of UN Global Compact.

In the first instance this Code is primarily aimed at communicating our values, priorities and objectives. We will seek to reinforce these through the procurement of goods, services and works. We will monitor adherence to the Code through the contract lifecycle, and collaborate with suppliers to evolve and improve alignment and delivery of these objectives.

All Suppliers must adhere to relevant laws and regulations as they apply to the goods and services procured by the Council and therefore this Code does not seek to detail these areas. However, as the Council believes that it must go further to address the challenges we collectively face and build sustainable, healthy and prosperous communities now and for the future, this Code describes those areas in which we expect suppliers to collaborate with the Council to achieve more than the legal or regulatory requirement.

This Code applies to suppliers, and their extended supply chain, performing obligations under a contract for the Council. The Code will be applied in a proportionate and relevant manner according to the market and the goods or services provided. The Council reserves the right to amend this Code as a result of emerging new policy objectives or further development of existing ones. Any specific requirements under the Code will be detailed in any given tender and resultant contract.

How this Code will be used

The Code is made available to our suppliers with the goal of strengthening our mutual understanding of how these principles should be practiced in day-to-day business. This may include Procurement:

- Using the Code in all relevant procurements, requiring suppliers to confirm acceptance with elements of the Code that are relevant and proportionate to a particular contract.
- Applying selection and/or award criteria in tenders related to the Code where relevant and proportionate.
- Asking suppliers to describe how they will support the relevant aims of the Code.
- Incorporating contractual clauses where relevant related specifically to the Code.
- Using performance measurement and reporting requirements in relevant contracts related to the Code and / or the principles within it.
- Working with suppliers to promote and improve ethical business practices.
- Guiding collaboration and innovation in supplier relationship management activities.

For the avoidance of doubt, if any of the provisions herein conflict with contractual stipulations between a Supplier and the relevant Authority, the contractual stipulations shall prevail.

Our principles

Adhering to the law is the minimum standard expected of suppliers. Suppliers must at all times comply with legislation, and any applicable regulations or industry standards (whichever affords the highest standard) relevant to the goods, services and works provided to the Council, wherever they operate.

This includes but is not limited to those related to:

- anti-bribery
- tax
- corruption
- fraud
- data privacy
- equality, diversity and inclusion
- health and safety
- environment
- modern slavery, labour and human rights
- ethical and responsible business practices

We expect our suppliers and their supply chains to follow three key principles which focus on people, planet and public service.



These principles are underpinned by an overarching expectation for suppliers to conduct their business responsibly, maintaining high standards of integrity and professionalism in their business dealings.

People - respect and uphold labour and human rights

We are committed to promoting awareness of and respect for internationally recognised human rights inherent to all human beings and respecting the principles concerning fundamental rights of workers set out in core labour standards. This includes workers operating within our organisation and supply chains and people that may be impacted by supply chain activities.

We also have a responsibility to ensure that our activities do not cause, contribute, or are linked to adverse human rights impacts such as modern slavery.

Modern slavery is an umbrella term used to describe a range of exploitative practices including slavery, servitude, forced labour or compulsory labour, and human trafficking. These practices sit at the extreme end of a continuum of exploitation ranging from poor and unlawful labour and employment practices to severe forms of exploitation amounting to modern slavery.

The Council's approach to this issue includes a commitment to ensuring that people are not subjected to exploitation anywhere in its operations and supply chains. We are committed to conducting due diligence to identify and address risks related to our projects, activities and relationships.

We are also committed to respecting and promoting equality, diversity, and inclusion. Advancing opportunity and fostering good relations are legal duties in all Council activities.

The Council is opposed to any form of discriminatory practices within its operations and supply chains and seeks opportunities to increase and promote equality.

Planet - manage environmental impact

The Council recognises that a healthy and properly functioning natural environment is the foundation of a thriving economy, employment stability, prosperous communities and personal wellbeing.

The Council has declared a Climate Emergency and has committed to improving biodiversity, recovering natural capital and enhancing the natural environment.

The procurement of goods, works and services has environmental implications in the local area and around the planet; as a result, the Council is actively working to reduce and minimise these negative effects where possible.

Our local communities are directly affected by climate change, with rural and urban communities facing increased risk of flooding, older people affected by extreme heat, and public services coming under greater strain due to natural resource depletion. In many cases, our supply chain is also part of that local community. This is therefore a shared challenge that requires a shared solution.

We are committed to ensuring that our supply chain now and in the future minimises the negative impact of delivering the goods, services and works we procure. Furthermore, we seek to ensure that opportunities for positive impacts on the environment are maximised.

This Code supports collaboration and early engagement with the supply chain to find new and innovative ways to tackle this, enabling us to jointly set challenging carbon reduction targets and environmental performance standards, without leaving it too late.

Public service - deliver social value

The Public Services (Social Value) Act 2012 requires the Council to consider:

how what is being proposed to be procured might improve the economic, social and environmental well-being of the area where it exercises its functions; and

how, in conducting the process of procurement, it might act with a view to securing that improvement

We look to achieve social value from all goods, works and services that we procure. Delivering social value is about embracing a culture of civic leadership and delivering value over and above the core requirements and outcomes outlined in the contract. We understand that working with suppliers is key to delivering social value.

Our communities are diverse and include a wide-ranging demographic, alongside large rural and urban areas, however the Council has developed an understanding of the core needs and priorities that will support healthy, prosperous and sustainable communities.

These form the underlying principles of our approach to social value in procurement, and we expect suppliers to engage and work with us to ensure targeted social value outcomes can be achieved.

Our commitments

- The Council is committed to developing collaborative supplier relationships by:
- being transparent and proportionate in all of our dealings with suppliers
- taking all reasonable steps to identify, and keep under review, any conflict or potential conflict of interest
- seeking a shared commitment to continuous improvement; and
- complying with our contractual commitments including timely payments

We will make sure our expectations and the requirements we set are proportionate to the market and the goods or services provided. We will not only look at the impact of a supplier's products and services, but also pay explicit attention to the sustainability of all aspects of our own business operations.

Our aim is to adopt ways of working that place respect for, and protection of, people and the planet at the heart of our business dealings and transactions. We commit to continuing to:

- Abiding by applicable laws and regulations in our dealings, including respecting national and international standards against criminal conduct and responding immediately to such matters where they are identified.
- Respecting and promoting fundamental human and labour rights within our operations.
- Addressing inequality and taking proactive opportunities to advance equality, inclusion and community cohesion.
- Taking action to minimise negative and promote positive environmental impacts generated by the goods, services and works we buy.
- Not place disproportionate burdens or transfer inappropriate risks onto the supply chain.
- Promoting the delivery of social value in a way which supports the needs and priorities of the community.
- Proactively engaging with our suppliers, their employees and extended supply chain to ensure that they align with the Council's goals and priorities.
- Working towards maintaining mutually beneficial relationships with our suppliers that are healthy, sustainable, and innovative.

Finally, we aim to work with suppliers who make mutually beneficial improvements and deliver a more ethical and sustainable outcome for our partners and customers, taking a positive and supportive approach to compliance.

Supplier commitments

We expect suppliers to abide by all parts of this Code that are relevant and proportionate to their organisation and the contractual requirement. This includes:

- Be honest and transparent in your dealings with us.
- Understanding the Councils' aims, objectives, values and priorities.
- Treat your employees and extended supply chain with honesty, respect and integrity.
- Taking all reasonable steps to identify, and keep under review, any conflict or potential conflict of interest.
- Working with the Council in a collaborative and cooperative way to deliver greater ethical and sustainable value from the relationship and move beyond compliance.
- Continuously improve your approach to delivery of the principles of this Code.
- Share and develop opportunities for innovation or alternative methods and technologies with us.
- Make efforts to train employees and suppliers on the Code and its implications for your business.
- Work with the Council to build resilience and adapt to periods of external change and disruption.

We encourage suppliers to share the results and outcomes of their work with regards to the core principles of this Code, not only related to required performance measurements, but more widely to aid continued learning, recognition and supply chain development.

Our supply chain should have measures in place to correct any wrongdoings caused or contributed by their activities and/or business relationships. We expect suppliers to have clear, transparent, and appropriate frameworks in place to respond to grievances and remedy wrongdoings. Mechanisms should enable people, including workers, and suppliers to confidentially raise concerns without the threat or fear of discrimination or retaliation.

Monitoring compliance with this Code

This Code forms part of the procurement and contract documents issued by the Council. When bidding for opportunities, suppliers may be required to demonstrate compliance with principles that are deemed relevant and proportionate to the contract. Suppliers will be informed of the key principles relevant to the subject matter of the contract at the point of tendering. As a minimum, all bidders will be asked to confirm that they will abide by the Code where relevant and proportionate.

The Council may include performance measurement requirements and/or key performance indicators (KPIs) related to the Code, its individual principles, related policies and guidance, as well as key enablers such as continuous improvement and innovation.

We reserve the right at any point in the procurement or contract lifecycle to verify your organisation's alignment with appropriate principles outlined within this Code, as well as any relevant contractual commitments, legal compliance, or performance requirements by means as deemed appropriate.

Compliance monitoring is expected to follow standard contract management processes to monitor aspects of the Code. In the event of wrongdoing, we reserve the right to enforce the contractual terms related to persistent default and breach of contract. Where possible and practical to do so, we will prioritise working with suppliers to put in place an action plan specific to the type of incident and to prevent recurrence.

The Council maintains a Whistleblowing Policy for all employees and suppliers. Any concerns pertaining to the violation of the principles contained within this Code should be reported via the

Council's whistleblowing channels by employees, suppliers, and anyone performing obligations under a contract with the Council.

This is key to ensuring that anyone, including employees of suppliers and contractors, can confidentially bring concerns to the Council's attention. Our suppliers are encouraged to use this policy when appropriate and ensure an appropriate policy is in place in their own organisation.

Whistleblowing policy

[Brighton & Hove City Council - Whistleblowing policy](#)

1. People - respect and uphold labour and human rights

Code of Conduct requirements	Indicator or evidence
1.1. Adhere to applicable national and international human rights and labour/employment laws and regulations.	Policies assuring compliance with labour and human rights issues, including recruitment, employment, discrimination, health and wellbeing, and modern slavery.
1.2. Where the law restricts, and where practical for your organisation, put in place alternative means of protecting worker rights.	Procedures in place to ensure a safe and healthy environment for employees and other workers supporting contract obligations.
1.3. Ensure responsible and ethical recruitment of workers in the supply chain.	Evidence of union representation or other worker engagement arrangements.
1.4. Provide a healthy, safe and humane workplace environment.	Engagement with suppliers on labour and human rights issues.
1.5. Support the mental health and wellbeing of workers.	Knowledge of specific modern slavery risks facing the supplier's organisation and supply chains.
1.6. Prohibit physical abuse, threats of physical abuse, sexual or other harassment, verbal abuse and other forms of coercion.	Due diligence and risk management processes to respond to identified risks.
1.7. Promote decent working practices for employees and those operating within supply chains.	Publication of a modern slavery statement where applicable.
1.8. Establish robust measures to prevent modern slavery, forced labour and child labour.	Delivery of modern slavery, equality, diversity and inclusion training to staff and supply chains.
1.9. Publish a modern slavery statement where applicable.	
1.10. Proactively engage with the supply chain on modern slavery, including carrying out due diligence where relevant.	

2. Planet - manage environmental impacts

Code of Conduct requirements	Indicator or evidence
2.1. Comply with and contribute to the objectives of the Council's Environmentally Sustainable Procurement Policy.	Demonstrating alignment with the Environmentally Sustainable Procurement Policy and the environmental criteria built into tenders, contracts and specifications.
2.2. Comply with applicable national and international environmental legislation and regulations.	Policies assuring compliance with environmental law and industry best practice.

2.3. Comply with all environmental criteria built into contracts and specifications. 2.4. Work with us to provide sustainable and lower carbon alternatives where practicable. 2.5. Ensure a process is in place to assess the impacts of climate change within your organisation and reduce this impact. 2.6. Commit to continually improving the positive impact, and reducing the negative impact, of the procured goods, services or works on the environment. 2.7. Adopt and promote the waste hierarchy and circular economy principles. 2.8. Encourage and participate in environmental programmes with local groups, schools and colleagues. 2.9. Encourage voluntary time dedicated to improving local green areas to increase biodiversity and keep green spaces clean. 2.10. Support the Council with closing the green skills gap.	Publication of environmental and carbon emission targets, such as Carbon Reduction Plans. Reporting to environmental initiatives such as CDP or SBTi. Membership of environmental groups or industry bodies focused on sustainability best practice. Use of environmental certifications, credentials or awards. Delivery of staff or supplier training, such as Carbon Literacy Training. Evidence of continuous innovation and improvement in managing environmental impacts. Evidence of how environmental commitments are implemented, communicated and monitored. Active steps to improve biodiversity in the local area.
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3. Public service - deliver social value

Code of Conduct requirements	Indicator or evidence
3.1. Familiarise themselves with the Council's corporate plans and other relevant policies and strategies. 3.2. Understand the needs of the local area and the Council's priorities and how these fit with their organisation's ethos and core service. 3.3. Collaborate and engage with the Council and the service users to help shape the social value offering. 3.4. Ensure their social value offering meets the need of the community and is fully planned and resourced. 3.5. Demonstrably deliver on their social value commitments. 3.6. Work with the council to create a cycle of continuous improvement in the delivery of social value across the region.	- Demonstrating alignment to relevant social value policies and corporate priorities. - Attending and participating in market engagement and other events organised to create Social Value for the Council. - Sharing good practice and seeking to collaborate with other sectors/organisations to maximise both impact and opportunities of social value. - Proactively demonstrating delivery of social value through reporting and submitting evidence of outcomes achieved. - Engage with local businesses and social enterprises to support contract delivery. - Sharing what worked and what didn't, to help the Council improve the delivery of social value for the region.

Environmentally Sustainable Procurement Policy

[Brighton & Hove City Council Environmentally Sustainable Procurement Policy](#)