



employee's right to book/vary leave by one. However, a change as a result of a child being born early, or as a result of the organisation requesting it be changed, and the employee being agreeable to the change, will not count as further notification. Any variation will be confirmed in writing by the organisation.

Statutory Shared Parental Pay (ShPP)

Eligible employees may be entitled to take up to 37 weeks ShPP while taking SPL. The amount of weeks available will depend on the amount by which the mother/adopter reduces their maternity/adoption pay period or maternity allowance period.

ShPP may be payable during some or all of SPL, depending on the length and timing of the leave.

In addition to meeting the eligibility requirements for SPL, an employee seeking to claim ShPP must further satisfy each of the following criteria:

- the mother/adopter must be/have been entitled to statutory maternity/adoption pay or maternity allowance and must have reduced their maternity/adoption pay period or maternity allowance period;
- the employee must intend to care for the child during the week in which ShPP is payable;
- the employee must have an average weekly earnings for the period of eight weeks leading up to and including the 15th week before the child's expected due date/matching date are not less than the lower earnings limit in force for national insurance contributions;
- the employee must remain in continuous employment until the first week of ShPP has begun;
- the employee must give proper notification in accordance with the rules set out below.

Where an employee is entitled to receive ShPP they must, at least eight weeks before receiving any ShPP, give their line manager written notice advising of their entitlement to ShPP. To avoid duplication, if possible, this should be included as part of the notice of entitlement to take SPL.

In addition to what must be included in the notice of entitlement to take SPL, any notice that advises of an entitlement for ShPP must include:

- the start and end dates of any maternity/adoption pay or maternity allowance;
- the total amount of ShPP available, the amount of ShPP the employee and their partner each intend to claim, and a non-binding indication of when the employee expects to claim ShPP;
- a signed declaration from the employee confirming that the information they have given is correct, that they meet, or will meet, the criteria for ShPP and that they will immediately inform the organisation should they cease to be eligible.

It must be accompanied by a signed declaration from the employee's partner confirming:

- their agreement to the employee claiming ShPP and for the organisation to process any ShPP payments to the employee;
- (in the case whether the partner is the mother/ adopter) that they have reduced their maternity/adoption pay or maternity allowance;
- (in the case whether the partner is the mother/ adopter) that they will immediately inform their partner should they cease to satisfy the eligibility conditions.

Any ShPP due will be paid at a rate set by the Government for the relevant tax year.

Terms and conditions during Shared Parental Leave

During the period of SPL, the employee's contract of employment continues in force and they are entitled to receive all their contractual benefits, except for salary. In particular, any benefits in kind (such as use of a company car, laptop, mobile phone and gym membership) will continue and contractual annual leave entitlement will continue to accrue.

Pension contributions will continue to be made during any period when the employee is receiving ShPP but not during any period of unpaid SPL. Employee contributions will be based on actual pay, while the organisation's contributions will be based on the salary that the employee would have received had they not been taking SPL.

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Annual Leave

SPL is granted in addition to an employee's normal annual holiday entitlement. Employees are reminded that holiday should wherever possible be taken in the year that it is earned. Where an SPL period overlaps two leave years the employee should consider how their annual leave entitlement can be used to ensure that it is not untaken at the end of the employee's holiday year.

Contact during Shared Parental Leave

Before an employee's SPL begins, the organisation will discuss the arrangements for them to keep in touch during their leave. The organisation reserves the right in any event to maintain reasonable contact with the employee from time to time during their SPL. This may be to discuss the employee's plans to return to work, to ensure the individual is aware of any possible promotion opportunities, to discuss any special arrangements to be made or training to be given to ease their return to work or simply to update them on developments at work during their absence.

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Shared Parental Leave in Touch days

An employee can agree to work for the organisation (or attend training) for up to 20 days during SPL without bringing their period of SPL to an end or impacting on their right to claim ShPP for that week. These are known as "Shared Parental Leave In Touch" or "SPLIT" days. Any work carried out on a day or part of a day shall constitute a day's work for these purposes.

The organisation has no right to require the employee to carry out any work, and is under no obligation to offer the employee any work, during the employee's SPL. Any work undertaken is a matter for agreement between the organisation and the employee. An employee taking a SPLIT day will receive full pay for any day worked. If a SPLIT day occurs during a week when the employee is receiving ShPP, this will be effectively 'topped up' so that the individual receives full pay for the day in question. Any SPLIT days worked do not extend the period of SPL.

An employee, with the agreement of the organisation, may use SPLIT days to work part of a week during SPL. The organisation and the employee may use SPLIT days to effect a gradual return to work by the employee towards the end of a long period of SPL or to trial a possible flexible working pattern.

Returning to work after Shared Parental Leave

The employee will have been formally advised in writing by the organisation of the end date of any period of SPL. The employee is expected to return on the next working day after this date, unless they notify the organisation otherwise. If they are unable to attend work due to sickness or injury, the organisation's normal arrangements for sickness absence will apply. In any other case, late return without prior authorisation will be treated as unauthorised absence.

If the employee wishes to return to work earlier than the expected return date, they may provide a written notice to vary the leave and must give the organisation at least eight weeks notice of their date of early return. This will count as one of the employee's notifications. If they have already used their three notifications to book and/or vary leave then the organisation does not have to accept the notice to return early but may do if it is considered to be reasonably practicable to do so.

On returning to work after SPL, the employee is entitled to return to the same job if the employee's aggregate total statutory maternity/paternity/adoption leave and

SPL amounts to 26 weeks or less, he or she will return to the same job. The same job is the one they occupied immediately before commencing maternity/paternity/adoption leave and the most recent period of SPL, on the same terms and conditions of employment as if they had not been absent.

If their maternity/paternity/adoption leave and SPL amounts to 26 weeks or more in aggregate, the employee is entitled to return to the same job they held before commencing the last period of leave or, if this is not reasonably practicable, to another job which is both suitable and appropriate and on terms and conditions no less favourable.


If the employee also takes a period of unpaid parental leave of 4 weeks or less this will have no effect on the employee's right to return and the employee will still be entitled to return to the same job as they occupied before taking the last period of leave if the aggregate weeks of maternity/paternity/adoption and SPL do not exceed 26 weeks.

If a parent takes a period of 5 weeks of unpaid parental leave, even if the total aggregate weeks of maternity/paternity/adoption and SPL do not exceed 26 weeks, the employee will be entitled to return to the same job they held before commencing the last period of leave or, if this is not reasonably practicable, to another job which is suitable and appropriate and on terms and conditions no less favourable.

Special Circumstances and further information

In certain situations an employee's rights and requirements regarding SPL and ShPP may change. In these circumstances the organisation will abide by any statutory obligations and an employee should refer to the documents listed below and/or clarify any issues or queries with the Managing Director.

Policy for Prevention of Harassment at Work

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The Policy

It is never acceptable for any employee to be subjected by any other employee to harassment on the basis of race, religious belief, creed, ethnic or regional origin, age, disabilities, physical characteristics, health, personal background, gender, marital status, sexual orientation, political beliefs, trade union membership or any other grounds.

Definition of Harassment

The company defines harassment as being any conduct, whether physical or verbal, whether persistent, occasional or singular, which is unwarranted by another person and either embarrassing, humiliating, intimidating or offensive to any other employee. Harassment is unwanted conduct of a discriminatory nature affecting the dignity of individuals at work. It can include unwelcome physical, verbal or non-verbal conduct. Such behaviour is unacceptable.

Harassment may include but is not limited to:-

- Making racist, sexually suggestive, offensive or lewd remarks, jokes or banter whether or not these are made directly to the recipient or to a third party)
- Threatening remarks or behaviour
- Linking opportunities for training, promotion or employment with sexual or other favours
- Displaying of pornographic or sexually suggestive pictures or material
- Writing of racist or sexually suggestive graffiti
- Denigration of the religious beliefs of another employee or less favourable treatment on the basis of those beliefs
- Office bullying
- False or frivolous accusations of sexual or racial harassment, or any other harassment
- Denigration and/or threatening remarks or behaviour or other less favourable treatment on grounds of sexual orientation

For harassment to have occurred, the behaviour complained of need not have been considered offensive by anyone other than the complainant. It is the perception or response of the person affected by such behaviour that is important.

Additionally, the harassment does not need to have been directed at the complainant, they may have merely witnessed it being directed at others. Please note that the remainder of this policy, however, assumes that the complainant is someone who has suffered direct harassment, however, the same policy and procedures will apply to witnessed harassment.

Legitimate action by employees in positions of authority to ensure that other employees perform their duties to the standard required by the company cannot be construed as harassment.

The company will ensure that a complainant alleging harassment will be provided with the opportunity to discuss the allegation with either a male or female member of staff appointed for that purpose. The company will ensure that all complaints of harassment are dealt with as speedily, confidentially and sympathetically as is practicable.


Disciplinary Action

Regardless of his/her position within the company, disciplinary action will be taken against any employee found to be engaging in, inciting or condoning harassment. Depending on the seriousness of the matter, dismissal may result.

Similarly, disciplinary action will be taken against any employee found intimidating, victimising or discriminating against any other employee because he/she has complained about harassment. Depending on the seriousness of the matter, dismissal may result.

Procedures for Dealing with Harassment

Any employee who considers that he/she has been or is being harassed in any way should immediately request the harasser to stop.

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If the harassment does not cease, or if it is inappropriate to adopt the course detailed above, the person who is being harassed should report the matter, preferably in writing, to the MD.

Upon receipt of a complaint of harassment, the MD will investigate the complaint, or arrange for it to be investigated, and, where necessary, arrange interviews to collect any evidence.

If there appears to be a case to answer, the evidence will be committed to writing. Members of staff and other persons will be requested to sign statements, which may then be used in any further disciplinary action.

If there appears to be a case to answer by the alleged harasser, that person will be interviewed by the MD or by an independent H.R Consultant if the MD considers that this is more appropriate. The alleged harasser will be informed of the allegation made against him/her and given copies of the statements that have been obtained. Time will then be given for the harasser to answer the allegations. A further interview will be held at which the harasser may be accompanied by a co-employee colleague or trade union representative. The response will be recorded in writing.

If the designated person considers disciplinary proceedings should be instituted, The Company's Disciplinary Procedure will be initiated without unreasonable delay. A decision to dismiss the allegation will be given in writing to the parties concerned within three working days.

In all reported cases of harassment the parties concerned should be kept apart as much as possible. In serious cases, the employee may be suspended on full pay whilst investigations proceed. The company will respect and comply with any wish by the complainant not to invoke the disciplinary procedures, but where harassment is proved, to speak to and counsel the harasser.

Risk Assessment Policy

The management of Health and Safety at Work Regulations 1999. These Regulations places a duty on the employers or self-employed persons to assess the risks to workers and any others who may be affected by their undertaking. Employers with five or more employees must also record the significant findings of the assessment.

A suitable and significant risk arising out of work.

Enable the employer to identify and prioritise the measures that need to be taken to comply with the relevant statutory provisions.


Be appropriate to the nature of the work and such that it remains valid for a reasonable period of time.

The Safety Officer is responsible for ensuring that a suitable and sufficient risk assessment is made of health and safety risks to employees. The significant findings should be recorded and procedures put into place to control the risks.

The general risk assessment forms should be used to identify the significant risks to health and safety and the control measures to reduce the risk where it cannot be eliminated (see risk assessment record).

Training will be provided for all persons who have responsibility for carrying out risk assessments.

Information should be given to the people who may be affected by the identified risk and the control measures put into place to reduce the risks that cannot be eliminated.

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Social and Welfare Policy

The company has a duty of care to protect employees from risks to their health and safety to this end the company has provided:-

- Good physical working conditions
- New shift systems resulting in reduced sickness
- Health and safety standards that are rigorously maintained
- New starters are given sufficient training and receive particular attention during the initial period of their work
- The prevailing ethos is one of team work

The company recognises that there are certain issues to be addressed and these key points are:-

Maternity

Absence records will be kept separate from sickness records – a woman attending regular antenatal classes should not initiate a 'trigger point' in the same way as someone with a regular sickness absence.

Disability

The company is legally required under the Equality Act 2010 to make responsible adjustments to enable a disabled person to continue working.

Data Protection

If it becomes necessary for the company to see an employee's medical record written permission will have to be obtained.

Health and Safety

The company has a duty under health and safety law to undertake a risk assessment of employee's activities to prevent harm to people.

Discipline and Dismissal

The company follows ACAS guidelines regarding disciplinary matters.

Gender Identity Issues

The company recognises 'Gender Dysphoria' and any person who undertakes the personal, social and medical transition to live in the gender identity of their personal conviction. The Equality Act 2010 places certain responsibilities on employers and this company will take heed and notice of this legislation and the Equality Act 2010.

If any employee falls within the above framework of 'Gender Dysphoria' the company will be sympathetic, supportive and ensure that the individual will not suffer any victimisation and harassment.

Smoke Free Policy

The Health Act 2000 bans smoking in enclosed public spaces and workplaces. This policy has been developed to protect all employees, customers and visitors from exposure to second hand smoke.

It is the policy of the company that all workplaces and work vehicles (used by more than one person) shall be smoke free enabling all employees to work in a smoke free environment.

The company may designate an unenclosed space as a smoking area. Employees will be notified if the company has a smoking area. Employees are not allowed additional breaks to smoke. Those who wish to smoke must do so in their own time.

Any employee who fails to comply with this policy will be subject to disciplinary action which may include dismissal on grounds of gross misconduct. Failure to follow the legal requirements which this policy implements is a criminal offence and may result in a fine.



Special Leave

Religious Holidays

The company will endeavour to allow time off to observe religious holidays but such holidays will count as part of your annual leave entitlement and a deduction from your annual leave will be made. Please let your Line Manager know if a holiday booking is for a religious festival so that the company can make allowance for this where-ever reasonably possible.

Public Duties (Jury Service etc.)

Public duties: these may also require time off to be granted depending upon the nature of the public duty. However the time off must still be booked and so you should liaise with your Line Manager so that the absence can be formally authorised and so that the company can meet its legal obligations where applicable.

Stress Policy

Policy Statement

The company is committed to protecting the health, safety and well-being of all those who work for it and to maintaining a working environment in which everyone treats one another with dignity and respect and is able to trust and co-operate with their colleagues.

It recognises that, whatever its source, stress is a health and safety issue in the workplace. The company acknowledges the importance of a supportive environment and working culture and of identifying and reducing workplace stressors.

It is committed to a programme of action to make this policy effective and to bring it to the attention of all staff. However, this policy can only be effective if everyone within the organisation co-operates to achieve its aims.

What is Stress?

Stress is the adverse reaction experienced in response to excessive pressures or demands. Stress is not an illness but, sustained over a period of time, it can lead to mental and/or physical illness.

There is an important distinction between working under pressure and experiencing stress. Certain levels of pressure are acceptable and normal in every job. They can improve performance, enable individuals to meet their full potential and provide a sense of achievement and job satisfaction. However, when pressure becomes excessive it produces stress.

Pressures outside the workplace, whether the result of unexpected or traumatic events such as accidents, illness, bereavement, family breakdown or financial worries, can result in stress. They can also compound normal workplace pressures.

The company recognises that, what triggers stress and the capacity to deal with stress, varies from person to person. Individuals react to similar situations in different ways.


Legal Obligations

The company has a legal duty to take reasonable care to ensure that the health of its staff is not put at risk by excessive pressures or demands arising from the way work is organised.

This policy acknowledges the company's obligations under the Health and Safety at work etc. Act 1974, Management of Health and Safety at Work Regulations 1999, Employment Rights Act 1996, Protection from Harassment Act 1997, Working Time Regulations 1998 and Disability Discrimination Act 1995.

Who Is Covered by the Policy

This policy covers all individuals working for the company at all levels and grades.

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Third parties who have access to our premises (such as consultants, contractors, customers and visitors) are also required to comply with this policy.

This policy does not form part of any contract of employment and it may be amended at any time.

Scope and Purpose of the Policy

The company is committed to identifying and tackling the causes of work-related stress and to providing appropriate support and consideration to staff suffering from stress, on a confidential basis where appropriate. The company:-

- Promotes a culture of open communication, participation and encouragement. Through training, effective planning and allocation of workloads and ensuring feedback is provided on performance, the company wishes staff to develop their skills and confidence and to feel able to raise any concerns they have about their work or working environment
- Uses its practice of staff development, staff support systems and policies reflecting current good practice to help staff understand and recognise the causes of stress and to address work-related stress and the impact of external stressors at work
- Recognises that the following policies and initiatives can assist staff to achieve an appropriate work/life balance and recognise and manage personal health issues, particularly where stress may result from a number of factors:-
 - Providing a workplace free from harassment, bullying and victimisation
 - Addressing violence, aggression and other forms of inappropriate behaviour through disciplinary action
 - Risk assessments to include or specifically address workplace stress

- Maintaining an appraisal process to ensure the suitability of workloads, supported by a capability procedure
- Flexible working
- Comprehensive change management procedures
- The development of support services, such as occupational health, for staff affected by or absent by reason of stress

Personnel Responsible For Implementation of the Policy

The MD has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. The MD has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Managing Director.

Recognition of stress as a genuine problem requires management support and action. Those working at management and supervisory level have a specific responsibility to:-

- Participate in the culture of open communication and encouragement; ensure that staff they manage receive training, effectively plan and allocate workloads and provide feedback on performance
- Monitor workloads and reallocate work where necessary
- Ensure that staff they manage understand the standards of behaviour expected of them and others and act upon behaviour that falls below those standards

To facilitate this process, managers and supervisors are encouraged to seek advice if necessary from the company on how to recognise stress in the staff they manage.

However, all members of staff are responsible for the success of this policy and must ensure that they:-

- Familiarise themselves with the policy and act in accordance with its aims and objectives
- Plan and organise their work to meet personal and organisational objectives



- Speak to their manager if they experience or are aware of a situation that may lead to a stress problem
- Co-operate with support, advice and guidance they may be offered by the company

The MD will have responsibility for informing all staff of this policy and their role in its implementation. Any questions concerning the operation of this policy should be directed to him.

Sources of Support

The company may put in place measures to assist staff who may be suffering from stress. This may include the measures below depending upon the circumstances:-

- Training **AND/OR** Workshops on stress management
- A confidential helpline manned by independent advisers with access to specialist counsellors
- Health and lifestyle screening through an occupational health practitioner
- Stress advice clinics

Resolving Cases of Stress at Work

Any member of staff who believes they are suffering from stress is encouraged to discuss this with their manager or supervisor in the first instance. If they feel unable to do so they should contact the MD.

Once an issue affecting the health of any member of staff comes to the attention of a manager, supervisor or steps will be taken to address that issue. Those steps may include any of the following:-

- A workload review, reallocation of work, monitoring of future workload or possible redeployment. The company may also review capability for your role
- Where appropriate, investigation under disciplinary and/or grievance procedures

- Referral for medical advice AND/OR a medical report to be provided from medical advisers AND/OR the GP (and any medical specialist) treating the member of staff concerned
- Where the member of staff is on sickness absence, discussion of an appropriate return to work programme. The company's sickness absence policy may be applied

Occupational Health AND/OR Counselling services may be used to try to help staff overcome problems associated with work-related stress as well as other stress and the impact that has on their ability to do their duties.

Absence due to Stress

Any member of staff who is absent due to stress should follow the sickness absence reporting procedure.


Confidentiality

Confidentiality is an important part of this policy. Every member of staff is responsible for observing the high level of confidentiality that is required, whether they are suffering from stress, supporting a colleague who is suffering from stress or because they are otherwise involved in the operation of our policies or procedures dealing with stress.

Breach of confidentiality may give rise to disciplinary action under the company's disciplinary procedure.

However, we should make it clear that there are occasions when matters reported by a member of staff suffering from stress may have to be put to third parties. For example, where duties need to be reallocated within a team or where, as the result of reported bullying or misconduct, an investigation and/or proceedings take place under our disciplinary policy.

If this is the case, matters will be discussed with the member of staff concerned before any action is taken in respect of the matters they have brought to our attention.

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Protection for those Reporting Stress or Assisting with an Investigation

Staff who report that they are suffering from stress, who support a colleague in making such a report or who participate in any investigation connected with this policy in good faith will be protected from any form of intimidation or victimisation.

Any member of staff who considers that they have been subjected to any such intimidation or victimisation should seek support from their Line Manager. They may alternatively or additionally raise a complaint in accordance with the company's grievance procedure.

Any member of staff who is, after investigation, found to have acted in bad faith or to have provided false information will be subject to action under the company's disciplinary procedure.

Substance Misuse

Introduction

Substance misuse can interfere with personal health and also safe and responsible work performance. It is recognised that substance misuse can be the product of a problem for which effective treatment may be available. Where at its entire discretion the company considers it as appropriate the company will provide access and support to employees with respect to treatment and rehabilitation, as well as or in place of taking any appropriate disciplinary action.

Voluntary Referral

Employees with a substance/alcohol problem are encouraged to seek help voluntarily, and before their job performance is affected. The company can give guidance and so far as is reasonably practicable confidentiality will be maintained at all times. Employees who volunteer and who decide to accept

treatment will be entitled to sick leave subject to the normal conditions as detailed in their employment contract.

Management Referral

Unsatisfactory job performance or employee conduct which are identified by the company, where an employee admits to substance misuse, are subject to the company's disciplinary procedures. The employee may be asked to take a test and if appropriate the employee will be offered support and access to treatment for rehabilitation. A formal treatment plan will be agreed. Disciplinary action may follow (possibly including dismissal) if the treatment plan is not adhered to.

An employee will be subject to the company's disciplinary procedures for refusal to enter into an agreed treatment plan to the company's satisfaction if a substance/alcohol problem is believed or admitted to be behind the unsatisfactory conduct or performance issue.

Disciplinary Framework

Staff should be in no doubt that substance misuse is unacceptable. Apart from its effects on the safety and well-being of staff, and thereby the efficient operation of the company, it may also involve illegality. This section lays down the company's disciplinary framework regarding substance misuse.

The company does not permit the abuse of drugs or solvents by employees during the course of their employment.

The company will deal with any incident involving the possession, sale or use of drugs for non-medical reasons as a very serious disciplinary matter, potentially leading to dismissal.

Individuals suspected of substance misuse whilst on the company premises who are not company employees, but are engaged on company business e.g. contractors, will be referred to their own management to take appropriate action. The company may require its contractors to remove from its premises on a temporary or permanent basis as it sees fit any of their employees



whom it believes to be in breach of the company's prohibitions on substance/ alcohol misuse.

Testing

The company may ask an individual to undergo testing for evidence of named drugs and/or alcohol levels at any time but in particular:-

Prior to employment; as part of a health assessment to establish fitness for duty, any successful applicant for employment will undergo a pre-employment medical examination. As part of those medical procedures, tests will be conducted to detect the use of substances. An applicant who refuses to consent at this stage of recruitment or whose test results indicate the presence of an unauthorised substance will not be considered further for employment.

Should any person on the premises give reasonable cause to believe they may be under the influence of drugs.

If, as a result of internal or police enquiries, the company has reason to believe that illicit drugs are on the company's premises or that substance misuse is a threat to the safety of the company's operations, it reserves the right to take any further measures it deems appropriate. Such measures may include making searches of company premises or employees or their belongings and asking employees to undergo drugs testing by an external professional. The fact that you are asked to take such a test should not be taken as an indicator that you are necessarily suspected of misusing alcohol or drugs, though you will appreciate that the company may draw its own conclusions if you refuse.

Testing Procedure

A senior manager or an independent external expert will carry out all internal company tests. Any tests will be properly explained to you and you will be provided with full information at the time.

Failure to comply with a request to have reasonable non-invasive tests carried out may result in disciplinary action up to and including dismissal on grounds of gross misconduct.

Search Procedures


The company may carry out random searches at entrances to the company. These searches will take place in private on an irregular basis and no prior notice shall be given. The qualified search will consist of one male and one female employee. Their brief will be to search bags and clothing on the premises for controlled substances, company property or other dangerous items.

In the instance that a member of staff is found in possession of a controlled substance/company property and/or drug related paraphernalia the matter will be referred to the senior manager and disciplinary action will be taken. In accordance with the law, the company will notify the police authorities if illegal drugs are found on the premises, or if an employee is suspected of being involved in the supply of drugs. At this stage an employee may also be required to undergo a test. Staff who refuse the random request to be searched may face disciplinary action up to and including dismissal on grounds of gross misconduct.

Unauthorised Possession and Supply of Controlled Substances

Should any employee become aware that another person is in possession of a controlled substance, or is supplying drugs to others, he/she will be responsible for reporting the situation to management. That report will be treated confidentially so far as practicable. Any manager who becomes or is made aware of this situation will be responsible for taking action in line with this policy and must in particular report the matter immediately to a director.

The employee or employees concerned will be interviewed and appropriate action taken.

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Training and Development Policy

The Private Security Industry Act 2001 has brought into force a licensing system for people working in the private security industry.

This law aims to raise standards in training and professionalism and prevent unsuitable people working within the industry.

To this end the company will ensure that all our Manned Guarding have the necessary training qualifications before being allowed to work.

The required qualification is the Level 2 National Certificate for Manned Guarding. This will be delivered by an SIA endorsed Awarding Bodies.

A recognised company will train successful new employees to industry standard. In addition, the company will also liaise with local colleges to help others obtain the qualification needed.

The company will keep a record of the employees' qualification in personnel files as proof of completion of training.

The company will also keep a copy of the employees' SIA badges as proof of acceptance to work in the relevant sectors of the industry.

To develop further an employee can undergo training in other aspects of security – leadership, first aid, etc. - the company encourages personal development and will give help and advice when necessary.

TUPE Policy

This company fully recognises and abides by the legislation surrounding TUPE and if it became the case that this business is transferred to another or vice versa the company will follow the letter of the law.

In the event that TUPE Regulations apply, the following will automatically be taken over by the new employer:-

- Contract of Employment
- The rights and obligations arising from these contracts
- The rights and obligations arising from the relationship between the transferor and the employees working in that undertaking
- Any existing collective agreements

Employees who are employed by the employer at the time of transfer


- Automatically become employees of the new employer, as if their contracts of employment were originally made with the new employer
- Have their service counted as continuous from the date of which employment commenced (with the first employer)

The company will cooperate fully in the exchange of information to provide a smooth transfer and also that they will assess the training needs and provide any training which may be identified within a reasonable timescale. This company will ensure that any such transition will occur with the minimum of disruption and inconvenience to employees

Screening will be completed in full as per BS 7858. Where appropriate, induction training will be given

Workplace Violence

The Company does not tolerate acts of workplace violence committed by or against employees. The Company strictly prohibits employees from making threats or engaging in violent acts.

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Note: This is a zero-tolerance policy, meaning that The Company disciplines or terminates every employee found to have violated this policy.

Prohibited Conduct - Prohibited conduct includes, but is not limited to:

- injuring another person physically;
- engaging in behaviour that creates a reasonable fear of injury in another person;
- engaging in behaviour that subjects another individual to extreme emotional distress;
- possessing, brandishing, or using a weapon while on company or client premises or engaged in Company business;
- damaging property intentionally;
- threatening to injure an individual or damage property; and
- committing injurious acts motivated by, or related to, domestic violence or sexual harassment.

General Points

- The Company will immediately investigate any reported violence, harassment, or threats committed on company or client premises.
- All employees who commit violent acts or who otherwise violate this policy are subject to corrective action or discipline, up to and including termination of employment.
- The Company will seek the prosecution of all of those who engage in violence on its premises or against its employees while they are engaged in employer business.

Employee Guidelines and Procedures

While we endeavour to provide our employees with a safe and secure workplace, The Company recognizes that crime and violence sometimes can spill over into the workplace. We are providing you with these

guidelines so you can be better prepared to handle violent and threatening situations.

This document summarizes actions you should and should not take to deal with threatening or violent situations. Taking a few moments to familiarize yourself with these guidelines is an important part of being prepared for workplace emergencies.


General Security Practices

- Never hesitate to call the police if confronted with a potentially violent situation. It is better to have called the police unnecessarily than not to have the police available when a threatening situation turns violent.
- Never attempt to physically restrain or physically remove a threatening or violent individual by yourself. Doing so puts you in danger and leaves you and The Company vulnerable to possible lawsuits.
- Always report violent, threatening, or harassing behaviour to your supervisor. Alert your supervisor to the presence of strangers in your work area or the presence of any suspicious packages.

Coping With Threatening or Violent Individuals

Effective handling of threatening or violent individuals requires you to use good judgment and common sense and rely on your own assessment of the particular situation. Nevertheless, you might be able to resolve or cope with many types of threatening or violent situations by following the guidelines below.

- When confronted with an angry or hostile individual:
 - stay calm
 - listen attentively
 - maintain eye contact; and
 - be courteous and patient, but try to keep the situation

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under control by expressing a willingness to sit and calmly discuss the matter with the individual

- When confronted with a person shouting, swearing, threatening violence, or engaging in bizarre or dangerous behaviour.
 - stay calm
 - be courteous and patient, but maintain your distance from the individual
 - signal a co-worker or supervisor that you need help. Do not call for help yourself if you are being directly confronted by the individual; and
 - have the co-worker or supervisor call the local police

- When confronted by someone with a gun, knife, or other weapon:
 - stay calm
 - never try to grab the weapon
 - quietly signal a co-worker or supervisor that you need help. Do not call for help yourself if you are being directly confronted by the individual
 - have the co-worker or supervisor call local police;
 - be courteous and patient. Keep talking, but follow the instructions from the person who has the weapon. Stall for time, but do not risk harm to yourself or others; and
 - watch for a safe chance to escape to a safe area. Take direction from the police once they arrive on the scene

WI Directive Policy

The WI Directive aims to limit the risks that waste incineration poses to the environment and human health.

The Waste Incineration Directive rules apply to most activities that involve **burning waste**, including burning waste for fuel.

Incinerators

There are a large number of **waste incinerators** in England and Wales, ranging from small laboratory incinerators to large operations that burn household waste. Incinerators burn waste at very high temperatures, which turns the waste to ashes.

The directive also applies to co-incinerators, such as combustion plants and cement works which **burn waste as a fuel**. Some wastes are exempt from the requirements of the directive.

The Directive


The Waste Incineration Directive is implemented through Environmental Permitting Regulations in England and Wales.

Waste incinerator operators have **improved their environmental performance** greatly in recent years. They used to be the largest producers of harmful substances called dioxins, but these days, they're among the lowest.

New rules like the Waste Incineration Directive aim to keep up these improvements, so we limit the risks that waste incineration poses to the environment and human health.

MEC Security Limited outsource the disposal of waste material and products and ensure that these sub-contractors comply with the above Policy.

Whistleblowing Policy

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Intention of Policy

This policy applies to all workers at the company, and is designed to allow concerns of a wider nature (called “protected disclosures”) to be raised and dealt with properly. The company is committed to giving workers the ability raise such concerns without fear of reprisals and to investigating concerns where they arise. This policy is not designed for individual matters – any concerns which you have which relate to you personally should be raised using the grievance procedure. Use of the grievance procedure will not remove any protection you may be entitled to under the law if your grievance is, in fact, a “protected disclosure”, but it is a more appropriate forum for individual concerns to be raised, and will allow them to be dealt with in the best way.

This policy should be used where your concerns relate to a matter of wider company significance. This policy is not restricted to matters within, but is designed to allow workers to raise any issue which they have a concern about, and to allow the company to ensure that matters are dealt with.

Examples of the types of concerns which this policy may be used to deal with are:-

- Theft by any person in the company
- Fraud of any kind being perpetrated (whether within or not)
- Environmental concerns
- Any kind of criminal activity (including drug taking – whether on or off the premises)
- Health and Safety concerns – whether affecting workers or the general public
- Harassment

This list is not exhaustive, and all workers should feel free to use this policy to report any concerns they have, so that the company can look into these.

Matters covered by the Policy

Where you believe that you have information that one or more of the following has taken place or is going to take place, then you should follow this policy to bring it to the company’s attention:-

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject
- A miscarriage of justice has occurred, is occurring, or is likely to occur
- The health and safety of any individual has been, is being, or is likely to be endangered
- The environment has been, is being or is likely to be damaged or
- Information tending to show any matter falling within the above paragraphs has been or is likely to be deliberately concealed


Information about the above may qualify as a “protected disclosure” if the proper reporting procedures in this policy are followed. Where your concern is a “protected disclosure” you will be entitled to the protection afforded by the law in respect of this. This policy outlines this protection and assists you in making such a disclosure in accordance with the law. It also ensures that the company is informed at an early stage about any of the above, so that action can be taken to stop such matters taking place.

Where you have reasonable grounds to believe that that one of the above is taking place, you should report the matter, in total confidence to the MD. Reporting can be done anonymously, but please bear in mind that this may restrict our ability to look into matters.

Conditions for a Disclosure

You must comply with the following conditions when making your disclosure to the MD

- You must reasonably believe that the allegation you are reporting is true
- You must report it in good faith

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- You must not make the disclosure for personal gain
- You must report the matter to the MD, unless you have reasonable grounds to believe that this will result in the concealment of evidence, in which case you should follow the procedure below

The Procedure

Stage One

The company will investigate matters, beginning by speaking to you to ascertain the reasons for your belief, and any evidence that you may have. It will then take such steps as are necessary to investigate your concerns, including speaking with other members of staff where necessary. The designated person at the company has a free hand to investigate as it feels fit. In order to do this, we may seek the right to disclose your name to those persons. You will not have to allow the company to do this, but, where the investigation cannot be properly completed without your consent to do so, you will be informed of this and the investigation may end at this point. We will, however, do everything possible to investigate any allegations as far as possible, as we take any such allegations very seriously.

Please note that, as set out below, where your disclosure relates to a possible criminal offence or other similar matter, then we may need to report it to the appropriate authorities, in which case we may need to reveal your name and the details you have reported.

Stage Two

Where allegations are found to give rise to reasonable concerns on the part of the company, and the investigations do not reveal explanations for the concerns raised, then matters will proceed in the way the company considers most suitable in the circumstances. This may involve the matter being handed over to appropriate authorities, or may involve internal

disciplinary proceedings being taken. The company will be free to take such steps as they consider appropriate in the circumstances.

Where the appropriate response is to put the matter into the hands of the appropriate authorities, they will then progress the investigation themselves. The company will have no further control over this, and all evidence, including yours, will be passed to them. Whilst the company will do all it can to protect your confidentiality, where criminal offences or other illegalities are revealed, then the proper reporting of these will be the priority for the company. The company will, of course, lose any control over the investigation at this stage, but will do all in its power to protect you from any reprisals and to keep the information as confidential as is possible.

You will be kept informed of the progress of the investigations at reasonable intervals. However, the confidentiality that we extend to you may also apply to others, and we may not be able to reveal details of the investigation to you or details of its outcome.

Where disciplinary proceedings are issued, you will not be entitled to know the result, as this will be confidential between the company and the Employee concerned. If disciplinary proceedings result in dismissal, you will be informed.

Where, however, the result is an internal sanction of any kind, you will not be entitled to know the outcome. Where the matter is handed over to appropriate authorities, we may also be unable to pass on any further information to you, and the decision of the authorities on the matter will be a final one. The company may request an independent professional to investigate matters.



Where we feel that your concerns are not substantiated, and do not require further action, then we will inform you of this and the reasons for this.

Appeal

You may appeal against this decision – whether not to take matters further or where you feel that the action taken does not remedy your concerns - if you have further information you wish the company to consider, or where you believe that we have not given sufficient weight to a matter you have already raised. You should do this by letter within five days of being informed of the decision. The appeal is to the MD, who will meet with you to go over your further concerns.

Once this appeal has been dealt with, there will be no further internal appeal. If you obtain any further information at any time you should bring this to the attention of the company's attention so matters can be considered and investigated. However, if you are not in possession of new matters or information, the company will not re-investigate or consider matters a third time. Any further allegations brought by you without further information will be responded to by way of letter, confirming that the allegation has been looked into and that no further investigations will be carried out without more evidence.

Protection from Detriment

You are entitled to be protected from being subjected to any detriment when making a disclosure under this policy. You will not be subjected to any ill treatment or suffer any detrimental treatment due to making a disclosure. If you believe that you are being subjected to such a detriment, you should use the grievance procedure to bring this matter to our attention.

However, you must bear in mind that a key ingredient of this policy and of the law in relation to Public Interest Disclosures generally, is that all disclosures must be made in good faith. As set out below, any misuse of this policy, or attempt to make a disclosure other than in good faith, will be

a matter which will be regarded seriously and may result in disciplinary action.

Misuse

Any attempt to misuse this policy, by the provision of information which the company has reasonable grounds to believe was not provided in good faith, will result in disciplinary proceedings being taken against you. However, please note that we do not require that you be sure your information is 100% accurate before bringing it to our attention. The disclosure of information which you believe, in good faith to be true will not result in disciplinary action if it turns out that the information was incorrect. We would rather hear about matters at an early stage and report them to us, and do not require 100% proof.

We do require that you have a reasonable ground for your concern. If this procedure is used in any way to attempt to mislead the company into disciplining another employee, or is an attempt to take matters about legitimate company issues into your own hands, or to cause general disruption where there is no genuine belief behind your concerns, this will be considered a very serious matter and will result in disciplinary proceedings, and possibly dismissal.

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