



THE LONDON SCHOOL
OF ECONOMICS AND
POLITICAL SCIENCE ■



Supplier Code of Practice

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Introduction

The London School of Economics and Political Science (LSE) is a world leading international University based in London. LSE was founded in 1895 to create and share knowledge addressing major social challenges and to shape a better world.

LSE is committed to acting responsibly and sustainably, as set out in both LSE 2030 Strategy and our Ethics Code. It is of great importance to LSE that our suppliers share these values and principles, by adopting high environmental, social, ethical, and responsible business standards.

This Supplier Code of Practice ('the Code') is a reflection of who we are and what we stand for and sets out minimum standards derived from established global conventions and standards including from the United Nations, the Ethical Trading Initiative (ETI) base code, and the International Labour Organization (ILO) Conventions.

We expect all our Suppliers to abide by this Code, and to mandate these standards from their own suppliers and sub-contractors. This includes but is not limited to all of our suppliers of goods and services, consultants, sub-contractors, service providers, intermediaries and agents. In addition to Suppliers, the School also expects other organisations or institutions we collaborate with to also comply with the minimum standards set out in this Code.

We will always ensure that the expectations and requirements we set out are relevant and proportionate to the size of the organisation we work with and the services provided.

The Key principles are set out below:

1	Protect workers by ensuring fair employment practices are in place;
2	Take active steps to identify, tackle and prevent Modern Slavery in their business and down the supply chain;
3	Provide the Living Wage for members of staff;
4	Protect the environment by reducing the carbon emissions and environmental impacts of their products and services;
5	Promote Equality, Diversity, inclusion and equal opportunities for all within a truly diverse workplace;
6	Create a safe and healthy workplace which includes but is not limited to a pro-active approach to staff wellbeing;
7	Comply with all applicable laws and contractual terms and conditions;
8	Demonstrate high standards of business ethics;
9	Comply with cyber security and data protection laws or requirements and standards.

The following pages provide examples of the minimum standards we expect from our suppliers. Where these may differ or conflict with your own local or international standards, then we would encourage a supplier to reach out to us so that we can look to address this and jointly agree on the most appropriate course of action. A developmental approach is encouraged.

Implementation of the Code

LSE aims to assess a Supplier's compliance with this Code early on and prior to the start of a contract, aiming to notify a supplier of requirements set out under this Code as early as possible. This would be at the tendering stage for new contracts or during contract renewal for existing contracts. LSE reserves the right to monitor and review compliance, implementation and adherence with this Code via periodic reviews/audits as part of our contract management process. Suppliers are also asked to register and provide details with the NETpositive tool which can be accessed via the School's Procurement Team.

Suppliers are encouraged to address any gaps in the implementation of this Code by establishing and implementing a time bound improvement plan in consultation with LSE. Breaches of this code may negatively affect our business and contractual relationship and potential consequences can include but is not limited to a termination of our contract(s) with you.

What to do if you have a serious concern

We encourage you to raise any serious concerns you may have regarding any inconsistency or failure to comply with this Code that may have come to your attention with the **LSE Manager/contact who you are working with** or via ethics@lse.ac.uk. All concerns will be looked at confidentially and communicated on a need to know basis. We will follow up any issues you may have discreetly, conscientiously and without bias. We support our Suppliers to do the right thing at all times.



A Message from our Director of Procurement Services

Dear Supplier,

Thank you for taking the time to read this Code of Practice.

When you provide goods or services to the School, you become a part of LSE and help support our mission of *understanding the cause of things for the betterment of society*.

This Code sets our minimum expectations which align to those of the higher education sector, and explains why these are important to us.

You may not meet all aspects of this Code from day one when joining the School, but we do expect you to apply the principles set and work actively to meet our requirements.

In return, our commitment to you is that we will:

- Apply this Code in a relevant and proportionate manner, based on the goods or services you supply us;
- Be transparent and provide equal treatment to all in our competitive processes;
- Say what we are going to do and do what we say.

We hope this Code will help your business make its own impact in shaping a just, inclusive and sustainable world, and also being competitive and successful.

Thank you for being a part of LSE.

Cristian Martin

Director of Procurement Services



Human and Labour Rights

We respect and promote human rights and fair working practices within our workplace and through our supply chain in line with national and international legislation, conventions, declarations and codes. The United Nations Declaration of Human Rights proclaims certain fundamental rights and freedoms. These include the right to life, liberty and security, equal rights of men and women, the right to protection under the law and against discrimination, slavery, servitude, torture, or inhumane or degrading treatment and freedom of speech, thought, conscience and religion.

Why is it important for us?

We support human rights and fair working practices for persons working in our workplaces, on our projects and in our supply chain. It is so important to us that we have set up a Modern Slavery Working Group to identify, tackle and prevent any instances of Modern Slavery in our supply chain and activities. We expect suppliers to adhere to The Modern Slavery Act 2015. The Act is aimed at identifying, tackling and preventing modern slavery and can be found at the following link: legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

What we expect from you

A commitment to respecting and complying with:

- The principles set out in the United Nations Universal declaration of Human Rights and the UN Global Compact Initiative;
- The International Labour Organisation's standards regarding child labour and minimum age-These include the four 'core' ILO conventions on labour rights:
 - Freedom of Association and the effective recognition of the right of collective bargaining;
 - The elimination of all form of bonded labour and compulsory labour;
 - The effective abolition of child labour;
 - The elimination of discrimination with respect to employment and occupation;
- The Ethical Trading Initiative (ETI)base code;
- The Modern Slavery Act 2015;
- National legal requirements regarding wages working hours and right to work.

Not use forced, involuntary or underage labour

- Ensure workers are free to choose their employment and leave that employment on reasonable notice without hold of financial deposit or personal items;
- Not use forced, bonded or involuntary / prison labour;
- Not engage in any way with human trafficking, nor support or work with organisations that engage in any way with human trafficking activities, organisations or persons;
- Ensure recruitment fees, if applicable, are always borne by the employer only;
- Actively exceed the requirements of any anti-slavery / modern slavery legislation in any country that they operate in and comply with any voluntary and mandatory publication schemes in place to provide transparency of this activity;
- Support the effective abolition of child labour;
- Comply with the national minimum age for employment, or minimum age 14, whichever is the higher unless a lower local minimum age is permitted under International Labour Organisation (ILO) convention 138.* LSE is a member of the Living Wage Foundation and require that any employees/workers providing goods or services on our UK premises are compliant with the UK living wage (as outlined by the Living Wage Foundation livingwage.org.uk/ as a minimum;
- Ensure where any child is found to be engaged in or performing child labour, to provide support for that child to enable them to complete, as a minimum, their compulsory education (even if they shall cease to be involved in child labour), or an equivalent education level, as provided for under the UN Covenant on Economic, Social and Cultural Rights. Such support by the supplier should recognise and not prove detrimental to the conditions of the child or those that their work supports;
- Ensure at least statutory minimum wages (or if none, a realistic living wage) are paid without discrimination to all workers, and all non-statutory deductions must be reasonable and with the consent of the worker;
- Ensure that working hours are not excessive (not over 48 hours per week, excluding overtime) and must allow for at least 1 day off for each 7-day period on average or, where allowed by national law, 2 days off in every 14-day period. Working beyond this should be non-regular and of workers' own will and not used to replace regular employment. Maximum working hours shall not exceed 60 hours including overtime, unless under exceptional circumstances and allowed by national law;
- Allow workers the freedom of association to join (but not be forced to join), or be represented by, a trade union or similar organisation of their choice, and be free to leave such organisations. Representatives of workers must be elected by the relevant workers, not appointed by management;

- Ensure the principles of equality, diversity and inclusion are fully respected for all workers, treating all workers with respect and dignity, and not accept inequality as justifiable for any reason;
- Remunerate all workers equally at the same employment grade, regardless of any characteristics listed above, unless statutory conditions require otherwise;
- Ensure effective worker engagement practises are in place to such an extent that all workers are clear of their duties and their employment rights under local and international laws.

We expect you to be able to confirm the steps you are taking to ensure modern slavery and labour exploitation are not taking place in your supply chains or in any part of your business.

Further resources

Modern Slavery Act: [Modern Slavery Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)

UN Declaration of Human Rights: [Universal Declaration of Human Rights | United Nations](#)

International Labour Organisation Standards: [Introduction to International Labour Standards \(ilo.org\)](https://ilo.org)

ETI Basecode: [ETI Base Code | Ethical Trading Initiative \(ethicaltrade.org\)](https://ethicaltrade.org)

UN Global Impact: [The Ten Principles | UN Global Compact](#)

LSE Modern Slavery statement: [antSlaSta.pdf \(lse.ac.uk\)](#)

Living Wage Foundation: livingwage.org.uk/

Modern Slavery helpline: [Modern Slavery Helpline](#)



Sustainability

Creating a Sustainable LSE is one of the key commitments of the LSE 2030 strategy. Our suppliers have a key part to play in supporting LSE to reduce its environmental impacts and carbon emissions.

Why is it important for us?

The immense climate crisis and grave threats to the environment we face require urgent and decisive action from each of us.

We work across our campus and halls of residences to:

- Reduce and mitigate our carbon emissions;
- Operate highly energy efficient buildings;
- Reduce waste and use resources efficiently;
- Reduce our water consumption;
- Enhance biodiversity and improve air quality;
- Promote sustainable travel options;
- Embed circular economy principles in our operations;
- And more.

What we expect from you

- As a minimum, comply with all local and national environmental laws, regulations and directives of the countries they are working in, manufacturing in or trading with, as applicable;
- Actively avoid causing environmental damage and/or negative environmental impact through raw material source, manufacturing processes, supply of the goods or services and disposal of supply chain waste;
- The Supplier will actively push to develop/innovate more environmentally friendly products/service solutions and takes manufacture, use and disposal into consideration, including the possibility of circular supply chains;
- Have a business plan in place, and be acting on it, to minimise their environmental impact year on year and adopting or working towards internationally recognised environmental standards and/or behaviours;

- The Supplier measures and monitors its environmental impacts, and measures are in place to effectively reduce identified environmental impacts (e.g. recycling, single use packaging, general plastic usage, energy efficiency measures);
- Have acknowledged the climate crisis and have clear plans and actions in place to address this for areas of their responsibility and influence (across their operations and in their supply chains) and published with specific, meaningful levels of Greenhouse Gas (GHG) reduction achievement (scopes 1, 2 and 3) defined in incremental steps to work towards their climate emissions being net zero by 2030 or earlier.

Further resources

Sustainability at LSE

Our work to reduce our carbon emissions and environmental impacts

LSE Sustainability Policy

LSE Energy Policy

The key goals and principles we work to

LSE Sustainability Strategic Plan

Six key themes to maximise our impact in shaping a sustainable world

LSE Sustainable Finance Framework





Equity, Diversity and Inclusion

Sustaining excellence through an inclusive and diverse community is one of the key commitments of the LSE 2030 Strategy.

Our suppliers have a key part to play in helping LSE promote equitable treatment, champion diversity and develop inclusive communities.

Why is Equity, Diversity and Inclusion important for us?

We believe that diversity is critical to maintaining excellence. We aim to ensure all members of our school community can achieve their full potential in an environment characterised by equality of respect and opportunity.

Therefore, across LSE we work to:

- enable everyone to fulfil their potential;
- ensure everyone is respected and their contributions are valued;
- create that environment free from discrimination, harassment and bullying;
- support underrepresented groups to access and succeed at LSE;
- represent different views, cultures and experiences within our curriculum;
- ensure our research and knowledge engagement activities contribute to a better understanding of equity, diversity and inclusion;
- ensure policies are in place to foster an equitable and inclusive community;
- champion the Equality Act 2010 and the Public Sector Equality Duty;
- progress equity, diversity and inclusion by participating in equality schemes such as Disability Confident, and Athena SWAN.

What we expect from you

- Allow workers the freedom of association to join (but not be forced to join), or be represented by, a trade union or similar organisation of their choice, and be free to leave such organisations. Representatives of workers must be elected by the relevant workers, not appointed by management;
- Not discriminate or unfairly treat any worker for any reason including education, social class/caste, nationality, trade union membership, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, culture, religion or belief, sex, or sexual orientation;

- Provide a workplace free from discrimination, bullying, harassment, violence or victimisation;
- Ensure the principles of equality, diversity and inclusion are fully respected for all workers, treating all workers with respect and dignity, and not accept inequality as justifiable for any reason;
- Remunerate all workers equally at the same employment grade, regardless of any characteristics listed above, unless statutory conditions require otherwise;
- Ensure effective worker engagement practises are in place to such an extent that all workers are clear of their duties and their employment rights under local and international laws;
- Ensure all representatives of suppliers, whilst on or near the institution's premises, or while interacting with any member of staff, student, or member of the public, behave in a respectful and polite manner and in accordance with the institution's equality, diversity and inclusion standards.

Further Resources

[LSE EDI Website](#)

[LSE EDI Policy](#)

[Athena SWAN](#)

[Race Equity Framework](#)

[Disability Confident](#)

[REPORT IT STOP IT](#)

[LSE Safe Contacts](#)

[LSE Public Sector Equality Duty reports](#)



Health and Safety

We expect our suppliers to comply with all relevant health and safety laws and regulations, both in letter and in spirit, in all the countries in which they operate.

Why is it important for us?

LSE has a strong focus on Health & Safety both on campus and anywhere else our staff work. We expect everyone who works for us or with us to understand the health and safety risks of their activities and have good Health & Safety management systems in place.

What we expect from you

- Ensure a safe and hygienic working environment is provided, including any catering, washroom or accommodation areas;
- Ensure all equipment is safe for use, and processes must allow a safe working environment. Workers shall receive training (which shall be in a language they can understand) in safe operation of all equipment and tools. Training must be provided as frequently as required to remain effective;
- Use best endeavours to eliminate (in the first instance) and to reduce the threat to workers health from all hazards, including any hazardous chemical agents used in manufacturing and/or supply chain activities and provide training (in a language workers can understand) in the safe use of any harmful chemicals;
- Provide all personal protective equipment necessary to ensure the health and safety of workers;
- Ensure policies and processes are in place for recording and eliminating occurrence/reoccurrence of health and safety related incidents and they should have regard to avoiding the cause of any mental health issues affecting workers.

Further Resources

[LSE Health and Safety Policy](#)



Ethics

All members of the LSE community are expected to act to the highest standards of ethical integrity. The School's Ethics Code sets out a number of ethical principles which should be applied across the School and by our suppliers.

Why is it important for us?

We all face a range of ethical issues in our day to day work. It is important that members of the School community and its suppliers act in an ethically responsible manner and can identify and resolve ethical matters.

Six core ethics principles guide our judgements and behaviour at LSE:

- Responsibility and Accountability;
- Integrity;
- Intellectual Freedom;
- Equality of Respect and Opportunity;
- Collegiality;
- Sustainability.

As it is impossible to devise a single set of rules, we ask that staff and suppliers ensure actions are compatible with our principles and policies. How would you explain your actions and what would be the impact on your reputation, or that of the School? If you are unsure of the right thing to do seek advice, you can get in touch through ethics@lse.ac.uk.

What we expect from you

Responsibility and Accountability

- To have an Ethics Code or Code of Conduct which outline your values and expectations;
- To encourage staff to raise concerns and have appropriate systems in place to raise concerns in confidence e.g. whistleblowing and complaints systems;
- To ensure a safe working environment with appropriate health, safety and wellbeing policies and procedures in place.

Integrity

- To be honest and truthful and act in accordance with all relevant legislation and statutory requirements;
- To have anti-bribery and corruption policies and procedures which prevent corruption, fraud or bribery and support a prompt response to incidents;
- To comply with data protection legislation and cyber security standards;
- To ensure that gifts and hospitality offered to School staff meet School policy by being proportionate and not intended to influence decisions;
- To declare and manage any actual, potential or perceived conflicts of interest with the School.

Equality of Respect and Opportunity

- A commitment to tackling inequality and promoting equality of respect and opportunity, treating all with dignity and respect;
- A zero tolerance approach to discrimination, harassment and bullying with appropriate policies, and procedures to prevent and address instances;
- To be able to demonstrate compliance with modern slavery legislation.

Collegiality

- To provide an inclusive and participatory working and social environment in which staff encourage, support and behave appropriately to one another.

Sustainability

- To minimise any negative impact on the natural and built environment by effectively managing resources.

Further Resources

LSE's Ethics Code

The Schools Ethics Code contains links to all relevant policies and procedures.

How to raise concerns

We encourage and welcome concerns to be raised. This page outlines the different ways in which concerns can be raised at the School



Data Protection and Cyber Security

Complying with data protection and managing the security of information falls within Priority 3, Developing LSE for Everyone, of the LSE 2030 Strategy. Suppliers are required to help LSE meet their legal obligations and business objectives in these areas.

Why is it important for us?

Data Protection

- LSE could receive large fines for data breaches;
- LSE could suffer reputational damage from mishandling of personal data, leading to loss of students and research data.

Cybersecurity

- Key services and systems could be lost through Cyber Attacks to the supplier or their supply chain;
- LSE's data could be jeopardised through known and unknown vulnerabilities of supplier's systems hosting such data.

What we expect from you

Data Protection

- Cooperation from suppliers with putting the right contract clauses in place to manage responsibilities to personal data from both LSE and the supplier(s);
- Including swift notification of any data breaches that take place relating to LSE personal data;
- Also including input into Data Protection Impact Assessments if required;
- Destruction of LSE personal data in line with contract clauses.

Cybersecurity

- Compliance to Cyber Security best practice framework (e.g. ISO 27001, SOC2, Cyber Essentials Plus);
- Adequate security controls for sub-contractors and supply chains;
- Appropriate vulnerability management procedure ;
- Co-operation with LSE's due diligence assessment of the supplier's Cyber Security posture;
- Swift reporting of Cyber Security attacks and critical vulnerabilities of IT systems that are hosting LSE's data.

Digital Accessibility

- Software and websites consider the WCAG2.1 regulations and where possible in its design, make their products and services on both computers and mobile devices usable by users with visual or manual dexterity impairments.

Further resources

Data Protection

[Data protection policy](#)

[Data breach procedure](#)

[Data protection impact assessment policy](#)

Cybersecurity

[Information Security Policy](#)

[Information Classification Standard](#)

Web Content Accessibility Guidelines

[Understanding WCAG 2.1 - Service Manual - GOV.UK \(www.gov.uk\)](#)

Please note that LSE is also subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.



Bribery, Fraud and Anti-Tax evasion

The School is committed to conducting its business fairly, honestly and openly and in accordance with relevant legislation, and to the highest standards of integrity. We do not tolerate any form of bribery or corruption, including but not limited to money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

The Bribery Act 2010 makes it an offence to offer, give, accept, receive, or request any form of 'advantage' to, or from, any individual, company or Government (including anyone working for a Government), if to do this would involve a breach of an expectation that the transaction be conducted in good faith, with integrity, and fulfilling any obligation of trust. The Act creates two general offences of bribing another person ('active bribery') and being bribed ('passive bribery'). It also creates a discrete offence of bribery of a foreign public official; and creates a new offence of failure of commercial organisations to prevent bribery by persons associated with them.

Fraud is an offence under the Fraud Act 2006. Section 1 of the Act creates a general offence of fraud and introduces three ways of committing it, which are set out in subsequent sections: i) Fraud by false representation (Section 2); ii) Fraud by failure to disclose information when there is a legal duty to do so (Section 3); and iii) Fraud by abuse of position (Section 4). In each case, the defendant's conduct must be dishonest; their intention must be to make a gain; or cause a loss or the risk of a loss to another. No gain or loss needs actually to have been made.

Tax evasion means the offence of cheating the public revenue or fraudulently evading UK tax authorities and is a criminal offence under the Criminal Finances Act 2017. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Why is it important for us?

As set out in our LSE Policy on Bribery and Fraud, the LSE is both a Company limited by Guarantee and a charity which derives much of its income from public funds, benefactions and charitable organisations; it has a particular responsibility and concern to ensure that income and resources are used solely for the purposes intended to protect its reputation and its funders, donors, staff and students from the detriment associated with fraud and other corrupt activity.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country.

What we expect from you

- You conduct business with integrity and you likewise do not tolerate any form of bribery, fraud or corruption;
- You never request, accept, pay, offer or authorize bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe one of our members of staff, customer, or public official (including foreign public officials) or any other individual or entity or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage and never use or permit others to do so. This includes any type of facilitation payment, large or small, even where such payments are perceived as a common part of local business practice or acceptable under local law;
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf. Facilitation payments are bribes – often small – paid to public officials to speed up processes and access services to which the payer is lawfully entitled;
- Prohibit your staff from giving a gift or hospitality to induce a fraud or other wrongdoing to secure a personal or business benefit;
- You must not engage in any activity, practice or conduct which would constitute either a UK or foreign tax evasion facilitation offence under sections 46(5) and 46(6) of the Criminal Finances Act 2017;
- You must not under any circumstances be knowingly concerned in, or take steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person or aid, abet, counsel or procure the commission of that offence by another person;
- If you or an employee has a reasonable suspicion of actual or attempted bribery or fraud that you ensure that this is raised directly to the School;
- You investigate and cooperate with any investigations into suspected bribery or fraud including reporting and any necessary disciplinary action.

Further resources

LSE Policy on Bribery and Fraud: [LSE Policy against Bribery and Fraud](#)

LSE Procedure for Gifts and Hospitality: [proGifHos.pdf \(lse.ac.uk\)](#)

Bribery Act 2010: [Bribery Act 2010 \(legislation.gov.uk\)](#)

Criminal Finances Act 2017: [Criminal Finances Act 2017 \(legislation.gov.uk\)](#)

* This Code was established in 2022 on the initiative of the Modern Slavery Working Group.

The School is an active member of the London Universities Purchasing Consortium and has collaboratively developed the Sustain Code of Conduct which is coordinated by and copyright © managed by APUC Ltd, Incorporated in Scotland number SC 314764. As part of LSE's approach set out in this Supplier Code of Practice, the institution works in collaboration with Universities across the UK and beyond to maximise effectiveness of the Code. As part of this, LSE has co-developed and has adopted the HE sector's shared Sustain Supply Chain Code of Conduct which sets out standards and expectations for suppliers and their supply chain's performance. This can be viewed via the following link [**Sustain Supply Chain Code of Conduct | Sustainability Exchange**](#). For ease of reference, within this document, we will identify * where particular sections relate to specific aspects of the Sustain Supply Chain Code of Conduct.

The Information contained within this document is for general information purposes only. Whilst we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability of the information, contained in this the Framework for any purpose. Any reliance you place on such information is therefore strictly at your own risk. In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising out of, or in connection with, the use of this Framework.

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The School seeks to ensure that people are treated equitably, regardless of age, disability, race, nationality, ethnic or national origin, gender, religion, sexual orientation or personal circumstances.

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Please note: a number of photographs in this document were taken before UK social-distancing guidance was in place. LSE takes every step to ensure the safety of all their staff and students.