



Flagship Group  
31 King Street,  
Norwich,  
Norfolk,  
NR1 1PD  
0808 168 4555  
[info@flagship-group.co.uk](mailto:info@flagship-group.co.uk)  
[flagship-group.co.uk](http://flagship-group.co.uk)

# Supplier Code of Conduct

## **1. About Flagship Group**

Flagship Housing Group Limited is a registered Co-operative and Community Benefit Society (Registration No. 31211R) managing over 30,000 homes within Norfolk, Suffolk, Essex and Cambridgeshire.

Flagship Group provides homes for affordable and market rent, and for sale across the East of England. We also maintain our own housing stock and support the communities they're part of. We do this through our housing arms of the business (Newtide Homes, Victory Homes & Samphire Homes), our in-house repairs and maintenance department (Flagship Services) and our heating servicing & repairs specialists (Gasway & BlueFlame).

Our purpose is to provide homes for people in need and our development company, Flagship Housing Developments, is tasked with building or acquisition of new homes including for open market sale under the Flagship Homes brand.

Our goal, to help solve the housing crisis in the East of England, means we must do more to meet the increasing demand for affordable homes and we are well placed to achieve our aspirations. Joint ventures also form an important part of our approach.

Flagship's social purpose is wider than just providing and managing affordable homes and encompasses training with an apprenticeship programme, community development and corporate social responsibility. We launched our own charitable foundation, Hopestead, with the aim of tackling wider issues such as street homelessness.

We are determined to keep improving performance, providing more value for customers and growing our business, all underpinned by a culture of learning and continuous improvement, which we call the Flagship Way. Our core values are:

- Great people doing great things
- Spending money wisely
- Relentlessly improving performance
- Delivering outstanding customer service

This code of conduct covers all Flagship group operations and activities including Gasway, Blueflame, Flagship Homes, Victory Homes, Newtide Homes, Samphire Homes, Hopestead, and Flagship Services.

For more information please visit [www.flagship-group.co.uk](http://www.flagship-group.co.uk)

## **2. About the Supplier code of conduct**

The organisations in our supply chain are an extension of our own team and we expect the same standards of conduct from our contracted suppliers as we do from our own staff. This is especially important when a service is being provided directly to our tenants and we seek to work with suppliers that hold similar values to us.

This Supplier Code of Conduct has been established to set out the principles Flagship Housing Group expects all contracted suppliers to commit to when they are engaged to work with the Group.

This code should be applied by both contracted suppliers own staff and also by any sub-contractor staff engaged, in order to ensure that together we are committed to providing a quality service to our tenants and customers and all parties are treated fairly with due respect.

Nothing in the Code of Conduct will override English law and contracted suppliers must comply with their legal obligations.

### **3. Key Principles - summary**

- Maintain high standards of behaviour to safeguard the reputation of the Group and the housing sector as a whole.
- Respect in all activities - unprofessional and discourteous behaviour with colleagues, tenants, customers, suppliers, sub-contractors or any other stakeholder is not acceptable and deemed a contract non-performance matter.
- Comply with all applicable laws, regulations and standards both in force at contract commencement and successive or new legislation which comes into force during the term of the contract.
- Comply with the Bribery Act and Money Laundering Regulations.
- Comply with all health & safety legislation and regulation applicable to the goods and services being provided.
- Act with probity and be honest and transparent, including avoidance of situations where conflicts of interest may arise.
- Ensure compliance with all applicable legislation in relation to building & fire safety.
- Maintain a culture of non-discrimination. Discriminatory behaviour will not be tolerated from contracted suppliers, employees, customers, sub-contractors or any other stakeholders and will be deemed a contract non-performance matter.
- Comply with privacy and data protection laws.
- Actively review, and work to minimize, the environmental impact of our business activities and maximise sustainability.
- Pay the real Living Wage to all applicable employees.
- Ensure appropriate cyber security controls are in place to ensure systems and data are protected.

### **4. Policies**

Contracted suppliers are expected to review the following Flagship Group's policies and where applicable comply with the principles set out in these:

- Anti-fraud & Anti-Bribery policy
- Anti-money laundering policy
- Whistleblowing policy

- Modern Slavery policy and statement
- Equality, Diversity & Inclusion policy
- General Terms & Conditions of business (these apply unless substituted with an alternative form of contract, including Data Protection & Cyber Security Addendum, agreed and signed by both parties)
- Reasonable adjustment to services policy
- Unacceptable Behaviour policy
- Data Protection policy
- Safeguarding policies
- Complaints policy
- Health & Safety Policy

Our main policies are available on the legal page of the Flagship Group website (<https://www.flagship-group.co.uk/about-us/policies/>) or directly from your Flagship contract manager.

## **5. Tenant and customer services**

Flagship Group is committed to providing outstanding customer service and expects partner organisations and contracted suppliers to support this commitment when they are working with our tenants and customers.

Where contract works or services are to be provided at any Flagship Group property or our customer's property the following principles should be applied:

- Visits to a tenant or customer's home should be pre-notified to the occupant
- When making appointments, we must specify a time slot of when anticipating arriving at the property.
- The supplier is permitted to arrange appointments outside normal working hours, subject to the tenant/customers' agreement.
- Carry identity cards and be mindful of a tenant's desire to confirm this with Flagship group.
- Be polite, considerate and professional in all dealings with tenants. Contractor staff should not involve themselves in any discussions that may be damaging to Flagship, its tenants, employees or properties

As a registered housing provider, we have a responsibility to eliminate discrimination, ensure equality of opportunity and promote good relations between people that have protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) and those who do not.

We expect our contracted suppliers to work in this way as well.

## **6. Complaints policy**

To ensure that complaints are dealt with in a consistent and effective manner we expect our contractors to have a complaints process which is appropriate and consistent with our approach to complaints. We will monitor complaints received by our contractors and where complaints are not handled by Flagship, we will use our discretion to take over the handling of complaints where we feel it is more appropriate to do so).

## **7. Health & Safety**

Group contracted suppliers must comply with health and safety legislation relevant to the extent of the works or goods supplied.

- We expect contracted suppliers to provide all their employees and others under their control with appropriate training, instruction, information, personal protective equipment, and a safe working environment.
- In all cases when contracted suppliers are carrying out works that may impact on resident safety they will be expected to communicate with local staff, put measures in place to enhance safety, and be considerate of our tenants' needs.
- All Flagship contracted suppliers must comply with applicable legislation in relation to premises and product fire safety standards and provide evidence of compliance on request. Any contractor working on behalf of the Group must also meet specific fire safety requirements detailed in their contract.
- Any contractor working on behalf of the Group must also meet all specific requirements detailed in their contract.

## **8. Data protection/Disclosure of information/confidentiality**

Flagship takes Data Protection very seriously. Data Protection legislation, policies, procedures and guidelines must be complied with at all times. Suppliers must comply with the requirements of any data sharing agreement entered as part of the contract.

- Suppliers must not at any time, disclose information of a confidential nature gained in the course of their duties. If in doubt concerning a disclosure, employees supplier staff should consult the Flagship contract manager in advance or the Group's Data Protection Officer.
- The Group's Data Protection Policy is available on Flagship Group website or from the Group's Data Protection Officer.

## **9. Cyber security**

Cyber attacks can have significant impact on an organisation including the theft of sensitive information, denial of key systems and data leading to reduced ability to deliver key services. There are also associated reputational and regulatory impacts.

- Suppliers should ensure that their systems, procedures, and controls are designed and maintained to ensure that sensitive and confidential information is protected.
- Contracted suppliers should notify Flagship immediately if a cyber breach occurs or is suspected to have occurred.

## **10. Sustainability and the environment**

Flagship is committed to minimising the environmental impact when procuring products and services. We look to limit our impact on the environment by:

- Reducing the amount of operating waste sent to landfill.
- Improving our energy use by investing in energy efficiency, renewables, trialling new technologies and offsetting our carbon emissions.
- Improving the sustainability of our properties.
- Improving our impact of travel by reducing emissions produced from business, commuting and travel.
- Working towards a net positive impact on biodiversity through ecologically enhancing our buildings and grounds.
- Reducing our water and paper use.

## **11. Anti-Bribery, Anti Money Laundering**

Flagship group have a zero-tolerance policy towards fraud. Any reports of actual or suspected fraud will be taken seriously.

- Agents, consultants, contractors and all other associated persons of Flagship Group should follow the guidelines for our employees. Where the guidelines state 'Line Manager' this effectively means the Flagship Group contract manager commissioning the work.

See the Group's Anti Money Laundering & Fraud policy, available on the Group's website, for more details.

## **12. Whistleblowing**

The whistleblowing policy can be used to report things that are illegal or if anyone at work is neglecting their duties or willfully exceeding their duties, including areas such as:

- someone's health and safety is in danger · damage to the environment · a criminal offence · the company or any person isn't obeying the law
- a miscarriage of justice
- covering up wrongdoing

Employees and contractors are often the first to realise that something is seriously wrong, but the last to voice their concerns as they feel that speaking up would be disloyal or may

compromise their employment. In accordance with the National Housing Federation Code of Governance, Flagship Group is committed to ensuring that proper arrangements are in place to enable all individuals can raise serious concerns about propriety or probity in a confidential manner without concerns of breaching confidentiality or fear of reprisals.

The Public Interest Disclosure Act 1998 gives full protection to any worker reporting serious concerns if that worker genuinely believes their concerns are true.

See the Group's Whistleblowing policy, available on the Group's website, for more details.

### **13. Conflicts of interest**

We operate in a way that avoids conflicts of interest. Contracted suppliers should:

- Declare to the Flagship contract manager any potential or actual conflicts of interest arising from personal or professional activities or relationships
- Not offer any gifts or hospitality that may influence or be perceived to influence a business decision.
- Not offer any gifts or hospitality where tendering and procurement process is in progress

Flagship Group maintains a register of Gifts & Hospitality to ensure that only modest and transparent corporate hospitality is offered or accepted. The Group also maintains a Disclosure of Interests Register to monitor any potential or actual conflicts.

Contracted suppliers should declare any potential conflicts of interest in advance of any contract commencing and if they arise during the contract.

### **14. Modern slavery**

Flagship Group are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of the business. Our Anti-Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have included a prohibition on modern slavery and human trafficking clause in our standard terms and conditions. Our legal and procurement teams are committed to ceasing business with any suppliers or contractors found to be involved in modern slavery or human trafficking either directly or in their supply chain.

See the Group's Modern Slavery statement, available on the Group's website, for more details.

### **15. Safeguarding policies**

We ask all our contractors to support Flagship in working jointly with others (subsidiaries, volunteers, contractors etc.) to safeguard and promote the welfare of children and vulnerable adults and where necessary, to help bring to justice the perpetrators of crimes.

## 16. Real Living Wage

The real Living Wage is a rate paid voluntarily by over 7,000 UK businesses and is based on real costs of living. It is different to the statutory Minimum Wage and National Living Wage.

Paying the real Living Wage to staff has well documented benefits including increased employee motivation, productivity and retention. We intend to pay all directly employed and third party contracted and sub-contracted staff, that work regularly on our premises, the real Living Wage. For more details see [www.livingwage.org.uk](http://www.livingwage.org.uk).

We ask all our contractors that carry out work regularly on our sites to pay the Living Wage to their staff working directly on the contract.

## 17. Confirmation statement

I/We acknowledge that we have read and understood the above Flagship supplier code of conduct and agree to work with Flagship in accordance with the principles and policies outlined.

I/We will ensure any subcontractors that we engage on work for Flagship Group are aware of this code of conduct and agree to work in accordance with it.

Contact name:	
Company:	
Address:	
Telephone:	
Email:	
Signature:	
Date:	

## 18. Further information

If you require any assistance or guidance, please contact your Flagship Group contract manager or the Flagship Procurement Team by email: [procurement@flagship-group.co.uk](mailto:procurement@flagship-group.co.uk)