



DPAS

Corporate Social Responsibility & Ethical Conduct Policy

Owner	Nigel Gooding		
Responsible for Delivery Across Data Privacy Advisory Service	Nigel Gooding		
Reference and Version Number	V3.0	Date:	06.08.24



TABLE OF CONTENTS

1.	Policy Statement	3
2.	Commitment to Corporate Social Responsibility	3
3.	Local Community & Social Responsibilities	3
4.	Our Staff	4
5.	Environmental Management Objectives	4
6.	Equal Opportunities	5
7.	Health & Safety	5
8.	Ethical Purchasing & Procurement	6
9.	Information & Confidentiality	7
10.	Conflict of Interests, Corporate Gifts & Hospitality	7



1. Policy Statement

DPAS is committed to operating its business in a manner that is both sensitive and responsible with proper regard to its legal obligations and according to relevant directives, regulations and codes of practice. It is also committed to supporting the Government's vision for Corporate Social Responsibility in terms of businesses taking account of their economic, social and environmental impacts, specifically:

- Promoting business activity that brings simultaneous economic, social and environmental benefits.
- Encouraging innovative approaches and continuing development and application of best practices.
- Ensuring best minimum levels of performance in areas such as health & safety, the environment and equal opportunities.
- Creating a framework that facilitates business practices that balance profit and success with achievement of social and sustainability goals.
- Taking an active part in supporting the local community and social causes.
- Creating real opportunities for local people and local enterprise development.
- Providing a rewarding, challenging and great place to work.

As from 1/1/2019 all contractors and partners are required to abide by this policy whilst representing DPAS and providing services to DPAS.

2. Commitment to Corporate Social Responsibility

The company recognises that its operations influence the communities and environment in which it operates. Considering this, the company is committed to operating in a socially responsible manner, supporting a number of local communities and social causes, as well as operating in an environmentally sustainable manner.

3. Local Community & Social Responsibilities

DPAS is proud to support local community projects as well as a range of deserving and charitable causes. To prevent funding or charitable donations from being misappropriated or interpreted as a bribe, we carry out appropriate due diligence to ensure that the recipients are bona fide, and that money raised is used for its intended purpose. This includes ensuring that donations are made to legitimate organisations or that beneficiaries are identified.

It is our objective to ensure that charitable donations, contributions or sponsorships genuinely benefit the causes to which they are given and that funds are not misappropriated or interpreted as bribery. As a company we will carry out due diligence to ensure that the recipients of any donations, contributions or sponsorships are bona fide and that the funding will be used for the purpose that it is intended. We will do this by ensuring that:

- Donations are only made to registered charities or that the recipients of any other donations are researched to ensure that they are legitimate and the beneficiary (be that an individual,



company or charity) is identified and approved in advance unless otherwise authorised by the Managing Director.

- An audit trail is maintained of all donations and sponsorships to enable them to be monitored to ensure funds are being used as agreed.

4. Our Staff

We are committed to ensuring that we provide a motivational, fulfilling and fun environment in which to work. We focus hard on recruiting and retaining the best people, recognising their achievements and rewarding their efforts.

We believe that much of our success can be attributed to the values that we hold and that are embedded throughout the organisation which include:

- Equality and diversity
- Honesty
- Integrity
- Professionalism

5. Environmental Management Objectives

Whilst DPAS does not produce any emissions or pollutants that come under the Integrated Pollution Prevention and Control Regulations, we recognise that our day-to-day practices can have an adverse effect on the environment. Our sustainability policy is to minimise our negative environmental impacts.

Our Commitment to Sustainability

DPAS commits to implement this policy throughout the organisation by:

- Maximising emission and carbon reduction savings of our activities and travel, offsetting carbon use where necessary and always using public transport in the first instance.
- Minimising consumption of resources and waste arising.
- Complying with all relevant environmental legislation.
- Training staff on our sustainability objectives.
- Communicating and reporting progress, both internally and externally.
- Operating in a socially and ethically responsible manner.
- Using all suitable opportunities to influence our partners, suppliers and sub-contractors to improve their own environmental performance.

Travel and meetings

- Walk, cycle and/or use public transport to attend meetings, site visits etc, apart from in exceptional circumstances where the alternatives are impractical and/or cost prohibitive.



- Minimise the use of air travel and when travelling to Europe, actively encourage the use of trains.
- Avoid physically travelling to meetings etc where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and efficient timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients and partners.
- Reduce the need for our staff to travel by promoting the use of public transport, walking and cycling and encouraging the use of low emission vehicles.

Practical Steps

- We actively recycle all paper waste, bottles, cans, cardboard and batteries via the services of professional recycling service companies.
- Minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste.
- We recycle all printing consumables.
- Reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping.
- Where possible purchase electricity from a supplier committed to renewable energy. Seek to maximise the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes.

6. Equal Opportunities

It is the aim of DPAS to create an environment that encourages and values diversity within its workforce and builds on the difference's individuals bring, enabling the company's continued success. We aim to draw upon the widest possible range of views and experiences in order to meet the changing needs of our staff, clients, and partners.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation (including the Equality Act 2010).

Our approach to equal opportunities applies equally to both our own employees and the way in which our services are offered to clients and partners.

7. Health & Safety

It is the Company's duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees. This requires that regard is paid in particular to:

- Maintaining safe premises, as well as a healthy and safe working environment.
- Providing and maintaining safe systems at work.
- Providing health and safety information and training.
- Publishing and regularly updating a Company Safety Policy.



- Ensuring safety in the use of articles and substances.
- Conducting special risk assessments for expectant, new mothers and young persons
- Providing such information, training, instruction and supervision as is necessary to ensure the health and safety at work of all employees.

Our Health and Safety Policy is updated yearly.

8. Ethical Purchasing & Procurement

DPAS is committed to procuring its works, goods and services in an ethically and environmentally sensitive way, yet with proper regard to its commercial obligations, ensuring that suppliers deliver to agreed timescales, quality and cost.

Purchasing is undertaken in a manner that encourages competition and offers fair and objective evaluation of offers from all potential suppliers.

Purchase of goods and services with an annual value in excess of £10,000 excluding VAT will be conducted according to the following principles:

- Completion of a business case to evidence the need to purchase.
- Procurement practices will be transparent, auditable and fair.
- Research will be conducted to ensure a clear understanding of the risks associated with the purchase of goods and services and purchasing decisions will include contingency and risk mitigation strategies.
- Tendering (if appropriate) is based on both quality and cost, is evaluated in a fair, objective, and structured manner that actively encourages competition.
- We will encourage all protected groups/communities to participate in the procurement process.
- Company employees responsible for purchasing will not accept corporate gifts, or any type of solicitation that could be construed as enticement.
- The procurement process demonstrates that the approach taken to competition is rigorous, balanced and driven by service needs and market intelligence.
- Potential suppliers are ethical, sensitive to the environment and operate within EU and UK legislation and uphold similar ethical and moral standards to DPAS. DPAS reserves the right to investigate the ethical record of potential new suppliers before entering into any agreement and to request information from suppliers regarding the production and sources of goods supplied.
- The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this policy.
- Suppliers are able to demonstrate their ability to deliver continuous improvement and cost savings throughout the life of the contract.
- Business transactions will, where possible be conducted electronically.



9. Information & Confidentiality

Information received by employees, contractors or agents of the company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. The company will at all times ensure that it complies with all applicable requirements of data protection legislation in force from time to time.

10. Conflict of Interests, Corporate Gifts & Hospitality

DPAS holds the trust and confidence of those with whom it deals, including clients, suppliers and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners. In order to help preserve and strengthen these relationships, the Company has developed rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest.

The Bribery Act 2010 states that “genuine hospitality or similar business expenditure that is reasonable and proportionate” is not illegal and should not be counted as bribery. Employees, however, may not accept corporate hospitality or gifts which could be considered an incentive or enticement, particularly if they have the potential to place the recipient under any obligation or if they have the potential to create any type of conflict of interest.

Any corporate gifts or hospitality (whether being given or received) must be disclosed to and approved by the Managing Director prior to being given/accepted. Details of such gifts including the purpose of the gift, the giver and recipient, the nature of the gift/hospitality, its value and who has approved it must be fully documented in the Gifts/Hospitality Register. This register will then be audited by the Managing Director on a quarterly basis. Any corporate gift must be given openly (not in secret) in the name of the company and not be construed as coming from a particular individual. Gifts should not include cash or a cash equivalent.

Corporate gifts are aimed at thanking customers or suppliers for their loyalty and custom and not as an incentive or inducement for future favourable treatment or business.

Promotional gifts without significant value (e.g. stationery, chocolates, or other gifts under the value of £75) need not be disclosed but should be shared with other employees. If it is felt that any gift received might constitute an act of bribery, then the gift must be passed to the Managing Director who will return it to the donor explaining the company policy.

DPAS will operate in accordance with the policies, procedures and restrictions of its clients in relation to corporate hospitality, gifts or incentives where such information forms part of a contract or has been specified in writing to the company.

11. Human Rights

DPAS is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

The company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights.



The company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by the organisation's activities, in compliance with the Modern Slavery Act 2015.