



**HISTORIC ROYAL PALACES**

# **Historic Royal Palaces**

## **Partner and Supplier Code of Conduct**

**December 2024**



## HISTORIC ROYAL PALACES

### 1. INTRODUCTION TO HISTORIC ROYAL PALACES

Historic Royal Palaces (HRP) is a registered charity, responsible for the care, conservation, and presentation of HM Tower of London (TOL), Hampton Court Palace (HCP), Kensington Palace State Apartments (KP), the Banqueting House at Whitehall (BH), Kew Palace (KEW), and Hillsborough Castle and Gardens (HCG), the official residence of HM The King in Northern Ireland and residence of the Secretary of State for Northern Ireland.

We are an independent charity that loves and looks after six of the most wonderful palaces in the world.

The palaces are the setting for the stories that shape us all, and we're bringing them to people in ways that mean more to them.

We want everyone to find themselves in the spaces and stories we share.

Historic Royal Palaces Enterprises Limited (HRPE) is the trading arm of the charity, and therefore generates income from various sale points that enables us to continue to conserve these magnificent palaces for future generations.

HRP does not receive any government funding and derives its income principally from admission, retail, function, sponsorship, and other commercial activities.

For further information please visit: [www.hrp.org.uk](http://www.hrp.org.uk)

### 2. PARTNER AND SUPPLIER CODE OF CONDUCT OVERVIEW

The work you do or the support you provide HRP helps HRP ensure these great monuments of British history along with the legacy of the Kings and Queens that resided within them are available for future generations to enjoy, experience and learn from.

We feel very passionately about the product we offer to our customers, and we strive to bring quality, inspiration, value, and educational product to our palaces.

To ensure customers take away a fond memory and experience during their visit we rely on our Partners to deliver quality at all levels of our relationship.

We hope that you will feel proud working and being associated with HRP and help continue delight our customers through the work we do.

This Code of Conduct contains details of the policies and standards which all partners and suppliers must adhere to. Please note that the term "Partner" will be used within this document to refer to both suppliers and partners.

Partners must familiarise themselves with the policies and standards contained within and ensure that it is shared with all relevant parties in their organisations, including any sub-contractors.

The Partner and Supplier Code is updated from time to time, so you may wish to review it periodically to ensure you have the most recent version.

The latest copy can be accessed on our website [here](#).



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Please contact your usual HRP contact immediately if you have any queries or there has been a breach of these policies and standards.

### **3. MODERN SLAVERY ACT 2015 (MSA)**

HRP fully endorses the provisions of the Modern Slavery Act 2015 (MSA).

See HRP's Modern Slavery Act statement [here](#).

So far as it is applicable to the goods, services, and activities in question, HRP requires that all Partners comply with the provisions of the MSA whether they are legally required to by virtue of their level of turnover or not.

If at any point HRP requires further information or evidence related to a Partners' compliance with the MSA we expect this to be provided without delay and at no cost to HRP.

This may include, but not be limited to, completion of a Modern Slavery risk assessment.

### **4. CRIMINAL FINANCES ACT (2017)**

Partners must undertake that they are in compliance with the Criminal Finances Act (CFA) 2017 and notify HRP of any breach of the CFA.

HRP requires Partners to have in place prevention procedures (as defined in the CFA 2017 and endorsed by top-level management) and to comply with any prevention policies HRP may in the future publish.

Should HRP request details of the Partners' prevention policies, these shall be provided within two working days, and at no cost to HRP.

Any breach of the CFA 2017 will be deemed a material breach and entitle HRP to terminate any Agreement immediately by providing written notice.

### **5. FRAUD, BRIBERY AND CORRUPTION**

HRP requires Partners to adhere to anti-corruption laws, including but not limited to the Bribery Act 2010, and anti-money laundering regulations.

We expect Partners to have robust processes in place to ensure that any subcontractors in their supply chain also comply with these laws.

HRP has zero tolerance for any form of corrupt practices including extortion and fraud that we become aware of, and we expect Partners to be vigilant and proactively look for fraud, and the risk of fraud, in their business.

Partners must immediately notify HRP where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision making or the advice that they give to HRP.

Careful consideration must be made to offering gifts, gratitude's or hospitality and its appropriateness.

Please be aware HRP staff are subject to strict guidelines and may be required to refuse such offers, particularly in the lead up to and during a tender process.



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### **6. FREEDOM OF INFORMATION & THE ENVIRONMENTAL INFORMATION REGULATIONS**

HRP is subject to the requirements of the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

Partners must familiarise themselves with the requirements of the Acts and agree to assist HRP as and when necessary to enable HRP to comply with its disclosure requirements.

Should there be a circumstance where HRP is lawfully compelled to publish information that might reasonably be considered commercially sensitive, we will always advise Partners in advance in order that such disclosure may be discussed prior to being published, on the basis that HRP's decision is final in order to comply with the Acts.

### **7. SAFEGUARDING**

HRP welcomes many millions of visitors a year in person to our palaces.

This welcome to 'everyone' includes children, young people and vulnerable adults.

We want their experience of engaging with our palaces and their stories to be meaningful, enjoyable and safe.

The safeguarding policies and procedures provide a framework for operating a competent safeguarding system and strengthen safeguarding practice within HRP.

Partners and their staff / sub-contractors working on our sites must become familiar and adhere to these policies which are detailed in full on our website here: <https://www.hrp.org.uk/about-us/policies/safeguarding-policies-and-procedures/#gs.5b3wd9>.

### **8. WHISTLEBLOWING**

HRP has facilitated means by which our employees can safely and securely “whistleblow” if they see or suspect any wrong-doing, illegal or inappropriate behaviour, or suspected wrong-doing, illegal or inappropriate behaviour, by any person or organisation.

We expect our Partners to have reciprocal arrangements in place.

In the event that the Partner, HRP or any employee of the Partner or HRP has any concerns relating to any conduct or, behaviour such matters may be raised through one or all of the following methods as most appropriate:

- i) [SupplierConcerns@hrp.org.uk](mailto:SupplierConcerns@hrp.org.uk) (accessible by HRP Head of Procurement & Contracts);
- ii) [Concerns@hrp.org.uk](mailto:Concerns@hrp.org.uk) (accessible by the Director of Corporate Services);

Such reports shall remain anonymous unless otherwise agreed with the individual raising the matter concerned and must be responded to within 10 working days outlining the action that shall be taken and how the results and findings of that action shall be reported.

### **9. PUBLIC SERVICES (SOCIAL VALUE) ACT 2012**

Intrinsically much of what HRP does ‘day to day’ contributes to Social Value.

That doesn't mean that HRP are complacent, and will, in due course, be developing policies encouraging / requiring Partners to demonstrate how they too contribute to social value.



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This will be both generally within wider society and also when working with HRP, for example delivering an apprentice scheme or supporting a local charity or community group.

The following link provides further information:

<https://www.gov.uk/government/publications/social-value-act-information-and-resources/social-value-act-information-and-resources>

Potential Partners may be asked to demonstrate how they, or their proposals, support the Social Value Act and may be assessed on this as part of contract award decisions.

Full details will be within any related invitation to tender documentation where this applies.

### **10. ETHICS / DISCRIMINATION**

HRP expects its Partners to display the highest ethical standards and behaviour.

Honesty, openness and transparency are key tenets within our organisation and Partners must demonstrate the same standards.

HRP is an inclusive organisation and has zero tolerance for discrimination in all its forms, requiring Partners to comply with the Equality Act (2010).

HRP has obtained the CIPS Code of Ethics Mark, showing our commitment to ethical procurement and the adoption of the CIPS ethical values <https://www.cips.org/employers/ethical-services/corporate-code-of-ethics/>

### **11. REAL LIVING WAGE / LONDON LIVING WAGE**

The Real Living Wage is defined as, 'the threshold at which people can live above the poverty level, with a sufficient safety net, to also provide for quality of life'.

This sets it apart from the statutory National Minimum Wage, set by the low pay commission at a level the market will bear, rather than the level required to live.

HRP expects Partners to conform to the Real Living Wage as set by the Living Wage Foundation as a minimum with respect to all staff salaries, regardless of age or employment type. In some contracts, we will insist upon it and seek evidence of such compliance from time to time.

Within London, the real living wage is more commonly known as the London Living Wage.

Current rates can be found here: <https://www.livingwage.org.uk/what-real-living-wage>

### **12. SOCIAL MEDIA & PUBLICITY GUIDELINES**

Partners are frequently involved in many varied projects across the palaces and are often keen to publicise their work with us on social media or through PR activity.

There are restrictions on Partners and third-party publicity and social media activity at the palaces, as noted in our Memorandum of Understanding with the Royal Household.

HRP and the palaces themselves cannot be used to promote commercial third-party products or services, or in a way that is seen to favour one Partner, product, or service over another.



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However, there may be some scope for Partners to factually present their work with us to their clients, and other interested parties once a project has been completed to a high standard (as confirmed by the contract relationship manager).

The following advice is intended as a guide to what may be permissible.

This policy covers the use of all current and future social media platforms, including (but not limited to) Facebook, LinkedIn, X (formerly Twitter), Tik-Tok and Instagram.

- Partners are asked to refrain from sharing images and content via social media or to press during the course of a project or delivering your services to HRP.

Any social media / PR activity around an ongoing project will be led by the Media and PR team at HRP, to co-ordinate and maximise the impact of our communications.

- Once the work or project has been completed to a high standard as confirmed by the HRP contract relationship manager, there may be opportunities for Partners to share information on social media.

This must always be approved by the Media and PR team in advance.

Similarly, once a project is complete, sharing details with trade media outlets may also be possible. Media materials and proposed contacts must be shared with the Media and PR team on [press@hrp.org.uk](mailto:press@hrp.org.uk) in advance.

If media / social media activity is agreed, HRP will issue the supplier with images if requested. The use of these images may be restricted if third-party objects / staff appear within them. Requests to conduct separate photoshoots must be submitted to the Media and PR team and may incur additional costs that HRP will need to pass on to the Partner.

- In the event of a major incident or emergency, Partners must refrain entirely from posting any comments, pictures, or updates on any social media channel.

This activity may interfere with the work of Emergency Services and the HRP Media and PR team in managing the situation.

- If Partners are uncertain or concerned about the appropriateness of any proposed external communications activity related to HRP, please refer to the HRP Media and PR Team for guidance.

### **13. INTELLECTUAL PROPERTY AND COPYRIGHT**

Partners must be aware that full details in respect of copyright and Intellectual Property Rights and ownership will be outlined in the order terms and conditions, or contract issued.

In the interests of transparency, we wish to highlight that as a general policy HRP expects to retain all intellectual property and copyright in work and / or deliverables produced for or in relation to any project or the delivery of services and to retain ownership of any materials HRP may provide to include the right to use them in the future as we may wish.

We do not expect to have ownership of your own knowledge, skills and equipment brought to any work.



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### **14. DATA PROTECTION**

Data Protection and privacy is a key priority for HRP, with the possibility of large fines and reputational damage in the event of non-compliance.

The Partner must agree that in the performance of their respective obligations it shall comply with the provisions of all data protection laws, including the Data Protection Act (2018).

Specific contract clauses will outline responsibilities and requirements where appropriate, including in some cases assisting in undertaking a data processing impact assessment and entering into a separate data processing agreement with HRP.

### **15. CONFLICTS OF INTEREST**

A conflict of interest is a set of circumstances that could lead to a person's impartiality being questioned, and in the context of procurement and purchasing activity, in respect of the fairness or a tender process or any contract award.

There is no definitive list of such situations that could be classed as a conflict, but below are some examples:

- A Partner's employees' spouse, other family member or personal friend works at HRP in a position of influence;
- A HRP employee or family member owns shares or other financial investment or interest in a Partner;
- Offering gifts or hospitality to HRP employees prior to (or during) a tender process.

Any such circumstances must be declared to the relevant Procurement contact or contract / project manager at the earliest opportunity in order for the impact to be assessed.

### **16. ENVIRONMENTAL IMPACT OF PARTNERS**

As part of our strategic objective to Act for the Future, and in line with our Sustainability Action Plan, HRP strives to purchase and source goods, services and works which have the least negative impact on the environment.

With consideration to the overall HRP Strategy, we look to work in partnership with Partners to ensure that:

- 1) Carbon emissions are reduced/removed as much as possible and alternative energy sources are sought where relevant.
- 2) Consideration is given to the impact to nature and biodiversity, both within the UK and globally, when selecting goods and services, especially in the selection of raw materials and construction.
- 3) Waste is minimised, and circular economy principles applied wherever possible. Items recycled whenever this is practicable. Effective controls of waste in respect of ground, air and water pollution are adopted. In the case of hazardous materials emergency response plans are in place.



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- 4) All documentation relating to the disposal of any waste generated by HRP or works completed at a HRP site, be fully auditable and provided to HRP by the Partner on request.
- 5) Undue and unnecessary use of materials is avoided and reused or recycled materials used whenever practically and economically possible.
- 6) Processes and activities are monitored and modified as necessary to ensure the conservation of scarce resources, e.g. water, flora and fauna and productive land in certain situations.
- 7) All production and delivery processes, including the use of fuels, heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.
- 8) Any ideas and innovations our Partners are aware of or are adopting elsewhere with other clients are proposed and discussed with HRP as part of on-going contract management.
- 9) We expect our Partners to comply with all statutory and other legal requirements relating to the environmental impacts of their business. We encourage our partners to be accredited to the relevant ISO standards.
- 10) Any data related to reporting of emissions in relevant GHG scopes is made available when requested.

In the event that we work in partnership with a Partner in good faith, but subsequently discover unacceptable practices either at the Partner or within the Partner's supply chain, we will engage with the Partner constructively to address identified weaknesses.

### **17. SUSTAINABILITY**

At Historic Royal Palaces we recognise the urgent need to act in response to climate change and the loss of nature. We must act now to ensure the health of our environment, the safety of the remarkable buildings and gardens that we care for, and the wellbeing of everyone who experiences them.

The overall goal of our sustainability work is to be nature-positive and carbon net zero across all three emission scopes by 2050.

Working in a multi-disciplinary way, we will: invest in carbon and water reduction and sustainable practices; use our estate to generate clean energy, increase biodiversity and climate resilience; embed sustainable decision-making across our value chain; and inspire those who visit and engage with us onsite, offsite, and online.

You can find our latest Sustainability Action Plan here.

[Sustainability Action Plan 2024–2027 \(hrp-prd.azureedge.net\)](https://hrp-prd.azureedge.net)

### **18. HEALTH AND SAFETY AND FIRE GUIDELINES**

At all times whilst on HRP premises, the Partner and the Partner's personnel must comply with statutory Health & Safety Regulations including the Health and Safety at Work Act (1974), if relevant the Construction Design and Management (CDM) Regulations (2015) and any additional regulations relating to submission of risk assessments, security of HRP property and the safety of the general public.





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Safety or security instructions given by HRP personnel on site must be complied with at all times.

More generally the Partner must deliver the Services to the highest professional standards in line with industry norms.

Partners are responsible for ensuring all legislative and licencing requirements and standards are met in relation the Services being provided to HRP.

Partners must make themselves familiar with fire guidelines in use at the site in which they are working, and complete related questionnaires and risk assessments as required.

Specifically, Partners and their employees have a level of responsibility to meet Health and Safety regulations as well as relevant HRP Health and Safety requirements and must:

- follow the relevant rules, procedures and instructions for the work in question;
- be aware of the hazards relevant to the work job;
- only use work equipment if authorised to do so and in-line with guidance issued;
- report any accidents or near misses and damage to equipment or property to HRP;
- cease use and inform the appropriate person of any hazards or defective equipment;
- inform the appropriate person of any concerns relating to health and safety;
- seek help where it is necessary in order to work safely;
- not fool around or play practical jokes;
- adhere to safety warning signs;
- not obstruct fire doors or exit routes;
- not bring illegal drugs to work or use on to site;
- only deposit waste in recognised disposal bins
- not smoke or vape on site, except in designated smoking areas.

### **19. SCHEDULED MONUMENT CLEARANCE**

All our sites are scheduled monuments.

As such, they are protected and any work that involves any fixing to or adjustment of the fabric of the buildings requires permission from not just HRP by also Heritage England.

Partners must never undertake any such work that may affect the fabric of the buildings without those permissions.

In addition, the erection of large structures may require planning permissions.

Advice must be sought from the HRP Surveyor of the Fabric.

### **20. CONSERVATION AND COLLECTION CARE (CCC)**

The buildings and interiors that HRP is responsible for are historically important, and many are quite fragile.

It is important, therefore, to treat them with respect and care to preserve them for future generations.



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Below are some key considerations for Partners working within the palaces.

- Supervision may be required dependant on the area and nature of the work. The Partner must ascertain in advance whether operatives require supervision and/or escorting.
- Use of mobile phones is not permitted in display areas open to the public, or in back of house areas where there is potential to invade the privacy of residents. In these cases, HRP will request that phones are stored before accessing specific locations.
- No food or drink is permitted within the palace, apart from in the green room and kitchen area designated for artists.
- Conservators need to check all props, costumes or furniture introduced into the palaces as they could harbour pests and may need to be put through a freezing procedure which takes two weeks.
- Ensure a clean and tidy working environment as far is practically possible.
- Doors are to be opened by their hardware, never pushed open using the foot.
- All items are to be placed on the floor directly and never rested against a wall or any HRP object. Items are to be placed down gently and never dropped. CCC will provide and install protective sheeting if required.
- No HRP object is to be touched or moved without prior consent and supervision by CCC. No equipment or supplies can have contact with the objects on display.

Please ask our conservators for further help and advice.

### **21. SUB-CONTRACTORS**

It is understood that sub-contractors are on occasion required to deliver services.

HRP require the principal Partner/contractor to ensure that sub-contractors are aware of the obligations in this Partner and Partner Code of Conduct, extend any applicable terms and conditions of contract to them, and be responsible for their actions.

### **22. EMERGENCIES & ACCIDENTS**

Partners and their personnel must not call the emergency services directly if there is an accident requiring first aid.

The relevant control room shall be contacted, as follows:

- 020 3166 6599: Hampton Court Palace
- 020 3166 6199: Kensington Palace, Kew and Banqueting House
- 020 3166 6299: Tower of London
- 028 9268 1324: Hillsborough Castle

If the Partner, their staff or you are involved in an accident or near miss, please ensure a HRP contact is notified immediately so they can assist you in completing the appropriate form and communicating to the right people.

### **23. SECURITY PROTOCOLS & CLEARANCES**



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HRP is home to many precious artefacts, including the Crown Jewels at HM Tower of London, and shares boundaries with Royal residences. Its sites are potential targets for terrorist and criminal activity.

As such, Partners must ensure their staff and sub-contractors have the relevant security clearance before attending site and comply with all security guidance and instructions that may be provided by HRP from time to time.

The Partner must ascertain in advance, via the relevant HRP contact, what level of clearance is required in each case. Clearances will be determined by the level of unsupervised access to collection items, data and restricted areas.

Please note that requirements may vary dependent on palace. 'Basic' security clearance can take a matter of days whereas Counter Terrorist Clearance can take many weeks – contact the contract relationship manager for further details.

Longer lead times apply where counter terrorism clearance is required (relevant to Hillsborough Castle and areas within Kensington Palace and the Tower of London).

All the Partner's personnel must wear or carry their HRP security pass at all times and be prepared to co-operate with HRP personnel in identifying themselves when asked. Only authorised entrances and exits may be used.

### **24. IT SECURITY**

In respect of IT systems Partners or consultants that may require access to our systems, we require Partners to provide an appropriate level of cyber security and readiness.

Certification against the ISO27001 standard or, at a minimum, the UK gov Cyber Essentials+ scheme must be provided.

A separate questionnaire may be provided to better understand and evaluate the Partners cyber security environment.

HRP provides specific and defined technologies and methods of remote access to its systems and maintains these requirements and controls. Partners are required to use methods of remote access and controls that are defined and provided by HRP.

### **25. PCI**

The Payment Card Industry Data Security Standard (PCI DSS) is a set of requirements intended to ensure that all organisations that process, store, or transmit credit card information maintain a secure environment. Its purpose is to manage PCI security standards and improve account security throughout the transaction process.

HRP has committed to not storing ANY electronic card data on its network or systems. This is a vital element of the compliance mechanism for HRP.

Payment card data that is subject to the PCI regulations is defined as the primary account number ("PAN," or credit card number), Cardholder Name, Expiration Date and Service Code (3 digit security number).

To fully meet the PCI regulations the following data must not be stored or retained in electronic format:



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- PAN numbers (the long 16-digit number)
- PIN numbers
- CSV numbers (shown on the back of cards)

PCI regulations also encompass paper records of electronic card data. File printouts and paper receipts need to be physically secured and locations / contents logged as part of the Information Asset Owners (IAO) quarterly audit process. Only Managers responsible for the collection of Payment Card data can authorise the sending of it to approved external parties. The data sent must be logged, protectively marked and sent via secured courier or other delivery method that can be tracked.

Any organisations, third parties or contractors that HRP employs, uses or partners with must demonstrate PCI compliance if they process payment card transactions.

### **26. INSURANCE**

HRP's sites are historic in nature and open to members of the public.

As such it is important that Partners working or undertaking activity on our sites have adequate insurance cover and indemnify HRP in the event of an accident they cause.

Our standard requirements are:

- £10m Public and Products Liability insurance
- £10m Employers Liability insurance
- £1m Professional Indemnity Insurance (applicable when providing consultancy or advisory services.)

Other coverages and levels may be appropriate required dependent on the nature of the activity or the services being provided.

The Partner is required to maintain the relevant cover of insurance throughout the term of any contract with HRP.

### **27. INVOICING AND PAYMENT**

Invoices shall be submitted upon completion/delivery of the goods/works/services or as otherwise agreed in writing. Payment will be made within 30 days of receipt of each invoice, via BACS.

HRP reserves the right to withhold payment where the services have not been provided in accordance with this Agreement and shall notify the Partner accordingly.

HRP has the right to charge interest on late payments for income contracts.

It is also a requirement that all Partners pay their sub-contractors for goods and services they provide HRP within 30 days of invoicing.

### **28. ARTIFICIAL INTELLIGENCE**

In any situation where a Partner intends to utilise Artificial Intelligence (AI) during the course of working with HRP, the Partner shall both inform and seek prior written permission from HRP in as much advance notice as possible.



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The Partner is required to implement and adhere to ethical practices when designing, implementing, monitoring, training, testing, deploying, or otherwise developing or using AI systems. This includes adhering to all applicable laws/regulations/standards/codes.

The Partner shall:

- a) ensure that any AI systems developed or used by the Supplier are robust, secure, and safe throughout their entire lifecycle;
- b) comply with the principles set out in the Framework Convention on Artificial Intelligence Treaty 2024. This includes:
  - i. developing and using AI systems in a way that respects human rights and human-centric values, including fairness, equality, diversity, privacy, data protection and avoiding discrimination and bias;
  - ii. being transparent about when and how AI is used;
  - iii. ensuring the explainability, auditability and traceability of any AI systems used or developed by the Supplier, including their outputs;
  - iv. establishing and maintaining appropriate governance, risk management, policies and procedures that promote the responsible, accountable, and ethical use of AI systems and where appropriate, ensuring that decisions or outcomes from an AI system are contestable; and
  - v. demonstrate to HRP's satisfaction that it has embedded these requirements into its responsible AI practices.

The Partner must not use or retain HRP's data or confidential information for the purposes of training or inputting into any AI system or model without prior written approval of HRP.

Where the Partner uses third-party providers to develop an AI system, it must implement appropriate risk management and supervision measures to ensure that such third-party provider adheres to the standards set out in this paragraph.