



**ETHICAL  
PURCHASING POLICY**  
Including  
**Modern Slavery Statement**

**DECEMBER 2020**



# Contents

- Part 1 Purpose**
- Part 2 Our Standards and Policies**
- Part 3 Risk Assessment: understanding our supply chain**
- Part 4 Our Purchasing Practices**
- Part 5 Modern Slavery Statement**
- Part 6 Monitoring and Review**



## Part 1

# Purpose

Our mission as a business is to deliver an excellent professional cleaning service whilst also achieving the highest standards of social and environmental responsibility possible. We aim to set new standards for our sector and promote their adoption by others, for the benefit of cleaners, customers and all of those in our supply chains.

Most of our policies are aimed at ensuring high standards within our company and the way that we behave. This Policy sets out the values and practices which are important to us and which we want to achieve within our supply chain.

We will monitor and review this Policy every year to assess our performance and also identify areas for improvement. We will also publish the key findings of our review each year in our Annual Report.

In developing this Policy we have drawn on best practice and used established national and international standards wherever they are available.

## Part 2

# Our Standards and Policies

Our agreed principles as a company for guiding purchasing decisions are as follows.

### 1 – Our commitment

We recognise that whenever we purchase goods and services we have an impact on the world around us and so we commit to use our purchasing not just to meet our own needs but to deliver the greatest good possible for all – including social and environmental considerations.

### 2 – The outcomes we seek

We commit to make purchasing decisions, wherever possible, which will deliver the following outcomes from those companies. Where possible we will seek out recognised third-party accreditations, otherwise we base our decisions on background research and options assessment:

Issues	Outcomes	Preferred standards to look for
<b>Human &amp; labour rights</b>	<ul style="list-style-type: none"> <li>➤ Fair and ethical employment practices</li> <li>➤ Reducing the risks of modern slavery and human trafficking</li> </ul>	For UK employment <ul style="list-style-type: none"> <li>• Living Wage Employer accreditation</li> </ul> For overseas employment <ul style="list-style-type: none"> <li>• EU REACH</li> <li>• WRAP</li> <li>• Fair Trade Mark</li> </ul>
<b>Workforce wellbeing</b>	<ul style="list-style-type: none"> <li>➤ A positive approach to promoting equal opportunities in recruitment</li> <li>➤ Pro-active approach to wellbeing, health and safety in the workforce as part of a commitment to dignified working conditions</li> </ul>	<ul style="list-style-type: none"> <li>• B-Corp Status</li> <li>• ISO standards</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>➤ Reducing environmental impacts, including carbon emissions</li> <li>➤ Maximising recycling and the re-use of materials</li> </ul>	<ul style="list-style-type: none"> <li>• EU Eco Label (sustainability)</li> <li>• Planet Mark (carbon emissions)</li> <li>• Oeko Tex Standards (overseas clothing manufacturing)</li> </ul>
<b>Animal welfare</b>	<ul style="list-style-type: none"> <li>➤ Promoting animal welfare and the prevention of cruelty to animals</li> </ul>	<ul style="list-style-type: none"> <li>• Choose Cruelty Free (CCF)</li> </ul>
<b>Community</b>	<ul style="list-style-type: none"> <li>➤ Promoting positive impacts in the local community</li> </ul>	n/a

## Part 3

# Risk Assessment: understanding our supply chain

## Employing People

Clean for Good is very much a 'people business' and some 90% of our annual expenditure is the employment cost of remunerating our own team.

Further information on how we employ our people is available in other documents, including our Staff Handbook. In summary, we work hard to recruit, employ, train and manage all of our people well, and this includes the following features:

- We have a hugely diverse workforce – age, ethnicity, gender, etc.
- We are a fully accredited Living Wage Employer (with the Living Wage Foundation)
- We directly employ all of our staff and provide Terms & Conditions which are above Statutory Minimums
- We ensure staff have information about our employment policies and their rights
- We invest in training and management, limiting how many contracts our Contract Managers oversee to ensure that there is sufficient time to manage people properly and liaise with customers

## Our Supply Chain

Approximately **10% of our annual expenditure** is used to purchase a range of goods and services – this is all of our expenditure which is not remunerating our own employees and is our supply chain. This is the focus of this Policy.

We have used data from the 2019-20 financial year to identify every type of purchase and the amount of expenditure in each case. We will review this each year to keep it up to date.

The purpose of this Policy is to ensure that this expenditure is made in as responsible a manner as possible.

For each type of expenditure, we identify the key risks to address. (Expenditure varies from year to year, so issues are identified for categories even where no expenditure has taken place in the last 12 months.)

**Supply Chain Expenditure & Key Risks**

<b>Goods</b>	<b>% of all Annual Expenditure in 2019-20</b>	<b>Key Risks</b>
Cleaning supplies & equipment	3.2%	Chemicals could be harmful to the environment & materials could be manufactured in an unsustainable way
Cleaner uniforms	0%	Clothing could have been produced to low labour standards in another country, and harmful chemicals could be used in manufacturing
Consumables purchased for Customers	3.0%	Materials could be manufactured in an unsustainable way
<b>Services</b>		
Outsourced support services, including: <ul style="list-style-type: none"> <li>• Accountancy</li> <li>• HR</li> <li>• Payroll</li> <li>• Banking</li> <li>• Website support</li> </ul>	3.1%	All services are provided by people in the UK, so the key issue is their corporate behaviour and how they treat and pay their staff in particular
Desk hire (including office services)	1%	We have no direct control over this co-working space, but can influence purchasing decisions by the landlord
Employer Insurance	0.5%	Insurance funds are invested in equities, so there are risks around the nature of investment
Telephone, IT services & printing	0.2%	Services purchased from specialist telecoms and IT companies, so their corporate behaviour should be reviewed
Travel (train, taxis)	0.1%	We own no vehicles and do not transport much, so this is occasional use of taxis by staff – are the taxi firms paying drivers fairly?
Certifications	0.1%	This is the enabling expenditure for ensuring we are independently accredited
Miscellaneous purchases (mainly marketing initiatives & entertainment)	0.4%	This will vary significantly from year to year and could encompass different goods and services
<b>TOTAL Supply Chain Expenditure</b>	<b>11%</b>	



## Part 4

# Our Purchasing Practices

For each type of purchase we will research best practice and identify the best way of sourcing goods and services ethically. Wherever possible we will seek out goods and services which are independently certified by third party organisations.

## Our Supply Chain Purchasing Practices

The table below sets out the practical actions we are taking for each kind of purchase to ensure that we behave as ethically as possible.

Category of Expenditure	Current Ethical Purchasing Policy	Key Third Party Accreditations	Further improvement this coming year
<b>Group 1 - Cleaning Chemicals</b>	<ul style="list-style-type: none"> <li>We commit to using regular/daily cleaning chemicals which are made by Delphis Eco, have the <b>EU Ecolabel</b>, are Cruelty Free, biodegradable and come in 100% recycled plastic bottles</li> <li>Where other chemicals are required for specific purposes or clients, we will seek, where possible, to identify products that have an independent environmental certification or which are made by companies with strong environmental track records.</li> </ul>	<ul style="list-style-type: none"> <li>The <b>EU Ecolabel</b> is an independent certification offering the highest environmental standards in Europe</li> </ul>	-
<b>Group 2 – Uniforms</b>	<ul style="list-style-type: none"> <li>We commit to purchasing uniforms produced in factories with certified labour standards and good environmental practices and which comply with our Modern Slavery Statement.</li> <li>Our present Tabards from Premier Workwear have REACH and WRAP accreditations. The polo shirts from Russell also have REACH and Oeko-Tex Standard 100 accreditations.</li> </ul>	<ul style="list-style-type: none"> <li><b>EU REACH compliance</b> – system to protect people and environment from harm from chemicals</li> <li><b>WRAP-</b> Worldwide Responsible Accredited Production, providing third-party workplace inspections</li> <li><b>Oeko-Tex Standards</b> – various environmental standards in clothing production</li> </ul>	Alternative suppliers to be researched in 2020 with a view to identifying uniforms with higher standards, organic materials, and/or fairtrade standards
<b>Group 3 – All Other Goods</b> Including equipment, consumables for clients and all other purchases of goods	<ul style="list-style-type: none"> <li>We commit to research alternative products in all cases, always seeking out the product with the best social and environmental credentials, preferably backed by independent certification – Fair Trade Mark, Planet Mark, etc</li> </ul>	<ul style="list-style-type: none"> <li><b>Fair Trade Mark</b> – safeguarding prices and conditions for workers in low-income countries</li> <li><b>Planet Mark</b> – For performance in lowering carbon emission</li> </ul>	Continue to seek out more sustainable consumables options to offer to clients





Category of Expenditure	Current Ethical Purchasing Policy	Key Third Party Accreditations	Further improvement this coming year
<b>Group 4 – Outsourced services</b> Including outsourced back-office services (e.g. payroll, HR) and telephone and IT services and travel/taxi	<ul style="list-style-type: none"> <li>We actively seek to work with <b>Living Wage Employers</b> and always ask new suppliers if they pay the Living Wage or more to all employees, whether LWEs or not.</li> <li>We also look for additional evidence of fair pay and good working conditions – eg purchasing telephone services from the Phone Co-op and using taxis via Taxi-App.</li> </ul>	<ul style="list-style-type: none"> <li><b>Living Wage Employers</b> – Accredited by the Living Wage Foundation</li> </ul>	-
<b>Group 5 – Office hire</b>	<ul style="list-style-type: none"> <li>We hire desks so do not control our office environment, but seek to influence ethical purchasing by the landlord</li> </ul>	-	-
<b>Group 6 – Insurance/ investments</b>	<ul style="list-style-type: none"> <li>Our Employers Insurance is now purchased from NatureSave, who lobby for environmentally responsible investment in the insurance industry, campaign on environmental issues and donate a % of profits to tree planting.</li> </ul>	-	-

## Part 5

# Modern Slavery Statement

## Introduction

We are not required to prepare this Statement but have voluntarily opted to do so.

This statement is made to voluntarily comply with the standards set out in section 54 of the Modern Slavery Act 2015. It constitutes Clean for Good's modern slavery and human trafficking statement for this financial year.

We are firmly opposed to all forms of modern slavery and human trafficking. The promotion of fair pay and dignified work are central to our business mission.

## Our organisation

Clean for Good is an ethical workspace cleaning provider, operating in London. We currently have around 50 staff, all directly employed by us. The main purpose of this statement is to ensure there are policies and due diligence procedures in place for purchases we make through our supply chain.

## Our supply chain

We are committed to continuously improving our practices to identify and eliminate any slavery and human trafficking in our business and supply chains, and to acting ethically and with integrity in all of our business relationships.

We purchase a modest range of goods and services from a number of suppliers, all based in the UK. Only a few of these pose any risks for modern slavery – primarily the purchase of uniforms which may not be manufactured in the UK.

## Policies

Clean for Good has developed an Ethical Purchasing Policy which is the main policy tool underpinning our approach to tackling the risk of modern slavery in our supply chain.

## Due diligence

We have reviewed our entire supply chain and sought to identify any purchases where modern slavery may be a risk. There are few instances of this, mainly around the purchase of uniforms.

Purchasing decisions are primarily made by the Managing Director and where there is any purchase which poses a risk of being affected by modern slavery, particularly in relation to clothing/uniforms, due diligence will be undertaken first to identify risks and options in relation to that purchase.

Clothing will only be purchased where it has relevant formal third-party accreditations to confirm decent working conditions in those factories.



## Improvement

Over the course of the next financial year we will continue to enhance our Ethical Purchasing Policy help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers and in relation to our own operations.

## Approval

This statement has been formally approved by the Board of Clean for Good on 10<sup>th</sup> December 2020 and is hereby signed on behalf of the Board by:

### **Martin Lawson**

Chair, Clean for Good

10<sup>th</sup> December 2020



## Part 6

# Monitoring and Review

We will keep this Policy under regular review and at least once per year in Quarter 4.

We will report on our progress in abiding by this Policy and improving our practices every year in our Annual Report.