

7

Company policies ***Equal opportunities and discrimination*** ***policy***

The Company recognises that discrimination is not only unacceptable, it is also unlawful.

The Company's aim is to ensure that no job applicant or employee is discriminated against, directly or indirectly, on any unlawful grounds.

By including this policy in the Employee Handbook, all employees are made aware that the Company will act in accordance with all statutory requirements and take into account any relevant codes of practice.

All job applicants will be considered solely on their ability to do the job. Interview questions will not be of a discriminatory nature.

All promotions will be made on merit in line with the principles of the policy.

Employees who have a disability will receive the necessary help, within reason, to enable them to carry out their normal duties effectively.

This policy will be assessed at regular intervals to ensure that equality of opportunity is afforded to all employees.

Harassment policy

The Company will not tolerate any form of harassment or bullying.

The purpose of this policy is to inform employees of the type of behaviour that is totally unacceptable and to explain what solutions there are to employees who may suffer harassment or bullying.

The Company intends to provide a neutral working environment in which no one feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Patronising or belittling comments.
- Comments about appearance/body/clothes.
- Leering or staring at a person's body.
- Unwelcome sexual invitations or pressure.

- Promises or threats, concerning employment or conditions, in exchange for sexual favours.
- Displaying offensive or sexually explicit material.
- Touching, caressing, hugging or indecent assault.

Please remember the test is that the behaviour is UNWELCOME, UNINVITED AND UNRECIPROCATED.

Bullying is also difficult to define. Obvious examples are:

- Threats of or actual physical violence.
- Unpleasant or over repeated jokes about a person.
- Unfair or impractical work loading.

Procedure

If you encounter a problem of this nature, it is vital that you make the person responsible aware that his/her remarks or conduct are offensive to you. This should be done in a simple, straightforward way.

It is recognised that complaints of harassment or bullying are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, you should put your request in writing and hand it to the harasser or bully.

When or if the informal approach fails or if you believe that the harassment or bullying is of a very serious nature you must bring the matter to the attention of a Director. If possible, you should keep notes of the harassment or bullying so that the formal complaint can be investigated, including the date, time and whereabouts of the act.

If you make a formal complaint it will be dealt with under the grievance procedure and all possible actions will be taken to separate you from the alleged harasser or bully.

If you bring a complaint of harassment or bullying you will not be victimised for having brought the complaint. However, following a full investigation, if the Company has grounds to believe that the complaint was brought with malicious intent, you will be subject to disciplinary action under the Company's disciplinary procedure.

The Company's appeal procedures apply to appeals against decisions made under the equal opportunities and discrimination policy and the harassment policy.

Anti-bribery policy

Introduction

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- setting out a clear anti-bribery policy,
- establishing and implementing anti-bribery procedures as appropriate,

- communicating this policy and any relevant procedures to employees and to others who will perform services for the Company,
- undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

Policy

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company),
- by any individual employee, agent or other person or body acting on behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical,
- or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded. Any gifts received by individuals are deemed company gifts and will be distributed between staff where appropriate.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

Employees' responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to the Director who has overall responsibility for bribery prevention.

Communication and representation policy

Introduction

The Company will take every step to communicate to all employees with particular respect to its products, services, and plans for the future, etc. It also encourages employees to express their views in terms of suggestions and opinions.

The Employee Handbook

All employees will be given a copy of this handbook at the beginning of their employment with the Company. After that time a copy will always be available on the premises.

Trade Union membership and recognition

The Company recognises your right either to join or not to join a trade union of your choice.

The Company has no recognition agreement with any union and as a result no paid union officials will be allowed on the premises except for the purpose of representation at a disciplinary or individual grievance meeting or any associated appeal meeting.

Telephones (including mobile phones)

Employees may use the Company's telephone system for local calls within reason and in cases of personal emergency. If possible authority should be sought from a member of Management before the call is made and if not as soon as possible afterwards. The cost of private calls made from the Company's mobile phones must be reimbursed to the Company. Personal mobile phones may be switched on in the office and used for calls within reason and in cases of personal emergency.

Postal mail

All posted mail delivered to the Company is normally opened centrally even if it is addressed as personal or has confidentiality marking. Therefore, no personal mail should be sent to the Company without permission (e.g. 'signed for' parcels) or personal mail sent out using the Company's system.

Computer policy

Computer usage

Employees must keep their passwords confidential and must not disclose them to any other party. Employees may request that their passwords are logged securely within the HR area of the server.

Employees are not permitted to load any software on to the Company's computer system without prior permission from the Director.

On the termination of employment, or at the Company's request, employees must return all information that they have in a computer compatible format to a nominated member of staff.

All information, programs and systems created by employees during the course of their employment with the Company will remain the property of the Company.

Employees are not permitted to play computer games in Company time or on Company terminals or laptops.

Email

The Company gives designated employees access to an email facility in order to improve business communication and efficiency. This is the primary purpose of this facility and although personal emails are permitted, the primary purpose of this facility should be remembered. The Company would ask its employees not to abuse the facility.

With this in mind it is important that emails are not used to spread gossip or to distribute information, jokes or graphics that are or could be said to be, any of the following:

- sexist or sexual in nature,
- racist or otherwise discriminatory,
- obscene,
- offensive,
- defamatory,
- malicious and/or unacceptable nature,
- otherwise conflicting with the interests of the Company.

The distribution of chain letters by email is also expressly forbidden.

Employees must not use emails to distribute information that is confidential in nature, unless the permission of the customer and/or the Director has been given in advance. Employees must not use emails to distribute anything that is copyright protected or to pursue or promote personal business interests. If in doubt, guidance should be sought from the Director.

Messages sent by email could give rise to legal action against the Company. It is therefore important that thought is given to the content of all emails and that hard copies are taken when necessary.

The Company reserves the right to retrieve messages in order to assess whether the facility is being used for legitimate purposes, to retrieve information following suspected computer failure or to investigate alleged acts of wrongdoing. The Company will not, however, monitor emails as a matter of course.

Misuse of the email facility will result in disciplinary action.

Internet use

Employees have a duty to use the Internet responsibly.

Employees must not access or display any sites or pages that are sexually explicit or offensive. Any breach of this rule may result in dismissal. If an employee receives information from, or accesses any such site unintentionally, the computer must be closed down or disconnected from the network and the Director must be informed immediately.

Although sensible and limited personal use of the Internet is permitted, the Company reserves the right to take disciplinary action against employees where their use amounts to an abuse of this rule, such as excessive downloading or streaming to computers or mobile devices.

The use of social networking sites for personal purposes during working time or on Company terminals or laptops is not permitted and is a breach of Company rules.

Employees using social networking sites away from work must ensure that, if adding personal news items, they do not include reference to the Company by name or by photograph, or to any employee, client, customer or any other person or organisation connected with the Company, or any of their relations or friends. Failure to comply with this policy will be treated as a serious breach of the rules and will result in disciplinary action being taken, up to and including summary dismissal.

Any use of social networking sites that brings the Company into disrepute, or breaches the equal opportunities and discrimination policy or harassment policy, will be regarded as gross misconduct and will result in summary dismissal.

Employee data

We hold personal data on all our employees to meet legal obligations and to perform vital internal functions. Our employee data privacy notice details the personal data we may retain, process and share with third parties relating to your employment and vital business operations. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

If you would like to see a copy of our employee data privacy notice, please contact the Director.

Training policy

Introduction

Day to day training is the responsibility of the Director who can call on specialised skills and knowledge within the Company and from external sources for advice on training matters.

Aims

The aims of the policy are:

- To provide induction training for all new employees, including relevant health and safety information.
- To provide job specific training to all new employees and to existing employees who are changing job within the Company, including health and safety information.
- To identify the longer-term development needs of those employees with potential to progress beyond their present job and to meet those needs when they are consistent with the needs of the Company.

Procedures

The procedures for training are:

- A record will be kept for each employee showing the training received.
- The training records will be monitored on a regular basis and the needs checked.
- All training programmes will be monitored and revised as necessary in order to meet changing business needs.

The Company will provide any necessary training and will meet the costs involved.

However, if an employee fails to complete the training or their employment ends within two years of completing any external training course for any reason except redundancy, the employee must reimburse the cost of any training on a pro-rata basis. Employees will be required to sign an 'Agreement to deduct from pay' prior to starting any external course, which authorises the Company to make this deduction.

Lay off/short time working

If a situation arises where there is a reduction of work, or there is any other occurrence that affects the normal running of the business, the Company has a right to either lay off without pay other than Statutory Guarantee Pay or implement shorter working hours. This procedure is in line with your terms and conditions of employment.

The Company also reserves the right to select the employees best suited to carry out whatever work is available.

Employees will be offered alternative work wherever possible.

Employees who are laid off must still be available for work as and when necessary since continuity of service is not affected by any period of lay off.

The Company will pay Statutory Guarantee Pay in accordance with the current government regulations.

Any employee who is laid off for longer than the Statutory Guarantee Pay period will be given a letter to take to the relevant government agency. Employees should then be able to sign on as temporarily unemployed, even though they will still be employed by the Company.

Redundancy policy

If a redundancy situation arises, for whatever reason, the Company will take whatever steps are reasonable in an effort to avoid compulsory redundancies, for example:

- Analyse overtime requirement.
- Reduce hours.
- Lay off with Statutory Guarantee Pay.
- Ask for voluntary redundancies, whether anyone has plans to retire or is considering a career move.

If compulsory redundancies are necessary, employees will be involved and consulted at various meetings to discuss selection criteria, any alternative positions, and be given every opportunity to put forward any views of their own.

Employees will be given the opportunity to discuss the selection criteria drawn up. The Company reserves the right to reject any voluntary applications for redundancy if it believes that the volunteer has skills and experience that need to be retained for the future viability of the business.

Drugs and alcohol policy

The Company is committed to maintaining a healthy, safe and productive working environment for its employees. The Company recognises the impact that drugs and alcohol may have on an individual's ability to work safely and correctly and aims to ensure a working environment free from the inappropriate use of substances and where employees are able to carry out their duties in a safe and efficient manner.

The use of illegal drugs or the consumption of alcohol by employees is deemed gross misconduct during working hours. If your doctor prescribes drugs that may affect your ability to perform work, you must discuss this with the Director.

The dispensing, distribution, possession, use, sale or offering to buy controlled drugs or alcohol at work is prohibited. Any such activity (including reasonable suspicion) will be reported to the police. Any employee found to be in breach of these rules will be liable to disciplinary action that may result in dismissal. This will apply whether or not there is any actual threat to health and safety.

Smoke-free policy

It is illegal to smoke in enclosed or substantially enclosed workplaces and the Company has a policy that prohibits smoking throughout the entire workplace with no exceptions, including commercial and pool vehicles. This policy applies to all employees and to visitors to the premises.

Failure to comply with this policy will result in disciplinary action and possible criminal prosecution.

This policy also applies to the use of e-cigarettes.

Dress code policy

Employees represent the Company whenever they meet customers and suppliers and we would ask that employees' appearance should be appropriate at all times.

Employees who have been given a uniform or name badge should wear them at all times whilst on Company business. Uniforms must be kept clean, pressed and presentable.

Any personal protective equipment that is issued by the Company must be worn at the relevant time. Failure to wear this equipment may result in disciplinary action.