

E M P L O Y E E H A N D B O O K

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1. Introduction to the Company

1.1 ACS Construction Group Ltd is committed to providing the very highest quality service to its clients in a professional and friendly manner. The complete satisfaction of our clients is vital to our success.

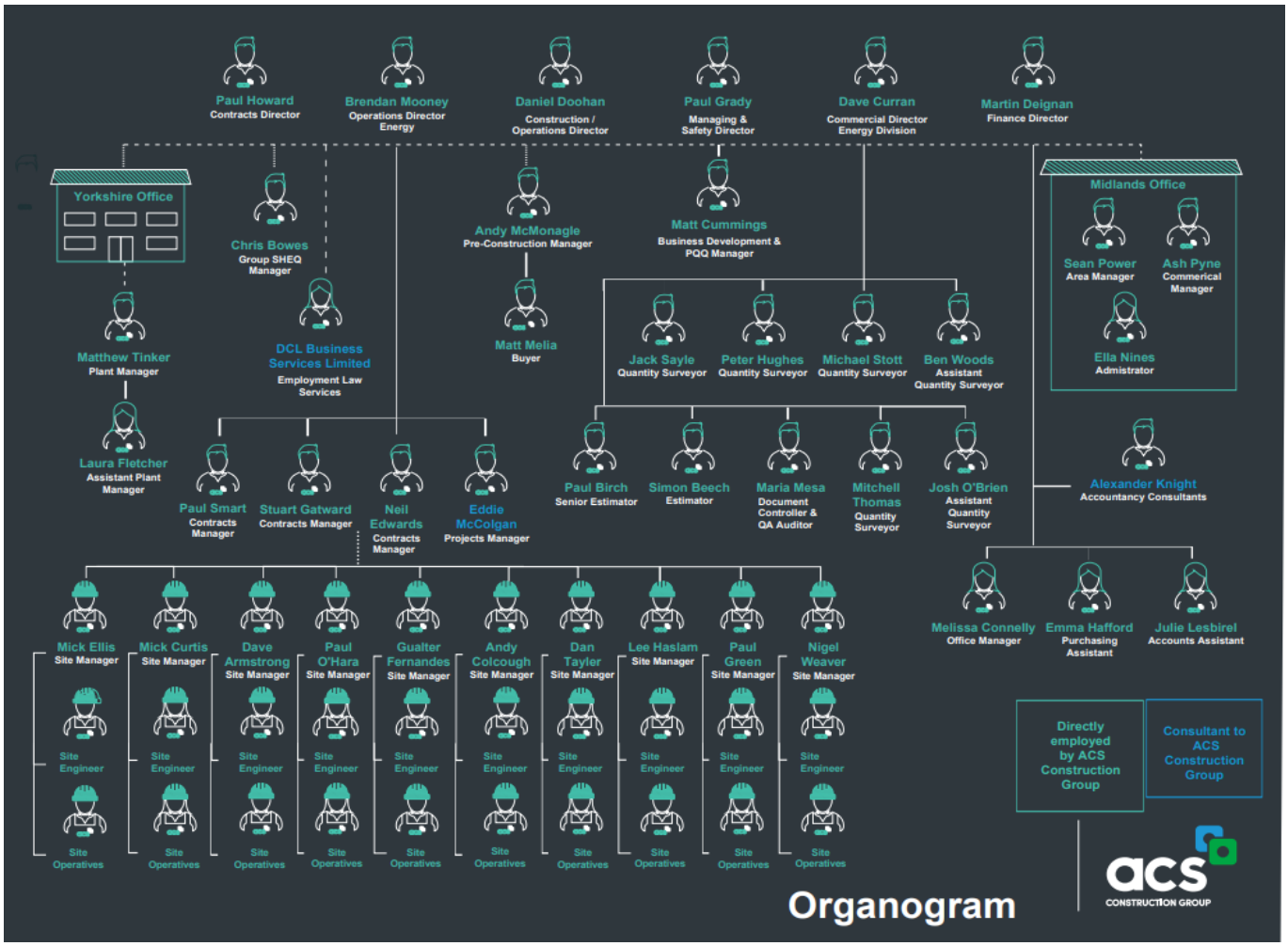
1.2 The Company is committed to providing a pleasant working environment for its employees, offering equal opportunities to all and promoting and encouraging training and personal development.

1.3 This Handbook sets out the main policies and procedures that you will need to be aware of while working for us. You should familiarise yourself with it and comply with it at all times. Any questions you may have with regard to its contents or what you have to do to comply with it should be referred to management.

1.4 We welcome you to ACS Construction Group Ltd and hope that you will have a successful and rewarding career with us.

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ACS Organogram June 2022



2. Absence Management Policy

2.1. Overview

This policy covers the procedure for reporting and managing absences and sick pay. Any absences that are disability-related will be managed in accordance with relevant legislation and related Codes of Practice.

This policy does not form part of your contract of employment, and we reserve the right to amend and not to follow any part of this policy at any time.

This policy applies to all employees. It does not apply to self-employed contractors.

If you are arranging a medical appointment, please do your best to arrange it outside working hours. If it is likely to involve taking most of the day off, please try to use a day's holiday (referring to our Holiday Policy).

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You should notify the Company of your absence in accordance with the Absence Reporting clause contained within your Contract of Employment.

It is not acceptable for you to text, email, contact a colleague, leave a message or have a friend or relative call on your behalf. If your manager is unavailable, you should contact someone in a position of authority in the Company.

You should provide the reason for your absence, an estimate of how long you expect to be off work, a telephone number by which you can be contacted and details of any outstanding or urgent work that requires attention.

2.1. **Short Term Absence**

If it is considered that your absence level is a cause for concern, the Company may meet with you to investigate the situation fully. The Company may require you to undergo an assessment by a doctor or Occupational Health specialist.

The Company cannot sustain frequent short-term absences, even if the reasons for the absences are genuine. Therefore, unacceptable levels of absence will be subject to disciplinary proceedings. The Company will take into account the reasons, frequency and pattern of your non-attendance in determining an appropriate course of action.

If you are issued with a formal disciplinary warning, you will be advised as to the level of attendance which the Company expects of you. If you fail to achieve this level of attendance further disciplinary action may be taken.

2.2. **Medical certification**

If your absence lasts for seven calendar days or fewer, you must complete an absence form immediately upon your return to work.

However, if you are entitled to contractual sick pay (please see your contract of employment for details) you may also be required to provide the appropriate medical certification for absences of fewer than seven days.

If your absence lasts more than seven calendar days, you must forward a medical certificate, completed by a medical practitioner, to management in order to cover the absence.

The medical certificate must be submitted as soon as possible. If you unreasonably delay in providing a medical certificate, your absence will be classed as unauthorised.

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If, on a medical certificate, your doctor recommends any adjustments to your duties, hours or working conditions, the Company will discuss these with you and implement the recommendations if these are reasonably practicable.

Failure to comply with the arrangements to assist your return to work without good reason may be treated as misconduct and may result in disciplinary action.

It is essential that you keep the Company updated on the reasons for your continued absence and its estimated duration. You should contact the Company daily during periods of absence unless you are instructed otherwise by your manager. You should also contact the Company before the expiry of your medical certificate if you continue to be unwell. In addition, a further medical certificate should be submitted immediately on expiry of the previous certificate.

Failure to contact the Company or submit a medical certificate at this time may result in the interim absence being classed as unauthorised.

2.3. **Procedure for return to work**

You should contact your manager as soon as you become aware of your intended return date. If this date changes, you should update the Company immediately.

2.4. **Return to work meeting**

Your manager will interview you on your return to work following a period of absence. The reasons for your absence will be discussed and your manager will decide whether the absence should be authorised. The onus is on you to satisfy management that there was a genuine medical reason for the absence.

2.5. **Long-term absence**

During a period of long-term absence, you are required to attend any scheduled welfare meetings with the Company. The purpose of these meetings is to discuss your current state of health, how long you expect to be absent from work and what steps, if any, the Company can take to facilitate your return to work.

If you are medically incapable of attending your place of work, a representative of the Company will come out to visit you. If the time scheduled for the meeting is not suitable, you should contact the Company immediately so that an alternative time can be agreed. You are

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also required to respond to any correspondence from the Company and any requests for information about your health.

2.6. **Disabilities**

If you have a disability that impacts on your attendance at work, the Company will give consideration to whether there are any reasonable adjustments that could be made to your job or other aspects of your working arrangements to minimise absenteeism or assist your return to work.

2.7. **Medical certification**

You should continue to provide medical certificates, completed by your medical practitioner, even if you have exhausted your entitlement to sick pay.

2.8. **Failure to co-operate**

The Company will always be sensitive to your physical and mental wellbeing during periods of long-term absence. However, where there is a failure, without good reason, to co-operate with the Company in relation to attending meetings, communicating effectively, attending occupational-health assessments and providing necessary information, this may be treated as misconduct and the Company may take disciplinary action.

2.9. **Termination of employment**

The Company is committed to supporting you during your absence and assisting your return to work. However, a prolonged period of absence cannot be sustained indefinitely, and the Company may need to review your continued employment periodically. Before any decision is made in relation to termination of your employment on the grounds of capability, the Company will consult fully with you and may obtain up-to-date medical advice. It may be necessary for the Company to obtain a medical report during the course of your employment in order to gather further information about your medical condition, its probable effect on your future attendance at work, your ability to do your job and whether there are any reasonable adjustments to be made, if appropriate.

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Although you have the statutory right to withhold your consent to the Company to approach your GP or consultant for a medical report, if you do choose to withhold your consent to our application, the Company may need to assess your state of health and its impact on your continued employment without the benefit of professional medical advice.

You may also be required to undergo a medical examination by a doctor nominated by the Company. The Company will be entitled to receive any report produced in connection with any such examination, and the Company may discuss the contents of the report with the doctor in question.

2.10. **Other types of absence from work**

Jury Service

If you are called for jury service, you must tell your manager as soon as possible. While you are on jury service, you will not be paid and should therefore claim all allowances made available by the court.

Other Public Duties

We will allow you time off to carry out duties in some public roles, including magistrate and school governor. As soon as you know what your duties are, and have dates for meetings you must attend, you should tell your manager so that we can plan for your absence from work. While carrying out these duties, you will not be paid for the time taken off work.

Emergency time off to look after dependants

You may take reasonable time off work to deal with emergencies involving your dependants. This does not cover general home issues, like wanting time off to deal with a problem with your boiler. We define a dependant as your spouse, civil partner, children (including adopted children), or a parent. Also included are other people who live in your household or anyone else who relies on you - for example, an elderly family member.

We always consider the circumstances of each case to allow for some flexibility, but the time you take off must be both reasonable and necessary for you to deal with something immediately and/or respond to an emergency. Normally this means hours, or a maximum of one or two days, and this type of leave is not designed to provide care over the longer term.

We do not pay you when you take time off for dependants.

Other family-related absences

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We cover all other types of time off for family-related matters including maternity, paternity, shared parental, parental and adoption leave in our separate Maternity and Family Friendly Policy.

Carrying out trade union duties

If you are elected as a trade union official, you are legally entitled to reasonable time off to fulfil your obligations and you will be paid at your full basic rate for all related absences during working hours. We will not pay you for duties carried out outside working hours.

Time off for Religious Observance

Employees should make any requests for time off for religious observance to their manager as early as possible. Although employees have no legal or contractual right to religious leave or time off to pray, the Company will consider all such requests sympathetically.

Time off for religious observance must be taken from the employee's rest periods or annual holiday entitlement. Alternatively, at the Company's discretion, the employee may work additional hours in lieu of the time taken off.

If the employee wishes to take the time off as annual holiday, he or she should make the request in accordance with the Company's annual holiday procedures. For the avoidance of doubt, the Company's rules relating to annual holiday will apply.

Bereavement Leave

The Company may, at its discretion; permit employees to take leave (either paid or unpaid) following the death of an immediate or close relative.

Adverse weather and other exceptional circumstances

Employees who are unable to attend work due to adverse weather conditions or other exceptional circumstances, will not be paid for any periods of non-attendance. Employees may request to take paid holidays or work additional hours at an alternative time to make up for the time they have been absent. The Company reserves the right to refuse such requests depending on the needs of the business. If the Company cannot operate due to adverse weather conditions or other exceptional circumstances, it reserves the right to require employees to take holidays during this time or impose a period of lay-off, where appropriate.

Unpaid Authorised Absence

The Company may grant unpaid leave of absence at its discretion and on a case-by-case basis. All requests should be made well in advance to management. Employees are not permitted

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to take unpaid leave of absence without prior management permission except in cases of emergency.

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3. Bribery Policy

3.1. Introduction

ACS is determined to maintain its reputation as a Company which will not tolerate bribery, corruption or abuse of position for personal gain, wherever it may be found in any area of activity. ACS values its reputation for ethical behaviour and reliability. It recognises that over and above the committing of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

This policy applies to all ACS employees. Employees are expected to understand and comply with the policy. They are also expected to be vigilant in reporting any suspicions of bribery or corruption.

3.2. Definition of Bribery

In general terms this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for already having done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of the tender process.

3.3. The Bribery Act 2010

The Bribery Act 2010 came into force on the 1st of July 2011 and represents the biggest change in UK laws in this area of business for many generations. There are three offences under the act:

1. General Bribery Offences
    - Bribing another person
    - Being bribed

2. Bribery of foreign public officials
3. Failure of a commercial organisation to prevent bribery

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In compliance with the Bribery Act 2010 ACS's policy is as follows:

3.4. ACS prohibits

The offering, the giving, the solicitation, or the 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, Director, agent or other person or body acting on ACS's behalf

In order to

Induce another person or be induced to perform a relevant function improperly. To gain any commercial, contractual, or regulatory advantage for ACS in a way which is unethical.

Or in order to

Gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

3.5. Further Clarification

This policy prohibits any inducement which 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 improper action which may not be solely in the interests of ACS.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or another special time

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- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

3.6. Hospitality

All requests to either offer or receive hospitality should be approved by a director. Approval can be obtained by completing a Hospitality Form. This form can be downloaded from the shared drive under 13.0 Human Resources Access All.

3.7. Gifts

All gifts of value that are given to employees by third parties should be declared to a director and permission to keep them obtained. This does not apply to small promotional gifts.

Where a particular employee is given a number of gifts at a particular time e.g., a substantial number of bottles of wine at Christmas, these should be declared and if approved, pooled amongst the local work group.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your supervisor or Line Manager. If necessary, guidance should also be sought from the Managing Director.

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3.8. Raising Concerns

Employees should normally raise concerns thorough their immediate manager or supervisor, who will inform the Managing Director. However, it is recognised that they may feel inhibited in certain circumstances. In this case, employees should refer to the ACS Whistle Blowing Policy which gives further guidance on how to raise concerns and it gives details about the support and safeguards that are available to those that do raise concerns. Concerns will be treated in confidence, properly investigated and dealt with fairly. The Whistle Blowing Policy (ACS HR 16) can be found in the Employee Handbook and on the Workspace under 03 Knowledge Area\03.09 HR Policies and Procedures.

There is, of course, a need to ensure that any investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

3.9. Disciplinary Action

Employees found to be in breach of the Bribery Policy may be subject to disciplinary action up to and including summary dismissal.

If the policy is breached, consequences may include police involvement.

Signed:



Name: Paul Grady (Managing Director)

Date: 03/10/2023

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3.10. Review

This policy will be reviewed every year, or subject to any changes to relevant legislation or standards.

3.11. Associated Forms

ACS HR FRM 01 Hospitality Form

4. Bring Your Own Device to Work Policy

4.1. Introduction

This policy sets out the Company's guidelines on using your personal mobile device such as a tablet, smartphone, PDA and laptop or notebook computer to access the Company's computer and electronic communication systems for business purposes and the action that will be taken when breaches of the policy occur.

You are only permitted to use your device to access the Company systems for business purposes in accordance with the Company policies detailed in the Employee Handbook but in particular, the Computers and Electronic Communications Policy, Data Protection Policy, Monitoring Policy and the following guidelines.

4.2. Your responsibilities

You must adhere to these guidelines wherever you use your device for business purposes, both during and outside your working hours.

When you access Company systems using your device, you will have access to Company data. This includes but would not be limited to data about the Company, our customers, clients, distributors, suppliers and other business connections, including information which is confidential, proprietary or private.

When you access the Company systems using a device, you must take adequate steps to protect any data which is confidential, proprietary or private, and you are not permitted to disclose such data without the Company's prior authorisation.

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When you access the Company systems using a device, you should be aware that the Company is exposed to a number of risks which include:

- the loss or theft of the device (which could result in unauthorised access to our systems or Company data);
- the threat of malware (such as viruses, worms, spyware, Trojans or other threats that could be introduced into the Company's systems via a device); and
- the loss or unauthorised deliberate alteration of Company data (including personal and confidential information which could expose the Company to the risk of non-compliance with any legal obligations of confidentiality, data protection and privacy).

Such risks could result in damage to the Company systems, our business and our reputation therefore you must have the Company's prior authorisation of your device and your use of it for business purposes.

You must not take a device you use for business purposes out of the European Economic Area (EEA) without the Company's prior authorisation.

Using your device for business purposes will be at your own risk and the Company will not be responsible for any losses, damages or liability arising out of its use.

The Company will not provide technical support for devices. If you use a device for business purposes you are responsible for any repairs, maintenance or replacement costs and services.

You must pay for your own device costs under this policy, including voice and data usage charges and any purchase and repair costs.

All employees are responsible for the success of this policy. Any misuse or suspected misuse of a device or breach of this policy should be reported to your manager.

4.3. Company data

The contents of our systems and Company data are our property. All materials, data, communications and information, including but not limited to e-mail (both outgoing and incoming), telephone conversations and voicemail recordings, instant messages and internet and social media postings and activities created on, transmitted to, received or printed from,

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or stored or recorded on, a device during the course of business or on the Company behalf is our property.

4.4. Processing personal data

When you access the Company's systems using a device, you may have access to the personal data of other individuals and of our customers and clients that is being processed within the Company's computer systems. Where this is the case, the Company relies on you to help meet its data protection obligations to employees and to customers and clients.

If you have access to personal data, you are required:

- to access only data that you have authority to access and only for lawful purposes;
- not to disclose or copy data without the Company's prior authorisation;
- to keep data secure; and
- not to store personal data on your personal device.

Failing to observe these requirements may amount to a disciplinary offence which will be dealt with under the Company's disciplinary procedure.

Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to your dismissal without notice.

4.5. Monitoring your device

We reserve the right to monitor, intercept, review and wipe, without further notice, all Company data on your device. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the device, whether or not the device is in your possession.

Monitoring, intercepting, reviewing or wiping of Company data on your device will only be for legitimate business purposes, in order to:

- prevent misuse of the device and protect Company data;

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- ensure compliance with our rules, standards of conduct and policies in force from time to time (including this policy);
- monitor performance at work; and
- ensure that employees do not use our facilities or systems for any unlawful purposes or activities that may damage our business or reputation.

It is possible that personal data may be inadvertently monitored, intercepted, reviewed or wiped. Therefore, you should have no expectation of privacy in any data on the device. You are advised not to use Company systems for any matter intended to be kept private or confidential.

The Company may also store copies of the data (including personal data) on your device for a period of time after they are created and may delete such copies from time to time without notice. The Company may obtain and disclose copies of the data on your device (including personal data) for legal purposes or disciplinary investigations.

The Company will not track your device via GPS or location based Wi-Fi without your prior consent.

4.6. Security requirements

When using a device to access Company systems, in order to maintain the systems' security, you must:

- consent to our efforts to manage your device and secure Company data, including providing us with any necessary passwords;
- at all times, use your best efforts to physically secure the device against loss, theft or use by persons, such as family, friends and business associates who we have not authorised to use your device;
- protect the device with a pin number or password, and keep that pin number or password secure at all times. If the confidentiality of a pin number or password is compromised, you must change it immediately. The use of pin numbers and passwords should not create an expectation of privacy by you in relation to the device;

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- install and use any anti-virus, anti-malware or any other software that the Company requests and comply with our device configuration requirements;
- maintain the device's original operating system and keep it current with security patches and updates;
- not alter the security settings of the device without the Company's consent;
- not download or transfer any Company data to the device, for example via e-mail attachments, unless specifically authorised to do so. You must immediately erase any such information that is inadvertently downloaded to the device; and
- not backup the device locally or to cloud-based storage or services where that might result in the backup or storage of Company data. Any such backups inadvertently created must be deleted immediately.

We reserve the right, without further notice or permission, to inspect your device and access data and applications on it, and remotely review, copy, disclose, wipe (partially or completely) or otherwise use some or all of the Company data on it for legitimate business purposes.

You must co-operate with the Company to enable such inspection, access and review, including providing any passwords or pin numbers necessary to access the device or relevant applications.

If the Company discovers or reasonably suspects that there has been a breach of this policy, including any of the security requirements listed above, the Company shall immediately remove access to our systems and, where appropriate, remove any Company data from your device.

4.7. Lost or stolen devices and unauthorised access

In the event of a lost or stolen device, or where you believe that a device may have been accessed by an unauthorised person or otherwise compromised, you must report the incident to your manager immediately.

Appropriate steps will be taken to ensure that Company data on or accessible from the device is secured, including remote wiping of the device if appropriate. The remote wipe will destroy all Company data on the device.

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Although the Company has no intention to wipe your personal data (such as photographs or personal files or e-mails) from your device, it may not be possible to distinguish or protect your personal data in these circumstances. You should therefore regularly backup any personal data contained on the device.

4.8 . Your personal data

The Company shall use reasonable endeavours not to access, copy or use any personal data held on the device, unless absolutely necessary. If such access or copying occurs inadvertently, we shall delete any and all such personal data as soon as it comes to our attention. This limitation does not apply to personal data which is also Company data (including personal e-mails sent or received using our e-mail system). For this reason, you are encouraged not to use work e-mail for personal purposes.

4.9. Procedure

Before you can use your device for business purposes, the Company must authorise your device and your use of it for business purposes before your access the Company systems.

The Company reserves the right to refuse or remove permission for your device to connect with our systems where in our reasonable opinion a device is being or could be used in a way that puts, or could put, the Company, our employees, our business connections, our systems, or our Company data at risk or that may otherwise breach this policy.

Some devices may not have the capability to connect to the Company systems. The Company is not under any obligation to modify our systems or otherwise assist employees in connecting to our systems.

In order to access Company systems it may be necessary for the Company to install software applications on your device. If you remove any such software, your access to the Company systems will be disabled.

4.10. Procedure on termination of employment

On your last day of work, all Company data and any software applications provided by the Company for business purposes will be removed from the device. If this cannot be achieved remotely, the device must be submitted to the Company for wiping and software removal.

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You must provide all necessary co-operation and assistance to the Company in relation to this process.

4.11. Breach of this policy

Breach of this policy may lead to us revoking your access to Company systems, whether through a device or otherwise. It may also result in disciplinary action up to and including dismissal and in some cases lead to possible criminal charges.

5. CCTV Policy

5.1. Overview

The Company uses closed circuit television (CCTV) recordings (including audio i.e conversations) to provide a safe and secure environment for employees, contractors and any other visitors to the company's premises, and to protect the Company's property. The Company will comply with the requirements of the General Data Protection Regulation (GDPR) and the CCTV Code of Practice in respect of its use and management of CCTV.

The Company reserves the right to retrieve the contents of CCTV recordings for the following purposes (this list is not exhaustive):

(a) to assist in the prevention or detection of acts of abuse/criminal acts and identify offenders;

(b) to monitor lateness;

(c) to ensure security of the premises;

(d) to ensure that health and safety rules and Company procedures are being complied with;

(e) to assist with the investigation of misconduct, wrongful acts, unauthorised actions or unsafe working practices.

The Company may use information gathered through CCTV recordings as the basis for disciplinary action against employees. Where disciplinary action arises from recordings (including audio i.e conversations) gathered through CCTV, the employee will be given the opportunity to see or hear the information in advance of the disciplinary meeting and make representations about it.

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5.2. Position of CCTV Cameras

The cameras are positioned strategically on Company premises. No camera focuses, or will focus, on toilets, shower facilities or changing rooms. All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.

Appropriate signs are prominently displayed so that employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

5.3. Storage of CCTV Recordings

Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records images and audio, any CCTV recordings that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis.

Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where the police or regulatory/statutory/prosecution agency are investigating a crime or act of abuse, images may need to be retained for a longer period.

5.4. Access to and Disclosure of Images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images and sounds that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the Directors, the operators of the CCTV system and to those managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images and sound will take place in a restricted area to which other employees will not have access when viewing is occurring.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

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The police and other law enforcement or regulatory/statutory/prosecution agencies, where the images recorded could assist in the prevention or detection of a crime/act of abuse or the identification and prosecution of an offender or the identification of a victim or witness.
Managers involved with Company disciplinary and performance management processes.
Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).
The Directors are the only persons permitted to authorise disclosure of images to external third parties such as the police or regulatory/statutory/prosecution agencies.
All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

5.5. Individuals' Access Rights (Subject Access Requests)

In accordance with the General Data Protection Regulations and the Company's Data Protection Policy, employees have the right to access personal data held about them including CCTV recordings. Employees should refer to the Company's Data Protection policy for full details regarding subject access requests)
To make a subject access request, the individual should send the request to the Accounts Manager.
The Company will normally respond to a request within a period of one month from the date it is received.
Any request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and the employee's identity can be established as the person in the images.
If any disclosure of a recording will reveal third party information, the recording of the third party may need to be obscured to avoid any unfair intrusion into their privacy Employees have no right to access CCTV images relating to other people. If the Company is unable to comply with an employee's request because access could prejudice the prevention or detection of crime or act of abuse or the apprehension or prosecution of offenders, you will be advised accordingly.

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5.6. Covert Recording

Where the Company suspects that certain employees are engaged in criminal activity/malpractice or where acts of abuse may be taking place, or are about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection, the Company may use covert monitoring to investigate their suspicion.

Any monitoring in this instance may take place under the guidance of the police and or regulatory/statutory/prosecution agency and will be carried out in accordance with the Data Protection legislation. Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity/malpractice or acts of abuse. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity/malpractice or accts of abuse. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

The Directors will carry out a regular review of the Company's use of CCTV. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to them.

6. Code of Conduct

6.1. Overview

The Company's Code of Conduct is set out below. It covers the main standards of behaviour the Company requires from employees. The Code includes the Company Rules, which employees need to follow, and examples of misconduct which the Company normally regards as gross misconduct. A breach of the Company Rules may result in disciplinary action. A single instance of gross misconduct may result in dismissal without notice.

The Company Rules and the examples of gross misconduct are not exhaustive. All employees are under a duty to comply with the standards of behaviour and performance required by the Company and to always behave in a reasonable manner.

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6.2. Attendance and Timekeeping

Employees are required to comply with the rules relating to notification of absence set out in the Company's Absence Policy and Procedure.

It is very important to the operation of the Company's business that employees are always punctual. Employees are individually responsible for ensuring that they arrive at work early enough to enable them to begin their work at their set start time. Similarly, employees are required to remain at work at least until their set finishing time, unless granted permission by their manager to leave work before that time. It is accepted that exceptional circumstances outside employees' control can cause lateness, for example if a traffic accident has caused long delays on the roads. However, a high volume of traffic causing delays that is a normal or regular occurrence, or which can reasonably be anticipated, will not be regarded as a valid reason for an employee's lateness.

Repeated or persistent lateness without good reason will be viewed as misconduct and result in disciplinary action. On each occasion when you arrive late to work your manager will speak to you informally to establish the reason for the lateness. If there are three occasions of lateness, you will be invited to a meeting to discuss the matter and you will be advised that any further incidents of lateness may result in disciplinary action up to and including the termination of your employment.

For the avoidance of any doubt, employees must obtain management authorisation if for any reason they wish to arrive later or leave earlier than their agreed normal start and finish times. The Company reserves the right not to pay employees in respect of working time lost because of poor timekeeping.

6.3. Standards and Conduct

Employees are required to maintain satisfactory standards of behaviour and performance at work.

Employees are required to comply with all reasonable management instructions.

Employees are required to co-operate fully with their colleagues and with management, and to ensure they maintain acceptable standards of politeness.

Employees are required to take all necessary steps to safeguard the Company's public image and preserve positive relationships with all persons and companies connected to the Company.

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Employees are required to ensure that they behave in a way that does not constitute unlawful discrimination, bullying, harassment or victimisation.

Employees are required to familiarise themselves and comply with the Company's Operating Policies and Procedures.

Any queries received from the media must be referred immediately to management. Employees must not attempt to deal with queries themselves.

6.4. Personal Mobile Telephones

To keep work interruptions to a minimum, personal mobile telephones must be always switched off/to silent mode during working hours. Employees must always present a positive and professional image of the Company. In this regard, it is obviously important that ring tones on personal mobile telephones during working hours are appropriate for the environment within which you work.

As far as possible the Company expects personal calls and text messages to be made during normal break times. However, in the case of an emergency, the Company understands that such calls and messages are necessary. Abuse of this rule may lead to disciplinary action.

The taking of photographs or filming of fellow employees, customers, visitors or any member of the public without their consent may breach an individual's right to privacy and could in certain circumstances constitute harassment. Only phones/tablets and cameras belonging to the Company are to be used during working hours. Photograph/film images CANNOT be taken unless authorised by management. Failure to follow this rule will be treated as a potential Gross Misconduct offence, which may result in summary dismissal.

6.5. Use of social media at work

The Company understands that employees may also wish to use their personal phones or mobile/handheld devices, to access social media websites. Employees must limit their use of social media on their own equipment to normal break times only. Abuse of this rule may lead to disciplinary action. Further details are set out in the Company's social media policy.

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6.6. Confidentiality

Employees are required to keep confidential, both during their employment and at any time after its termination, all information gained in the course of their employment about the Company's business, and that of all persons and companies connected to the Company.

Disclosure of information without the authorisation from management will be treated as a potential Gross Misconduct offence, which may result in summary dismissal. It may also constitute an offence under the Data Protection Act 1998. If employees are in any doubt about whether to disclose any information, they should not do so until they have discussed the matter with management.

6.7. Conduct While Representing the Company

As a rule, behaviour outside of normal working hours is a personal matter and does not directly concern the Company. However, there are some exceptions to this rule. The Company will become involved when incidents occur:

- at work parties or other work-related social occasions or gatherings.
- at social occasions or gatherings organised by a third party, where you have been invited in your capacity as an employee.
- at work related conferences; and
- while working away on business on behalf of the Company.

On these occasions employees are expected to behave in an appropriate and responsible manner, keeping in mind that they are representing the Company. Employees are instructed specifically not to consume any alcohol at such events where they are driving.

Any employee whose conduct brings the Company into disrepute or creates adverse publicity for the Company or loss of faith in the integrity of the employee will be subject to the Company's disciplinary procedure. If an employee's actions cause serious embarrassment or damage to the reputation or image of the Company, their behaviour may be viewed as a gross misconduct offence and could render the employee liable to disciplinary action up to and including dismissal without notice.

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6.8. Outside Activities and Other Employment

Employees are not permitted to engage in any activity outside their employment with the Company which could reasonably be interpreted as competing with the Company.

Employees are required to seek permission from management before taking on any other employment while employed by the Company in order to comply with the Working Time Regulations 1998. This is to assess the effect that the additional employment will have on your ability to perform your work for the Company. You must obtain written confirmation from the Company authorising any additional employment and you MUST ensure that you inform the Company of the number of hours worked for any other employer.

Employees must take care when using social networking and similar websites. Please refer to the social media Policy for further information.

6.9. Flexibility

Employees may be required to work additional hours at short notice, in accordance with the needs of the business. Employees may be required from time to time to undertake duties outside their normal job remit. Employees may be required from time to time to work at locations other than their normal place of work.

6.10. Buying and Selling of Goods and Services

Employees are not permitted to buy and sell goods and/or services on their own behalf on Company premises or during working hours unless authorised by management.

6.11. Gratuities

In accordance with the Bribery Act 2010, employees must not directly or indirectly offer, promise, give or demand a bribe or other undue advantage to obtain or retain business or gain other improper advantage. All offers of bribes from third parties must be reported to the Company. You must not accept or agree to accept any offer of gifts or services from customers, suppliers, distributors, or any person having similar connections to the Company without prior consent from management. A breach of this rule may give rise to disciplinary action which may lead to an employee's dismissal without notice. Further details are set out in the Company's Bribery policy.

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6.12. Dress and Appearance

The personal appearance of employees makes an important contribution to the Company's reputation and image. It is, therefore, important that employees dress in a professional manner that is appropriate for their job role and the environment in which they work.

6.13. Health and Safety

The health and safety of employees whilst at work is a matter of the utmost importance. Employees are required to gain an understanding of the Company's health and safety procedures, observe them, and ensure that safety equipment and clothing are always used. Further information is available in the Health and Safety Policy. Under the Health and Safety at Work Act 1974, employees are responsible for taking care of themselves and other persons who may be affected by their acts or omissions at work.

Employees who are required to wear protective clothing or use protective equipment (PPE) must do so while carrying out their duties whenever required by law or by Company rules.

If you wilfully or by neglect fail to observe the Company health and safety rules and regulations or fail to use PPE or wear protective clothing, when necessary, may face disciplinary action. In serious cases, such action may include your dismissal without notice for gross misconduct.

6.14. Accidents at Work

Employees should report all accidents at work as soon as possible to management or a first aider if treatment is required. All accidents and near misses should be entered in the Company's Accident Book. Employees MUST provide details of the nature of the accident or injury, any first aid treatment that was administered, the names of any witnesses and the date and time the accident occurred.

6.15. Fire Procedures

It is essential that all employees familiarise themselves with the Company's fire procedures including emergency exit and assembly points. Employees should speak with management who will explain the fire procedures relevant to their department.

On discovering a fire, employees should operate the nearest fire alarm, alert other people within their immediate vicinity and should not attempt to tackle the fire unless they have been trained or are competent to do so.

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On hearing a fire alarm, employees should try to remain calm and proceed in an orderly manner to the fire assembly point. Employees must not delay and should vacate the premises immediately without stopping to collect personal possessions. Employees must not re-enter the premises or site until the Fire Brigade is satisfied that the premises and site are safe to re-enter.

6.16. Health and Hygiene

All employees who have either been in contact with persons suffering from infectious or contagious diseases or are themselves suffering from infectious or contagious diseases must notify management before commencing work. Any cut or burns to the hands or arms must be covered with an appropriate dressing.

6.17. Property and Equipment

Except for use on authorised Company or customer business, employees are not permitted to make use of the Company's or its customer's property, equipment, telephone, fax, postal or other services.

Employees must not remove Company property, or equipment from Company premises unless for use on authorised Company business or with the permission of management.

Where an employee damages property belonging to the Company either through misuse or carelessness, the Company reserves the right to make a deduction from the employee's pay in respect of the damaged property.

On termination of their employment employees must return all Company property, such as keys, laptops, mobile telephones, Company vehicles, documents, uniform, tools, entry passes or any other items belonging to the Company. This list is not exhaustive.

6.18. Personal Searches and Personal Property

In the interests of security, the Company reserves the right to search employees' clothing, personal baggage or vehicles at any time. An authorised member of management in the presence of an independent witness must conduct any such search. Should an employee refuse such a request, the Company will require the appropriate authorities to conduct the search on behalf of the Company. An employee's failure to co-operate with the Company in

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this respect may be treated as gross misconduct. It is agreed that the conduct of such a search does not constitute an allegation or admission of guilt of any wrongful conduct.

Employees are solely responsible for the safety of their personal possessions/property on Company premises and should ensure that their personal possessions/property are always kept in a safe place. The Company does not accept liability for the loss or damage to any personal possessions/property. Should an employee find a lost item of personal property on the premises he or she is required to inform management immediately.

6.19. Payments on behalf of the Company

Employee's Authority to bind the Company and commit to expenditure (products and services) on behalf of the Company will be set out in writing by the Company's Accounts Manager at his/her sole discretion.

6.20. Expenses

The Company will normally reimburse employees in respect of any expenses wholly, necessarily and proportionately incurred in the course of their work against the relevant receipts. The Company reserves the right to refuse to pay an expense claim where the expenditure is unreasonable, disproportionate or unnecessary. Further information is available in the Expenses Policy.

6.21. Environment

To provide a cost-effective service, employees are requested to use the Company's equipment, materials and services wisely. Employees should try to reduce wastage and the subsequent impact on the environment by ensuring that they close windows, avoid using unnecessary lighting or heating or leaving taps running, switch off equipment when it is not in use and handle all materials with care.

6.22. Housekeeping

Work areas and kitchen facilities provided for employees to use during authorised breaks must be always kept clean and tidy to reduce the risk of fire and accidents. Employees have access to rest areas for authorised breaks.

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6.23 Mail

No private mail should be posted at the expense of the Company. Private mail should not be sent c/o the Company as all mail that is received by the Company will be opened, including that which is sent to named individuals.

6.24. Changes in Personal Details

Employees must notify the Company of any change in personal details, including change of name, address, telephone number or next of kin. This will help the Company to maintain accurate personal details in compliance with the Data Protection Policy, and ensure it is able to contact the employee or another designated person in case of an emergency.

6.25. Third Parties

Employees' employment with the Company may in some cases be conditional on the approval of third parties.

If the third party withdraws permission for an employee to carry out work on its behalf, the Company will consider all alternative arrangements that can be made to allow the employee's continued employment with the Company. If, however, in the sole opinion of the Company, no suitable alternative arrangements can be made, the Company reserves the right to terminate the employment.

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7. Data Protection Policy

7.1. Overview

The Company takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR') in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

This policy applies to current and former employees, workers, volunteers, apprentices and consultants. If you fall into one of these categories, then you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract of employment (or contract for services) and any other notice we issue to you from time to time in relation to your data.

The Company has measures in place to protect the security of your data in accordance with our Data Security Policy. A copy of this can be obtained from the Accounts Manager.

The Company will hold data in accordance with our Data Retention Policy. A copy of this can be obtained from the Accounts Manager. We will only hold data for as long as necessary for the purposes for which we collected it.

The Company is a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This policy explains how the Company will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

This policy does not form part of your contract of employment (or contract for services if relevant) and can be amended by the Company at any time. It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the Company intends to comply with the 2018 Act and the GDPR.

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7.2. Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection Principles. It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

7.3. How we define personal data

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of the contract of employment (or services) or after its termination. It could be created by your manager or other colleagues.

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We will collect and use the following types of personal data about you:

- recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;
- your contact details and date of birth;
- the contact details for your emergency contacts;
- your gender;
- your marital status and family details;
- information about your contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- your bank details and information in relation to your tax status including your national insurance number;
- your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- information relating to your performance and behaviour at work;
- training records;
- electronic information in relation to your use of IT systems/swipe cards/telephone systems;
- your images (whether captured on CCTV, by photograph or video);
- any medical details that may be necessary; and

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- any other category of personal data which we may notify you of from time to time.

7.4. How we define special categories of personal data

'Special categories of personal data' are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your political opinions;
- your religious or philosophical beliefs;
- your trade union membership;
- your genetic or biometric data;
- your health;
- your sex life and sexual orientation; and
- any criminal convictions and offences.

We may hold and use any of these special categories of your personal data in accordance with the law.

7.5. How we define processing

'Processing' means any operation which is performed on personal data such as:

- collection, recording, Company, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

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This includes processing personal data which forms part of a filing system and any automated processing.

7.6. How will we process your personal data?

The Company will process your personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.

We will use your personal data for:

- performing the contract of employment (or services) between us;
- complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. **See details of your rights in section 12 below**.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain personal data you should be aware that we may not be able to carry out certain parts of the contract between us. For example, if you do not provide us with your bank account details we may not be able to pay you. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

7.7. Examples of when we might process your personal data

We will have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement).

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For example (**see section 7.8 below** for the meaning of the asterisks):

- to decide whether to employ (or engage) you;
- to decide how much to pay you, and the other terms of your contract with us;
- to check you have the legal right to work for us;
- to carry out the contract between us including where relevant, its termination;
- training you and reviewing your performance*;
- to decide whether to promote you;
- to decide whether and how to manage your performance, absence or conduct*;
- to carry out a disciplinary or grievance investigation or procedure in relation to you or someone else;
- to determine whether we need to make reasonable adjustments to your workplace or role because of your disability*;
- to monitor diversity and equal opportunities*;
- to monitor and protect the security (including network security) of the Company, of you, our other staff, customers and others;
- to monitor and protect the health and safety of you, our other staff, customers and third parties*;
- to pay you and provide pension and other benefits in accordance with the contract between us*;
- paying tax and national insurance;
- to provide a reference upon request from another employer;
- to pay trade union subscriptions*;
- monitoring compliance by you, us and others with our policies and our contractual obligations*;

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- to comply with employment law, immigration law, health and safety law, tax law and other laws which affect us*;
- to answer questions from insurers in respect of any insurance policies which relate to you*;
- running our business and planning for the future;
- the prevention and detection of fraud or other criminal offences;
- to defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure*; and
- for any other reason which we may notify you of from time to time.

We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting the Accounts Manager.

We do not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do:

- where it is necessary for carrying out rights and obligations under employment law;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and
- where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.

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We might process special categories of your personal data for the purposes in paragraph 7.2 above which have an asterisk beside them. In particular, we will use information in relation to:

- your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities;
- your sickness absence, health and medical conditions to monitor your absence, assess your fitness for work, to pay you benefits, to comply with our legal obligations under employment law including to make reasonable adjustments and to look after your health and safety; and
- your trade union membership to pay any subscriptions and to comply with our legal obligations in respect of trade union members.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

7.8 Sharing your personal data

Sometimes we might share your personal data with group companies or our contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.

We require those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

7.9. How should you process personal data for the Company?

Everyone who works for, or on behalf of, the Company has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy and the Company's Data Security and Data Retention policies.

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The Company's Accounts Manager is responsible for reviewing this policy and updating the Board of Directors on the Company's data protection responsibilities and any risks in relation to the processing of data.

- You should direct any questions in relation to this policy or data protection to that person.
- You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of the Company and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.
- You should not share personal data informally.
- You should keep personal data secure and not share it with unauthorised people.
- You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
- You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.
- You should use strong passwords.
- You should lock your computer screens when not at your desk.
- Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
- Do not save personal data to your own personal computers or other devices.
- Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the Accounts Manager.
- You should lock drawers and filing cabinets. Do not leave paper with personal data on it lying about.
- You should not take personal data away from Company's premises without authorisation from your line manager or the Accounts Manager.
- Personal data should be shredded and disposed of securely when you have finished with it.

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- You should ask for help from the Accounts Manager if you are unsure about data protection or if you notice any areas of data protection or security on which we can improve.

Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you in accordance with our disciplinary procedure.

It is a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.

7.10. How to deal with data breaches

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact the Accounts Manager immediately and keep any evidence, you have in relation to the breach.

7.11. Subject access requests

All data subjects can make a 'subject access request' ('SAR') to find out the information we hold about them. This request must be made in writing. If you receive such a request, you should forward it immediately to the Accounts Manager who will coordinate a response.

It is a criminal offence to destroy, delete or modify data after an SAR has been made in relation to it. Any attempt to do so will be treated as gross misconduct.

If you would like to make a SAR in relation to your own personal data you should make this in writing to the Accounts Manager. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by up to a further two months.

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There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request.

7.12. Your data subject rights

You have the right to information about what personal data we process, how and on what basis as set out in this policy.

You have the right to access your own personal data by way of a subject access request (see above).

You can correct any inaccuracies in your personal data. To do you should contact the Accounts Manager. You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact the Accounts Manager.

While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact the Accounts Manager.

You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.

You have the right to object if we process your personal data for the purposes of direct marketing.

You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

With some exceptions, you have the right not to be subjected to automated decision-making.

You have the right to be notified of a data security breach concerning your personal data.

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In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Accounts Manager.

You have the right to complain to the Information Commissioner. You can do this be contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

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8. Disciplinary Policy

8.1. Overview

This policy covers the Company's procedure relating to disciplinary issues, where there is suspicion of misconduct/poor performance.

It applies to employees. It does not apply to self-employed contractors, workers and agency workers.

This policy does not form part of your contract of employment, and we reserve the right to amend this policy at any time. The Company reserves the right to discipline or dismiss you without following the Disciplinary Policy if you have less than 24 months' continuous service.

8.2. Your Entitlements and Responsibilities

The Company aims to deal with disciplinary matters promptly and fairly.

You have the right to appeal against a decision the Company makes at a disciplinary meeting. In these cases, the Company will make every effort for the appeal to be dealt with by a different manager to the person who dealt with the matter initially.

The Company's decision at the appeal stage is final and there is no further right of appeal.

You have a responsibility to assist the Company, if required, to investigate the matters raised at disciplinary meetings and comply with the disciplinary procedures.

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8.3. Disciplinary sanctions

The level of the disciplinary sanction, if any, will be determined by the severity of the offence. The Company will normally select one of the following:

8.4. Written warning

A Written Warning will usually be applied as the first step of corrective action following unsatisfactory performance or conduct offences.

The Company will define the unacceptable acts and explain the conduct or standards required in the future. You will be advised in writing that a failure to improve the standard of conduct or performance may result in further disciplinary action. A time limit (usually six months) will be placed on the warning.

8.5. Final written warning

A Final Written Warning is usually applied after a Written Warning has been given and performance or conduct has not improved but may be applied after a more serious first or a second offence.

You will be advised in writing that a failure to improve the standard of conduct or performance may result in dismissal. A time limit (usually 12 months) will be placed on the warning.

8.6. Dismissal

Dismissal occurs when your employment is terminated either with or without notice. Dismissal without notice is also referred to as 'summary dismissal' and is restricted to cases of gross misconduct.

The Company reserves the right, at its complete discretion, to impose a sanction short of dismissal if it is deemed appropriate. This may include demotion, transfer to a different post or another appropriate sanction. Any such decision will be confirmed to you in writing once you have been informed of the outcome.

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8.7. Disciplinary procedure

Suspension from work

If the Company believes it is appropriate, it may decide to suspend you from your work pending further investigation or disciplinary action. Suspension itself is not a disciplinary sanction.

If a decision to suspend is made, you will be informed verbally, and this will usually be followed up in writing. While you are suspended, you should not attend work or make contact with anyone connected to the Company unless otherwise instructed by the Company. If you need to contact anyone connected to the Company while you are suspended, you must notify your manager. Any reasonable request will not be refused. Breach of the terms of your suspension may result in additional disciplinary action up to and including dismissal without notice.

The Company will endeavour to keep any suspension as brief as possible. Any period of suspension will be on full pay. However, should you fail to co-operate at any time with the investigatory process, for example by failing to attend any meeting, without good reason then the Company reserves the right to treat this as unauthorised absence, and this may result in pay being withheld until such time as you attend any rearranged meeting.

8.8. Investigation Meetings

Depending on the circumstances, you may be required to attend Investigation Meetings before a decision is taken to invoke the disciplinary procedure. An Investigation Meeting is an informal meeting and so you are not permitted to be accompanied unless you are under the age of 18 (when a parent or guardian will be permitted).

Depending on the outcome of the investigation, the Company will decide whether or not to proceed with a Disciplinary Meeting.

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If it is decided that there is no case to answer, then you will be informed of this fact either verbally or in writing. You will be expected to return to work at the agreed date and time. This will end the process.

8.9. Invitation to a Disciplinary Meeting

If you are required to attend a Disciplinary Meeting, the Company will inform you of this in writing. In the letter, the Company will set out the issues that are to be considered, how seriously these are being viewed, the potential consequences and details of any intention to call witnesses. The letter will also inform you of the date and time of the meeting to allow you sufficient time to prepare your case.

As this is a formal meeting, the letter will also detail your right to be accompanied.

8.10. Your right to be accompanied at a Disciplinary Meeting

You are entitled to be accompanied at a Disciplinary Meeting by a fellow worker or a trade union official. With the exception of those under the age of 18, when a parent or guardian will be permitted, no other person will be permitted to attend.

Should you wish to be accompanied, you must notify the Company of the name and position of your chosen companion as soon as possible.

Your companion is permitted to put forward and summarize your case, respond on your behalf to views expressed in the meeting, ask questions and confer with you, but will not be entitled to answer questions directly on your behalf.

8.11. Action if you cannot attend the meeting on the proposed date

If you feel that you have a legitimate reason as to why you cannot attend the meeting on the proposed date, you must contact the person named on the invitation letter to advise them of this fact immediately. The meeting may then be delayed facilitating your attendance, if this is considered reasonable.

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8.12. Attending the disciplinary meeting

You must attend the meeting at the proposed time. Failure to participate in the process or attend arranged meetings without good reason may result in additional disciplinary action or a decision being made in your absence.

Prior to the meeting, you should ensure that you are fully prepared to answer questions relating to the incident/circumstances in question. At the meeting you will be given every opportunity to state your case, present any evidence and call relevant witnesses before any decision is made.

8.13. After the Disciplinary Meeting

At the end of the meeting there will normally be an adjournment to allow for consideration of the facts. You will be informed of the outcome and any sanction will be confirmed in writing to you as soon as possible.

In some circumstances there may be a need to adjourn and reconvene a meeting at a later date, to allow further investigation. In this case you will be advised accordingly.

8.14. Notification of the decision and disciplinary sanction

Following the Disciplinary Meeting, the Company will notify you of its decision and the disciplinary sanction it will apply. This letter will also explain your right to appeal against any decision taken and sanction applied.

8.15. Your right of appeal against disciplinary action

If you wish to appeal against a decision, you must submit your request in writing, stating the reasons for the appeal, to the individual identified in the letter confirming the sanction. This should be submitted within five working days of receiving notification.

8.16. The Appeal Meeting

You will be informed of the date and time of the Appeal Meeting. If you feel that you have a legitimate reason as to why you cannot attend the meeting on the proposed date, you must

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contact the person named on the invitation letter to inform them of this fact immediately. The meeting may then be delayed facilitating your attendance if this is considered reasonable. You will be entitled to be accompanied by a fellow worker or a Trade Union official.

At the Appeal Meeting you will be given an opportunity to state your case. Your companion is permitted to put forward and summarize your case, respond on your behalf to views expressed in the meeting, ask questions and confer with you, but will not be entitled to answer questions directly on your behalf.

The meeting will then be adjourned to allow the Company to consider the facts and the decision will be confirmed in writing. The outcome will be communicated as soon as possible, considering the complexity of the issues raised in the appeal. The decision at this stage will be final.

8.17. How we define 'gross misconduct'

You will usually be dismissed without warning, without notice, and without payment in lieu of notice if we find you have committed an act of gross misconduct. This is known as summary dismissal.

The following list gives examples of what we would normally regard as gross misconduct likely to lead to summary dismissal. This list is not exhaustive and should be referred to as a guide.

- bullying or physical violence;
- fraud, theft, or any act of dishonesty;
- malicious misuse of any of our procedures, for example if you make up allegations when taking out a grievance against someone
- negligence or carelessness, particularly if it leads to the Company losing trust and confidence in you;
- serious health and safety breaches;
- serious breach of the Data Protection legislation;

- serious and intentional damage to Company property;

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- unlawful harassment or discrimination;
- viewing, receiving, or sending anything that breaches the Company's Harassment and Bullying Policy or Equal Opportunities Policy.
- knowingly accessing websites containing offensive, obscene or pornographic material;
- serious insubordination or refusal to obey management instructions;
- serious breaches of confidence;
- being under the influence of, or possessing, illegal drugs;
- being under the influence of alcohol, unless this is with your manager's express knowledge and permission — for example, where you are involved in entertaining on the Company's behalf;
- conduct which breaches common decency or brings the Company into disrepute.

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9. Drugs and Alcohol Policy

9.1. Policy

It is the policy of the company to actively control the use of drugs and alcohol by employees at work at others within our control.

It is the Company Policy that no controlled drugs or alcohol are allowed on Company premises unless it is with the explicit permission of a Director.

9.2. Purpose

The purpose of this procedure is to explain the company's method of controlling the use of drugs and alcohol.

The use of drugs or alcohol can significantly affect an individual's ability to work safely. Drugs and alcohol affect a person's ability to identify hazards and impair judgement when interacting with hazards. This can lead to significant risks being created which affect not only the drug / alcohol user, but also their work colleagues and others.

9.3. Scope

The scope of this procedure is all employees and workplaces controlled by the company.

Responsible Persons

- SHE Manager.
- Employees taking prescription drugs.
- Employees involved in rail work.
- All employees.

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9.4. Procedure for Drugs and Alcohol

It is prohibited to bring illegal drugs onto company premises, and for any person to use, sell, pass on or keep such substances on company premises.

Any person taking prescription drugs who believes that in so doing may be creating a risk to himself or herself or others must declare the situation to their Manager. The Manager can ask the SHE Manager for advice and guidance on this matter.

It is the Company Policy that no alcohol is allowed on Company premises unless it is with the explicit permission of a Director.

9.5. Employees and subcontractors must not:

- Start work if you have consumed alcohol in the previous 8- 12 hours. This will depend on the total consumption of alcohol, its strength, a person's body weight and metabolism. (Rail work only).
- Come to work in an unfit state as a result of consuming alcohol or taking any drug.
- Use, possess or supply any drug of abuse whilst at work or on Company or Client premises.
- Consume alcohol or take any illegal drug or other drug of abuse in the workplace or while at work.
- Discontinue an agreed course of treatment for a drugs or alcohol related problem without good reason.

9.6. Employees and subcontractors must:

- Agree to take a drugs and alcohol test if asked.
- Tell your manager about any drug or alcohol-related problem you have or think you may be developing.
- Tell your supervisor, manager or Director about any prescription or over the counter medication you are taking which could affect your ability to work safely.

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In relation to work on railways, Company policy is to implement a risk-based programme to ensure that 5% of the workforce will be drug and alcohol tested per annum. The SHE Manager is responsible for ensuring that this testing takes place.
Any person involved in an accident, serious incident or suspected of being unfit through drugs or alcohol will undergo 'for-cause' testing.

Should any person fail a drugs test, they may appeal by following the procedure laid out in Company HR procedures.

Failure to agree to a drugs or alcohol test is considered gross misconduct and may result in dismissal.

9.7. Audit / Monitoring

This procedure will be included in the programmed management system audits and site audits.

9.8. Review

This procedure will be reviewed every year, or subject to any changes to relevant legislation or standards.

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10. Equal Opportunities Policy

10.1. Overview

The Company is committed to providing a working environment in which employees are able to realise their full potential and to contribute to its business success irrespective of their gender, race, disability, sexual orientation, marital status, part time status, age, religion or belief. This is a key employment value to which all employees are expected to give their support.

In order to create conditions in which this goal can be realised, the Company is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the Company. The Company expects employees to support this commitment and to assist in its realisation in all possible ways.

Specifically, the Company aims to ensure that no employee or candidate is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or belief. This commitment applies to all aspects of employment, including:

- recruitment and selection, including advertisements, job descriptions, interview and selection procedures;
- training;
- promotion and career development opportunities;
- terms and conditions of employment, and access to employment related benefits and facilities;
- grievance handling and the application of disciplinary procedures; and
- selection for redundancy.

Equal opportunities practice is developing constantly as social attitudes and legislation change. The Company will keep its policies under review and will implement changes where

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these could improve equality of opportunity. This commitment applies to all the Company's employment policies and procedures, not just those specifically connected with equal opportunities.

10.2. Harassment

Harassment is physical, verbal or non-verbal behaviour which is unwanted and personally offensive to the recipient, and which causes the recipient to feel threatened, humiliated, intimidated, patronised, denigrated, bullied, distressed or harassed.

10.3. The way in which Complaints of Unlawful Discrimination and Harassment will be handled.

Discrimination and harassment are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases, employees may be able to deal satisfactorily with an issue by raising it with their immediate manager.

The Company will treat seriously all allegations of unlawful discrimination, or should an employee feel that they have been harassed by a third party they should initially speak to their line manager, providing full details of their complaint, to see if the matter can be resolved informally. If an employee wishes to make a formal complaint, he or she should use the Company's Grievance Procedure which is set out in the Employee Handbook.

10.4. If an Employee is Accused of Unlawful Discrimination or Harassment

If an employee is accused of unlawful discrimination or harassment, the Company will investigate the matter fully.

In the course of the investigation the employee will be given the opportunity to respond to the allegation and provide an explanation of his or her actions.

If the Company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter.

If the Company concludes that the claim is false or malicious the complainant may be subject to disciplinary action.

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If on the other hand the Company concludes that the employee's actions amount to unlawful discrimination or harassment, he or she may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

10.5. Monitoring

The Company will not tolerate unlawful discrimination or harassment of any kind in the working environment and will take positive action to prevent its occurrence.

In this connection the Company will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all the Company's employment policies and procedures, not just those specifically concerned with equal opportunities.

For further information relating to harassment or bullying please refer to our ACS HR 12 Harassment and Bullying Policy.

Our policy will be monitored and reviewed annually to ensure that equality and diversity is continually promoted in the workplace.

We will continue to support our leaders, managers and employees to demonstrate the principles of diversity and inclusion in their everyday activities, roles and functions.

Signed:



Danny Doohan,
HR Director
Date: 28/10/2023

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11. Expenses Policy

11.1. Overview

The Company will normally reimburse employees in respect of any expenses wholly, necessarily and proportionately incurred in the course of their work. The Company reserves the right to refuse to pay an expense claim where the expenditure is unreasonable or unnecessary.

Claims for business mileage must be supported by a completed Business Mileage Record form, giving full details of the journeys involved.

Any special ad hoc arrangements made to suit particular circumstances will not be considered to set any form of precedent.

11.2. Claims will be reimbursed provided:

- they are reasonable;
- they are backed up with receipts; and
- the appropriate documentation has been completed.

Cars:	Mileage at the rate notified and in force. All necessary parking costs. **NB**. Employees are responsible for any fines or penalties they incur.
Trains:	Second class fares.
Flights:	Where necessary while on authorised business.
Accommodation:	Hotels - cost of room and breakfast.
Meals:	Whenever necessary and reasonable while on authorised business.

Employees are required to use the most cost-effective transport methods and routes in conducting business.

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12.Flexible working policy

12.1. Overview

This policy explains how to make a flexible working request to the Company. It explains what flexible working means and how it can be used to help employees to achieve a balance between their work and home life and also help managers to organise work around business and customer needs.

This policy does not form part of your contract of employment, and we reserve the right to amend this policy any time.

This policy applies to employees with at least 26 weeks' service only.

We encourage you to have an informal discussion with your line manager about flexible working before submitting a formal request.

12.2. What is flexible working?

Flexible working might involve reducing or varying your hours, the days that you work, or changing the location of where you work. Options are varied and can include:

- Part-time working.
- Term-time working.
- Annualised hours.
- Compressed hours.
- Flexitime.
- Homeworking; and
- Job-sharing.

12.3. Business needs

We recognise the benefits of flexible working and will genuinely and seriously consider all flexible working requests in a reasonable manner. However, we will need to balance the request against its effect on the business, the needs of the Company and the impact on other staff.

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12.4. Eligibility

Any employee with at least 26 weeks' service with the Company can make a request for flexible working by law.

An eligible employee may submit one flexible working request in a 12-month period (unless it relates to a request to consider reasonable adjustments on account of disability under the Equality Act 2010.)

12.5. How to submit a flexible working request

To submit a request, to your manager. The request must:

- state that it is a flexible working request and be dated.
- include the changes that you want and the proposed start date for them.
- explain the effect you think the change would have on the Company and how that could be dealt with; and
- include the dates of any previous flexible working applications.

12.6. Meeting

We may invite you to a meeting, usually within 28 days, to discuss the flexible working request. It is your responsibility to make every effort to attend the meeting but, if you cannot, we will normally reschedule it, provided we are satisfied with your explanation for why you cannot attend. We reserve the right to make our decision without you being present, and we will in any case only reschedule the meeting once, unless there are very good reasons to justify a second rescheduling. If you fail to attend a rearranged meeting without good reason, we will assume you have withdrawn your application.

We may also grant your request without a meeting.

12.7. Your right to be accompanied.

You are entitled to be accompanied by a colleague or trade union representative at any meeting called under this policy.

If you want to exercise this right, you should tell us as soon as possible who you want to accompany you. It is your responsibility to arrange for them to attend. If you choose a work

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colleague, we will not prevent them from attending, but we may rearrange the meeting if their absence from work causes operational problems.

Your colleague or union representative can, if this is your preference, explain the key points of your case to the meeting and can respond on your behalf. You can also confer with them during the meetings. They must not however, answer questions put directly to you, or try to prevent the Company asking questions or outlining its points.

12.8. Responding to a request

We will deal with flexible working requests reasonably and in less than three months from the date of your initial request, to informing you of our final decision (including any appeal), unless we have agreed a longer period with you.

We will consider the proposed flexible working arrangements, weighing up the benefits to you (and to the business) against any adverse impact that granting your request would have on the business or other staff.

Each request will be considered on its own merits. Agreeing to one request will not set a precedent or create a right for any other employee.

We will respond to your request in writing as soon as reasonably possible. We usually aim to respond within two weeks of the meeting.

We may grant your request in full or in part or refuse it. We may also propose changes to your request for you to consider. Your request may be granted on a permanent or temporary basis, and you may be asked to complete a trial period, before we confirm whether we agree to the changes.

If we reject your request, it will normally be for one of the following business reasons:

- the burden of additional costs.
- an inability to reorganise work amongst existing staff or recruit additional staff.
- a detrimental impact on quality, performance or on our ability to meet customer demand.
- insufficient work for the periods you proposed to work; or
- where we intend to reorganise or change the business and consider the flexible working changes may not fit with our plans.

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You will be sent a letter with the Company's decision and the reason for rejection or details of the new working arrangements. Any permanent changes agreed will involve a permanent change to your contract of employment (i.e., you have no right to revert to your original contract). You should sign and return a copy of this letter to your manager.

12.9. Appeal

You may appeal the Company's decision within a week of the decision. Your appeal should be sent in writing to the person stated in the decision letter and dated. In your response to that letter, you must explain exactly why you are appealing.

We will invite you to an appeal meeting. Wherever possible, the appeal meeting will not be led by the manager who held the meeting at which we decided what action to take. You may be accompanied by a trade union representative or work colleague, in line with the process outlined in paragraph 7 above. Appeals will normally be determined before the expiry of the 'decision period' (i.e., 3 months) wherever possible. An extension to the 'decision period' may therefore need to be agreed with you, if necessary".

The Company's final decision will be sent to you in writing. We try to do this within two weeks of the appeal hearing. You do not have any further right to appeal.

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13. Grievance Policy

13.1. Overview

This policy helps the Company ensure that complaints, concerns, and problems to do with employment are dealt with fairly and consistently.

This policy applies to all employees but does not form part of your contract of employment, and we reserve the right to amend this policy at any time.

You should only use this procedure to raise a grievance connected with your employment. Complaints made against you are dealt with under our Disciplinary Policy as appropriate.

You should also look at our Harassment and Bullying Policy and our Whistleblowing Policy, both of which might be relevant.

13.2. Taking informal action

You should approach your manager before doing anything else, as we find most grievances can be resolved informally. If your grievance is about your manager or you do not want to raise it with them for some other reason you must instead notify their manager or somebody else holding the same level of responsibility as your manager.

Should taking the informal approach does not resolve your problem, you must use the formal procedure.

13.3. Taking formal action: First stage

You will need to set out the details of your complaint in writing. Include dates, names of individuals involved, and any other relevant facts, and tell us clearly that you want to lodge a formal grievance. It is helpful if you can set out any steps you have taken to resolve matters informally.

You must also explain clearly what you want to see the Company do. You could for example say: 'I want you to issue a warning to (the name of the individual you are complaining about)', or: 'I want you to change your policy on overtime working'.

Send or hand your written grievance to your manager. If your manager is part of your grievance, their manager needs to receive your written complaint instead.

We will acknowledge receipt of your grievance in writing.

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You must co-operate with us to ensure our investigation is fair and thorough. How we investigate will depend on the nature of your grievance. We will look at relevant documents and may interview you and/or take a statement from you and from other people able to provide information.

13.4. Taking formal action: Second stage

We will invite you to a meeting, usually within a week of you lodging your grievance. The meeting is your opportunity to explain your problem and how you think we should resolve it, and we ask that you make every effort to attend.

You can bring a companion with you to the meeting this will typically be a work colleague or a trade union representative (full details in paragraph 6 below). You must let us know as soon as possible if either you or your companion is unable to attend the meeting and we will try to reschedule.

After the meeting, we will take any steps to investigate further that we consider appropriate. Sometimes this will involve looking at documents or interviewing other people. We will not normally allow you to participate in this part of the investigation (for example, you will not normally be allowed to question other people directly). Sometimes, we may ask you for more information or for another meeting. And sometimes, we may think there is no need for any further investigation.

Within a week of the final meeting (this may be the first or the second meeting, depending on the circumstances) we will write to you with our decision and let you know if we plan to take any action to address your grievance.

13.5. Taking formal action: Third stage

You can appeal in writing within a week of us giving you our decision. You must address whoever is named in the letter you received telling you of our decision, and you must explain clearly why you are appealing. You should also give us any new evidence you may have acquired since the initial investigation was completed.

We will invite you to a meeting, usually within two weeks of you lodging your appeal. Wherever possible, the appeal meeting will not be led by the manager who held the original grievance meeting. You may be accompanied by a trade union representative or work colleague, in line with the process outlined in paragraph 6 below.

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The Company's final decision will be sent to you in writing. We try to do this within two weeks of the appeal hearing. You do not have any further right to appeal against our decision.

13.6. Your right to be accompanied

You are entitled to be accompanied by a colleague or trade union representative at any meeting called under this policy.

If you want to exercise this right, you should tell us as soon as possible who you want to accompany you. It is your responsibility to arrange for them to attend. If you choose a work colleague, we will not prevent them from attending, but we may rearrange the meeting if their absence from work causes operational problems.

Your colleague or trade union representative can, if this is your preference, explain the key points of your grievance at the meeting and can respond on your behalf. You can also confer with them during the meetings. They must not however answer questions put directly to you or try to prevent the Company asking questions or outlining its views.

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14. Harassment and Bullying Policy

14.1. What this policy covers

As part of the Company's overall commitment to equality of opportunity, it is fully committed to promoting a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated. The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties you encounter while doing your job.

Harassment or bullying at work in any form is unacceptable behaviour and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice.

14.2. What is harassment and bullying?

Harassment and bullying detract from a productive working environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

14.3. Definition of harassment

Harassment is any unwanted physical, verbal or non-verbal conduct based on sex, sexual orientation, marital or civil partnership status, gender reassignment, religious belief, age, race or disability which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below, but many forms of behaviour can constitute harassment. These examples are:

- Physical conduct, ranging from touching, pushing or grabbing to punching or serious assault;

- verbal or written harassment through jokes, offensive language, defamatory remarks, gossip, threats or letters;

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- unwelcome sexual behaviour, including unwanted suggestions, propositions or advances;
- the sending or displaying of material that is pornographic or obscene, including e-mails, text messages, video clips, photographs, posters, emblems or any other offensive material;
- isolation, non-co-operation at work or exclusion from social activities;
- coercion, including pressure for sexual favours;
- inappropriate personal contact, including intrusion by pestering or spying

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

Definition of bullying/ (**violence)-** *"Any incident in which an employee is abused, threatened or assaulted in circumstances relating to their work"*

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.
Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.
Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- shouting at or humiliating others;
- high-handed or oppressive levels of supervision;
- unjustified, offensive and/or insulting remarks about performance;
- excluding employees from meetings, events or communications without good cause;
- physical or emotional threats
- cyber bullying which includes sending text messages, e-mails or posting information on social media sites which is of an intimidating or threatening nature.

Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips.

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14.4. Your rights and responsibilities

Your rights

You have the right to work in an environment which is free from any form of harassment or bullying. The Company recognises your right to complain about harassment or bullying should it occur. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that, when you make a complaint, you will be protected from further acts of bullying and harassment. If others also give evidence or information in connection with the complaint, they equally will be protected. Perpetrators of these acts will be subject to disciplinary action which may warrant dismissal.

Your responsibilities

You have a responsibility to help ensure a working environment in which the dignity of everyone is respected. You must comply with this policy and you should ensure that your behaviour to colleagues and anyone connected to the Company, does not cause offence and could not in any way be considered to be harassment or bullying.

You should discourage harassment and bullying by making it clear that you find such behaviour unacceptable. You should also support colleagues who suffer such treatment and are considering making a complaint. You must alert a manager or supervisor immediately to any incident of harassment or bullying to enable the Company to deal with the matter promptly and effectively.

14.5. The Company's responsibilities

The Company will ensure that adequate resources are made available to promote respect and dignity in the workplace and to deal effectively with complaints of harassment and bullying. This policy and procedure will be communicated effectively to all employees, and the Company will ensure that all employees are aware of their responsibilities. Appropriate training, where necessary, will be provided.

Procedure

In order to raise a complaint of harassment or bullying, please refer to the Company Grievance Procedure. (As outlined in the Employee Handbook).

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ACS is committed to the continued development and implementation of a range of measures and procedures, to protect and support an employee whilst engaged in the company's business, including:

- Robust security systems and procedures which have the capacity to prevent and control situations which may lead to the threat of violence/bullying,
- Provision of adequate and relevant information for employees and others
- Reporting and recording systems for incidents, near misses and activity that raises concern
- The provision of all necessary medical and professional support to employees who are victims of violence/bullying whilst at work
- Periodic monitoring and review

14.6. Support for Staff (Reporting)

Any employee who feels that he or she has been the target of workplace violence/bullying (verbal or physical) must report this to their line manager and complete an incident form (in a case where the line manager is the aggressor, the employee should report the incident to the line manager's manager, or in exceptional circumstances, their dedicated Human Resources Officer). Once complete, the incident form should be sent to the Health and Safety department.

Support following a violent incident

If the employee has been the target of physical violence and has injuries, the employee must receive any necessary medical treatment and advice; a first aider/ambulance should be called. In the event of an employee being a victim of physical or verbal violence, ACS will offer appropriate and timely, help and support. Managers should be sensitive to the employees need to talk about the incident and may wish to seek additional support from Senior Management Team and/or Human Resources.

It is important to recognise that the employee may be suffering some distress and require support in dealing with the post-incident effects. It is not possible to be prescriptive here because individuals react differently to particular experiences. There are a range of measures that can be implemented to support a victim:

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Debriefing – enabling the victim to talk through their experience and to express their emotions, concerns and needs is often helpful. How this is best achieved depends upon the relationship with the individual and their reaction to the incident. In some situations, the line manager may be appropriate, on others the use of a trained counsellor or the Chaplaincy services may be the most appropriate means of support. In such cases, advice can be obtained through the Human Resources Department.

Employee support – this can take many forms, e.g., temporary changes in role, location or working practices; and in serious cases such support may include time off, phased return to work, referral to Occupational Health or counselling. Advice and assistance in determining the extent to which support can be provided is available via the Human Resources Department

Colleague support - the importance of colleague support should never be underestimated. Colleagues are likely to be seen as primary emotional supports. If the employee is a member of a Trade Union, he/she may find this an appropriate source of practical and emotional support.

Additional advice and information is available from Human Resources

Witnesses to violence

Any employee who witnesses workplace violence (be it verbal or physical) should feel able to report this to their line manager without fear of intimidation.

Extreme Acts of Violence

In the event of an employee or group of employees being victims of, or witnessing, an extreme act of violence ACS will offer appropriate and timely, help and support. It is not possible to be prescriptive about the support because individuals react differently to experiences.

In the event of a violent incident on the construction site/office involving one or more major injuries, death, multiple deaths or casualties, the business continuity team will take responsibility for managing the situation and will act as the co-ordinator.

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14.7. Responsibilities:

Corporate

The Board of Directors have ultimate responsibility for the health, safety and welfare of all ACS employees, to ensure that proper procedures are in place to implement this policy and to monitor compliance. In practice, the Board of Directors delegates the management functions **for the effective implementation of the policy to Duty Holders.**

Directors

Directors/Safety must take all reasonable steps to ensure that adequate arrangements are in place to review the working practices, procedures and working environment of their members of staff. This will be done in consultation with employees and other relevant persons to develop appropriate safe systems of work (i.e., a risk assessment). In so doing, the aim is to:

- prevent employees being placed in situations which present significant risks to their personal safety *(this is a fundamental principle)*.
- identify those posts, where those occupying them may be considered to be 'at risk' from violence/bullying due to the nature of the work activities, location or other pertinent factors.
- ensure that those 'at risk' are provided with all necessary information, instruction and training to enable the individual to identify circumstances which may give rise to the potential for violence, how to avoid such situations and how to deal with them should they arise.
- effectively communicate safe working procedures to all employees, including part-time and temporary employees.
- develop employee awareness, via induction processes, line-manager supervision and intervention, team meetings etc.
- enable sensitive and careful consideration to expressions of concern by employees, (*the threat of violence or aggression should not be taken lightly*).
- ensure that all incidents of violence are reported and recorded, notified to the appropriate manager(s), and that appropriate actions are taken to support the individual, prevent a recurrence and to investigate promptly and thoroughly any reported incidents.

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- report all suspicious incidents to duty holders, to prevent potentially violent incidents from arising.
- monitor incidents of violence and review the effectiveness of the arrangements made.

All employees:

Effective policies and procedures to tackle the issue of violence at work, depend upon the co-operation between employers and employees. Thus, it is expected that all employees will:

- familiarise themselves with this Policy and any associated procedures, guidelines and instructions.
- take reasonable steps to avoid situations, which may have the potential for the risk of violence.
- report and record all incidents of violent, aggressive, threatening or abusive behaviour, *(or any incident or behaviour which they consider may lead to such acts),* to their site-manager immediately.
- actively participate in training events or other preventative measures designed to raise awareness, deal more effectively with potentially violent situations and to minimise the potential for such incidents.
- co-operate with their site-manager in the identification of situations which may give rise to the potential for violence and assist in the development of 'safe systems of work'.

14.8. Links to ACS Policy and Guidelines

- Violence at Work Guidelines
- Code of Conduct
- Disciplinary Procedure
- Whistle-blowers policy
- Grievance Procedure
- Equal opportunities policy
- Accident and Near Miss Reporting Procedure
- Fraud and bribery policy

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- employee leaflet
- Business Continuity Plan
- Work procedures
- Health surveillance procedures

Links for further information

www.hse.gov.uk/violence/ Health and Safety Executive

www.suzylamplugh.org/ Charity with information on personal and workplace safety

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15. Holiday Policy

15.1. Overview

This policy covers everything to do with your holiday entitlement and explains what you must do to arrange time off for holidays. This policy applies to all employees and workers but does not apply to self-employed contractors.

If you are an employee, this policy does not form part of your contract of employment, and we may amend it at any time.

15.2. What is my holiday entitlement?

How many days holiday do I get?

- You will find the number of days of paid holiday you are entitled to in your contract. This includes bank and other public holidays. The first four weeks of your annual leave will be classed as leave under Regulation 13 of the Working Time Regulations 1998 and the remainder under Regulation 13A and/or your contract as appropriate.

What if I work part-time?

- If you work part-time, you are entitled to time off for public holidays on a pro-rata basis.

When does the holiday year start?

- The Company's holiday year begins on 1 January and ends on 31 December. We will calculate your holiday entitlement on a pro-rata basis if you join or leave the Company part-way through the holiday year.

What if I've just started work?

- During your first year, you can only take the number of days you have accrued up to the day your holiday starts, unless your manager has agreed otherwise.

Can I roll my holiday over if I don't take it all?

- You are strongly encouraged to take all the holiday due to you in the holiday year in which it has accrued. Holidays not taken by the end of the holiday year will be lost and you will not receive payment in lieu.

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15.3. How do I request time off?

You can take a maximum of two weeks' holiday at any one time. You should put in your request as soon as you have chosen the dates, normally giving a minimum of four weeks' notice for a holiday of two weeks.

You must make all requests for holiday leave in writing to your manager, either in an email, a letter or a memo.

Employees are required to reserve up to 5 days of their annual holiday entitlement to cover the shutdown period between Christmas and New Year. The exact number of days and timing of the shutdown will be confirmed to employees as early as possible on an annual basis.

If you are leaving the Company, we may also require you to take your remaining holiday entitlement during your notice period.

Provided you have sufficient holiday entitlement, we will – wherever reasonably possible – try to fulfil requests for time off for a religious occasion. This will however be subject to our business requirements.

Your manager will always discuss alternative dates with you if we have to turn down a holiday request. If your request is refused and you take time off anyway, we will view it as an unauthorised absence. This would be dealt with under our Disciplinary Procedure and may lead to your dismissal due to gross misconduct.

Do not make any travel arrangements or financial commitments until you have written confirmation that you can take the time off work. The Company will not be responsible if you suffer losses because your holiday request is refused, regardless of the reason.

15.4. How much will I be paid?

We will pay you at your normal rate while you are on holiday.

We will let you know whether any commission or overtime payments will be included in your holiday pay. If we do include these elements in your holiday pay on one occasion, it does not set a precedent and we reserve the right not to include them in the future.

15.5. What happens if I am sick during my holiday?

If you are sick while on holiday, you can treat the time off as sick leave instead of holiday.

To reclaim your holiday time and take it at a later date, you must tell your manager as soon as possible (normally meaning while you are on holiday) and provide medical evidence — translated into English if necessary — of your illness or injury. If you do not do this, we will

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treat your absence as holiday and not sick leave. You must then follow the procedure outlined above to book dates for another holiday.

Should you already be on sick leave at the start of a holiday period, and provided that you would not have been fit to work at any time during it, you may reschedule the affected days. You will need to provide medical evidence and follow the procedure outlined above.

We will treat dishonest claims or any other abuse of this policy under our Disciplinary Policy.

15.6. What happens to my holiday entitlement if I am on long-term absence?

6.1 Your entitlement to annual leave accrues whenever you are off work long-term for any of the following reasons:

- sick leave;
- maternity and paternity leave;
- adoption leave;
- parental leave; or
- shared parental leave (known as family leave in this policy).

You may carry over unused holiday relating to the four-week Regulation 13 leave only to the following year if your sick leave spans two holiday years or you return to work too near the end of the holiday year to fit in the time off due to you. Any holiday carried over will be lost if you do not take it within 18 months of the holiday year in which it accrued. You shall not be entitled to carry over any additional Regulation 13A or contractual leave.

If you intend taking family leave and expect this to span two holiday years, you must give your manager as much notice as you can. You may carry over into the next holiday year any holiday entitlement that it is impractical for you take before the start of your family leave. This covers your full annual leave entitlement.

You should take any holiday leave you have carried over within the holiday year in which you return to work, unless a different timescale is agreed with your manager.

15.7. What happens if I leave the Company?

You will normally be required to use up any outstanding annual leave days during your notice period. This applies whether you resign, or we give you notice that we are ending your employment.

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We may alternatively pay you in lieu of any accrued holiday you have not taken. Payment will be made at the rate of 1/260th of your basic salary for each day of leave you have outstanding. Should you have taken more annual leave than you were entitled to up to the day you leave the Company, an amount calculated as above will be deducted from the final payment we make to you.

16. IT Acceptable Use Policy

16.1. Overview

This Acceptable Usage Policy covers the security and use of all the Company's information and IT equipment. It also includes the use of email, internet, voice and mobile IT equipment. This policy applies to all information, in whatever form, relating to the Company's business activities, and to all information handled by the Company relating to other companies and individuals with whom it deals. It also covers all IT and information communications facilities operated by the Company or on its behalf.

All User IDs and passwords are to be uniquely assigned to named individuals and consequently, individuals are accountable for all actions on the Company's IT systems.

Employees must not:

- Allow anyone else to use their user ID and password on any Company IT system.
- Leave their user accounts logged in at an unattended and unlocked computer.
- Use someone else's password

Individuals must not:

- Use the internet or email for the purposes of harassment or abuse.
- Use profanity, obscenities, or derogatory remarks in communications.
- Access, download, send or receive any data (including images), which the Company considers offensive in any way, including sexually explicit, discriminatory, defamatory or libellous material.
- Use the internet or email to make personal gains or conduct a personal business.
- Use the internet or email to gamble.

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- Use the email systems in a way that could affect its reliability or effectiveness, for example distributing chain letters or spam.
- Place any information on the Internet that relates to the Company, alter any information about it, or express any opinion about the Company, unless they are specifically authorised to do this.
- Send unprotected sensitive or confidential information externally.
- Forward Company mail to personal or non-Company email accounts (for example a personal Hotmail/Gmail account).
- Make official commitments through the internet or email on behalf of the Company unless authorised to do so.
- Download copyrighted material such as music media (MP3) files, film and video files (not an exhaustive list) without appropriate approval.
- In any way infringe any copyright, database rights, trademarks or other intellectual property.
- Download any software from the internet without prior approval of the IT Department.
- Connect Company devices to the internet using non-standard connections.

16.2. Clear Desk and Clear Screen Policy

2.1 In order to reduce the risk of unauthorised access or loss of information, the Company operates a clear desk and screen policy as follows:

- Personal or confidential business information must be protected using security features provided for example secure print on printers.
- Computers must be logged off/locked or protected with a screen locking mechanism controlled by a password when unattended.
- Care must be taken to not leave confidential material on printers or photocopiers.
- All business-related printed matter must be disposed of using confidential waste bins or shredders.

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16.3. Working Off-Site

3.1 It is accepted that laptops and mobile devices will be taken off-site. The following controls must be applied:

- Working away from the office must be in line with the Company's remote working policy.
- Equipment and media taken off-site must not be left unattended in public places and not left in sight in a car.
- Laptops must be carried as hand luggage when travelling.
- Information should be protected against loss or compromise when working remotely (for example at home or in public places). Laptop encryption must be used.
- Care should be taken with the use of mobile devices such as laptops, mobile phones, smartphones and tablets. They must be protected at least by a password or a PIN and, where available, encryption.

16.4. Mobile Storage Devices

4.1 Mobile devices such as memory sticks, CDs, DVDs and removable hard drives must be used only in situations when network connectivity is unavailable or there is no other secure method of transferring data. Only Company authorised mobile storage devices with encryption enabled must be used, when transferring sensitive or confidential data.

16.5. Software

5.1 Employees must use only software that is authorised by the Company on the Company's computers.

5.2 Authorised software must be used in accordance with the software supplier's licensing agreements. All software on Company computers must be approved and installed by the Company (Acme Corporation), the IT department or the person responsible for IT within the Company.

5.3 Individuals must not store personal files such as music, video, photographs or games on Company IT equipment.

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16.6. Viruses

6.1 The Company, IT department or person responsible for It within the Company has implemented centralised, automated virus detection and virus software updates within the Company. All PCs have antivirus software installed to detect and remove any virus automatically.

6.2 Individuals must not:

- Remove or disable anti-virus software.
- Attempt to remove virus-infected files or clean up an infection, other than using approved Company anti-virus software and procedures.

16.7. Telephony (Voice) Equipment Conditions of Use

7.1 Use of Company voice equipment is intended for business use. Individuals must not use Company's voice facilities for sending or receiving private communications on personal matters, except in exceptional circumstances. All non-urgent personal communications should be made at an individual's own expense using alternative means of communications.

7.2 Individuals must not:

- Use Company's voice for conducting private business.
- Make hoax or threatening calls to internal or external destinations.
- Accept reverse charge calls from domestic or international operators, unless it is for business use.

16.8. Actions upon Termination of Contract

All Company equipment and data, for example laptops and mobile devices including telephones, smartphones, USB memory devices and CDs/DVDs, must be returned to the Company on termination of employment. All Company data or intellectual property developed or gained during the period of employment remains the property of the Company and must not be retained beyond termination or reused for any other purpose.

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16.9. Monitoring and Filtering

All data that is created and stored on Company computers is the property of the Company and there is no official provision for individual data privacy, however wherever possible the Company will avoid opening personal emails. IT system logging will take place where appropriate, and investigations will be commenced where reasonable suspicion exists of a breach of this or any other policy. The Company has the right (under certain conditions) to monitor activity on its systems, including internet and email use, to ensure systems security and effective operation, and to protect against misuse. Any monitoring will be carried out in accordance with the Company's monitoring policy, the General Data Protection Regulations, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice Interception of Communications) Regulations 2000. It is the responsibility of every employee to report suspected breaches of information security without delay to management. All breaches of information security policies will be investigated. Where investigations reveal misconduct, disciplinary action may follow in line with the Company's disciplinary procedures.

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17. Internet and E-Mail Policy

17.1. Introduction

The Company encourages its employees to use email and the internet at work where this can save time and expense. However, employees must follow the rules below. It is important that employees comply with these rules, and any serious breach could lead to disciplinary action up to and including dismissal. Any employee who is unsure about whether or not something he/she proposes to do might breach this email and internet policy should seek advice from his/her manager.

Although the Company encourages the use of email and the internet where appropriate, their use entails some risks. For example, employees must take care not to introduce viruses to the system and must take proper account of the security advice below. Employees must also ensure that they do not send untrue statements about others in emails as the Company could face legal action for libel and be liable for damages.

These rules are designed to minimise the legal risks to the Company when its employees use email at work and access the internet. Where something is not specifically covered in this policy, employees should seek advice from their manager.

17.2. Use of email

Emails that employees intend to send should be checked carefully. The use of email to send or forward messages that are defamatory, obscene or otherwise inappropriate will be treated as misconduct under the appropriate disciplinary procedure. In serious cases, this could be regarded as gross misconduct and lead to summary dismissal.

Equally, if an employee receives an obscene or defamatory email, whether unwittingly or otherwise and from whatever source, he/she should not forward it to any other address.

Statements to avoid in emails include those criticising the Company's competitors or their staff, those stating that there are quality problems with goods or services of suppliers or customers, and those stating that anyone is incompetent.

Employees should ensure that official corporate information is given on any emails that they send with the Company's footer.

Employees should exercise care not to copy emails automatically to all those copied in to the original message to which they are replying. Doing so may result in disclosure of confidential information to the wrong person.

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Employees should not attach any files that may contain a virus to emails, as the Company could be liable to the recipient for loss suffered. The Company has virus-checking in place but, if in doubt, employees should check with the persons or organisation responsible for IT.

Employees should exercise extreme care when receiving emails with attachments from third parties, particularly unidentified third parties, as these may contain viruses.

17.3. Personal use of Email

Although the email system is primarily for business use, the Company understands that employees may on occasion need to send or receive personal emails using their work address. When sending personal emails, employees should show the same care as when sending work-related emails.

The Company considers the following to be valid reasons for checking an employee's email:

- If the employee is absent for any reason and communications must be checked for the smooth running of the business to continue.
- If the Company suspects that the employee has been viewing or sending offensive or illegal material, such as material containing racist terminology or nudity (although the Company understands that it is possible for employees inadvertently to receive such material and they will have the opportunity to explain if this is the case).
- If the Company suspects that an employee has been using the email system to send and receive an excessive number of personal communications.
- If the Company suspects that the employee is sending or receiving emails that are detrimental to the Company.

3.3 When monitoring emails, the Company will, save in exceptional circumstances, confine itself to looking at the address and subject heading of the emails. Employees should mark any personal emails as such and encourage those who send them to do the same. Where possible, the Company will avoid opening emails clearly marked as private or personal.

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17.4. Use of Internet

Where employees are allowed access to the internet at work, they are expected to use it sensibly and in such a manner that it does not interfere with the efficient running of the Company. Employees may be called upon to justify the amount of time they have spent on the internet or the sites that they have visited.

The Company does not currently impose any time limitation on work-related internet use. It trusts employees not to abuse the latitude given to them, but if this trust is abused it reserves the right to alter the policy in this respect.

The Company reserves the right to deny internet access to any employee at work, although in such a case it will endeavour to give reasons for doing so.

Employees should download files only on to computers with virus-checking software and should check how long the download will take. If there is any uncertainty as to whether or not the software is virus-free or whether or not the time the download will take is reasonable, you must discuss this with and obtain authorization from your manager and/or the person responsible for IT before downloading any files.

17.5. Personal use of the internet

Although the email system is primarily for business use, the Company understands that employees may on occasion need to use the internet for personal purposes. Employees may access the internet at work for personal purposes provided that:

- such use is limited to reasonable use.
- the internet is not used to access offensive or illegal material, such as material containing racist terminology or nudity.
- they do not enter into any contracts or commitments in the name of or on behalf of the Company.
- they do not arrange for any goods ordered on the internet to be delivered to the Company's address or order them in the Company's name.

Employees should not use the internet for personal purposes before working hours begin or after they end. The Company has security concerns about staff arriving early and leaving late and it is harder to monitor use of the internet at such times.

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In accordance with the Company's monitoring policy, the Company reserves the right to monitor employees' internet usage, but will endeavour to inform an affected employee when this is to happen and the reasons for it. The Company considers the following to be valid reasons for checking an employee's internet usage:

- If the Company suspects that the employee has been viewing offensive or illegal material, such as material containing racist terminology or nudity (although the Company understands that it is possible for employees inadvertently to view such material and they will have the opportunity to explain if this is the case).
- If the Company suspects that the employee has been spending an excessive amount of time viewing websites that are not work related. Monitoring will consist of checking the websites that an employee has visited and the duration of such visits.

17.6. Data Protection

Monitoring will only be carried out in accordance with the Company's data protection policy. Monitoring is in the Company's legitimate interests and is to ensure that this policy on email and internet use is being complied with.

Monitoring will normally be conducted by management. The information obtained through monitoring may be shared internally, including with an employee's manager. However, information would normally be shared in this way only if the Company has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after three months although this might be extended to six months if the Company has reason to believe its systems have been misused.

Information obtained through monitoring will not be disclosed to third parties (unless the Company is under a duty to report matters to a regulatory authority or to a law enforcement agency).

Employees have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in the Company's data

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protection policy. If workers believe that the Company has not complied with their data protection rights, they can complain to the Information Commissioner.

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18. Maternity and Family Friendly Policy

18.1. Overview

This policy covers the Company's procedures for all types of family-related leave and pay, and it includes details of your statutory rights. This is our most complicated policy, not because we set out to make things complicated, but because the law is very detailed on maternity and family friendly rights. This policy summarises the law, but if there's anything in here which differs from legal requirements, the statutory provisions will always take precedence.

This policy does not form part of your contract of employment, and we reserve the right to amend it at any time.

This policy applies to all employees. Self-employed contractors and other workers are not covered.

Most of the rights set out in this policy apply to each pregnancy, not each baby. So (for example) the periods of leave are the same whether you have one baby or twins.

We use acronyms throughout this policy. They are explained the first time they are used, and for convenience are set out in the glossary at the end.

18.2. What happens during pregnancy?

To take maternity leave and be paid Statutory Maternity Pay ('SMP'), we need you to give us the following information in writing before the end of your Qualifying Week (the 15th week before the Expected Week of Confinement – see glossary):

- you must confirm that you are pregnant.
- you must give us the date of the week — starting on a Sunday — that your baby is due.
- you must give us the date you want your maternity leave to begin; and
- you must give us the date when you will start claiming SMP.

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Although you are not obliged to tell us that you are pregnant before the end of your Qualifying Week, we would appreciate it if you could tell us earlier. This gives us more time to plan, and also gives us the chance to think about any health & safety matters that may arise.

We need a form MATB1 from you as soon as possible. Your midwife will normally give it to you automatically at the first antenatal appointment after your 20-week scan, or you can get a copy from your GP surgery. It must be signed by your doctor or midwife and confirm the date your baby is due.

Antenatal Appointments

You are entitled to paid time off for antenatal appointments during working hours. We ask for as much notice as possible, and we may want to see confirmation of your pregnancy and an appointment card for all but the initial appointment.

If you have what is known as a 'qualifying relationship' with a pregnant woman or the unborn child, you are entitled to unpaid time off to accompany her to a maximum of two antenatal appointments. This applies to each pregnancy. A 'qualifying relationship' is one where you are:

- the baby's father.
- the pregnant woman's spouse or partner.

We expect you to give us as much notice as possible. Legally, you are only entitled to 6.5 hours off work for each appointment (which includes travelling and waiting time), but if you need more time, please discuss it with us. To attend any further appointments, you will need to request time off as holiday (which will be managed as laid out in our holiday policy) or unpaid leave.

You must provide a signed statement showing the date and time of each appointment. It must also confirm that:

- you are eligible under the 'qualifying relationship' criteria.
- the time off is solely to accompany the woman to her appointment; and
- a doctor, midwife, or nurse has advised that the woman needs the appointment.

You may be entitled to time off to attend up to two antenatal appointments if you are having a child by surrogate. For guidance, ask your manager.

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18.3. What happens during maternity leave?

You can decide when you want your maternity leave to begin, as long as it's not earlier than the 11th week before your Expected Week of Confinement ('EWC'), i.e. the week in which you are expected to deliver your baby.

We will write to you within 28 days of you telling us that you are pregnant, to tell you when your maternity leave will end (if you take your full entitlement).

You can change the start date for your maternity leave if we have the new date in writing at least 28 days before the earlier of the original or revised date. We will write to you within 28 days of you giving us the new date to tell you when your maternity leave will now end (if you take your full entitlement).

You are entitled to 52 weeks' maternity leave (consisting of 26 weeks' 'ordinary' maternity leave and 26 weeks' 'additional' maternity leave — your rights differ during the additional maternity leave, as set out in this policy). This is your right regardless of how long you have worked for the Company or how many hours you work.Your maternity leave may start earlier than the date you wanted if you are off work because of your pregnancy at any time in the four weeks leading up to your EWC. Maternity leave will also start early if your baby is born before your preferred start date.

If you and your spouse or partner are both eligible, you may want to use the Shared Parental Leave ('ShPL') scheme so that you have more flexibility around your childcare in the first year after birth (see section 7). However, no woman is allowed to come back to work for the two weeks immediately after her baby is born. This is called 'compulsory maternity leave'.

We may contact you from time to time while you are on maternity leave — for example to discuss arrangements for when you return, possible internal job vacancies, or qualification expiry dates. If you'd prefer us not to contact you, please tell us.

You may also be offered up to 10 days' work while you are on maternity leave at a rate of pay agreed in advance. These are sometimes used for purposes such as keeping a qualification valid, key meeting, corporate training days, appraisals or consultation meetings. You do not have to come to them if you don't want to. Your decision as to whether to work some or all of them will not affect your right to maternity leave and SMP. These are known as Keeping in Touch days (also known as KIT days).

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You will continue to receive benefits due to you under your employment contract whilst on maternity leave. Except for terms relating to pay, all your normal terms and conditions will apply, and you will continue to accrue holiday entitlement. If you are due any holiday before your maternity leave begins, you should try to take it where practical.

18.4. How much is my maternity pay?

You may be entitled to SMP if you have at least 26 weeks' service with the Company by the end of the Qualifying Week (so, broadly, if you've been with the Company for just over nine months by the time the baby is due). Whether or not you qualify then depends on whether:

- your average weekly earnings are at or above the National Insurance Lower Earnings Limit.
- you are able to give at least 28 days' notice that you intend taking maternity leave (or as much notice as you can);
- you are still pregnant, or have already had your baby, 11 weeks before the EWC.

We calculate average weekly earnings during the eight weeks that end with the Qualifying Week.

You will receive SMP for up to 39 weeks. This will be paid at 90% of your average weekly earnings for the first six weeks and paid at the standard SMP rate for the remaining 33 weeks. The standard rate is set by the government, and we will tell you how much you will receive. We will pay SMP at 90% of your average weekly earnings for all your maternity leave, if your average weekly earnings fall below the standard rate.

We will deduct tax and National Insurance contributions from your SMP in the same way as we do from your regular salary.

18.5. What happens when I return to work?

There is no need to let us know if you intend returning to work at the end of your full 52 weeks' maternity leave. However, if you want an earlier return date you must give your manager at least eight weeks written notice. We may delay your return to work by up to eight weeks —

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or the end of your maternity leave if that's earlier — if you fail to inform us of your revised plans.

You are entitled to take up the same job you had before going on maternity leave if you return to work immediately after your ordinary maternity leave ends (i.e., at the end of the first six months' maternity leave). Should you instead return after taking additional maternity leave (i.e., in months 7-12), you may be offered a similar job if it is not reasonably practical for you to resume your previous role. Your terms and conditions will be unchanged.

When you return after maternity leave, you will meet your manager to discuss what has happened in your absence. You will also have opportunity to talk about other matters, such as breastfeeding/expressing milk during working hours.

You must tell us in writing as soon as possible, if you decide not to return at all after maternity leave and give notice as required under your employment contract.

Please refer to the Flexible Working Policy if you wish to make a flexible working request. It would be helpful if you could make any request as early as possible to allow us time to properly consider it.

If your job is one that has been identified as posing a risk to your health and safety as a new mother or because you are breastfeeding, we will notify you and take measures to eliminate all risks. This also applies to women during pregnancy. If you have any concerns about your health and safety, you should speak to your manager.

18.6. How do I claim paternity leave?

You are entitled to a maximum of two weeks' statutory paternity leave. This must be taken after the birth to care for the child and/or support the mother. You can take a single week's paternity leave or two consecutive weeks, but not separate weeks or as odd days.

You must take your paternity leave within 56 days of the child's birth. Where the baby is born early paternity leave must be taken within 56 days of the date it was due.

To qualify, you must have worked for us for at least 26 weeks by the end of the 15th week before the EWC. You must also:

- be the biological father and have the main responsibility with the mother for the child's upbringing; or

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- be the mother's partner and expect to have the main responsibility with the mother for the child's upbringing; or
- be the biological father and have some responsibility for the child's upbringing.

You must tell us in writing by the end of the Qualifying week (or as soon as possible):

- Expected Week of Confinement (EWC).
- whether you would like to take one- or two-weeks' paternity leave; and
- when you would like it to start. You can change this date by giving us 28 days' notice (or as much as you can).

6.5 While you are on paternity leave, all the terms and conditions not relating to pay in your employment contract will apply. When you return, you have the right to the same job with the same terms and conditions as you had before your paternity leave began.

18.7. How much is my paternity pay?

Your Statutory Paternity Pay is the lower of a fixed weekly rate set by the government or 90% of your average weekly earnings. Tax and National Insurance contributions are deducted in the usual way.

18.8. How do I qualify for Shared Parental Leave?

If you want more flexibility in the first year after your baby is born, you and your partner may want to consider Shared Parental Leave instead of just taking maternity and paternity leave. Provided that you are both eligible, ShPL allows you to split the available leave between you, so that you can be off work at the same time or consecutively.

There is a total of 52 weeks of ShPL available, less any weeks the mother has either been on maternity leave (including the compulsory period) or receiving SMP or Maternity Allowance ('MA') if she is not entitled to maternity leave. ShPL is additional to paternity leave.

You or your partner may be eligible for ShPL if:

- you are the mother and share the main childcare responsibility with the child's father or your partner; or

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- you are the father and share the main childcare responsibility with the child's mother; or
- you are the mother's partner and share the main childcare responsibility with the mother in place of the father; and
- you have worked for us for at least 26 continuous weeks by the end of the Qualifying Week and you will still be employed by us before you take ShPL; and
- the other parent has worked at least 26 of the 66 weeks before the EWC — this can be as an employee or self-employed — and had weekly earnings averaging at least £30 during 13 of the weeks; and
- you and the other parent fulfil the notice and other requirements detailed below.

The child's mother cannot start ShPL until the end of the compulsory maternity leave period. This is usually two weeks after birth.
The child's father, or the mother's partner, may consider using their two weeks' paternity leave before starting ShPL as once ShPL starts, any paternity leave not already taken is lost.

18.9. What paperwork is needed to claim ShPL?

You must tell us in writing at least eight weeks before you intend your ShPL to begin that you want to opt in to the ShPL scheme. We will also need to know:

- your name and the other parent's name.
- the start and end dates of the mother's maternity leave (or the SMP or MA start and end dates if she is not eligible for maternity leave).
- how many weeks of ShPL is available — that is, 52 weeks less maternity leave, SMP or MA already taken by the mother or due to be taken.
- how many weeks ShPL you will take and how many the other parent will take — you can change this by telling us in writing and you do not have to take your full allowance.

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- the total Statutory Shared Parental Pay ('ShPP') available — that is, 39 weeks less the number of weeks of SMP or MA already taken or due to be taken.

- how many weeks of the ShPP available is to be allocated to you and how many to the other parent — you can change this by writing to us, and you do not need to use all your allocation.

- the pattern of leave you want to take, with start and end dates for each block of leave — although this is not binding, it will help us if you give us as much information as possible; and

- that you and the other parent are both eligible to claim ShPL and ShPP — we will need signed declarations from both of you.

If you are the child's mother, you must give us at least eight weeks' notice in writing ending your maternity leave. We need this curtailment notice at the same time as you supply the ShPL opt-in notice, and you cannot take ShPL unless we have it. In the notice, you must tell us the date your maternity leave will end, which must be at least two weeks after the baby is born.

If your partner is the one taking ShPL, we need a written declaration that their employer has received an opt-in notice and all the necessary declarations have been made. They may be able to take ShPL from their employer before your maternity leave ends, but only if we have received your curtailment notice.

Curtailment notices are binding and can only be revoked if your maternity leave has yet to finish and you meet one of these conditions:

- you find out that neither you nor the other parent is eligible for ShPL or ShPP — in this case you can revoke the curtailment notice by writing to us any time up to eight weeks after it was given; or

- the curtailment notice was issued before the birth, and you are revoking it in writing during the six weeks after the birth; or

- the child's other parent has died.

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You cannot opt back into the ShPL scheme after you revoke a curtailment notice except if the notice was given to us before the birth and it is revoked in writing during the six weeks following the birth.

If the mother is still on maternity leave or claiming SMP or MA, you as the partner will be unable to start ShPL until she:

- has returned to work; or
- has given a curtailment notice to her employer to finish her maternity leave; or
- has given a curtailment notice to her employer to finish her SMP; or
- has given the benefits office a curtailment notice ending her MA.

We may also ask you to provide the following:

- a copy of your child's birth certificate or a signed declaration of the date and place of birth if you have yet to get the certificate; and
- contact details for the other parent's employer, or a declaration that they do not have an employer.

18.10. How do I organise ShPL?

Once you have opted into the ShPL scheme, you need to give us a 'period of leave' notice to book your time off. You can give us this at the same time as your opt-in notice or at any other time, if it is at least eight weeks before the first period of ShPL begins.

On the 'period of leave' notice you can either give us specific dates or the number of days after the birth that you want ShPL to start and finish. You may prefer the second option if the father plans taking paternity leave as soon as the baby is born and wants ShPL to run on from it. You must take ShPL in blocks of at least one week at a time.

You are automatically entitled to take a single continuous block of ShPL (but we will consider any request for separate blocks of ShPL as detailed in the following paragraphs).

You may lodge up to three 'period of leave' notices, which may allow you to take up to three separate ShPL blocks with periods at work in between. If you later reschedule or cancel one of the blocks, it nevertheless counts towards your three notices.

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To make it easier for us to consider allowing you to take ShPL in more than one block, you should discuss your requirements with your manager as early as possible before you submit your formal 'period of leave' notice.

If you want separate blocks of ShPL, you must give us details of the pattern you want to follow in your 'period of leave' notice. Once we have received this, we will either agree immediately or we will start a discussion period with you which will last for two weeks. If we reach agreement, we will confirm this in writing before the end of the two-week period. If we fail to agree, you can take all the ShPL you asked for in one continuous block, beginning on the start date you gave us in your notice. For example, if you asked for three separate three-week periods, you could combine them into one continuous 9-week leave period.

The other way we can approach this is if you agree to the following:

- choosing a new start date and telling us what it is within five days of the two-week discussion period ending. The new date must be at least eight weeks after the start date of the first of the blocks you asked for; or

- withdrawing the notice and informing us within two days of the two-week discussion period ending. This will not be counted as a 'period of leave' notice, and you are free to submit a fresh one.

If you need to cancel a period of ShPL, you must put your request in writing at least eight weeks ahead of the relevant block start date.

If you want to change a start date, you must put your request in writing at least eight weeks before whichever is the earlier of the original and new start dates. Similarly, you can change the end date if you inform us at least eight weeks before whichever is the earlier of the original or new end dates.

If you want to combine blocks of ShPL into one continuous period, you will need to give us the new start or end date, whichever is relevant.

If you want to split a continuous period of ShPL into two or more periods separated by periods at work, you will need to tell us the new start or end date. We may not be able to agree but are prepared to approach your request as if you had asked for separate blocks of ShPL in the first place.

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If you submit a notice to change or cancel a block of leave, we will count this as one of your three 'period of leave' notices. There are three exceptions to this rule, which are:

- if the change is because your baby was born earlier or later than the EWC.
- if you cancel a request for separate blocks of leave within two days of the two-week discussion period ending: or
- we ask you to make the change.

18.11. What happens during ShPL?

If your baby is born before the beginning of the EWC, we may allow you to start ShPL during the eight weeks following birth despite you being unable to give us eight weeks' notice. To enable us to do so, we need to apply the following rules:

- if your 'period of leave' notice gave us a set date within the 8 weeks following the EWC for your ShPL to start, you can move the date forward by the same number of days if you write to tell us as soon as possible.
- if you want to take ShPL in the eight weeks following birth and your baby arrives early, you will need to give us your opt-in notice and 'period of leave' notice as soon as possible.

If you had a start date of a set number of days — rather than a set date — after the birth in your 'period of leave' notice, you do not need to do anything.

You will continue to receive benefits due to you under your employment contract. Except for terms relating to pay, all your normal terms and conditions will apply, and you will continue to accrue holiday entitlement.

If you are due any holiday, you should discuss with your manager when to take this before starting ShPL, and if you are the mother you should try to take any holiday due to you before your maternity leave begins.

We may need to contact you from time to time while you are on ShPL leave — for example to discuss arrangements for when you return.

You may also be asked to work during ShPL for up to 20 days. These are known as SPLIT (shared parental leave in touch) days. This includes training and — if you are a woman — is in addition to the 10 Keeping In Touch days you have the option to work during your

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maternity leave. You are not obliged to work any of these days, but if you do, you will be paid at a rate agreed with your manager. This also applies if you ask us to work any of the 20 days.

18.12. What happens when I return to work?

You must give us eight weeks' notice in writing if you want to end a ShPL period early and provide the new return-to-work date. You will be unable to end your ShPL early without our agreement if you have already used your three 'period of leave' notices.

If you have unused ShPL entitlement and want to extend your leave, you must tell us in writing by submitting a 'period of leave' notice at least eight weeks before the date you had intended returning to work. You will be unable to extend your ShPL without our agreement if you have already used your three 'period of leave' notices. Instead, you may be able to take annual leave or ordinary parental leave.

You are entitled to take up the same job with the same employment terms you had before going on ShPL. However, under certain circumstances it may not be reasonably practical for you to resume your previous role and we may place you in another appropriate post with no less favourable terms and conditions. This will only apply if:

- your ShPL plus any maternity or paternity leave taken amounts to more than 26 weeks, irrespective of whether or not it was taken consecutively; or
- your ShPL was taken consecutively, before or after more than four weeks of ordinary parental leave.

18.13. Can I claim statutory Shared Parental Pay?

If you have at least 26 weeks' continuous employment with us at the end of the Qualifying Week, you may be able to claim Statutory Shared Parental Pay for up to 39 weeks. We will pay this at the rate set annually by the government, less any SMP or MA already claimed by either you or your partner. Your average earnings must be not less than the lower earnings limit set each tax year for you to qualify.

When you give us your 'period of leave' notice (or notices), you must notify us that you intend to claim ShPP while you are on ShPL. You can also write to us at least eight weeks before the

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date you want us to start paying your ShPP if you have not already told us in a 'period of leave' notice.

18.14. What is ordinary parental leave?

Ordinary parental leave can be taken at any time until a child's 18th birthday and comprises 18 weeks' unpaid leave per child.

If you have responsibility for a child, you are entitled to take parental leave. Those eligible include the registered father and anyone else with formal parental responsibility for the child. You must have worked for us for at least a year before you can take parental leave, already have — or expect to have — responsibility for a child and intend using the leave only to care for the child or otherwise spend time with them.

You can take up to four weeks of ordinary parental leave per child, per year, in blocks of a single week or more. You cannot take less than a week at a time, unless the child is disabled.

You need to give your manager 21 days' notice that you intend to take parental leave. We will always try to accommodate your request but may have to rearrange your dates if your absence would disrupt our business by, for example, leaving us short-staffed. If your leave has to be postponed, we will tell you why in writing within seven days of your request and provide you with new start and end dates.

We are unable to postpone parental leave if you have asked us for it to start immediately after a child's birth or adoption. We are also unable to postpone parental leave beyond six months or beyond the child's 18th birthday.

Your employment contract and all its terms and conditions remain in force throughout ordinary parental leave, other than the fact that it is unpaid. Your holiday entitlement continues to accrue in the normal way.

18.15. What happens if I am adopting a child?

You are entitled to time off to attend an adoption appointment. This is an appointment arranged by an adoption agency, usually for you to get to know the child who will be placed with you, but sometimes for other reasons related to the adoption.

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If more than one child is being placed with you at the same time, we treat this as one adoption and will not give you time off to attend additional appointments. Time off for this type of appointment must be taken before any child is placed with you.You may attend up to five appointments per adoption, on paid time off if you are adopting on your own or will be the primary adopter. You may attend up to two appointments, on unpaid leave, if you are the secondary adopter.

You are entitled to take up to 6.5 hours for each appointment. This includes travelling and waiting time. We will need a signed statement with details of the time and date of the appointment as well as confirmation that:

- the adoption agency has arranged or requested the appointment.
- you are either adopting the child on your own or jointly with someone else; and
- you are electing to take either paid or unpaid time off work if you are adopting jointly.

It is sometimes necessary to ask you to rearrange an appointment, and we reserve the right to refuse a request for a particular day or time in exceptional circumstances. We will however never do this without good reason.

18.15 Can I claim adoption leave and pay?

We have similar arrangements in place for adoption as we do for maternity leave and pay. You should ask your manager for full details.

You may be entitled to adoption leave if you are having a baby by a surrogate mother. Your manager will be able to explain the process.

You may also be eligible for ShPL and ShPP if you are adopting or having a child by a surrogate mother. Again, ask your manager for more information.

18.16. Glossary

This is a glossary of the acronyms used in this policy:

- EWC — Expected Week of Confinement, or the week in which a pregnant woman is due to deliver.

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- Qualifying week — the 15th week before the EWC
- MA — Maternity Allowance
- SMP — Statutory Maternity Pay, the legal minimum women are entitled to receive while on maternity leave.
- KIT – Keeping In Touch days
- ShPL — Shared Parental Leave, the scheme under which a mother can share leave with somebody else (usually the father) by opting out of the statutory maternity leave scheme.
- ShPP — Statutory Shared Parental Pay, a payment similar to SMP but paid to the mother and her partner while they are on ShPL.

19. Mobile Telephone Policy

19.1. Introduction

This policy applies to mobile telephones provided by the Company and to the use of private mobile telephones while employees are at work.

19.2. Work mobile telephones

Company mobile telephones are provided at the discretion of the Company based on business need and must be returned to the Company on the last day of your employment.

Company mobile telephones may not be used for private purposes provided such use is kept to reasonable levels. Should the Company deem that you have made an unreasonable amount of calls/data it reserves the right to make a deduction from your wages/salary.

The safeguarding of your work mobile telephone is your responsibility. Do not leave it in a visible place such as in an unattended car.

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19.3. Etiquette

Be considerate in your use of your mobile telephone. Turn it off when its use could be distracting, for example during meetings and training sessions.

Observe any restrictions imposed by other Companies on the use of mobile telephones, including requests to turn them off.

19.4. Monitoring

The Company monitors the use of its mobile telephones in accordance with its monitoring policy. Monitoring is in the Company's legitimate interests and is for the purpose of ensuring that workers are using mobile telephones in accordance with this policy.

The data controller is the Accounts Manager who may be contacted at martind@acsconstructiongroup.com.

The Company will monitor the telephone numbers to which calls are made and from which calls are received, including by random checks of numbers that have been dialled, and the duration of calls, but will not monitor the content of telephone calls.

Monitoring will normally be conducted by management. The information obtained through monitoring may be shared internally, including with an employee's manager. However, information would normally be shared in this way only if the Company has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after three months although this may be extended for up to six months should the Company have reason to believe that its facilities have been misused.

Information obtained through monitoring will not be disclosed to third parties (unless the Company is under a duty to report matters to a regulatory authority or to a law enforcement agency).

Employees have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in the Company's Data Protection Policy. If workers believe that the Company has not complied with their data protection rights, they can complain to the Information Commissioner.

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19.5. Driving

It is a criminal offence to use a hand-held mobile telephone or similar device while driving. Use of hand-held mobile telephones while driving is permitted only in an emergency.

Drivers should concentrate on driving and avoid distractions. Answering and making telephone calls, sending text messages and accessing the internet are all distractions and in certain circumstances could amount to the offence of driving without care and attention or even dangerous driving.

Any mobile telephone that is or must be held at any time while in use is a hand-held telephone. The use of an earpiece does not make a telephone hand free. To be hands free the telephone must be fixed or in a cradle.

All hand-held mobile telephones should be switched off/placed in silent mode and not answered until you reach your destination or have stopped in a safe place.

If the telephone or equipment is hands free you may press buttons to send and receive messages. However, even the use of hands-free telephones can be dangerous. Wherever possible you should wait until the vehicle is stationary and in a safe place before using a hands-free telephone.

19.6. Breach of this Policy

Breach of this policy will be treated as misconduct. Whether it is minor or gross misconduct will depend on the circumstances, but you should expect breach of the driving provisions to be gross misconduct.

If you have been issued with a mobile telephone, breach of the policy could result in its being withdrawn.

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20. Modern Slavery & Human Trafficking Statement

20.1. Introduction

ACS Construction Group Ltd is committed to driving out acts of modern-day slavery, child labour and human trafficking within its business and that from within its supply chains, including subcontractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within ACS Construction Group Ltd.

As part of the company's due diligence, the Company will not knowingly support or deal with any business involved in slavery or human trafficking. The Company works within a strict supplier chain register.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

20.2. People and checks

The steps we take within own business to prevent modern slavery and human trafficking is as follows:

- Our recruitment policy explicitly commits us to the prevention of modern slavery in our business and guidance is provided to relevant managers and our HR Department (Recruitment)-Using this policy and the Home Office (Modern Slavery Awareness and Victim Identification Guidance)
- HR and relevant managers carryout face to face checks on original "right to work" documents before they start work.

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20.3. The ACS way

We are committed to improving our processes and educating our workforce better over the coming years, with particular focus on:

- Staff Awareness, A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from Workspace upon request.
- Toolbox talks and posters on the subject will be rolled out and ongoing throughout the coming years
- Managers posted on site a copy of Modern Slavery Awareness and Victim Identification Guidance
- Policy statement will be reviewed annually and published.
- This policy should be read in conjunction with the Equal opportunities policy

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 45001:2015. The implementation and operation of this management system underlines our commitment to this policy.

Policy is available on the website, and or provided to individuals on request and sent within 30 days of a written request.

Signed:



Danny Doohan, HR Director

Date: 03/10/2023

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21. Monitoring Policy

21.1. Overview

The Company's systems enable us to monitor telephone, e-mail, voicemail, internet, vehicles and premises. For business reasons, and in order to carry out legal obligations in our role as an employer, use of our premises, vehicles and systems including the telephone and computer systems, and any personal use of them, is monitored.

Employee monitoring may be necessary to identify and/or investigate unauthorised or excessive use of the Company's telecommunications/electronic systems, breach of Company procedures, security of premises, as well as the detection and/or prevention of crime.

21.2. Company rights

The Company reserves the right to retrieve the contents of CCTV recordings, telephone calls, vehicle tracking data, electronic messages or check searches which have been made on the internet for the following purposes (this list is not exhaustive):

(a) monitoring lateness by CCTV video cameras;

(b) checking e-mails and analysing e-mail traffic to ensure the system is not being abused;

(c) to find lost messages or to retrieve messages lost due to computer failure;

(d) checking websites visited by employees using Company systems;

(e) recording telephone calls and reviewing call logs;

(f) to assist in the investigation of misconduct or wrongful acts;

(g) to check conduct and/or ensure security on Company premises;

(h) checking the use of Company vehicles; or

(i) to comply with any legal obligation.

Monitoring is only carried out to the extent permitted or required by law and as necessary and justifiable for business purposes.

The Company may use information gathered through employee monitoring as the basis for disciplinary action against employees. Where disciplinary action arises from information (including recordings and reports) gathered through monitoring, the employee will be given the opportunity to see or hear the information in advance of the disciplinary meeting and make representations about it.

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The Company will ensure data collected through monitoring is kept secure, and access is limited to authorised individuals.

21.3. CCTV Cameras

CCTV cameras are not placed in private areas (i.e. toilet and washroom areas).

Disciplinary action may be taken against employees as a result of data collected on CCTV cameras.

Where evidence of misconduct is found the Company may undertake a more detailed investigation in accordance with the Company's disciplinary procedure, involving the examination and disclosure of monitoring and CCTV records to those nominated to undertake the investigation and any witnesses, managers or Directors involved in the disciplinary procedure. If necessary, such information may be handed to the police in connection with a criminal investigation.

If disciplinary action results from information gathered through CCTV monitoring, the employee will be given the opportunity to see or hear the information in advance of the disciplinary meeting and make representations about it.

The Company will ensure data and footage collected through CCTV monitoring is kept secure, and access is limited to authorised individuals.

21.4. Covert Monitoring

Where the Company suspects that certain employees are engaged in a criminal activity or equivalent, the Company may use covert monitoring to investigate their suspicion.

Any monitoring in this instance will take place under the guidance of the Police and will be carried out in accordance with the Data Protection legislation.

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22. No Smoking Policy

22.1. Overview

The Company recognises that the health, safety and welfare of employees, sub-contractors and anyone else directly affected by the Company's operations are of prime importance. The Company has therefore developed and enforces a dedicated no smoking policy, conforming to the requirements of the smoke-free legislation. Exposure to second hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

22.2. Application

This policy is applicable to all employees as well as sub-contractors who undertake activities on behalf of the Company and any visitors to the Company's premises. Employees are responsible for informing their visitors to the premises of this policy.

22.3. Prohibition on smoking

Smoking is strictly prohibited on all parts of the Company's premises, including at entrances or anywhere on its grounds. This includes areas that are outside but that form part of the Company's premises.

22.4. Vehicles

The Company does not permit workers to smoke in company vehicles.

22.5. Electronic cigarettes

5.1 Although they fall outside the scope of smoke-free legislation, the Company prohibits the use of e-cigarettes in the workplace. The Company's rationale for a ban on e-cigarettes is that:

- although they do not produce smoke, e-cigarettes produce a vapour that could provide an annoyance or health risk to other employees;

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- some e-cigarette models can, particularly from a distance, look like real cigarettes, making a smoking ban difficult to police, and creating an impression for visitors/clients that it is acceptable to smoke.

22.6. Signage

The Company displays signs that make it clear that smoking is prohibited on its premises. These signs are located at all entrances to its buildings/list entrances where the signs are displayed. The Company also requires that no-smoking signs are displayed in those of its vehicles that are subject to the ban.

22.7. Assistance for employees to give up smoking

The Company recognises the difficulty that employees who wish to give up smoking may face. There are various sources of support available for employees who wish to stop smoking. Employees may contact the Smokeline on 0800 022 4332. The local NHS Board's Public Health Department and many GP surgeries will also provide assistance.

22.8. Non-compliance

Any infringement of these rules by an employee may result in appropriate disciplinary action, which will be dealt with in accordance with the Company's disciplinary procedure. Employees are also reminded that it is a criminal offence for employees to smoke in smoke-free areas, with a fixed penalty of £50 or prosecution and a fine of up to £200.

Customers who are smoking in smoke-free areas should be reminded of the no-smoking signs and asked to stop. If a customer continues to smoke, employees should explain that the customer is committing a criminal offence and will not be served if he/she continues to do so. If the customer still refuses to stop smoking, staff should ask the customer to leave the premises and, where relevant, direct him/her to where he/she can smoke. As a last resort, the Company's procedure for dealing with illegal behaviour on its premises will be used.

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23. Pension

23.1. Legal Position

As you may be aware, the Government has made changes to workplace pensions and as a result Automatic Enrolment has been introduced and is currently being rolled out throughout the UK. It is a legal requirement for ACS that, from the 6th of April 2015, we are required under the rules to enrol eligible workers into a pension scheme.

We have decided to use The People's Pension for Automatic Enrolment which is provided by B&CE.

23.2. Things you should know

The people's pension has:

- Been designed for Automatic Enrolment.
- An annual management charge of 0.5%
- A wide choice of investment options to choose from. This choice includes a 'default' balanced fund if you would prefer not to take an active part in managing your investments.

23.3. Automatic enrolment

The Company will automatically enrol you in the people's pension if you are:

- Aged at least 22 but are under State Pension Age
- Earning more than £10,000 a year (£833 a month or £192 a week)
- Not already an active member of a qualifying workplace pension scheme with us
- Working, or usually working, in the UK.

If you don't currently meet these criteria but you do meet them at a later date, we'll automatically enrol you then.

Once you're in The People's Pension, you will make contributions towards your pension pot which we will deduct from your wages. You will normally receive tax relief on these contributions. You will also receive contributions to your pension pot from ACS Construction

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Group Ltd. This means much more than just your contributions will be going into your pension pot.

23.4. Can I join even if I won't be automatically enrolled?

Yes, if you're aged between 16 and 75 you are able to join The People's Pension at any time. We'll start contributing from the time you join. If you earn less than £5,772 a year (equal to about £481 a month or £111 a week), the regulations mean you will not be entitled to contributions from us but we have decided that we'll make contributions anyway.

If you want to join, you should sign a letter telling us you'd like to join The People's Pension. Alternatively, you can send an e-mail to tell us this, but your e-mail must also include a statement confirming that you have personally sent it to us. It should be sent to the Company address.

23.5. What happens next?

Once you're a member of The People's Pension, you will receive a joiner pack from The People's Pension in the post. This will include information about how to opt out if you wish to.

23.6. Where can I find out more?

More information about automatic enrolment: www.gov.uk/workplacepensions

More information about The People's Pension: www.thepeoplespension.co.uk/employees

If you have any questions please contact Martin Deignan – Company Secretary.

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24. Social Media Policy

24.1. Overview

This policy explains your responsibilities when you use social media, both on Company premises and in your own time.

This policy applies to all employees and anyone else working for the Company.

If you are an employee, this policy does not form part of your contract of employment, and we reserve the right to amend it at any time.

Your use of social media may, along with your wider use of Company IT resources, be monitored to make sure you are complying with this policy. Whenever you use our IT resources and systems, you give us your consent to monitor your activities.

If you breach this policy, you may face action under our Disciplinary Policy. We may require you to remove any social media content that breaches this policy and may invoke the Disciplinary Policy if you fail to do so. In addition, you could face legal proceedings if comments you post about the Company or named individuals are found to have harmed their reputation.

24.2. What is social media?

We define social media as any websites and applications that allow users to create and share content and/or take part in online networking. The most popular sites currently include the following (but this policy covers all social media):

- Facebook
- X (Previously Twitter)
- LinkedIn
- TikTok
- YouTube
- Instagram

This policy also covers personal blogs, any posts you might make on other people's blogs, and to all online forums and noticeboards.

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24.3. Using social media at work

You must not use Company IT resources to access social media unless you need to do so as part of your job. You also must not use you own IT equipment — your personal phone, for example — to access social media during working hours.

You must not post personal content on any Company social media account you are authorised to use. These accounts belong to us, and your access will be stopped if you abuse this policy in any way. If you leave the Company, your access will also be stopped and we will ask for your usernames and passwords. We may also ask for them at any other time and in either case you must supply them on request.

24.4. Your responsibilities when using social media

Always identify yourself and make it clear your opinions are your own and you are not speaking on the Company's behalf. You might consider doing this in a disclaimer. Use a personal email address, not your Company email address, and do not create a social media account that could be mistaken for a corporate account we have set up or could set up.

It is your duty to protect the Company's interests and you must not publish anything that could directly or indirectly damage these or compromise our reputation. You must never speak on the Company's behalf on social media unless authorised to do so and you must always make sure anything you do post is accurate and lawful. Always get your colleagues' permission before posting images of them or any of their personal details.

You must take personal responsibility for your social media content. If you can be identified as working for the Company, you must make sure your profiles, and anything you post, fit with how we expect you to present yourself to business associates and colleagues. Be mindful that even if you do not name us as your employer, people who know you and where you work may still make an unwelcome association with the Company. If you are in any doubt about what is and is not acceptable, please talk to your manager.

You must always show respect to others when using social media. You must never criticise the Company, our clients, suppliers, business associates, your colleagues or anybody else you come into contact with professionally. Our other Policies — in particular the Harassment and Bullying Policy and Equal Opportunities Policy — give guidance on the type of behaviour we consider unacceptable in the workplace, and we expect you to maintain the same high standards when using social media. Specifically, we will not tolerate any of the following:

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- abusive or threatening language;
- sexually explicit language or images;
- unlawful or disrespectful comments;
- trolling (starting or pursuing arguments in an online community with the intention of disrupting normal discussions within that community);
- false or misleading statements;
- impersonating your colleagues or third parties; or
- inciting somebody to commit a crime.

If another Company employee is bullying, harassing or victimising you using social media, you must follow the process laid out in our Harassment and Bullying Policy

You are obliged to respect Company confidentiality at all times and not to use social media to comment on sensitive business matters, including — but not restricted to — the following:

- our intellectual property;
- our trade secrets;
- our current or future trading performance;
- any information intended for internal use only; or
- anything else that is not already in the public domain.

We also insist that you never use our logo, trademark, or other corporate artwork in anything you post or as part of any of your social media profiles.

You must remain aware at all times of the public nature of social media. Even content posted on a restricted forum can quickly be shared across other social media and you must assume that anything you publish anywhere will sooner or later reach the public domain. When you share content posted by others, remember that you may be seen as giving tacit approval to opinions that could bring the Company into disrepute.

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You must never air grievances about the Company or any of its activities on social media. You should use our internal process if you want to make a complaint, raising it first with your manager. If the issue remains unresolved, you must then follow our Grievance Policy.

24.5. Other social media guidance

Always respect copyright and always check whether or not a third party's content is protected before you reuse or re-post it.

You are not allowed to add the details of business contacts you make while at work to any of your personal social media accounts.

The contact details of any business contacts you make while working for the Company belong to us and must remain confidential. When you leave the Company, you must give us this data and delete any copies you have, including any you have added to your social media accounts.

You should contact your manager if you find anything posted to a social media site that breaches this policy or otherwise brings the Company into disrepute.

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25. Training Policy

25.1. Overview

The Company's employees play a crucial role in ensuring business success. Wherever possible, all necessary steps will be taken to ensure that employees are provided with the training they require to perform their duties effectively at all stages of employment.

The kinds of training that the Company provides fall into four broad categories: induction, on the job, in house and external.

25.2. Induction

Whenever a new employee joins the Company, it is their manager's duty to ensure that they are given a proper introduction to the workplace, colleagues, catering facilities, duties, health and safety and other procedures.

Within the first few days of employment the manager will assess the new employee's training requirements and arrange for that training to be provided. Very often, the employee's needs will be adequately met by a combination of on the job and related in house training. From time to time, however, it may be necessary to arrange external training.

The main purpose of the induction process is to enable a new employee to become productive as quickly and effectively as possible. Each induction process will be tailored to the individual employee.

25.3. On the Job Training

Very often, new skills can be gained as part of on the job training by recently trained and/or more experienced colleagues. Employees will undergo this kind of training from time to time throughout their employment with the Company.

25.4. In House Training

From time to time, the Company will bring outside trainers into the workplace and organise internal training courses. This form of training will often be triggered by the introduction of new equipment and working methods and will be arranged when on the job training cannot be supplied.

25.5. External Training

External training may be provided in a variety of forms ranging from short courses of a few hours duration, through to lengthy courses leading to the award of qualifications.

Where necessary, the Company will arrange for employees to undertake external training where this cannot be provided in house.

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25.6. Cost Reimbursement

Employees who undertake external training courses with significant cost implications will be required, before commencing the course, to sign an undertaking to repay a proportion of the costs of the course if they leave the Company's employment within 12 months of the end of the course.

This requirement to repay the Company will be reduced by 1/12th of the course costs for each complete month that the employee remains employed by the Company after the end of the course.

25.7. TRAINING AGREEMENT

between

ACS Construction Group Ltd (the Company)

and

…….. (the Employee)

The Company hereby agrees to meet the course fees incurred by you in pursuing the following [training course][course of study][other]:

……..

It is a condition of your employment that you attend all required classes and pass your exams satisfactorily. Where you are unable to attend any classes, you must notify the Company by following the Absence Procedure.

If you fail to complete the course or your employment with the Company is terminated for any reason either prior to the completion of the course, or within one month of the date of completion of the course, then 100 per cent of all training costs are to be paid back in full by you.

If your employment with the Company is terminated for any reason at any point after one month of completion of the course, then the training costs you are required to pay back will reduce on a sliding scale of 1/12th for each month that elapses.

The Company reserves the right to deduct from your pay any money owed under this agreement, subject to the provisions of the Employment Rights Act 1996.

I confirm that I have read, fully understand and agree to the above terms.

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I agree that any monies I owe to the Company under these terms may be deducted from my pay.

Signed (Employee): _____ Date:

PRINTED:

_____

__

Signed (for and on behalf of the Employer): _____

Date:

PRINTED:

_____

___

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26. Vehicles and Driving

26.1. Driving whilst carrying out your duties

To be permitted to drive as part of your duties, you must hold a full and valid driving licence that permits you to drive in the UK.

Prior to driving for business purposes, you are responsible for ensuring that your vehicle is roadworthy. You may also be responsible for completing any checklist relating to the vehicle as instructed by management. Under no circumstances should you drive a vehicle that is not roadworthy, does not have a valid MOT or is illegal to drive.

You are required to drive in a safe, lawful and efficient manner, paying due regard to all traffic and weather conditions. You must use the most direct route when carrying out your duties and you should advise management of any problems or delays that could affect the scheduling for that day. The image that the Company presents to its customers is influenced by the cleanliness and appearance of its vehicles. Employees are required to wash and clean Company vehicles as often as it is necessary to maintain a smart professional image.

Employees are required to advise management of any problems or delays which could affect the scheduling for that day.

Employees must always lock and alarm the vehicle when they leave it unattended.

Employees are reminded that care should be taken not to leave valuable personal belongings in Company vehicles. This applies to both drivers and passengers. The Company insurance policy does not cover the theft of personal belongings, from a Company vehicle. Any incidents of theft involving personal belongings should be pursued through the employee's own home contents insurance.

Employees are not permitted to carry passengers in Company vehicles except for employees of the Company, unless otherwise agreed with management.

The safety and security of the vehicle, passengers or loads are the responsibility of the driver.

Employees must comply with all legal requirements which regulate maximum permitted driving hours and speed limits. Employees should also obey laws pertaining to not using mobile phones while driving.

Where applicable employees must familiarise themselves with and comply with the Tachograph Regulations and the operation of the Tachograph unit. Tachograph charts are regularly analysed. Failure to comply with the Tachograph Regulations is a disciplinary offence

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which will result in disciplinary action. Interference with the Tachograph unit is a serious disciplinary offence and will normally result in summary dismissal.

26.2. Mobile phones and driving

You must not use a mobile phone, including a hands-free phone, while driving. Mobile phones should only be used when the vehicle has been parked in a safe place and the engine has been switched off.

You should divert your phone to voicemail so that messages can be left while you are driving and picked up when it is safe to do so.

26.3. Driving under the influence of alcohol or drugs

You must not drive on business while you are under the influence of alcohol, illegal drugs or prescribed drugs if the prescribed drug has any potential effect on your fitness to drive. Driving Under the Influence of Alcohol or Drugs

If an employee is in charge of a Company vehicle while under the influence of alcohol or drugs (prescribed or otherwise) where that alcohol or drug use has any potential effect on the employee's fitness to drive, he or she will be subject to disciplinary action up to and including summary dismissal.

26.4. Using your own vehicle when carrying out your duties

If you use your own vehicle when carrying out your duties, it is your responsibility to ensure that your vehicle is roadworthy and properly taxed and that your vehicle insurance cover extends to business usage.

The Company rules relating to Vehicles and Driving also apply if you drive your own vehicle at any time for the purpose of undertaking your duties You must read, understand and follow these rules.

26.5. Taking your driving license details

If you drive your own vehicle on business, you must provide the latest Shared Driving Licence Information to the Company every six months.

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To do this, log on to www.viewdrivingrecord.service.gov.uk and enter your details as required. You must then create a licence check code to share your driving record with the Company and supply this to the Company within 21 days.

You must also notify your manager whenever there is any change to the details on your driving licence, such as the addition of penalty points.

26.6. Driving offences

If you are charged with, or convicted of, a driving offence, or if your driving licence is endorsed, you must report this fact to your manager at the earliest opportunity and, in any event, within 24 hours.

Driving-related fines are your responsibility, whether they were incurred while undertaking your duties for the Company or not, and you must pay these as soon as is reasonably practicable. If you fail to pay a driving-related fine, and the Company pays it on your behalf, the Company will deduct the cost of paying this fine from your pay.

If you are disqualified from driving, and you are required to drive for all or a significant proportion of your job, the Company reserves the right to terminate your employment. Company vehicles are essentially for work use.

26.7. Personal Use of Company Vehicles

The Company does allow Company vehicles to be used by employees for reasonable personal use. Employees should purchase their own petrol to cover personal journeys and receipts should be submitted to the ACS Plant Manager as proof. Employees are not permitted to use Company vehicles for long distance or out of the ordinary use unless prior permission is given by a director. For the avoidance of doubt, Company vehicles are essentially for the benefit of the Company and not any individual.The Company reserves the right to require employees who are absent from work to make their vehicles available for business use by other employees.

26.8. Accidents and Damage

Employees must immediately report to management all damage to a Company vehicle. A full written report of the circumstances in which the vehicle was damaged should be submitted thereafter.

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If damage to a Company vehicle is incurred because of an employee's negligence, the employee will be liable for the total cost of repairing the vehicle. Employees are responsible for paying any insurance excess following a claim for damage to a Company vehicle. Payments will be deducted from the employee's pay unless an alternative method of payment is agreed with management.

26.9. Vehicle Tracking

Employees should be aware that some Company vehicles are fitted with a tracking system which allows the Company to locate a Company vehicle at any given time. This allows the Company to track use of the vehicles and to reduce insurance premiums and monitor petrol consumption.

26.10. Breach of this policy

In the event that you breach this policy or the procedures to be followed, this may result in disciplinary action, up to and including dismissal without notice.

27. Wellbeing Policy

27.1. Purpose

The purpose of this policy is for the Company to establish, promote and maintain the mental health and wellbeing of all staff through workplace practices, and encourage staff to take responsibility for their own mental health and wellbeing.

We believe that the mental health and wellbeing of our staff is key to organisational success and sustainability. Promoting and protecting the mental wellbeing of our workforce is important for individual's physical health, social wellbeing and productivity.

27.2. Aims of the Policy

- to build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying and harassment)

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- to increase employee knowledge and awareness of mental health and wellbeing issues and behaviour
- to reduce stigma around depression and anxiety in the workplace
- to facilitate employees' active participation in a range of initiatives that support mental health and wellbeing.

27.3. Scope

Mental health problems and stress can affect anyone, regardless of their position in the organisation. This policy applies equally to all employees.

27.4. Responsibility

All employees are encouraged to:

- understand this policy and seek clarification from management where required.
- consider this policy while completing work-related duties and at any time while representing the Company.
- support fellow workers in their awareness of this policy.
- support and contribute to the Company's aim of providing a mentally healthy and supportive environment for all workers.
- All employees have a responsibility to:
- take reasonable care of their own mental health and wellbeing, including physical health.
- take reasonable care that their actions do not affect the health and safety of other people in the workplace.
- raise any issues of concern and seek help from their manager, human resources, H&S manager, GP, or any of the other relevant organisations listed below.

Managers have a responsibility to:

- ensure that all workers are aware of this policy.

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- monitor the workplace to identify stress factors and take steps to eliminate where doing so is reasonably possible.
- aid and support employees who are known to have a mental health problem or are experiencing stress outside of work.
- monitor workloads to ensure that staff are not overloaded.
- ensure effective communication between management and staff, particularly where there is organisational change.

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27.5. Objectives

The Company commits to:

- tackle workplace factors that may negatively affect mental wellbeing
- to develop management skills to promote mental wellbeing
- to manage mental health problems effectively.
    - We aim to achieve this through the following policy actions:
    - supplying information to employees to increase their awareness of mental wellbeing.
    - supply opportunities for employees to look after their mental wellbeing.
    - ensure staff have well defined job descriptions, aims and responsibilities.
    - provide staff with good management support, training and adequate resources to do their job.
    - manage conflict effectively.
    - establish good two-way communication to ensure staff involvement, particularly during periods of change.
    - supply non-judgemental and proactive support to employees who experience mental health problems.
    - ensure employees suffering from mental health problems are treated fairly and consistently and are not made to feel guilty about their problems.
    - investigate the contribution of working conditions and other organisational factors to poor mental health and remedy this where possible.
    - in cases of long-term sick, put in place, where possible, a gradual return to work
    - treat all matters relating to individual employees and their mental health in the strictest confidence and share on a ‘need to know Basis’ with consent from the individual concerned.

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- positively encourage the employment of people who have experienced mental health by supplying fair and non-discriminatory recruitment and selection procedures.

- recognise that workplace stress is a health and safety issue and acknowledge the importance of finding and reducing workplace stressors**.**

27.6. Communication

The Company will ensure that:

- all employees receive a copy of this policy during the induction process
- this policy is easily accessible by all members of the organisation
- employees are informed when a particular activity aligns with this policy
- employees are empowered to actively contribute and supply feedback to this policy
- employees are notified of all changes to this policy.

27.8. Monitoring and review

The Company will review this policy annually. The effectiveness of the policy will be assessed through feedback from workers and management.

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27.9. Getting Help

If you are concerned about your mental health or of someone you know or work with the following organisations may be able to help:

ACS Mental Health First Aiders:



Mel Connelly (Office Manager)	**Paul Smart (Site Manager)**
T: 0161 486 6300 (Option 5) melissac@acsconstructiongroup.com	T: 07498 309 864 paulsmart@acsconstructiongroup.com

Other Organizations:

mind.org.uk 0300 123 3393 Text 86463

Samaritans 116 123

Citizens Advice 03444 111 444

Relate 0300 100 1234

Talk to Frank 0300 123 6600

CLASP: www.claspcharity.com

Mates In Mind www.matesinmind.org

28. Whistleblowing Policy

28.1. Overview

This policy outlines what you should do if you suspect something happening at work is putting you or others in danger or is illegal or unethical.

This policy applies to all employees, contractors, consultants, officers, interns, casual and agency workers.

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If you are an employee, this policy does not form part of your contract of employment.

28.2. What is whistleblowing?

Our aim is to maintain the highest standards of integrity in everything we do. However, all companies can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have any such concerns, we encourage you to report them immediately — this is called 'whistleblowing'. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- any activity you suspect is criminal;
- any activity you suspect puts health and safety at risk;
- any activity you suspect may damage the environment;
- any activity you suspect breaches our policy on bribery and corruption;
- any failure to comply with legal or regulatory obligations;
- any failure to meet professional requirements; and/or
- any attempt to conceal one or more of these activities.

Speak to your manager if you are not sure whether something you have become aware of is covered by this policy. Note that if your complaint is about the way people are behaving towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.

28.3. How to raise a whistleblowing concern

In most cases, you should start by raising your concerns with your manager, either face-to-face or in writing.

If you would prefer not to go to your manager, you should write to one of the Company's directors. You should also do this if your concerns are of a very serious nature.

Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.

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You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

You will be kept informed about how our investigations are progressing and how long they are likely to take. Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating and give you concerns about whether we have actually done anything, and if this happens we will do our best to sit down with you and explain why we are acting in the way we are.

Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our board directors for further consideration.

Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy and is at risk of being dismissed for gross misconduct.

28.4. Confidentiality and anonymity

There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.

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You are always encouraged to raise concerns openly, and if you prefer to do so in confidence, we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation but will always discuss this with you first.

You are protected from reprisals under this policy (see paragraph 5), but if you are still worried, we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.

Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

28.5. How we protect whistleblowers

If you raise a concern in good faith under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation etc. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.

All whistleblowers are afforded the same protection, so you must not threaten others who have raised concerns or carry out reprisals against them. You may face disciplinary action which could include dismissal for gross misconduct, if we find that you have. You may also face legal action from the whistleblower in these circumstances.

You can seek further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from the independent charity Protect, which offers a confidential helpline on 020 7404 6609; protect-advice.org.uk.

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28.6. Taking your concerns outside the Company

This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Company to become involved when a whistleblowing allegation is made.

In some exceptional circumstances, you may need to go to an external body — an industry regulator, for example — and the independent charity Public Concern at Work (contact details in paragraph 5.3) can direct you towards the appropriate regulator for the type of issue you want to raise.

This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager will be able to explain how you should proceed.

Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Public Concern at Work before being justified in approaching the press.

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