

BUSINESS ETHICS AND SOCIAL IMPACT POLICY	
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Statement

Health Partners are committed to providing our services in a sustainable and responsible way creating 'value with purpose'. Using an 'ESG' based model we believe through hard work, creative innovation and responsible decision making we have founded a business that plays a vital role in our economy by providing a valued service to our clients; creating good quality jobs and developing our people; and that gives back to our government, our environment and society in a positive way.

Our strategy is closely aligned to the United Nations Sustainable Development Goals. Through shared and individual accountability we aim to

- Integrate sustainability and responsibility into every facet of our internal and external operations.
- Build trusted quality relationships with our Employees, Clients and Business Partners, creating Stakeholder value
- Develop our staff and ensure their safety and wellbeing
- Treat others as we wish to be treated ourselves, with respect, honesty and professionalism.
- Ensure all our business affairs are conducted with integrity, diligence and transparency
- Ensure every activity we undertake meets the highest ethical, safety and quality standards.
- Maximise our effective altruism through the Health Partners Foundation
- Create 'shared value' by making a practical difference to the diverse society in which we operate.
- Support and develop the community in which we operate, upholding all labour standards, human rights and ensuring a positive social impact including recruitment of those from disadvantaged backgrounds
- Build our growth on an ethical, sustainable and environmentally sound framework and thus accelerating our transition to a low carbon future
- Measure and reduce usage of utilities and emissions, while working with NGOs and charities to mitigate our environmental impact through activities such as tree planting initiatives
- Do the right thing, not because we should, but because we want to.
- Continually strive to improve in the arena of ESG (Environment, Social & Governance)

Overall responsibility for this policy lies with Jacqueline Cragg, the Governance Director of Health Partners.

Scope

This policy is based upon shared and individual responsibility for the services we provide, the way we provide them and the impacts they may have.

Each employee within Health Partners can make a difference to help us achieve our objectives; ensure our reputation remains untarnished and develop their own potential and that of the community in which we operate.

All employees and all aspects of our service delivery are therefore in scope.

Responsibilities

Every employee should strive to achieve and support the objectives of this policy through diligence; honesty; exemplary customer services; professionalism; ethical and trustworthy behaviours. Valuing colleagues, customers and business partners, and taking responsibility for their actions.

The leadership team and line managers should endeavor to lead by example; living the values and ethos of the policy; supporting the objectives; initiating change when needed; encouraging, supporting and developing their teams; and building trusted relationships with all interested parties.

The Governance Director has overall responsibility for business ethics; ensuring the policy remains dynamic to adapt to change; and continually strives for improvement in the arena of social impact and ethical best practice.

Health Partners' Policy

Trusted quality relationships

Fundamental to everything that we do is trust. Trust is based upon a perception of honesty, competence and sharing the same values.

Our customers trust us to provide an exemplary service; they trust us to care for their employees and provide practical advice to ensure they are healthy and in productive work; they trust us with their information and data; they trust us to communicate openly and honestly with them, sharing our expertise and knowledge; they trust us to respect and embrace their diversity; they trust us to provide our services sustainably and do no harm; and they trust us to provide value for money.

Our business partners trust us to build effective, long term and profitable business relationships; they trust us to be honest, fair and have integrity in our dealings with them; they trust us to work in partnership with them and our customers equally; they also trust us with their information.

Our employees trust us to provide a safe, secure working environment, free from harassment or discrimination; they trust us to develop and support them, reward them, listen to them and engage proactively with them; they trust us to treat everyone equally and promote on merit and experience alone and they trust us to do the right thing as a responsible company.

It is therefore imperative that each person endeavours to develop and maintain this trust in all our business relationships, both internally and externally. Trusted quality relationships forge a strong foundation upon which we can build the business effectively. Trusted quality relationships are based upon an ethical framework or code of conduct that incorporates integrity, professionalism and care.

Business ethics complements and upholds the clinical ethical codes of each of our health care practitioners and should be seen as a cohesive set of values within which to conduct our activities, not as stand-alone requirements.

Environmental stewardship – managing our sustainability and environmental impact

Our aspiration is that whatever we take from nature we find a way of reusing it or replacing it. The reality is that this is complex and reliant on third party systems, nevertheless we do what we can.

Health Partners will endeavour to integrate exemplary sustainability management practices into all our activities; they will form the foundation of all our procurement decisions, influence our operational models and work systems and reflect how we do business with our customers.

We will train, support and encourage our employees to consider sustainability throughout the business. We will sponsor environmental champions to communicate the company's values and objectives regarding sustainability and act as a conduit for new ideas.

Seek innovative ways to minimize our impact using technology and other means to reduce our negative impact, accelerating the transition to a low carbon future.

We will purchase responsibly; buying fair trade products, sustainably resourced and/or locally bought products and services to reduce travel emissions, where possible.

We will monitor, manage and reduce our utilisation of resources, such as energy, water and heating, as effectively as possible.

We will encourage the use of public transport, video conferencing and other means to reduce our carbon footprint.

We will minimise pollution and waste going to landfill by recycling and reusing products wherever possible or by buying biodegradable products or those with no or limited packaging.

We will comply with all environmental legislation and uphold the principals of best practice in the arena of sustainability.

To confirm our commitment to this principal we have achieved ISO14001, SEDEX, CEASAR and Achilles UVDB accreditations. We will therefore ensure we continue to maintain these standards and continually improve.

Social Impact – develop and support our communities

To create shared value, we know that sustainability extends beyond the environment and Health Partners' own services and place of work. As a business we will have an impact on the community in which we operate, for that impact to have a positive value we must commit to positive global, national and local principals, regulations and rights and do the right thing.

We are committed to advancing workplace healthcare to make a positive and measureable difference to the quality of people's health and wellbeing.

We will utilise our Foundation to ensure effective altruism that benefits the society in which we live and operate.

Health Partners are committed to upholding the 10 principals set out in the UN Global Compact and advancing the UNs 17 Sustainable Development Goals, where we can.

We believe in the fundamental rights of individuals and will not endorse any breaches of the Human Rights Act in our business undertakings with any interested party.

Health Partners are committed to equality and champion the benefits that diversity can bring to our organisation within our own team, our customer base, their employees and the community at large.

We declare that we will not abide any compulsory working practices; bonded or forced labour; child labour; or modern slavery, as defined by the Modern Slavery Act, in any aspect of our supply chain or business operations, as we believe in an individual's fundamental rights at work, as defined by the ILO Declaration.

Health Partners will ensure a safe and secure workplace for all our employees and any other interested party, where engagement, health, safety and risk management are at the forefront of all our business endeavours.

We will provide health education to improve the lifestyles of our own employees and those with whom we have contact.

We advocate and support freedom of association and we will pay all employees at least the 'living wage' while ensuring all best practice workplace standards are adhered to within our operations, including our supply chain.

We will recruit locally to where we operate, training and developing people to match the competencies and skills required for the roles and commit to organisations such as the 'Armed Forces Covenant', 'Disability Confident' and 'Movement to Work' to assist those who may be disadvantaged to find 'good work' We will develop our Apprenticeship programme to offer young people additional opportunities in the workplace.

We will, wherever possible, work with small, local business partners or charities who share our values and business ethics.

We will purchase fair trade, ethically sourced and sustainable products and services and those from companies with charitable affiliations, wherever practicable.

Governance – conducting our affairs with integrity

Governance and business ethics form the foundations upon which the other aspects of social impact are structured, they are the crucial tools and principals that create the framework to legitimise and ensure that the policies, practices and decision making are based upon the principals of honesty, integrity and fairness.

We will ensure compliance through oversight, internal controls, due diligence protocols and audit, ensuring our principals and values are at the heart of all that we do.

We will leverage risk and mitigation of our impact through strong leadership, strategic planning and structured procedures, policies and standards.

Health Partners will conduct all our business affairs with integrity. Our reputation is of the utmost importance to us and can easily be lost or damaged through inappropriate actions.

All employees are trusted to obey all laws, regulations and any obligations that are specified in our customer contracts, when conducting any business transactions with other interested parties.

We will not participate, condone or allow competitive collusion; price fixing; reciprocal dealings; financial inducements; or offer gifts or gratuities that may be construed as bribes, to win business, provide services or partner with a supplier either directly or through a third party.

No employee may accept any form of payment, gift, entertainment or gratuity from a customer, supplier or business partner that may be construed as a bribe or has the appearance of improperly influencing a business decision. Small gifts of 'friendship' up to the value of £50 may be accepted but should be logged and signed off with the Governance Director.

Reasonable business expenses such as meals or other sustenance at business meetings may also be accepted and offered, as long as they are considered 'chargeable' under tax legislation and justifiable.

If any employee is unsure of what may or may not be offered or accepted, they should discuss this with the Governance Director before taking any action.

Every employee and contractor will abide by all tax laws and ensure they do not bring the company into disrepute by any 'evasive' or criminal activities.

It is our standard policy that loans will not be made/given to employees, Directors, Shareholders, Connected Persons or any other interested party. In exceptional circumstances the company may make a loan to an employee on condition that this loan falls within the HMRC's guidelines and definitions of a 'small loan'.

If a 'conflict of interest' arises with a customer, potential customer or business partner, the employee should immediately notify their line manager.

Our intellectual property (IP) is what provides us with a unique selling proposition to potential and existing customers, it should therefore be protected at all times. Likewise, we should respect the IP of our customers or business partners, if we are given access to it and should protect it, as if our own.

Procurement of products or services from business partners and suppliers should be conducted with integrity, fairness and transparency. Due diligence must be undertaken before we approve a new business partner or supplier, as our supply chain's behaviour and conduct reflects on us. The Supplier procedure must be followed at all times.

If we make a mistake in our service delivery or business operations, we must own up to it and correct it as soon as practicable. Transparency in our dealings with all interested parties will ensure our reputation remains untarnished and our trusted relationships are not damaged.

The Health Partners Foundation

In 2021 Health Partners launched our Foundation. The Foundation purpose is to ensure 'effective altruism' with funding being given to projects where the impact will be felt most widely and appropriately.

We will engage with all employees in our choice each year of projects to be supported and funds may also be available for one offs special projects.

Conduct, whistleblowing and raising concerns

We trust that all employees will behave with integrity, honesty and professionalism in all their business activities. Exemplary customer services, a willingness to co-operate and apply their ability and attention to the tasks at hand are expected from our teams. In return Health Partners will ensure a safe and secure work environment for everyone; we will develop; lead; support; engage; reward; and motivate our employees to do the best they can.

We have robust grievance and disciplinary procedures in place which all employees have access to if they have any concerns.

If any employee suspects or has a concern regarding a colleague's behaviour, patient safety, any acts of harassment, discrimination or threats, or that the company may have acted illegally or inappropriately in any way, they should raise their concern confidentially with their line manager or HR.

Investigations

We recognise the importance of responding promptly to whistleblowing allegations. We will promptly triage the information and the issue described in the whistleblowing disclosure and make a timely decision to perform a full investigation. That investigation is performed using experienced resources and engaging third party specialist help where required, including where necessary legal advice and technological knowhow.

Where appropriate, independent investigators are engaged and operate with a predefined mandate from the Leadership Team. The investigation is subject to strict confidentiality and security protocols, both to protect the anonymity of the whistleblower and the integrity of the investigation.

The investigation will include

1. **Assessment** - to properly assess or understand the whistleblower disclosure or to recognise the seriousness of a matter
2. **Planning** - to properly plan the investigation or to include the right team and set of skills on the investigation team from the outset; especially lawyers, skilled investigators, interviewers and technology specialists.
3. **Preservation** - Issuing an information preservation order to all staff. This action helps to prevent data loss by employees inadvertently deleting data which is relevant to an investigation.
4. **Evidence** - to ensure that the investigator has access to the most up to date evidence and to mitigate the risk of bad actors deleting evidence.
5. **Legal advice** - to take legal advice from the outset.
6. **Trust** - ensuring the anonymity of the whistleblower to protect the employee from retaliation.
7. **Remediation** - to act on the findings and recommendations of the investigation report if found to be true. Taking remedial actions, communicating them with staff, and learn from the investigation.
8. **Notifications** - to make mandatory notifications for regulatory purposes. This would include notifications such as data protection purposes or for employee relationship management; or legal notifications to civil or criminal authorities.

We will not tolerate any form of retaliation against an employee who, in good faith, raises a concern even if it is found, after investigation, to be untrue. However, if an employee raises what proves to be a vexatious, mischievous or malicious issue, disciplinary action may be taken, up to and including dismissal.

References

Legislation and Regulations that apply;

- UN Global Compact
- UN Sustainable Development Goals
- ILO Fundamental Principles
- Modern Slavery Act
- (Human Rights Act)
- Equality Act
- Bribery Act
- Criminal Finances Act
- Health and Safety Act

Related Health Partners documents;

- Employee Handbook

- Diversity and Equality Policy
- Training and Development Policies and Procedures

Change control

This policy should be formally reviewed every three years. However, changes to working practices, new legislation or regulation updates will supersede this review procedure as necessary.