

# Supplier Code 2025 of Conduct

Sanctuary  
Group

Updated April 2025

Sanctuary Group is a trading name of Sanctuary Housing Association

## About Sanctuary

We are Sanctuary. We were set up more than 50 years ago and now provide housing and care in England and Scotland to more than a quarter of a million people. We exist to serve our customers and communities.

Our mission is to build affordable homes and sustainable communities where people choose to live.

We are a not-for-profit housing association, which means we don't make profits for shareholders. Instead we invest all the income we make – every penny – into delivering on our social purpose.

## Leading housing and care provider

We own and manage around 125,000 homes. This makes us one of the largest housing associations in the country. Our size, effective governance and careful financial management means we have significant financial strength.

We play our part in tackling the national housing crisis by building good quality affordable homes all over the UK. We build to a wide variety of needs and styles, with the aim of creating or adding to a sustainable community. Our regeneration projects transform communities by listening to residents and putting their needs first.

Social housing is at the core of what we do, and we believe secure, good quality accommodation can be the foundation that enables people to achieve their goals in life.

It's not enough to be financially strong. We believe that to live up to our social purpose, we need to play an active role in the local communities where we work. This means connecting with residents, local authorities, charities and groups so we can work together to create communities that are resilient.

[Read more about our sustainable communities programme.](#)

**Affordable housing**

We provide social and affordable housing across England and Scotland. We let homes through what's called 'choice-based lettings schemes' in some local areas, according to the local authority rules, and directly to tenants in some local authority areas.

**New homes**

We build new homes around the country for affordable rent, shared ownership and outright sale. Our homes range from flats to large family homes and are at a range of price points.

**Enriching lives**

We manage around 110 care homes under Sanctuary Care. We believe in going beyond basic provision of care to enrich people's lives – whether those people are the residents of our care homes themselves, their loved ones or our teams.

**Pathways for independence**

Supported Living is an important piece of our DNA. We support people on their pathways to independence. Through quality support and housing, we equip people with the confidence, self-esteem and life skills they need to live independently.

**Where people choose to live**

We've been providing purpose-built student accommodation for over 20 years and we're currently home to over 10,000 students in large university cities across the UK including London, Glasgow, Liverpool, Preston and Manchester.

**Keyworker accommodation**

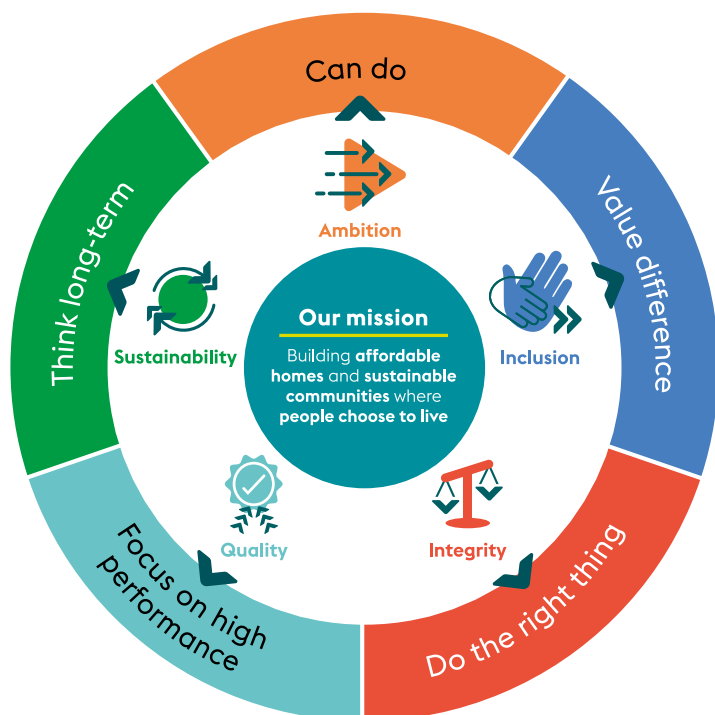
We provide accommodation to keyworkers at hospital sites to enable them to complete their practical studies close at hand to their place of work.

## Our beliefs

We believe that everyone deserves a good, safe home and a community they can belong to. We believe that everyone should feel included and able to realise their potential. We want to help build a society with opportunities for everyone, regardless of their background or circumstance.

## Our values

Our values are ambition, inclusion, integrity, quality and sustainability.



## Who we are

Sanctuary has around 14,000 employees who make up one team. From the top of our organisation to the frontline, we are united in working together for our mission.

Sanctuary procures goods, services and works contracts to support our operational areas.

This Supplier Code of Conduct has been established to set out the ethical principles and safety standards we expect all suppliers to commit to when they are engaged to work with us.

Suppliers are responsible for making sure that they, their employees, and any sub-contractors (who are supplying Sanctuary) comply with the principles set out in this document in order to provide a quality service to us and our customers.

This Code of Conduct shall form part of any contract entered into by Sanctuary and compliance with it shall be a binding obligation on each supplier.

## **Legal, regulatory and ethical standards**

Sanctuary requires all of its suppliers to comply with all applicable laws, regulations and standards.

## **Contacting Sanctuary**

Prior to visiting any of our premises, please phone and make an appointment.

## **Customers**

The experience of our customers is at the heart of how Sanctuary operates. We expect our suppliers to use customer insight to improve quality and drive innovation. Where services are customer facing they must be accessible, seamless and easy to deal with, using the appropriate tone of voice to ensure customers feel listened to and that their feedback is important.

[Suppliers who are working in care homes or supported accommodation are asked to watch the short video Your Working Environment is our Home.](#)

## **Equality, equity, diversity and inclusion**

Our goal is to be a diverse, inclusive organisation where our people thrive and meet our customers' needs with fairness and empathy. We want to work with organisations who are equally committed and who are willing to share their successes and learning: <https://www.sanctuary.co.uk/equality-diversity-and-inclusion>

### **Equality, equity and diversity**

As a provider of a range of diverse services, we ask that you do not make assumptions about what people want, but actively seek to understand and respond to their individual needs. We are a disability confident employer and expect our suppliers also to have the appropriate level of disability confidence.

### **Respect and inclusion**

We expect that you and your employees will value and respect the identities and cultures of our employees, customers and communities, using this growing understanding to improve your culture and performance.

### **Anti-discrimination**

We expect your organisation to have a strong anti-discriminatory attitude that is promoted throughout your workforce. You must have clear disciplinary processes should there be an issue in regard to discrimination, harassment, victimisation or bullying and be monitoring their effectiveness. Under The Worker Protection Act 2023 we acknowledge our duty to prevent sexual harassment in the workplace, and take any such complaints seriously, as we would expect our suppliers to.

### **Compensation and working hours**

We expect you to be working towards eliminating any gender pay gap, support equal pay for work of equal value and comply with national laws and regulations regarding working hours, minimum wages and benefits.

## **Communication**

We expect honest and transparent communications allowing for people's needs, language and literacy.

## **Modern Slavery Act 2015**

You will comply with the obligations set out in this Act. All suppliers are expected to commit to having a slavery-free supply chain, with all endeavours being made to ensure this. Those with a turnover of £36 million or above are obliged to produce and publish a slavery and human trafficking statement each financial year.

## Health, safety and wellbeing

All of Sanctuary's suppliers and contractors must comply with health and safety legislation relevant to the extent of the works or goods supplied. We expect suppliers and contractors to provide all their employees and others under their control with appropriate training, instruction, information, personal protective equipment, and a safe working environment. Any contractor working on behalf of Sanctuary must also meet all specific requirements detailed in their contract.

### **Resident safety**

We take our responsibilities to ensure the safety of our residents seriously. In all cases when suppliers and contractors are carrying out works that may impact on resident safety they will be expected to communicate with local employees, put measures in place to enhance safety and safeguarding, and be considerate of residents' needs.

### **Fire safety**

Sanctuary is committed to making sure that its supply chain positively impacts on standards of fire safety in its premises. All of Sanctuary's suppliers and contractors 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 Sanctuary must also meet specific fire safety requirements detailed in their contract.

## Business continuity planning

As our supply chain is integral to the service we provide it is essential that our suppliers have robust business continuity plans in place to protect their operations as far as possible, should any disruption to their business occur (for example natural disasters, terrorism, software viruses, illness and infectious diseases). As a minimum, these resilience arrangements should consider: people, premises, process (information and technology) and providers.

## Community benefits

Sanctuary is committed to creating vibrant and sustainable communities. We take a long-term view of our involvement in an area or community and want to maximise the opportunities for our suppliers to work with us and support these goals.

We actively encourage our suppliers to create employment and training opportunities through apprenticeships and work experience, and to consider broader social value contributions that include financial charitable contributions, materials and resources.

## Environmental

Sustainability is one of Sanctuary's core values and we are committed to a data driven approach to understanding and limiting our environmental impact. This commitment applies to both our own operational footprint and our extended footprint. The procurement of products and services significantly impacts Sanctuary's annual scope 3 emissions.

We are accountable for a portion of the operational emissions of each organisation we work with, based on what we buy from them. In line with the [Decarbonisation and Net Zero Strategy](#), we have set a public target to reduce the emissions related to the purchase of goods and services by 10% by 2030 at the latest, reaching net zero throughout our value chain by 2050.

Any organisation we work with will need to demonstrate how there is a strategic fit between their environmental values and objectives and Sanctuary's sustainability strategy and net zero targets, demonstrating how they are considering the environmental impact of their operations.

## Honesty and integrity

Honesty and integrity are core to Sanctuary's values. We expect our suppliers to operate with honesty, integrity and transparency in all business activities, complying with relevant legislation such as the Bribery Act 2010 and Money Laundering Regulations 2017. Suppliers may not offer services, gifts or benefits to Sanctuary employees or their families.

## Whistleblowing

Sanctuary respects the right of our employees, residents, contractors and other stakeholders to raise concerns about possible wrongdoing within the organisation. We encourage individuals to raise concerns through responsible whistleblowing to either your local contact or HR Services. We will act to investigate the concerns without discriminating against the whistleblower. We make it easy for whistleblowers to raise concerns and expect our suppliers to do the same.



## Open and fair competition - The Procurement Act 2023

Sanctuary complies with competition legislation. We believe in open and fair competition and expect our suppliers to do the same. Suppliers must not engage in anti-competitive practices including price fixing, bid rigging or blacklisting.

In accordance with the Procurement Act 2023, we are required to identify and keep under review actual and potential conflicts of interest. Suppliers have an obligation to notify us if they are aware of any such conflict.

## Data protection

Sanctuary expects its supply chain to protect all data that we provide to them in the course of business, to an appropriate standard so as not to cause Sanctuary to become non-compliant with the UK GDPR and Data Protection Act 2018 through a deliberate act, negligence or ignorance. Personal, sensitive or confidential information must not be disclosed to a third party (either by accident or deliberately) without our prior agreement and must be handled according to current, relevant legislation, for example PCI DSS, DPA 2018, UK GDPR, Caldicott Principles and so forth.

## Cyber security

We expect all our suppliers to observe appropriate levels of cyber security as set out in Cyber Essentials. Where processing any sensitive or personnel information, suppliers must have a minimum accreditation of Cyber Essentials or higher to make sure that their own systems and supply chains are as secure as possible. Our suppliers may be subject to checks through the Security Scorecard and we expect prompt collaboration with us to resolve any issues highlighted.

## Prompt payment

Sanctuary strives to pay all invoices within 30 days of receipt of a valid invoice and expects its suppliers to do the same.

If you have any serious concerns that something is not consistent with this Code, please let us know. We encourage you to raise any concerns or questions you have with the Director of Group Procurement at [group.procurement@sanctuary.co.uk](mailto:group.procurement@sanctuary.co.uk).

Supplier's authorised representative signature:

----- Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Print name: -----

Position: -----

Company name: -----

Registered company number: -----

If you have any queries, or for further information, please contact:

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