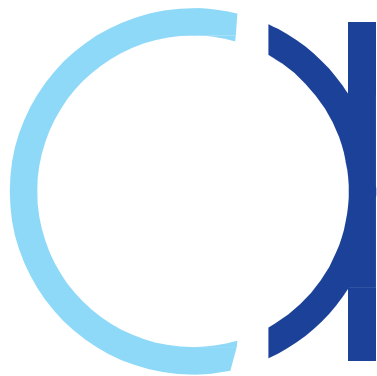


Policies and Practices



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POL 001 - 0022
January 2012



INDEX OF CONTENTS

Absence Policy	3
Anti Bribery Policy	4
Bullying and Harassment Policy	14
Code of Ethics Policy	15
Customer Care Policy	16
Data Protection Policy	17
Disciplinary Rules and Procedures	18
Grievance Procedures	21
Environmental Policy	22
Equality & Diversity Policy	23
Health and Safety - General Policy Statement	25
Objectives of the Policy	26
Responsibilities	27
Specific Areas of Work	29
Fire Prevention	31
Accident and Incident Reporting	34
Emergency Evacuation	39
Maternity Paternity and Adoption Policy	40
Paternity Policy	46
Adopted Children	46
Human Rights Policy	47
Lone Worker Policy	48
Quality Policy	51
Recruitment of Ex Offenders Policy	52
Redundancy Procedure	53
Safeguarding Policy	54
Secure Storage & Disposal of Disclosure Information	56
Smoking Drugs and Alcohol Policy	58
Training Policy	59
Whistle Blowing Policy & Protected Disclosure Policy	60



Absence Policy

The main aim of the 'Absence Policy' is to enable absence to be addressed in a fair, consistent and reasonable manner; however, an employee is expected to do everything they can to return to work quickly.

During any absence an employee should not undertake work elsewhere or carry out duties which are inconsistent with the illness and which may delay a return to work. By this it is meant activities such as sports, social activities, home improvements or working for a family business.

Therefore to ensure all employees are aware of the implications of absence, the following policy applies:

Unauthorised Absence

Periods of unauthorised absence cause significant disruption to our operation. Therefore if no communication is received within 24 hours, giving adequate reason for the absence disciplinary action will be taken.

Where absence is reported, but following investigation the company considers the employee's answers to be unsatisfactory, that absence will be considered to be unauthorised. This would be regarded as a disciplinary offence.

Absence

We regard any absence of longer than four normal working weeks as long term. If you are absent for longer than this you will be entered onto the suspense register held by the Company.

If you are unable to attend work for whatever reason you **MUST** make contact with the office and your Line Manager immediately, this must be done by telephone, text messages are not acceptable. Failure to inform immediately may result in disciplinary action.

Level of Attendance

It could be considered as a disciplinary offence where an employee has more than five occasions of absence for whatever reason, including certified and uncertified absence, other than authorised in advance, linked by any twelve month period.



Anti Bribery Policy

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope of this policy

This policy applies to all employees of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. Employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

The Bribery Act 2010 is in force from 1 July 2011. This policy covers:

- The main areas of liability under the Bribery Act 2010
- The responsibilities of employees and associated persons acting for, or on behalf of the Company; and the consequences of any breaches of this policy.



The Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity; or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company offers, promises, gives, requests, receives or agrees to receive bribes; or
- An employee or associated person acting for, or on behalf of, the Company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence)

The Company can use the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons, this defence can only be used by the Company and not the individual employee.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.



What is prohibited?

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all Company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.



Working Overseas

Principle

Employees and associated persons conducting business on behalf of the Company outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to the Company to be extra vigilant when conducting international business.

Procedure

Employees and associated persons are required to cooperate with the Company's risk management procedures and to report suspicions of bribery to the HR Manager. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- Close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
- A history of corruption in the country in which the business is being undertaken;
- Requests for cash payments;
- Requests for unusual payment arrangements, for example via a third party;
- Requests for reimbursements of unsubstantiated or unusual expenses; or
- A lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to the HR Manager.



Facilitation payments

Principle

The Company prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Company under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

Procedure

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to the HR Manager.

If the public official provides written details, the Board will consider the nature of the payment. Local legal advice may be sought by the Company.

If it is concluded that the payment is a legitimate fee, for example part of a genuine fast-track process, or is permitted locally, the Company will authorise the employee to make the payment.

Where the Board considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment and notify the public official that the employee or associated person is required to report the matter to the Company and the UK embassy.

The Company will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.



Corporate entertainment, gifts, hospitality and promotional expenditure

Principle

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- For the purpose of establishing or maintaining good business relationships;
- To improve the image and reputation of the Company; or
- To present the Company's [goods/services] effectively;

Provided that it is:

- Arranged in good faith, and
- Not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their line manager.

Employees are required to set out in writing:

- The objective of the proposed client entertainment or expenditure;
- The identity of those who will be attending;
- The organisation that they represent; and
- Details and rationale of the proposed activity.

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).



Gifts & Rewards

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the line manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, hampers etc may be retained by employees subject to the gifts being recorded and reported to the employees Line Manager.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior approval from the line manager is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the Company's expenses policy.

Charitable and political donations

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company supports charities that are selected in accordance with objective criteria. The Company may also support fundraising events involving employees.

This policy does not prohibit:

- Normal and appropriate hospitality and entertainment with clients; and
- The use of any recognised fast-track process that is publicly available on payment of a fee.

Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.



Risk management

Principle

The Company has established detailed risk management procedures to prevent, detect and prohibit bribery. The Company will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of the Company who are in positions where they may be exposed to bribery.

Procedure

The Company will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects. [Employees and associated persons are required to complete a bribery risk assessment form with [name of individual/the line manager/the compliance officer] when commencing a new project.]

The Company will:

- Regularly monitor "at risk" employees and associated persons;
- Regularly communicate with "at risk" employees and associated persons;
- Undertake extensive due diligence of third parties and associated persons; and
- Communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners.



Reporting suspected bribery

Principle

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the HR Manager as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery;
- Concerns that other employees or associated persons may be being bribed; or
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Procedure

A form is available from the HR department to allow employees to record any incidents of suspected bribery. Any such reports will be thoroughly and promptly investigated by the HR department in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the HR Manager.



Action by the Company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures and training

The Company will regularly communicate its anti-bribery measures to employees and associated persons. The Company will set up education sessions where applicable. The HR Manager is responsible for the implementation of this policy.

The implementation of this policy will be monitored and reviewed and related procedures on a regular basis.

The Company reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.



Bullying and Harassment Policy

Cleaning Assurance Ltd recognises the right of every employee to be treated with dignity and respect at work and condemns all forms of bullying and harassment. Such behaviour is potentially damaging to individuals as well as the company's reputation and performance and will not be tolerated in the workplace. It may also be unlawful and render both the company and perpetrator liable for legal action.

Bullying may be characterised as repeated offensive, intimidating, malicious, oppressive, insulting or otherwise inappropriate behaviour, which is either intended to, or has the effect of, undermining, humiliating or injuring the recipient, or making them fearful. It is frequently an abuse or misuse of power.

Harassment may be isolated or recurring incidents of behaviour which are unwanted by another person. It occurs when the unwanted conduct is either intended to violate another person's dignity or does so whatever the intention.

The company expects all staff to be helpful and courteous to each other and to be particularly aware of the needs of less experienced colleagues.

Victims of minor bullying or harassment should, if they feel able, make it clear to the bully/harasser, either verbally or in writing that the behaviour is unacceptable and must stop immediately. If informal methods fail, or serious bullying or harassment occurs, the employee is advised to bring a formal complaint in accordance with the Grievance procedure and should write in to the HR Department stating their grievance. An assessment will be made of the feasibility of separating the alleged harasser/bully from the complainant.

Subsequent action will be in line with the company policies.



Code of Ethics Policy

Cleaning Assurance's code of Business Conduct and Ethics is designed to ensure that we comply with the rules that companies have to follow. Along with other policies outlined it provides a set of general principles on the way in which we should behave towards customers, employees and anyone we deal with on behalf of the company.

It is there to ensure that individuals are not left open to criticism and to ensure that the reputation of Cleaning Assurance is not damaged.

It covers a wide range of areas including –

- Financial impropriety (e.g. breach of accounting practices)
- Conflicts of interest (e.g. working with or for a competitor)
- Misuse of company assets (e.g. disclosure of confidential information, abuse of company email or internet access)
- Discriminatory behaviour (e.g. sexual or racial harassment or possession of offensive materials)



Customer Care Policy

We are aware that good customer care is a prime consideration when awarding any contract and we have worked hard to put into place systems that maximise the satisfaction of our customers.

We will adhere to the following criteria for each contract we work on –

- All staff will be made aware of the impact their activities may have on the smooth running of the contract. All members of staff will be trained to understand that their professionalism, friendliness and expertise are paramount to the smooth running of the contract.
- Any complaints regarding the service provided will be dealt with quickly and efficiently and we undertake to keep our customers fully informed until the issue is resolved.
- We agree to carry out site audits at an agreed frequency, to set Key Performance Indicators (as required by the customer), to monitor them on a regular basis and to report back to the customer.
- If any of our staff work in a regulated activity or environment we will carry out a Criminal Records Bureau check (CRB) on the client's behalf and maintain records.
- The Help Desk facility will be manned during office hours and will deal with any day to day queries the customer may have. They will also conduct regular feedback audits to ensure customer satisfaction.
- We will endeavour to meet any specific contractual requirements customers may have and can, in most cases alter our procedures to bring them into line with the customers.

The on-going success of our business depends on how well we can meet our customer's requirements regarding, communication value for money, dealing with complaints and the professionalism of our employees.



Data Protection Policy

Introduction

Cleaning Assurance is fully committed to compliance with the requirements of the Data Protection Act 1998 ("the Act"), which came into force on the 1st March 2000. The Company will therefore follow procedures that aim to ensure that all employees, contractors, suppliers and consultants of the Company who have access to any personal data held by or on behalf of the Company are fully aware of and abide by their duties and responsibilities under the Act.

Statement of policy

In order to operate efficiently, Cleaning Assurance has to collect and use information about people with whom it works. These may include current, past and prospective employees, clients, customers and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of central government. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the Act to ensure this.

Cleaning Assurance regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the Company and those with whom it carries out business. The Company will ensure that it treats personal information lawfully and correctly.

To this end the Company fully endorses and adheres to the Principles of Data Protection as set out in the Data Protection Act 1998.



Disciplinary Rules and Procedures

On most occasions, it will not be appropriate for managers to use the disciplinary procedure on the first occasion of poor performance or conduct by an employee.

At the informal stage, managers are expected to meet with the employee concerned and discuss with them why the expected standards of performance or conduct are not being met. The aim of this meeting should be to agree joint standards and plan improvement over an agreed timescale where appropriate. Any training needed to facilitate should also be identified. Informal meetings do not attract the right to be accompanied.

Informal meetings to discuss issues are not disciplinary hearings following an informal meeting a decision may be taken that formal action is necessary.

Cleaning Assurance Limited relies on its staff to conduct themselves and their duties in a positive manner. This procedure details what action will be taken if the conduct of any member of staff, or the quality of their work, falls below acceptable standards.

The procedure is in place for the benefit of the member of staff - as well as the Company. The aims are:-

- To ensure that each case is fully investigated before any action is taken.
- To make sure that all cases are dealt with in a consistent manner.
- No disciplinary action will be taken until the matter has been fully investigated.

The Principles

The member of staff always has the opportunity to offer their side of the story. They will also have the right to be accompanied by a colleague.

The first stage of discipline (a verbal warning), may be given by the Area Manager or Site Supervisor. Further stages of discipline (written warnings and dismissals), will be dealt with by the Area Manager or Senior Operations Manager.

Records will be kept of all disciplinary circumstances and action. The length of time these records are kept on file will vary depending on the circumstances, the seriousness of the charge, the number of other disciplinary actions etc. but would not normally exceed one year.

A member of staff may appeal against the disciplinary penalty within the prescribed time scale of 5 days from the communication of the penalty decision.



The Disciplinary Procedure

Stage 1: Verbal Warning

You will receive details in writing of the cause of the dissatisfaction and a meeting will be arranged to discuss these with you.

If the conduct or performance of a member of staff is seen to fall below acceptable standards, a formal Verbal Warning will be given, usually by the Area Manager or Site Supervisor. This will be recorded (on form DP1) and kept on file.

- This warning will be disregarded after 3 months satisfactory conduct and performance.

Stage 2: Written Warning

You will receive details in writing of the causes of dissatisfaction and a meeting will be arranged to discuss these with you.

This may result in a Written Warning.

A Written Warning will be given if any of the following circumstances apply:-

- The offence is considered by the Company to be serious.
- There is a repeat of a previous offence for which there was a verbal warning.
- The employee has received previous verbal warnings but conduct has not improved.

This warning (form DP2) and the reason for this action will be given and be recorded and kept on file for 6 months. The warning will include a note that if there is no improvement after 6 months, a 'final written warning' will be given.

Stage 3 - Final Written Warning

You will again receive details in writing and a meeting will be arranged to discuss these with you.

A Final Written Warning will be given in the following circumstances:-

- The member of staff's conduct or performance continues to be below acceptable standards.
- There is a repeat of the offence.
- There is a repeat of any other previous offence.

This warning (form DP3) will clearly state that if there is a repeat of the offence, or if there is any other cause for disciplinary action within the next 12 months, this will result in dismissal. This warning will be kept on file for a period of 12 months.



Stage 4 – Dismissal

A letter will outline the reasons for a further meeting to discuss the matter with you.

Dismissal will be the result of any of the following circumstances:-

There is no satisfactory improvement.

- The member of staff's conduct or performance continues to be below acceptable standards.
- There is a repeat of the offence.
- The offence is considered, by the Company to be gross misconduct.

The Dismissal Notice will be given along with a letter explaining the reasons for dismissal. The date of dismissal, which will be confirmed in the letter, will be the date that the letter was posted.

Suspension

Where the Company feels such action necessary, an employee may be suspended while an investigation takes place. This suspension will be for a maximum of five working days. You will be paid while on suspension but you may be required to work on another site.



Grievance Procedures

Occasionally an employee may wish to make a query or complaint to the Company. This will usually involve issues such as holiday entitlement, pay rates and benefits, but may also include improper treatment or harassment, working conditions etc.

The Company will take all grievances very seriously and will expect them to be dealt with quickly, usually within 7 working days.

The Grievance Procedure is as follows:-

If the employee has a grievance, he/she should detail the matter in writing to his/her Supervisor. A conclusion may be reached immediately.

If the employee is unhappy with the result of their discussion with the Supervisor, or if the grievance involves the Supervisor directly, the employee should make their complaint in writing to their Operations Manager. The Operations Managers will deal with the complaint or may refer it to a senior colleague.

If a meeting is required, then the employee may be accompanied by a colleague.

The decision of the Company shall be made and the employee will be informed of the conclusion in writing. The employee has the right of appeal. The employee should put their appeal in writing within 5 days of the decision of the grievance hearing. The decision of the appeal is final.



Environmental Policy

The Directors and Senior Management Team of Cleaning Assurance recognise that their business impacts on the environment. As a company we are committed to the prevention of pollution and minimising any potentially harmful effects wherever and whenever possible. This statement provides the framework for our environmental programme.

The Directors have made a commitment to comply with all applicable legal obligations and with other requirements relevant to the environmental impacts of the company's activities and to provide adequate resources to ensure this compliance.

The key points of its strategy to achieve this are:

- Minimising waste by regularly evaluating operations and ensuring they are as efficient as possible
- Encouraging staff to embrace the principles of the Environmental Policy by reducing, re-using and recycling wherever possible
- To minimise toxic emissions through the selection and use of its fleet and the source of its power requirement
- To actively promote recycling amongst its customers and suppliers
- Source and promote a product range to minimise impact on the environment

Meet or exceed all the environmental legislation that relates to the Company

The company's environmental management system has been documented, implemented and accredited to meet the requirements of BS EN ISO 14001:2004 and the company will monitor delivery of any improvements. The policy is communicated to all employees and is available to the public if required.



Equality & Diversity Policy

Underlying Philosophy

Cleaning Assurance believes that the recognition of individual ability and merit, the absence of discrimination and the promotion of a positive attitude towards diversity will result in the most productive deployment of skills, expertise and competence across the company.

Cleaning Assurance also believes that increasing diversity and valuing differences will help frontiers become more progressive and innovative.

Cleaning Assurance recognises and accepts the legal obligations to have suitable equality employment policies and practices in place.

Objectives

To have in place processes and practices which facilitate individual progression and opportunity based on employees ability and contribution, and which are free from discrimination and meet legal obligations.

To establish an inclusive culture in which employees, potential employees and customers are treated with dignity and respect.

Principles & Practices

Cleaning Assurance will ensure access to employment, training and promotion is:

- Free from discrimination on the grounds of gender, sexual orientation, marital status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability.
- Based solely on the objective assessment of ability and other relevant job related criteria.
- In case of training and career development, based on assessed need.

Any allegation of discrimination will be treated seriously and investigated fully; any case of discrimination will be dealt with in accordance with Cleaning Assurances disciplinary policy.

Those involved in decision making shall be trained to ensure that decisions are based on objective criteria and can be justified. The main area where such processes shall be established are:

- Recruitment and selection
- Career planning, promotion and transfer
- Training and personal development
- Redundancy



Responsibilities

Senior Managers will demonstrate their personal commitment to this policy by raising their own levels of awareness, challenging inappropriate behaviours and championing appropriate policies and practices.

Human resources will have the responsibility for monitoring compliance, reporting on performance against policy agreeing resources as well as driving actions in conjunction with appropriate managers and staff.

It is the responsibility of all staff to behave in a manner which reflects the inclusive culture that Cleaning Assurance Ltd is trying to achieve.



Health and Safety - General Policy Statement

This policy statement is to define under the Health and Safety at Work Act 1974 and subsequent legislation, the Company's commitment in pursuing ongoing improvements, by outlining the details and direction of the policy framework in relation to its organisation and arrangements in support of health and safety, the Company's and individuals' responsibilities. These are supplemented by more detailed statements within the Policy.

As a Director within the Company I have the ultimate responsibility for ensuring the Health and Safety of all our employees and others who may be affected by our acts or omissions. It is my responsibility to implement, review and monitor the effectiveness of this policy and bring any changes to the attention of all employees.

In addition, all Directors, senior managers, managers and staff are directly responsible for the day to day adherence to this policy within their own areas of responsibility. In this way the Company will provide an effective organisation with detailed arrangements and will ensure that all necessary resources, both financial and other are adequate and made available as required.

All staff are trained to understand their responsibilities, both to themselves and others in relation to Health and Safety and to actively take control and responsibility for their actions.

Cleaning Assurance, together with their Board of Directors, their senior management and all staff are dedicated to ensuring that Health and Safety at Work is given paramount importance during the delivery of their daily business.



Objectives of the Policy

The Company is committed to do all that is reasonably practicable to ensure the health, safety and welfare of all its employees and the general public in so far as they come into contact with the Company or its products and services.

The company is committed to the continual improvement of health and safety management and performance by setting, achieving, monitoring and reviewing the following objectives:

- To comply with all applicable legal requirements relating to health, safety and welfare at work.
- To provide adequate control of the health and safety risks arising from our work activities.
- To consult with our employees on matters affecting their health and safety and to offer them participation in the development and review of policies and objectives.
- To provide and maintain safe plant and equipment.
- To ensure safe handling and use of substances.
- To provide information, instruction and supervision for employees.
- To ensure all employees are competent to do their tasks, and to give them adequate training.
- To provide Personal Protective Equipment (PPE) where required.
- To prevent incidents and cases of injury and work-related ill health.
- To keep adequate and suitable records of incidents and any health surveillance programmes.
- To maintain safe and healthy working conditions for employees, sub-contractors and visitors.
- To review and revise this policy as necessary at regular intervals.



Responsibilities

Position within Company	Health and Safety Position	Responsibilities
Managing Director	Nominated responsibility for all Health & Safety within Company	Overall responsibility for Health and Safety throughout Company. Formulation of Policy. Delegation of tasks to managers
Contract Administration Manager	Health and Safety Co-ordinator	Maintenance of management system, monitoring and collation of accident and incident reports and statistics, co-ordinate all H&S actions. Design training programmes. Distribute Risk Assessments for all tasks as required.
Senior Operations Manager		Assisting in the preparation of training programmes and delivery of programmes as required. Random audits on site to ascertain standards. Implementation of policy, ensuring training is completed for all levels of staff under their control. To act as the H&S representatives on site. Preparation of Risk Assessments as required and sent to the Contract Administration Manager. Complete safety audits
Supervisors		Assist with training on site – ensure that all staff under their control work to the safe systems in place.
Lone Workers		Take particular care to work safely and working to the safe system of working practices.
Employees		To work safely at all times and to report any accidents or incidents in a timely manner



Safety Representatives

Working to the Health and Safety (Consultation with Employees) Regulations 1996 Company safety representatives are there to represent the interests and concerns of their co-workers and respond on their behalf.

Because of the peripatetic nature, the Company the Directors have stated that Area and Site Managers will act as safety representatives for their staff. If the concern is in respect of their line manager employees have the right to speak directly to the Director responsible for Health and Safety.

The Safety Representatives role includes:

- Take up concerns with you about potential hazards or dangerous events in the workplace that may affect the employees they represent.
- Take up general matters affecting the health, safety and welfare of the employees they represent.
- Represent employees if and when consulted by health and safety inspectors
- Investigate accidents and incidents
- Carry out work based safety inspections
- Assist in the completion of work based risk assessments



Specific Areas of Work

Safe Working

Awareness of the need for safe working practices shall be generated by effective implementation of the corporate policy in Health and safety at Work and supporting statements. It will be carried out and supported by all members of staff and employees of Cleaning Assurance.

Health and Safety Training

Training on Health and Safety will be provided by the Company for all levels of staff.

New staff joining the Company will receive Health and Safety training as part of the Day One and the In House induction programme, details of which will be signed for and kept on their personal file. Additional training will be provided in specific areas as required and all employees will receive detailed training on the equipment they will be asked to use while carrying out their duties.

Any additional training, e.g. access equipment, fork lift training will be carried out at the Company's expense at a time to suit the current business demands and in line with the licence dates.

All training is recorded and kept on the employee's personal file. No member of staff will be allowed to use equipment or to carry out a task unless the training record is signed and in their file.

Risk Assessments

Within the Management of Health and Safety at Work Regulations and other supporting Regulations a need exists for assessment of risk to be completed prior to any work being carried out. The Compliance Manager is charged with adhering to these regulations and will ensure that if applicable a current risk assessment is available to the client before the work commences. The assessment will identify hazards and the risk associated with those hazards. It will identify specific groups who may be especially at risk. It will also list the control measures in place to control the risk.

Risk Assessments will be reviewed on a regular basis or when it is considered that:

- They are no longer valid
- There have been significant changes within the workplace
- After improvements have been made
- After an accident, incident or serious near miss.

Risk assessments are readily available to all staff in the site file. In addition, their attention will be drawn to any hazards that are associated with their work activity.



Workplace Safety Management

The Head Office and any regional offices used by Cleaning Assurance will be subject to a Health and Safety Audit on a quarterly basis. The assessment will include the evacuation procedures for the relevant building. All visitors to the site will be made aware of the emergency and evacuation procedures in place for their safety and that of others.

Control of Substances Hazardous to Health (COSHH)

In order to protect employees from the possible effects of exposure to substances which may cause them injury or ill health the Company will implement procedures in line with the Control of Substances Hazardous to Health Regulations (COSHH) 1999 and amended regulations.

Before a product is used by staff Safety Data sheets (MSDS) are obtained from the manufacturer and a COSHH assessment carried out by the Compliance Manager to ascertain if the product is safe to use. Wherever possible we will eliminate the use of hazardous substances by replacing them with a more suitable alternative. If this is not possible we will reduce the risk by containment, enclosure or adequate ventilation.

Product safety data sheets are available in all site files for products issued to be used on site and staff are trained as part of the induction process on the safe use of chemicals on site. Additional training is provided for chemicals not listed as 'site chemicals' and the completed training form is kept in the employee's personal file.

All products are stored in a Company warehouse and any hazardous products are contained in a separate area.

Delivery drivers and site supervisors are trained in spillage procedures and there are spill kits available for use if required.

Health Surveillance

The Company has ensured that wherever possible the chemicals we provide for our staff do not have risk factors attached. If any product with a risk factor is used the employee is made aware that there are risk factors attached and regular health surveillance is then completed by the Area Manager.

First Aid Measures

First Aid Supplies will be made available, compliant in quantity with current best practice at the Head Office, Regional Offices of the company and also at any location where required. There are currently three trained first aiders working from the Head Office.



Fire Prevention

Any flammable materials will be stored safely within the premises of the Company or elsewhere whilst in use, to minimise the risk of fire and injury to person or property.

Cleaning Assurance will hold regular fire alarms tests and fire drills and any visitor to the Company will be made aware of the fire precautions on arrival.

The Company Fire Risk Assessment will be updated on a regular basis and will be made available to the HSE or Fire Authority upon request.

Adequate means of escape will be provided and maintained. All fire exits will be clearly and permanently marked and will be kept clear of any obstruction at all times – both inside and out. All doors within the escape route will be clearly marked 'Fire Exit' and the method of operating these doors will be clearly indicated.

Suitable portable fire fighting equipment has been provided and will be regularly maintained. This will be inspected at least annually and the date of each inspection will be clearly marked on the appliance.

General fire and evacuation procedures will be displayed for all employees and visitors to see.

The validity of the fire evacuation procedures will be tested at least twice per annum by a practice evacuation drill. All employees will be expected to evacuate the building, gathering at the appointed assembly point. All practice drills are to be recorded in the Fire Log Book.

The risk of fire can be kept to an absolute minimum by all employees playing an active role in maintaining good housekeeping standards, correct storage or removal of waste combustible material, obeying the no smoking policy within the building and being vigilant at all times.



Peripatetic Workers

The Company recognises the need to safeguard peripatetic workers who provide services away from Head Office and by visiting other premises.

To assist the Company, it is expected that each peripatetic worker exercises a high level of self discipline and control throughout, reporting immediately any concerns they may have. When visiting other businesses for whatever reason, upon arrival they should ensure that they comply with the following procedures:

- Always park in a safe, sensible manner
- Report to reception, as directed or to the person responsible
- If required, make sure that they sign in and out of the building
- Familiarise themselves with the building emergency and evacuation procedures and the assembly points
- Do not put themselves at risk or danger
- During the visit, if they have an accident they are advised to seek first aid treatment, notifying the host employer and the Company as soon as possible.
- They must ensure that they co-operate fully at all times with the host employer.

Use of Electrical Equipment

The Company will ensure that all reasonable steps will be taken to ensure the health and safety of employees who use and operate electrical equipment. All equipment will be maintained in a safe working order and will be visually checked before each use. All portable electrical equipment will be tested in line with the Provision and Use of Work Equipment Regulations (PUWER) 1998 on an annual basis. Records of the PAT testing will be maintained.



Company Vehicles

All vehicles used by the Company to carry out its work, including company cars and vans will be safe at all times and compliant with the requirements of the Road Traffic Act. It is the responsibility of the driver of the vehicle to ensure road worthiness when in use on company business and this includes regular checks of the brakes, lights, steering and tyres. Defects, in the opinion of the driver must be reported to their line manager immediately. Drivers are also responsible for ensuring the vehicle is regularly dealer serviced.

Company drivers are reminded that any event which causes their competence whilst driving, including matters of health or any actions by the Courts or the police to be questioned **MUST** be reported to the Finance Director without delay. Failure to do so will be considered as gross misconduct and may result in suspension or dismissal. Drivers are reminded that they are to submit their driving licence to the Compliance Manager each April so the system can be updated.

Vehicle packs are provided in each Company vehicle and updated in June each year. It is the drivers responsibility to ensure that the current pack in the vehicle at all times and is present if and when the vehicle changes hands.



Accident and Incident Reporting

All accidents involving employees or visitors, whether or not an injury results must be reported to their immediate line manager. Those resulting in an injury, no matter how minor must be reported to the Compliance Manager without delay. Accident reporting forms are to be found in the Site File. Once completed these can be faxed or scanned and e-mailed.

It is the responsibility of the Company to report the following to the Health and Safety Enforcing Authority (HSEA).

- Fatal accidents to Company employees or others
- All major injuries / accidents
- Major injury sustained by non-employees requiring hospital treatment
- Specified dangerous occurrences
- Accidents resulting in more than three consecutive days absence from work
- An employees death within one year of a reportable injury
- Any person suffering from a specified occupational disease
- Injuries caused by actions of violence

Fatal accidents, major injuries and dangerous occurrences must be reported to the HSE by the quickest practical means (telephone or e-mail) and followed up using form F2508 within five days.

Furthermore, all accidents resulting in more than three consecutive days' incapacity for work also need to be reported as soon as possible after they are known.

In order for the Company to comply with the above it is important that employees absent for whatever reason who are still absent after three full working days inform the Company immediately, particularly if due to an injury sustained while at work.

Due to the nature of our business any injuries to employees are likely to occur on client premises. Therefore, the injured person or their line manager must inform the client regarding the injury as soon as possible, as the client will have to record the circumstances.

The Company will undertake an accident investigation for all accidents as reported above and for any non injury accidents that involve work equipment or near miss situations, which could have resulted in more serious consequences.

Copies of all reports, accident and investigations and records will be kept for a minimum of five years and will be archived thereafter. Recommended improvements will be assessed by the Director responsible for Health and Safety, along with the Compliance Manager.

Accident statistics will be subject to analysis at the six monthly Management Review Meetings.



Visitors

The Company will conduct their business in a safe manner to ensure that persons other than employees, which includes visitors and suppliers are not exposed to risks to their health and safety while on Company premises.

Visitors will be accompanied at all times, both for their safety and premises security. It is the responsibility of the member of staff being visited to ensure that the visitor is made aware of the emergency procedures and is escorted out of the building in case of fire.

All visitors are expected to conduct themselves in safe manner at all times while on Company premises. Appropriate PPE will be supplied by the Company to visitors if it is required.

Sub Contractors

The competence of all Sub Contractors used by the Company will be formally assessed before they complete any work on behalf of the Company and on an annual basis thereafter. Sub contractors are to supply adequate Employers and third party insurance cover on request. They are also required to supply training records, training certificates, risk assessments and method statements for the work they are to undertake.

Lone workers

There is a separate policy for lone and solitary workers and a copy is attached as an appendix to this document.



Office Safety

Suitable and sufficient risk assessments will be undertaken in all office working areas to assess general risk, those associated with the control of substances hazardous to health, use of display screen equipment and manual handling operations. Corrective actions and improvements will be actioned as necessary.

All accidents and/or injuries, no matter how minor must be reported to the Compliance Manager.

In order to prevent slips, trips and falls, all staff are reminded that they should not block passageways, corridors or general working areas. Always ensure that all trailing leads are safe and do not create tripping hazards. When spillages occur ensure they are cleaned up quickly. Personal belongings such as handbags, briefcases etc., should be stored in a safe position away from walkways.

Suitable welfare facilities will be provided to maintain good standards of safety, cleanliness and environmental conditions within all offices.

Personal Protective Equipment (PPE)

Any requirement to provide PPE will be evaluated as part of general risk assessment of the workplace. If the assessment requires PPE to be worn it will be provided by the Company at no cost to the employee. Full training on the use of the PPE will be provided.

All PPE will be regularly maintained to ensure it is kept in good working order. Any losses or defects are to be reported immediately to the employee's line manager.



Display Screen Equipment (DSE)

The Health and Safety (Display Screen Equipment) regulations 1992 apply to all Company employees who 'habitually' use DSE as part of their normal work. 'Habitual' use is considered to be more than two hours use per day or ten hours in any one week.

In order for the Company to carry out suitable and sufficient risk assessment of each user workstation, each user is required to undertake a 'self-assessment' on an annual basis. To make the assessment viable employees will be given information and instructions.

Users will be given discretion when to take rest breaks but it is recommended that a five minute break away from the workstation each hour is taken.

At the request of a habitual user the Company will arrange for the provision of an eye test. The basic cost of this purpose DSE eye test will be paid for by the Company. For those employees who normally wear spectacles or have visual problems not related to DSE use they must still take full responsibility for their own general eye health. If they require regular visits to an ophthalmic optician they, not the Company are responsible for any costs involved.

It should be noted that if an employee obtains a test independently without the prior knowledge or approval of the Company then the Company will not be responsible for any costs incurred.



Manual Handling and Lifting Equipment Safety

Where possible the Company will avoid the need for manual handling operations as far as is reasonably practicable by providing and enforcing the use of suitable lifting aids.

Where manual handling operations cannot be avoided, suitable and sufficient risk assessments will be undertaken by a competent person.

To assist the Company it is expected that all employees take care to ensure that their activities do not put themselves or others at risk, they co-operate fully with the Company, make proper use of lifting equipment and adopt safe systems of work as introduced by the Company.

To avoid lifting equipment becoming damaged the Company will:

- Give adequate instruction and training with regard to lifting
- Ensure lifting operations are adequately supervised by a competent person and properly planned
- Ensure that all lifting equipment is regularly inspected, tested and examined.
- Withdraw from use if faults are identified and repair or replace as required
- Provide adequate storage facilities for lifting equipment
- Expect all employees to use the equipment as provided in a safe manner and to follow safe systems of work.

Workplace Health, Safety and Welfare

The Company will provide and maintain its workplace, buildings, roadways, access and egress ways in a safe condition and good repair, free from risks to Health and Safety. Health and safety audits of the workplace will take place on a regular basis.

Adequate standards and provision in relationship to ventilation, temperature, lighting and cleanliness will be maintained. Workplace equipment, devices and systems will be regularly maintained and kept in a safe, efficient condition.

Purpose waste receptacles will be provided and all employees are expected to assist in maintaining their work areas in a safe and tidy condition.

The Company will also provide suitable welfare facilities to include:

- Sanitary conveniences which are kept clean, well lit and ventilated
- Washing facilities which are kept clean and tidy
- Places to eat and drink which are kept clean and hygienic, free from smoke and fumes
- Supplies of wholesome drinking water



Emergency Evacuation

The Company procedure for emergency evacuation is attached as an appendix to this document

Working at height

Cleaning Assurance will ensure that all procedures are in place to eliminate, as far as possible any risks associated with working at height. Ladders will be inspected prior to use and if faulty will be taken out of use and reported immediately to the line manager.

Disciplinary procedures

After investigation, if any employee is found to be in contravention of this policy or any current Health and Safety legislation disciplinary action will be taken against them.

Monitoring and Review

All aspects of this policy will be reviewed on an annual basis and any changes made will be issued to each employee. A copy of the policy statement forms part of the induction handbook, which is issued to all employees.

Health and Safety audits are completed for every site on a quarterly basis and any findings are actioned on by the Compliance Manager, working with the Area or Contracts Manager.

The annual review of this policy to include accident and incident statistics and a review of all specific areas of work form part of the Management Review process.



Maternity Paternity and Adoption Policy

Introduction

This policy sets out the statutory rights and responsibilities of employees who are pregnant or have recently given birth and gives details of the arrangements for antenatal care, pregnancy-related illness, and maternity leave and pay.

Cleaning Assurance recognises that, from time to time, employees may have questions or concerns relating to their maternity rights. It is the Company's policy to encourage open discussion with employees to ensure that questions and problems can be resolved as quickly as possible.

The following definitions are used in this policy:

"Expected week of childbirth" means the week, starting on a Sunday, during which the employee's doctor or midwife expects her to give birth.

"Qualifying week" means the 15th week before the expected week of childbirth.

Notification of pregnancy

On becoming pregnant, an employee should notify her line manager as soon as possible. This is important as there are health and safety considerations for the Company.

By the end of the qualifying week, or as soon as reasonably practicable afterwards, the employee is required to inform the Company in writing of:

- The fact that she is pregnant;
- Her expected week of childbirth; and
- The date on which she intends to start her maternity leave.

The employee must also provide a MAT B1 form, which is a certificate from a doctor or midwife confirming the expected week of childbirth. The form must have either the doctor's name and address or the midwife's name and registration number on it.

The employee is permitted to bring forward her maternity leave start date, provided that she advises the Company in writing at least 28 days before the new start date or, if that is not possible, as soon as reasonably practicable.

The employee may also postpone her maternity leave start date, provided that she advises the Company in writing at least 28 days before the original proposed start date or, if that is not possible, as soon as reasonably practicable.

The Company will formally respond in writing to the employee's notification of her leave plans within 28 days, confirming the date on which she is expected to return to work if she takes her full 52-week entitlement to maternity leave.



Time off for antenatal care

Once an employee has advised the Company that she is pregnant, she will be entitled not to be unreasonably refused time off work to attend antenatal appointments as advised by her doctor, registered midwife or registered health visitor.

In order to be entitled to take time off for antenatal care, the employee is required to produce a certificate from her doctor, registered midwife or registered health visitor, stating that she is pregnant. Except in the case of the first appointment, the employee should also produce evidence of the appointment, such as a medical certificate or appointment card, if requested to do so.

The employee should endeavour to give her line manager as much notice as possible of antenatal appointments and, wherever possible, try to arrange them as near to the start or end of the working day as possible.

All pregnant employees are entitled to take up to 26 weeks' ordinary maternity leave and up to 26 weeks' additional maternity leave, making a total of 52 weeks. This is regardless of the number of hours they work or their length of service. Additional maternity leave begins on the day after ordinary maternity leave ends.

Ordinary maternity leave can start at any time after the beginning of the 11th week before the employee's expected week of childbirth (unless her child is born prematurely before that date in which case it will start earlier). Maternity leave will start on whichever date is the earlier of:

- The employee's chosen start date
- The day after the employee gives birth; or
- The day after any day on which the employee is absent for a pregnancy-related reason in the four weeks before the expected week of childbirth.

If the employee gives birth before her maternity leave was due to start, she must notify the Company in writing of the date of the birth as soon as reasonably practicable.

The law obliges all employees to take a minimum of two weeks of maternity leave immediately after the birth of the child.



Ordinary Maternity Leave

During the period of ordinary maternity leave, the employee's contract of employment continues in force and she is entitled to receive all her contractual benefits, except for salary.

In particular, any benefits in kind (such as life assurance, private medical insurance, permanent health insurance, private use of a company car, laptop, mobile phone) will continue; contractual annual leave entitlement will continue to accrue; and pension contributions will continue to be made provided that the employee is receiving statutory maternity pay (SMP).

Employee contributions will be based on actual pay, while employer contributions will be based on the salary that the employee would have received had she not gone on maternity leave.

Salary will be replaced by SMP if the employee is eligible to receive it.

Employees are encouraged to take any outstanding annual leave due to them before the commencement of ordinary maternity leave. Employees are reminded that holiday must be taken in the year that it is earned and therefore if the holiday year is due to end during maternity leave, the employee should take the full year's entitlement before starting her maternity leave.

Additional Maternity Leave

During the period of additional maternity leave, the employee's contract of employment continues in force and she is entitled to receive all her contractual benefits, except for salary.

Any benefits in kind (such as life assurance, private medical insurance, permanent health insurance, private use of a company car, laptop, mobile phone) will continue and contractual annual leave entitlement will continue to accrue.

Salary will be replaced by statutory maternity pay (SMP) for the first 13 weeks of additional maternity leave if the employee is eligible to receive it. The remaining 13 weeks of additional maternity leave are unpaid.

Pension contributions will continue to be made during the period when the employee is receiving SMP but not during any period of unpaid additional maternity leave.



Statutory Maternity Pay (SMP)

Statutory maternity pay is payable for up to 39 weeks during maternity leave. An employee is entitled to SMP if:

- She has been continuously employed by the Company for at least 26 weeks at the end of the qualifying week and she is still employed during that week
- Her average weekly earnings in the period between the last normal pay day before the Saturday at the end of the qualifying week and the last normal pay day at least eight weeks before that date are not less than the lower earnings limit for national insurance contributions;
- She is still pregnant 11 weeks before the start of the expected week of childbirth (or has already given birth);
- She provides a MAT B1 form stating her expected week of childbirth; and
- She gives the Company proper notification of her pregnancy in accordance with the rules set out above.

For the first six weeks, SMP is paid at the higher rate, which is equivalent to 90% of the employee's average weekly earnings calculated over the period between the last normal pay day before the Saturday at the end of the qualifying week and the last normal pay day at least eight weeks before that date. For the purpose of calculating average weekly earnings, shift allowances, overtime payments, bonuses and commission are all included.

The standard rate of SMP is paid for the remaining 33 weeks (or less if the employee returns to work sooner). This is paid at a rate set by the Government for the relevant tax year, or 90% of the employee's average weekly earnings calculated over the period between the last normal pay day before the Saturday at the end of the qualifying week and the last normal pay day at least eight weeks before that date if this is lower than the Government's set weekly rate.

If the employee becomes eligible for a pay rise between the start of the original calculation period and the end of her maternity leave (whether ordinary maternity leave or additional maternity leave), the higher or standard rate of SMP will be recalculated to take account of the employee's pay rise, regardless of whether SMP has already been paid. This means that the employee's SMP will be recalculated and increased retrospectively, or that she may qualify for SMP if she did not previously. The employee will be paid a lump sum to make up any difference between SMP already paid and the amount payable as a result of the pay rise.

Statutory maternity pay is treated as earnings and is therefore subject to PAYE and National Insurance Deductions.



SMP

Payment of SMP cannot start prior to the 11th week before the employee's expected week of childbirth. Statutory maternity pay can start from any day of the week in accordance with the date the employee starts her maternity leave.

Statutory maternity pay is payable whether or not the employee intends to return to work after her maternity leave.

Employees who are not entitled to SMP may be entitled to receive maternity allowance payable by the Government.

Contact during Maternity Leave

Shortly before an employee's maternity leave starts, the Company will discuss the arrangements for her to keep in touch during her leave, should she wish to do so. The Company reserves the right in any event to maintain reasonable contact with the employee from time to time during her maternity leave. This may be to discuss the employee's plans for return to work, to discuss any special arrangements to be made or training to be given to ease her return to work or simply to update her on developments at work during her absence.

Keeping-in-touch days

Except during the first two weeks after childbirth an employee can agree to work for the Company (or to attend training) for up to 10 days during either ordinary maternity leave or additional maternity leave without that work bringing the period of her maternity leave to an end and without loss of a week's SMP. These are known as "keeping-in-touch" days. Any work carried out on a day shall constitute a day's work for these purposes.

The Company has no right to require the employee to carry out any work, and the employee has no right to undertake any work, during her maternity leave. Any work undertaken, including the amount of salary paid for any work done on keeping-in-touch days, is entirely a matter for agreement between the Company and the employee. Any keeping-in-touch days worked do not extend the period of maternity leave. Once the keeping-in-touch days have been used up, the employee will lose a week's SMP for any week in which she agrees to work for the Company

Returning To Work

The employee will have been formally advised in writing by the Company of the date on which she is expected to return to work if she takes her full 52-week entitlement to maternity leave. The employee is expected to return on this date, unless she notifies the Company otherwise. If she is unable to attend work at the end of her maternity leave due to sickness or injury, the Company's normal arrangements for sickness absence will apply. In any other case, late return without prior authorisation will be treated as unauthorised absence.



Assisting the Company

While the employee is under no obligation to do so, it would assist the Company if she confirms as soon as convenient during her maternity leave that she will be returning to work as expected.

If the employee wishes to return to work earlier than the expected return date, she must give the Company at least eight weeks' notice of her date of early return, preferably in writing. If she fails to do so, the Company may postpone her return to such a date as will give the Company eight weeks' notice, provided that this is not later than the expected return date.

If the employee decides not to return to work after maternity leave, she must give notice of resignation as soon as possible and in accordance with the terms of her contract of employment.

If the notice period would expire after maternity leave has ended, the Company may require the employee to return to work for the remainder of the notice period.

Rights on and after return to work

On resuming work after ordinary maternity leave, the employee is entitled to return to the same job as she occupied before commencing maternity leave on the same terms and conditions of employment as if she had not been absent.

On resuming work after additional maternity leave, again she is entitled to return to the same job as she occupied before commencing maternity leave on the same terms and conditions of employment as if she had not been absent. However, if it is not reasonably practicable for the Company to allow the employee to return to the same job, the Company may offer the employee suitable alternative work, on terms and conditions that are no less favourable than would have applied if she had not been absent.

An employee who worked full-time prior to her maternity leave has no automatic right to return to work on a part-time basis or to make other changes to her working patterns. However, all requests for part-time work or other flexible working arrangements will be considered in line with the operational requirements of the Company's business. If an employee would like this option to be considered, she should write to her line manager setting out her proposals as soon as possible in advance of her return date, so that there is adequate time for full consideration of the request.



Paternity Policy

Introduction

An employee whose wife, civil partner or partner gives birth to a child is entitled to two weeks' paid paternity leave provided that he or she has 26 weeks' continuous service by the week that falls 15 weeks before the week in which the child is expected.

Paternity leave is also available to adoptive parents where a child is matched or newly placed with them for adoption. Either the adoptive father or the adoptive mother may take paternity leave where the other adoptive parent has elected to take adoption leave. A separate policy is available in respect of adoption leave.

Paternity leave is granted in addition to an employee's normal annual holiday entitlement.

Paternity leave must be taken in a single block of one or two weeks within eight weeks of the birth or adoption of the child.

Paternity Pay

Pay during paternity leave will be at a standard rate of £124.88 per week, or at a rate equivalent to 90% of the employee's average weekly earnings if this figure is less than £124.88 per week. However, employees whose average weekly earnings are below the lower earnings limit for national insurance contributions will not be eligible for statutory paternity pay.

Where an employee wishes to request paternity leave in respect of a birth child, he or she must give their 15 weeks' written notice of the date on which his or her partner's baby is due, the length of paternity leave he or she wishes to take and the date on which he or she wishes the leave to commence.

Adopted Children

In the case of an adopted child, the employee must give written notice of his or her intention to take paternity leave no later than seven days after the date on which notification of the match with the child was given by the adoption agency. The notice must specify the date the child is expected to be placed for adoption, the date the employee intends to start paternity leave, the length of the intended paternity leave period and the date on which the adopter was notified of having been matched with the child.

Changes

If an employee subsequently wishes to change the timing of the paternity leave, he or she must give 28 days' written notice of the new dates. The employee must also, if so requested, complete and sign a self-certificate declaring that he or she is entitled to paternity leave and statutory paternity pay.



Human Rights Policy

Cleaning Assurance Ltd are committed to upholding basic Human Rights through the following –

- We will treat all employees fairly and honestly, regardless of where they work.
- All staff will have a written contract of employment, with agreed terms and conditions, including notice periods on both sides.
- All staff are entitled to appropriate job skills training, holiday leave in accordance with current legislation, reasonable rest breaks and adequate welfare facilities.
- We have formal grievance procedures through which staff can raise personal or work related issues.
- Cleaning Assurance Ltd does not discriminate unfairly on any basis.
- We will pay a fair wage reflecting the local markets and conditions. We always meet the national minimum wage and take this into account when reviewing pay and conditions.
- Working hours will not be excessive and they will comply with current industry guidelines. All overtime will be voluntary and will not be forced or unpaid.
- Employees have the right to freedom of association. We recognise the right of our employees to join a recognised trade union.
- We provide a safe working environment for all our employees by minimising foreseeable risks in the workplace. All employees receive regular health and safety training.
- We ensure that all staff can work safely, without fear of violence or aggression and will take steps to discipline any breaches of this policy.
- We ensure that our Company security arrangements do not infringe Human Rights and are consistent with international standards of law enforcement.
- Any employee who suspects infringements of the policy or any of the above has the right to inform us without fear of persecution.
- We will investigate any allegations of infringements of the Human Rights Policy and take appropriate action as necessary. Serious breaches will be considered as gross misconduct and may lead to summary dismissal.
- This policy applies to all Cleaning Assurance Ltd employees whether they are in full time or part time employment.



Lone Worker Policy

The Company has a legal duty to ensure the health, safety and welfare of its employees while they are at work. At any given time there are a number of employees who are working alone, whether as a substantial part of their working life or on an occasional basis. The Company has a responsibility to assess the risks to lone workers and take steps to avoid or control the risks where necessary and the employee has responsibilities to take reasonable care of themselves and others in lone working situations. Lone working is not inherently unsafe and proper precautions can reduce the risk associated with working alone. This policy refers to frequent lone workers and occasional lone workers.

Definition

The Health and Safety Executive (HSE) defines lone workers as those “who work by themselves without close or direct supervision”. They may include:

- People working separately from others in a building
- People who work outside ‘normal’ hours
- People who work away from their fixed base without colleagues

Potential Hazards of Lone Working

- Accidents or sudden illness may happen when there is no-one to summon help or first aid
- Violence or the threat of violence
- Fire
- Attempting task that cannot be done by one person alone, e.g. heavy lifting, or using certain equipment
- Lack of a safe way in or out of a building (accidentally locked in)

The perception of these hazards or the actual risks may be different for different people. Inexperienced or young workers may well underestimate the risks of an activity; some people may feel vulnerable away from the workplace or after dark or a medical condition may make it unsafe for an individual to work alone.



Risk Assessment

The manager must consider these factors when doing risk assessments. If there are lone workers then the manager must take appropriate steps to reduce and control the risk. They should consider:

- Does the workplace present any special risk to the lone worker?
- Can all the equipment, chemicals and goods used on the premise be safely handled by one person?
- Is any manual handling involved safe for a single person?
- Is there a risk of violence or a threat of violence?
- Will the employee be alone in a dark or remote location?

Measures to reduce the risk of Lone Working

Supervision:

Lone workers are by definition not under constant supervision. However, supervisors can ensure that the employee understands the risk associated with their work and the relevant safety precautions. They can put into place arrangements for the individual to contact a supervisor or manager if they need additional guidance. Site visits may be appropriate. New employees or those undergoing training will need to be accompanied initially. Regular contact by telephone may be appropriate.

Reporting back:

A system should be in place to ensure that a lone worker returns to their base or their home at the completion of their work. This may be as simple as telling a colleague or family member where they are going and when they are expected back. A manager's mobile number should always be made available to the colleague or family member in case of a late return.

Alternatively, if appropriate the member of staff can use the time attendance system to book on and off. This system can be used to trigger an e-mail or a text message to the manager if the employee has not booked off at the correct time. This system should ensure that a call or message is acted on urgently to ensure the safety of the employee. However, employees are expected to share a responsibility to ensure this system works correctly.



Accidents and Emergencies:

Lone workers should be capable of responding correctly to emergencies. This should include being made aware of special arrangements for out of hours incidents. First aid facilities may be available within the building or it may be prudent to issue first aid kits to lone workers if there is a foreseeable risk of injury. If they are working in a building where there is security it is important that they inform the duty guard so they can be accounted for in case of fire.

Tasks not suitable for Lone Working:

Risk assessment will identify the hazards of the work. When a risk assessment shows it is not possible for the work to be done safely by a lone worker arrangements for providing help or back up should be put into place. Alternatively, the work should be reassigned to another worker or done in hours when the worker is not alone.

Conclusion

Establishing safe working for lone workers is no different from organising the safety of other employees, but the risk assessment must take account of any additional risk factors. Managers must ensure that they have not only introduced measures to reduce any risk but they must also ensure that they have communicated their expectations to lone workers and trained them appropriately. All employees, including lone workers are responsible for following safe systems of work and all employees can take simple steps to reduce the risks associated with their normal working lives.



Quality Policy

Cleaning Assurance believes in a commitment to quality. If we cannot demonstrate to our customers that our services are rendered with exceptional quality as our foremost concern, we can jeopardise their support which is paramount to the Companies success.

Accordingly, clients must find Cleaning Assurance to: _

- Proactively manage contracts
- Use trained staff in an organised and quality-conscious way,
- Maintain a controlled system for document issue,
- Allocate and record responsibility for all aspects of quality,
- Purchase material and services from company-approved sources, and to check conformance to the company specification on the arrival of the materials,
- Be able to identify all materials in our possession, and to handle these materials in a non-damaging way.
- Log and analyse all complaints and faults, and take appropriate corrective action as per company policy, to ensure continuous improvements in the quality of service to our customers,
- Meet the standards defined in ISO 9001 Quality Management Systems and provide objective, written evidence in support of that policy which will be retained for a specified time.
- Execute audits of the quality system to ensure continuous compliance with this policy statement.
- Review the success of this policy at predetermined intervals.

To demonstrate our commitment, we have developed a quality system designed to meet both the requirements of ISO 9001 Quality Management System and our most demanding customers, both now and in the future.



Recruitment of Ex Offenders Policy

As an organisation using the Criminal Records Bureau (CRB) Disclosure Service to assess applicant's suitability for positions of trust, Cleaning Assurance Ltd fully comply with the CRB Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

Cleaning Assurance Ltd is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

We have a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.

We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

A Disclosure is only requested after a thorough risk assessment has indicated that is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all applications forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.

Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Cleaning Assurance and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows the Company to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in the Company who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

We make every subject of a CRB Disclosure aware of the existence of the CRB Code of Practice and make a copy available on request.



Redundancy Procedure

Sometimes the need for someone to be employed in a particular duty decreases or even disappears - in these circumstances the Company will investigate all the options.

The Company will always consider offering the employee alternative employment if a suitable opening exists. Unfortunately, this is not always possible or appropriate. In such cases redundancy may need to be considered.

There will be adequate consultation which may include a general meeting with who may be involved.

Individual meetings with a two way contribution will be fully minuted.

A second meeting with both parties having considered the facts/implications.

Selection of Last in first out (LIFO) will be adopted where possible.

We may take qualifications and employment history, administrative difficulties into consideration.



Safeguarding Policy

The welfare of children is paramount and all children, whatever their age, culture, gender, disability, language, racial origin, religious beliefs and/or sexual identity have the right to protection from physical, emotional and sexual abuse as well as neglect. This policy is applicable to all employees working in an education environment and is one way in which Cleaning Assurance Ltd is working to safeguard children.

Policy Aims:

- To provide children and young people with appropriate safety and protection.
- Through appropriate training to allow all staff to make informed and confident responses to specific child protection issues.
- To allow the correct reporting procedures to be used for each site.

Recruitment and Training:

- Cleaning Assurance Ltd recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children.
- All employees who work in an education environment complete an application form. On the first day of employment a CRB check is then completed and no employee will be allowed to work alone on any school or college until this check is returned. On completion the disclosure number and disclosure date is recorded by the Company and forwarded to the relevant school. Any changes to staff are reported and new disclosure numbers forwarded.
- All employees who work in a school or college environment will be given recognised training in the safe-guarding process.
- This will enable them to: Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child or young person.
- Work safely and effectively in an education environment.

Reporting incidents:

- The named person responsible for safe-guarding within the company is Samantha Fowles (0844 247 9294)
- Any suspicions or allegations should be reported to this person and this person should refer any suspicions or allegations to the Local Authority Designated Officer who will contact the relevant authorities as necessary.



Confidentiality:

- Confidentiality should be maintained at all times. Information should be handled and disseminated on a need to know basis only.



Secure Storage & Disposal of Disclosure Information

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for positions of trust, Cleaning Assurance Ltd complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available on request.

Storage and access

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This is generally for a period up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult CRB about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.



Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.



Smoking Drugs and Alcohol Policy

This policy has been developed to protect all employees, customers and visitors.

Smoke free policy

It is the policy of Cleaning Assurance Ltd that all our workplaces are smoke free and all employees have a right to work in a smoke free environment. Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes Company vehicles. This policy applies to all employees, contractors, customers and visitors.

However within Cleaning Assurance Ltd customer premises there are certain designated outside areas and receptacles are provided for smokers to dispose of cigarette butts and other smoking waste at all outside locations where smoking is allowed.

Employees who go outside to smoke are restricted to this area within their designated breaks. Smoking in non smoking areas on customer's premises will be dealt with under the company disciplinary policy.

Alcohol and Drugs Policy

Our customers expect a safe and reliable service from us.

The consumption of even the smallest amount of alcohol or drugs (except legally obtained medicines) may greatly affect employees' judgement and efficiency at work and therefore Cleaning Assurance Ltd operates a strict zero tolerance to alcohol, illegal drugs and substance use in the workplace.

Employees must not consume alcohol or drugs (except legally obtained medicines) at any time while at work including during breaks spent at or away from work premises.

The company's policy is that any employee who smells of or is believed to have consumed alcohol or drugs will be subject to the company's disciplinary procedure and this will be treated as Gross Misconduct.



Training Policy

Cleaning Assurance Limited has always been committed to developing every member of the team through training. Not only does this improve working standards, it also maximises job satisfaction.

The purpose of this Training Commitment and Policy is to define the success we hope to gain and to describe how we aim to achieve this. The result is a focused approach, which will benefit the Company and all employees. Staff will be trained according to job role in conjunction with the structured training plan.

Company Philosophy

Many benefits will be gained by providing ongoing training. These benefits will be enjoyed by the Company, as they all lead to improved efficiency and greater effectiveness. Employees will also reap the rewards of job satisfaction and career development, so long as they are as committed to learning, as the Company is to training.

'An Able Workforce' will be developed as employees become more skilled in the technical aspects of the job. This will result in higher cleaning standards and will allow a greater pride in work completed.

'A Motivated Workforce' will develop as employees see the effect that good cleaning has on the location and its people. Employees will also appreciate that the Company values them highly and wants them to progress in their career.

'A Safer Workforce' will be developed through health and safety training. The benefits of this are obvious, as nobody wants to see themselves (or any of their colleagues) injured or involved in an accident.

'An Environmentally Conscious Workforce' is important in any industry, but especially in our industry where the use of chemicals is extensive.

'A Cost Effective Workforce' is a result of less waste and greater productivity. It is not just the Company that benefits, because by making the operation more cost effective, the Company can either make greater profits or reduce charges to its clients.

'A Retained Workforce' is the aim for every company in the contract cleaning industry. By creating a valued and consistent workforce the Company is able to offer a reliable service to its customers.

'A Strong Image' will be gained if every member of the team works with a professional attitude. Employees will benefit through a greater pride in their position. The Company will benefit from an enhanced reputation throughout the industry.



Whistle Blowing Policy & Protected Disclosure Policy

Introduction

Employees are often the first to realise that there may be something seriously wrong within the Company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may be just a suspicion of malpractice.

Cleaning Assurance will not condone the malpractice of turning a blind eye to a colleague violating policies, whether it applies to stock, money or people, it should be reported. You are protected in the law for whistle blowing' and no action will be taken against you

The Company is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment we expect employees and others that we deal with, who have serious concerns about any aspect of the Company's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis

The Policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

These procedures are in addition to the Company's Complaints procedures and other statutory reporting procedures that may apply. As employees, you are responsible for making yourself aware of these procedures.



Aims and scope of the Policy

Policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for you to raise concerns and receive feedback on any action taken
- Reassure you that you will be protected from reprisals or victimisation if you have a reasonable belief that you made any disclosure in good faith

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This whistle blowing policy is intended to cover concerns that fall outside the scope of other procedures.

That concern may be something that:

- Is unlawful, or
- Is against the Company's policies, or
- Falls below established standards or practice, or
- Amounts to improper conduct.



Safeguards

Harassment or Victimisation

The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith. However, this does not mean that if you are already the subject of disciplinary or redundancy procedures, that those procedures will be automatically halted as a result of your whistle blowing.

Confidentiality

The Company will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that any investigation process may reveal the source of the information and a statement may be required as part of the evidence.

Anonymous Allegations

This Policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Board of Directors. In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If you make an allegation in good faith, but is not confirmed by the investigation, no action will be taken against you. If, however you make allegations that are malicious or simply to cause anger, irritation or distress disciplinary action may be taken against you.



How to Raise Concerns

As a first step you should normally raise the concerns with your immediate supervisor or manager. This depends however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should approach the Director of Operations or the Financial Director.

Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing you can telephone or meet the appropriate person. Remember, the earlier you express the concern, the easier it is to take action.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

If you are a member of a Trade Union they can raise the concern on your behalf. Alternatively, you can contact a professional body who can raise the concern.

How the Company will respond

The action taken by the Company will depend on the nature of the concern. The matters raised may be:

- Investigated internally
- Be referred to the Police
- Be referred to an external body for investigation

In order to protect individuals and the Company, initial enquiries will be made to decide whether and investigation is appropriate and if so what form it should take. Concerns or allegations which fall within the scope of specific procedures will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

The Company will aim to write to you within five working days of a concern being raised:

- Acknowledging that the concern has been received
- Indicating how it proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling you if any initial enquiries have been made, and
- Telling you whether further investigations will take place and if not why not

The amount of contact between the Company and yourself will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.



Trade Union Representation

When any meeting is arranged you have the right, if you wish to be accompanied by a Trade Union Representative (if you are a member of a Trade Union) or a work colleague.

The Company will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Company will advise you about the procedure.

The Company accepts that you need to be assured that the matter has been properly addressed. Therefore, subject to legal constraints you will receive information about the outcomes of any investigations.

How the matter can be taken further

This policy is intended to provide you with an avenue to raise concerns. The Company hopes you will be satisfied. If you are not you are always entitled to take the matter up with a Director of the Company. In addition, if you feel it is right to take the matter outside the Company you can contact:

- Relevant Professional Bodies or voluntary organisation
- The local Citizens Advice Bureau
- Your Solicitor
- The Police

If you do decide to take the matter outside the Company you need to ensure that you do not disclose any confidential information.

As a member of the Board of Directors of the Company I have full responsibility for the maintenance and operation of this policy. I will maintain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report to the Board as necessary.