



PRACTICAL
PROCUREMENT

ADDED VALUE SOURCING

THE INTEGRITY COMPASS

A practical ethical decision-making framework for procurement.

See It. Think It Through. Act On It.

PHASE 1

See It

PHASE 2

Think It Through

PHASE 3

Act On It

Use it standalone, or alongside the online tool:

compass.practicalprocurement.com



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Use it alone, or alongside the online tool at **compass.practicalprocurement.com** — the digital version of this framework that walks you through the same six steps and produces a written record at the end.

INTRODUCTION

Why This Exists

Every procurement professional eventually hits a decision that isn't just commercial — it's moral. A supplier relationship that's gone too far. A tender where the criteria feel bent toward a favourite. A trade-off between cost savings and the people at the far end of a supply chain. Policy manuals rarely settle these moments, because the hard cases are hard precisely because more than one principle applies at once. This framework gives procurement teams a repeatable, defensible way to work through those moments — fast enough to use under real deadline pressure, and rigorous enough to stand up to scrutiny afterwards.

What's New Here

This is a direct evolution of the LION Ethical Decision-Making Model (the three-lens reasoning tool, the moral compass, and the leadership questions originally developed by Luke Russell). That model was a genuinely strong foundation — clear philosophical grounding, simple visual language, and no unnecessary jargon. Three things were missing, and this version adds them:

A front door	A back door	Procurement-specific throughout
The original gave you three deep reasoning tools but no way to tell, quickly, whether a situation even needed them. This version opens with a Red-Flag Screen and a set of Quick Filters, so a straightforward case can be resolved in two minutes and a genuinely hard case gets escalated to the full reasoning process — not the other way round.	The original stopped at “what is our moral position?” and left you holding it. This version adds a Voice It & Record It step — a script for raising the issue with the right person, and a short record of the decision for the audit trail. Working out the right answer is only half the job.	The reasoning questions, the red flags, the worked example and the checklist are all built around sourcing, tendering, supplier relationships and contracting — not generic business ethics — and cross-checked against the CIPS Code of Conduct, ISO 20400 and the Modern Slavery Act 2015.

Who It's For

Category managers, buyers, procurement leaders, and anyone on a sourcing or tender panel who needs a fast, structured way to work through a dilemma — alone, with a manager, or as a panel.

How To Use It

Work through the three phases in order. Most situations resolve at Phase 1 or Phase 2. Reserve the full three-lens reasoning in Phase 2 for decisions that are genuinely finely balanced, high-stakes, or contested. A one-page team canvas and a pocket quick-reference card are provided at the back for live use.

Working it through digitally? The Integrity Compass tool at compass.practicalprocurement.com mirrors these six steps and produces a structured summary you can attach to the tender file.

PHASE 1 — FROM BLIND SPOT TO CLEAR SIGHT

See It

Before you can reason about a dilemma, you must notice it's there. Phase 1 gives you a trigger list, so risk doesn't slide past unnoticed, and a way to frame exactly what's being decided.

1

Frame the Decision

Name the actual choice in one sentence, before anything else.

Write the decision as a single, specific sentence — an action, not a feeling. “Something feels off about this tender” is a feeling. “Whether to award the fleet contract to Fleet Plus over our incumbent of eight years” is a decision. Note who else is affected and who else needs to be involved before you go further.

Frame it like this: “Should [organisation] do [specific action] in relation to [supplier / stakeholder / process]?”

2

Screen for Red Flags

Check the situation against known procurement risk patterns.

Most ethically loaded procurement situations fall into one of six patterns. If any of these are present, treat the decision as needing at least the Quick Filters in Phase 2 — don't wave it through on instinct.

Risk pattern	What to look for
Conflicts of interest	Personal, family or financial ties to a bidder; undisclosed relationships; a team member discussing future employment with a current or prospective supplier.
Gifts, hospitality & inducements	Gifts, travel or entertainment beyond policy thresholds — especially timed close to a tender or award decision.
Selection integrity	Vague or shifting evaluation criteria; a single-source justification without real evidence; unexplained favouritism toward one bidder; a quote that's suspiciously low or high; requirements quietly waived for one supplier.
Fair competition & confidentiality	One bidder getting information, time or access another doesn't; a competitor's pricing or specification reaching you through the back channel.
Sustainability & human rights	Sourcing from high-risk sectors or geographies; indicators of forced or child labour; environmental non-compliance; a supplier that won't answer due-diligence questions.
Financial integrity	Unusual payment terms; purchases split to dodge an approval threshold; anything that resembles a kickback.

One more signal worth naming: If you notice you're avoiding writing the decision down, or you're being pushed to skip the process “just this once,” that reluctance is itself a red flag. Go to Phase 3, Step 6 sooner rather than later.

PHASE 2 — FROM GUT FEEL TO GROUNDED JUDGEMENT

Think It Through

If Phase 1 raised a flag, work through the Quick Filters first. Most cases resolve here. Reserve the full three-lens reasoning for the genuinely hard ones — where the filters themselves come into tension.

3

Apply the Four Filters

A fast, structured check — adapted from the widely-used PLUS model (Ethics Resource Centre).

Filter	The question to ask
Policy	Does this align with our procurement policy, delegated financial authority, and contract terms?
Law	Is it legal — anti-bribery and corruption law, competition law, Modern Slavery Act 2015 s.54 obligations?
Standards	Does it meet the external standards we've committed to — the CIPS Code of Conduct, ISO 20400, client or industry codes?
Self	Does it sit right with your own professional judgement, independent of the pressure you're under?

Decision point

All four filters clear, no tension between them → note your answer and go straight to Step 5 (Stress-Test) to confirm and record it.

Any filter fails, or two filters pull in different directions (e.g. it's legal but doesn't sit right, or policy-compliant but not standards-aligned) → continue to Step 4.

PHASE 2 · THINK IT THROUGH

4

Reason Through Three Lenses

For genuinely contested decisions — where reasonable, well-intentioned people would disagree.

Moral philosophy offers three independent ways of testing an action. They don't always agree with each other — that disagreement is often exactly where the real dilemma lives. Work through all three before forming a view.

Consequentialist Reasoning	Rights-Based Reasoning	Virtue-Based Reasoning
Choose whichever action produces the best overall outcome for everyone affected.	An action is off the table if it violates a right or a duty, no matter how good the outcome.	Do whichever action a wise, admirable procurement professional would take, on balance.
- Who gains and who loses, and by how much? - What's the best outcome, considered over the long run, not just this quarter? - Whose interests might we be neglecting or discounting?	- Is this action ever permissible — or is it the kind of thing that shouldn't be done at all? - Whose consent would be needed, and have we got it? - Am I violating anyone's right by acting this way?	- How would a genuinely admirable practitioner act here? - What would this look like to an unbiased observer? - What virtues or vices does this decision display — fairness, courage, greed, cowardice?
IN PRACTICE <i>Switching suppliers saves 8% but risks disrupting a stakeholder's production line during peak season — do the savings outweigh that risk to the business and its customers?</i>	IN PRACTICE <i>A factory audit shows technically-compliant but borderline labour conditions at a preferred supplier — does proceeding respect worker rights, regardless of the commercial upside?</i>	IN PRACTICE <i>A supplier offers you privileged early sight of a competitor's leaked tender pricing — what would a person of integrity do with that information?</i>

Then look for arguments by analogy. Is this situation relevantly like another case where the right course of action was already clear? If two cases are alike in the ways that matter, treat them alike.

PHASE 3 — FROM SILENCE TO INTEGRITY

Act On It

A well-reasoned position that never gets said out loud, or never gets written down, hasn't protected anyone. Phase 3 turns judgement into action.

5

Stress-Test & Position

Calibrate how far the obligation goes, then run the final checks.

5a. Where does this sit on the Moral Compass?

Not every right action is heroic, and not every acceptable action is admirable. Placing the decision on this scale stops two common failure modes: over-claiming credit for doing the bare minimum, and quietly expecting heroics from people as if it were routine.

Position	What it means
Impermissible	This would be morally blameworthy — it may even be illegal. As a business we do not knowingly breach the law or cross this line, even if it's legal in a technical sense.
Permissible (bare minimum)	Not blameworthy, but not something to be proud of either. It's the floor, not the standard. Ask: can we do better?
Above and beyond	Praiseworthy — carries real cost or risk to the business but isn't so extreme it's unreasonable to expect it.
Morally heroic	So far beyond the call of duty it involves major self-sacrifice. Consider the impact on the business before setting this as the expectation — and consider what message it sends if we don't.

5b. Final checklist

Work through these before you commit. If any answer is uncomfortable, that's the one to dig into.

- ☐ Is it legal?
- ☐ Does it comply with company policy and professional standards (CIPS Code, our own Procurement Policy)?
- ☐ Does it hold up against our ISO 20400 and Modern Slavery Act commitments?
- ☐ How does it affect others — suppliers, colleagues, customers, communities — and how much?
- ☐ What would a reasonable, independent procurement professional think of this?
- ☐ Would you be comfortable if this were on the front page tomorrow, with your name on it?
- ☐ Can you sleep at night having made this call?
- ☐ Have you genuinely taken other people's perspectives into account, not just your own?
- ☐ Does anything here need specialist legal, compliance or ESG input before you proceed?

If you've worked through all of this and it still doesn't feel right, go a step further — talk it through with someone else, or get advice, before you act.

PHASE 3 · ACT ON IT

6

Voice It & Record It*Say it to the right person, in a way you can deliver — then leave a record.***6a. Script it before you say it**

People are far more likely to raise a concern if they've rehearsed how, not just decided that they should. This is the single most-skipped step in ethical decision-making — and the one that determines whether good judgement ever reaches anyone who can act on it.

Prepare	How
What's the issue, in one sentence?	Strip it back to the fact pattern, not the feeling. "Supplier X's quote is 40% below the next-nearest bid, and the spec was changed twice after their submission" — not "something feels wrong."
Who has the authority to act on it?	Line manager, category lead, procurement director, legal/compliance, or the whistleblowing channel — pick the right level for the risk, not just the most comfortable one.
What's your opening line?	Prepare the actual first sentence. "I need to flag something about the Fleet Plus tender before we go further" is a sentence you can say under pressure; a vague plan to "mention it at some point" isn't.
What pushback might you get, and how will you respond?	"We don't have time to redo the evaluation" — have your answer ready before you're in the room, not while you're in it.

6b. Escalate appropriately

Start at line manager or category lead level for most cases. Go straight to compliance, legal or the whistleblowing channel — skipping levels — where there's a legal, safety, or immediate financial risk, or where the concern involves someone in your direct reporting line.

6c. Record the decision

Keep a short written record: the decision, the filters and lenses applied, who was consulted, and the outcome. It protects you, creates an audit trail, and builds organisational memory.

Field	Capture
Decision framed	One sentence, as per Step 1.
Red flags identified	Which patterns from Step 2, if any.
Filters / lenses applied	Which of the Four Filters and Three Lenses were used, and the headline conclusion from each.
Compass position	Impermissible / permissible / above and beyond / heroic.
Who was consulted	Names and roles.
Final decision and rationale	What was decided, and why, in plain language.

Shortcut: the online Integrity Compass produces this record for you — work the decision through at compass.practicalprocurement.com and export the summary straight into the tender file.

FOR PROCUREMENT LEADERS

Building the Culture That Makes This Work

A framework only works if the environment around it rewards people for using it. Individuals rarely act more ethically than the culture around them makes easy. Score your team honestly against each theme below — 1 (rarely) to 5 (consistently) — and use the questions as discussion prompts, not a compliance tick-box.

Theme 1 — Opportunity & Incentives

Are we deliberately or accidentally making it harder for people to do the right thing?

- Do our incentives (financial targets, KPIs, authority limits) ever pull against the right decision?
- Do cultural, social or authority pressures tend to block people from doing what they know is right?
- How do we build a culture and working environment that reflects the morality of our people's actual best judgement — not just their compliance?

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Theme 2 — Culture of Voice

Can people say what they think, and does it change anything when they do?

- Do you trust your team to be “authentic” — to make and act on decisions in a consistent, values-led manner?
- Is “decide and act fast” treated as a skill that's over-used at the expense of getting the decision right?
- Have you created and sustained a climate in which the truth can be heard, even when it's inconvenient?

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Theme 3 — Coaching & Feedback

Are we building the capability to make good calls, or just issuing rules?

- How effective are you as a coach in helping your team build the skills and confidence to make the right decisions?
- Do you reinforce the need to be open to new ideas and feedback — including feedback that the “right thing for the long term” isn't obvious?
- In coaching your team, do you also consider “doing the right thing” as a key consideration alongside commercial performance?

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Theme 4 — Role-Modelling

Are we deliberately limiting how much our own moral reasoning shapes the team — for better or worse?

- Do we deliberately limit the extent to which we reflect on the morality of our own actions, in a way that stops the team knowing what senior leaders value?
- If we want to influence the environment, what message does the way we personally operate send about the course of action that's expected?

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Retained and restructured from the original LION leadership questions (Luke Russell), reframed as a working scorecard.

APPLIED END-TO-END

Worked Example: The Fleet Contract Decision

A category manager is deciding whether to award the fleet management contract to a promising new entrant, Fleet Plus, instead of the incumbent supplier of eight years. Fleet Plus is 12% cheaper and offers a stronger technology roadmap; the incumbent has been reliable but slow to innovate, and several of its account team have become personal friends of the buying team over the years.

Phase 1 — See It

Frame: “Should we award the fleet management contract to Fleet Plus instead of our incumbent supplier?”

Red flags present: personal relationships with the incumbent's team (conflict-of-interest risk); a large price gap worth interrogating rather than simply banking.

Phase 2 — Think It Through

Quick Filters: policy and law are both clear — no breach either way. Standards and Self are where the tension sits: is staying with the incumbent, given the friendships involved, really a standards-led decision or a comfort-led one? That tension sends this to the full three-lens reasoning.

- **Consequentialist:** Fleet Plus's saving and technology roadmap likely produce the best outcome for the business and, over time, for the incumbent's own market discipline — provided transition risk is managed.
- **Rights-based:** the incumbent has no right to the contract; a fair, well-run re-tender respects the rights of all bidders, including the incumbent, to a level playing field.
- **Virtue-based:** a person of integrity would separate the personal relationship from the commercial decision and would be transparent about the relationship rather than letting it go unspoken.

Phase 3 — Act On It

Compass position: awarding to Fleet Plus on merit is permissible and arguably above and beyond — it resists a comfortable status quo in favour of a fair process. **Checklist:** legal, policy-compliant, defensible under the front-page and reasonable-person tests, provided the relationships are disclosed.

Voice it: the category manager discloses the personal relationships to their manager before the award decision, in writing, and requests a second reviewer on the evaluation panel.

Record it: decision, rationale, and the disclosure are logged in the tender file for audit purposes.

APPENDIX A

The Integrity Compass Canvas

A blank working template for a team, panel or 1:1 discussion. Print it, project it, or copy it into a shared doc.

1. Frame the decision

2. Red flags present

- ☐ Conflict of interest
 ☐ Gifts/hospitality
 ☐ Selection integrity
☐ Fair competition/confidentiality
 ☐ Sustainability/human rights
 ☐ Financial integrity

3. Four Filters — Policy / Law / Standards / Self

4. Reason through the lenses

Consequentialist	Rights-Based	Virtue-Based
Best outcome overall?	Any right violated?	What would the wise choice be?
Notes:	Notes:	Notes:
<i>In practice:</i>	<i>In practice:</i>	<i>In practice:</i>

5. Compass position

- ☐ Impermissible
 ☐ Permissible
 ☐ Above and beyond
 ☐ Heroic

6. Voice it & record it — who, what, when

APPENDIX B

One-Page Quick Reference

Designed to print on a single sheet and keep close by.

1-2

SEE IT

Frame the decision in one sentence · Check it against the six red-flag patterns

3-4

THINK IT THROUGH

Four Filters: Policy · Law · Standards · Self — if in tension, run the Three Lenses: Consequences · Rights · Virtue

5-6

ACT ON IT

Place it on the Compass · Run the final checklist · Script how you'll voice it · Record the decision

The nine final checks

#	Check
1	Is it legal?
2	Company & professional standards?
3	ISO 20400 / Modern Slavery Act?
4	Impact on others?
5	Reasonable person test?
6	Front-page test?
7	Sleep-at-night test?
8	Others' perspectives considered?
9	Specialist input needed?

Work it through online: compass.practicalprocurement.com — the Integrity Compass tool follows the same six steps and produces a written record you can file.

REFERENCES

Sources & Acknowledgements

This framework builds directly on:

- The LION Ethical Decision-Making Model and Ethical Decision-Making Guide, © Luke Russell — the three-lens reasoning structure, the moral compass, and the leadership questions.

And draws on the following external sources:

- CIPS, “Procurement Ethics — 10 Components of Ethical Procurement” and the CIPS Code of Conduct, [cips.org](https://www.cips.org)
- ISO 20400:2017, Sustainable Procurement — Guidance, [iso.org](https://www.iso.org)
- Ethics Resource Centre / Ethics & Compliance Initiative, the PLUS Ethical Decision-Making Model, [ethics.org](https://www.ethics.org)
- Mary C. Gentile, *Giving Voice to Values* (Yale University Press) — the scripting approach used in Step 6
- Modern Slavery Act 2015 (UK), s.54 supply chain transparency requirements; UK Government PPN 009 guidance, [gov.uk](https://www.gov.uk)
- IACRC and industry sources on common procurement fraud schemes and red flags, [iacrc.org](https://www.iacrc.org)

Practical Procurement

Added Value Sourcing — helping organisations unlock measurable value without squeezing suppliers dry.

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