

# KANOPI

CONTRACT SERVICES

## EMPLOYEE HANDBOOK

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## Introduction to your Employee Handbook

This handbook tells you about the things you need to know about working for Kanopi Contract Services (the Employer). Every employee will have access to a copy of the handbook, and you are expected to become familiar with its contents. If there is any matter in this handbook that you do not understand you should ask Kanopi Contract Services for clarification.

This handbook is designed to help you understand the policies, general rules and operating standards that apply to the employees of the Employer. It is intended as a statement of the Employer's policies and procedures and, except where specifically indicated, does not form part of your contract of employment. Any dispute between you and the Employer will be determined on the basis and content of your contract of employment.

The content of this handbook will be reviewed regularly, and updates will be notified to employees by email. Where necessary, an updated version of this handbook may be reissued in its entirety in electronic or hard copy format.

## Equal Opportunity Policy

The Employer is fully committed to providing equal opportunities for all employees, workers and job applicants, and to eliminating unlawful and unfair discrimination. The Employer aims to create a culture that encourages and values diversity, and that appoints, rewards and promotes staff based on merit.

The Employer will not unlawfully discriminate against any employee, worker or job applicant because of any 'protected characteristic', namely:

- age;
- disability;
- gender reassignment;
- marriage or civil partnership status;
- pregnancy and maternity;
- race (including colour, nationality and ethnic or national origin);
- religion or belief;
- sex; or
- sexual orientation.

The Employer has responsibility for the successful implementation of the policy by;

- not discriminating in the course of employment against fellow employees or job applicants.
- not inducing or attempting to induce others to practice unlawful discrimination.
- bringing to the attention of employees that they will be subject to disciplinary action for failure to adhere to the policy.

As an individual employee you have the responsibility to ensure that you assist the organisation in achieving these objectives by;

- not discriminating in the course of employment against fellow employees, customers, suppliers or members of the public with whom you come into contact during the course of your duties.

- not inducing or attempting to induce others to practice unlawful discrimination.
- reporting any discriminatory action to the Employer.

The successful operation of this policy necessitates a contribution from each employee, and you have an obligation to report any act of discrimination known to you. If you consider that you are suffering unlawful discrimination, you should raise the issue through the Grievance Procedure.

No employee will suffer detriment as a result of any matter raised, in good faith, under this policy.

## Anti-bribery Policy

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Our legal obligations are primarily governed by the Bribery Act 2010. That Act affects us, as a UK company, if bribery occurs anywhere in our business.

This policy is designed so you can understand the implications of the law and to assist you with any decisions with which you may be faced. It provides guidance but is not a comprehensive statement of legal requirements. It is intended to clarify most situations and to flag up ones that may require more senior intervention or further legal guidance.

Principally, we require you to act honestly and with integrity at all times and in doing so you will be complying with this policy and with the law.

### What is Bribery?

If someone seeks to influence you to act so that you breach trust, lack impartiality or perform in bad faith (i.e. act improperly) then you need to be on your guard. If they seek to do so by offering, promising or giving an advantage to you (such as money, a gift, or anything of value) then that is bribery. Bribery also occurs if you request, agree to receive or actually receive such an advantage. Such exchanges are illegal.

Reasonable and proportionate gifts as a token of appreciation or as part of facilitating normal business relationships are acceptable; the key is that they must not be an inducement to act improperly.

Employees who influence or make decisions on our behalf are more vulnerable and if you are uncomfortable with any form of influence you should report it immediately to the Employer.

### Gifts and Hospitality

Typical examples of gifts of proportionate value as appreciation would be a bottle of wine, flowers, or chocolates either at Christmas or as a genuine "thank you". These are entirely acceptable.

Hospitality is defined as where the Employer providing the hospitality is present (say a buffet lunch at an exhibition) and where this level of hospitality falls within our normal business relationship this would be acceptable. Hospitality which is disproportionate may be seen to be influencing impartiality and is prohibited under this policy. Please refer any such offers to a Director.

Where the Employer providing the hospitality is not present, for example if a restaurant voucher is given, then this is a gift, not hospitality. If you are in doubt about the proportionality of any gift you should discuss the matter with a Director.

If you are involved in any form of tendering process then gifts and hospitality (even if proportionate) must not be accepted and, if offered, should be politely declined and referred to a Director.

### Third Parties

Where a service is being carried out by a third party, for example distributors, a term requiring them to comply with all anti-bribery and corruption legislation should be included in the contract.

### Conflicts of Interest

You should avoid any situation where you might benefit personally from decisions you take or influence on behalf of the Employer. Where a conflict of interest could arise, the relevant decision must be referred to the Employer.

### Breaches of this Policy

Failure to comply with this policy may result in investigations, disciplinary action and potentially dismissal. You could also be subject to other civil or criminal sanction.

## Disciplinary Procedures

### Purpose

The purpose of these procedures is to ensure the safe and effective operation of our organisation and the fair and equal treatment of all employees.

The Employer will communicate its expectations effectively to employees and, in turn, listen to their needs and expectations. We seek an environment of mutual co-operation and understanding in meeting the aims and mission of the Employer. Informal means of discussion, communication and counselling will be used to resolve issues wherever possible.

Where they cannot be resolved by these means then the Employer, at its discretion, may involve a third party. This will be someone who can be seen as independent and may come from outside our organisation.

Where more serious conflict arises between the expectations of employer and employee these procedures are designed to resolve issues in a fair and equitable manner. Where the Employer feels they have a complaint against you the disciplinary procedure will be invoked. Behaviour that could give rise to such a complaint is outlined in the section on misconduct. If you feel you have a complaint against the Employer, you should raise a grievance. The method of doing so is outlined in the section on grievance procedure.

These procedures apply to all employees of the Employer whether they are part-time or full-time, permanent or temporary employees. However, if during the first three months of service you fail to achieve satisfactory levels of behaviour or performance the Employer may, at its discretion, omit some of the stages in this procedure, however there will always be at least one formal disciplinary meeting.

There is no requirement within our procedures for a grievance procedure to be concluded before a disciplinary procedure can be commenced.

## General Principles

This procedure does not form part of your contract of employment.

No disciplinary action, other than suspension with pay in extreme cases, will be taken against you until any necessary investigations have been carried out to establish the facts. Where practicable, different people will carry out the investigation and disciplinary hearing.

All stages of the procedure will be implemented without undue delay.

At every stage in the procedure you will be informed in writing of the nature of the complaint against you and will be given the opportunity to state your case before any decisions are made.

Following a decision, you will be informed in writing of any disciplinary action to be taken (or if not, that such action is not being taken) and the reason for action, indicating the specific areas of improvement required within, where appropriate, a specific period.

You will not be dismissed for a first breach of discipline except in the case of gross misconduct (see the relevant section) when the penalty will be dismissal without notice and without payment in lieu of notice.

A work colleague, certified Trade Union Representative or employed Trade Union Official may accompany you during any disciplinary meeting and you will probably find this helpful.

The procedure may be implemented at any stage if your alleged misconduct warrants such action. Further warnings for misconduct may be applied even if the further misconduct is of a different nature to the previous misconduct.

## Procedure

You will be advised of the date for any disciplinary meeting. You will be given at least 24 hours' notice, unless we mutually agree that we should have an earlier meeting. We will tell you in writing what you are alleged to have done and provide you with details of the evidence available to us. We will also notify you of the possible consequences.

At such a meeting we will present the allegations against you. You will have an opportunity to set out your case and to answer any allegations. You may offer any mitigating circumstances that might be taken into account. This will be done before any decision is made.

In complex cases where it is relevant to call witnesses, we will give you advance notice or, if you wish to call witnesses you should give us advance notice.

These points apply at all stages of the procedure.

Those taking the meeting will adjourn it to consider their decision. If it is decided that no action is to be taken, the matter will be closed.

### Stage 1 - Written Warning

If it is decided that your conduct or performance is unsatisfactory the Employer may give you a WRITTEN WARNING. This will give the details of the complaint, the improvements

required and the timescale for the improvement, depending on the nature of the offence. You will be informed that this is the 1st stage of the formal disciplinary procedure and the consequences should the required improvement not be made. You will be informed of your right to appeal. A copy of the written warning will be kept on your personnel file, but it will be spent for disciplinary purposes after 6 months subject to satisfactory conduct and performance. However, should there be any recurrence of the offence or commission of a subsequent but different offence whilst the note remains on your file, then stage 2 of the disciplinary procedure may be invoked.

### **Stage 2 - Final Written Warning**

If there is still failure to improve and your conduct or performance is still unsatisfactory, or there is any other breach of discipline there will be a further meeting. (If the misconduct is sufficiently serious to warrant only one written warning but insufficiently serious to justify dismissal this will be a first meeting.) Depending on the outcome of the meeting the Employer will give you a FINAL WRITTEN WARNING. This will give details of the complaint, and the improvement required. It will warn you that dismissal may result if there is no satisfactory improvement (within a specified period, if appropriate). You will also be informed of your right to appeal. A copy of this final written warning will be kept on your personnel file for one year. However, should there be any recurrence of the offence or commission of a subsequent but different offence whilst the note remains on your file, then stage 3 of the disciplinary procedure may be invoked.

### **Stage 3 – Dismissal**

If your conduct or performance is still unsatisfactory and you still fail to reach the prescribed standards, or there is any other breach of discipline, there will be a further meeting. DISMISSAL will normally result. You will be provided, as soon as reasonably practicable with the date on which your employment will terminate and informed of your right of appeal.

### **Appeal**

You have the right to appeal against any disciplinary penalty imposed. Your appeal should be addressed to a Director of Kanopi Contract Services Ltd, in writing, within 5 working days, stating the grounds for your appeal. You may feel that the penalty imposed is too harsh or that you were not given opportunity to explain a particular aspect of your case.

At our discretion we may involve a mediator from either within the Employer or potentially from outside. Their remit will be to try to resolve the problem to your satisfaction and the satisfaction of the Employer.

If mediation does not succeed then you will be invited to an appeal meeting and may be accompanied by a work colleague, certified Trade Union Representative or employed Trade Union Official. As far as is possible in a small organisation, such an appeal will be fair and impartial. Although new evidence will be considered if it is relevant, an appeal is not necessarily a re-hearing. After the appeal hearing you will be informed of the final decision.

### **Gross Misconduct - Dismissal Without Notice**

Gross misconduct is an offence of such a serious nature that your employment contract can be regarded as breached.

If gross misconduct is alleged, you may, at the discretion of the Employer be suspended on full pay for five days pending completion of an investigation.

If you cannot attend a disciplinary hearing because of some reason outside the control of the Employer then continuing suspension beyond five days will be without pay, unless it is due to your sickness.

If it is established, after investigation, that there has been an act of gross misconduct, you may be dismissed summarily, with no notice or pay in lieu of notice. We will only make a decision to dismiss following an appropriate meeting with you.

Circumstances that may give rise to an allegation of gross misconduct are described in the section "Gross misconduct".

In the event of summary dismissal, you will be deemed to be no longer in employment from the date of the decision.

We will set out in writing the alleged misconduct that has led to the dismissal and your right to appeal against the dismissal. We will send this to you.

If you do wish to appeal you must address your appeal to the Director, in writing, within 5 working days stating the grounds for your appeal.

In such cases you will be invited to attend a meeting. You must make all reasonable attempts to attend the meeting.

Should an appeal be lodged which subsequently overturns the initial dismissal, will reinstatement occur with appropriate back-pay to the date of the initial decision, under such circumstances continuous service would be maintained.

Every attempt is made to hear appeals within five working days from the date of the written appeal being lodged, or as soon thereafter as is practical.

We will inform you of the final decision in writing.

## Disciplinary Rules

### Misconduct

The following are examples of misconduct that may lead to disciplinary action. This list does not cover every possibility but is intended to indicate the type of misconduct that could lead to disciplinary action and, if persistent, dismissal.

### Insubordination

- Unauthorised consumption of intoxicating liquor during working hours on the premises
- Negligent work
- Inappropriate behaviour with the potential to cause offence
- Giving an unauthorised reference on behalf of the Employer
- Disregard of the Data protection policy
- Disregard of the Equal opportunities policy



- Disregard of the Health and safety policy
- Significant failure in following internal procedures
- Harassment of any description towards another person including: offensive or suggestive material, offensive or suggestive comments, unacceptable or suggestive acts.

### Gross Misconduct

The following are examples of misconduct that may be regarded as gross misconduct. In this context the word “serious” implies such severity as to mean a complete breakdown of trust in the employee. This list does not cover every possibility but is intended to indicate the type of misconduct that could lead to summary dismissal.

- Theft from the Employer, other employees or service users
- Fraud (such as deliberate falsification of sickness records)
- Using email or internet for malicious purposes, or to view or circulate pornography
- Fighting or assault on another person
- Malicious damage to the Employer’s property
- Incapability through alcohol or being under the influence of illegal drugs
- Wanton negligence
- Gross insubordination
- Disruptive or abusive behaviour causing serious damage to relationships
- Giving of an unauthorised reference that has the potential of exposing the employer to a claim for damages
- Any breach of the Data protection policy that has the potential of exposing the employer to a claim for damages or breaches a fellow employee’s trust and confidence in the Employer
- An unsafe act exposing self or others to severe injury
- Bringing the Employer into disrepute
- Acts of incitement or intentional acts of discrimination on the grounds of gender, sexual orientation, race, religion or beliefs, colour, national or ethnic origin, or disability
- Serious harassment of any description towards another person.

### Grievance Procedure

This procedure does not apply where you are appealing against disciplinary action that has been taken against you. In those circumstances, you must appeal to the Manager, in writing and within 5 working days, stating your reasons for the appeal.

If you consider that you are not being treated fairly as an employee, then you should raise a grievance. A work colleague, certified Trade Union Representative or employed Trade Union Official may usually accompany you during a grievance meeting and you will probably find this helpful.

The right of accompaniment does not apply automatically and will depend on the nature of the grievance.

There is no requirement within our procedures for a grievance procedure to be concluded before a disciplinary procedure can be commenced.

### Informal Meeting

You are first encouraged to raise the grievance informally with the Employer. Feelings of unfair treatment often result from misunderstandings and careful communication and discussion can usually resolve these.

Where they cannot be resolved by these means then the Employer, at its discretion, may engage a mediator. This will be someone who can be seen as independent and will usually be someone from outside our organisation.

### Grievance Meeting

If you are not satisfied that your grievance has been resolved, then you must put the details of your complaint in writing, you will be expected to explain the grievance and how you think it should be resolved. We will then arrange a grievance meeting with you to give further consideration to your grievance and may discuss it with others inside the Employer and, potentially, advisers from outside.

Wherever practical your grievance will be heard by a representative of the Employer who is not the subject of the grievance.

We will normally reach a decision within 5 working days and will communicate this to you in writing as well as verbally and of your right to appeal against the decision if you are not satisfied.

### Appeal Meeting

If you wish to appeal you must inform a Director of Kanopi Contract Services Ltd within 5 working days. We will invite you to attend a further meeting at which we will hear a formal appeal. Ideally that will be held by someone not involved at the initial meeting. After that meeting you will be informed of the final decision in writing.

### Grievances Raised by Past Employees

In circumstances where an employee has already left employment, the procedure above has not been commenced or completed and both parties agree in writing then the following procedure will apply:

- The former employee must set out the grievance in writing within 5 working days of leaving employment and send a copy of the grievance to the Employer.
- The response will be set out in writing and a copy sent to the former employee.

## Bullying and Harassment Policy

### What is it?

Harassment is behaviour that offends the dignity of another person, for example by offensive remarks. It may relate to race, sex, disability or other protected characteristics of an individual. Bullying is harassment in situations where we influence others. Inappropriate language in giving an instruction or making a complaint would be an example. Swearing is not acceptable. Bullying results in a gradual wearing down process that makes individuals feel demeaned and inadequate, that they can never get anything right, and that they are hopeless.

Harassment and bullying breed dysfunctional work groups and the detrimental effect shows in all the major indicators: productivity; quality; creativity; attendance and staff retention.

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior person of your choice as a confidential helper and your confidential helper can assist you in this.

If you are the victim of minor harassment or bullying, you should make it clear to the harasser or bully on an informal basis that their behaviour is unwelcome and ask them to stop. If you feel unable to do this verbally then you should hand a written request to the harasser or bully. If you feel uncomfortable with this, please discuss with a senior person.

### Formal Complaint

Where the informal approach fails or if the harassment or bullying is more serious, you should bring the matter to the attention of a Director as a formal written complaint and a confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- The name of the alleged harasser/bully
- The nature of the alleged harassment/bullying
- The dates and times when the alleged harassment/bullying occurred
- The names of any witnesses

On receipt of a formal complaint we will take action to separate you from the alleged harasser or bully to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser or bully to another work area or suspension with pay until the matter has been resolved.

It must be appreciated that such issues often give rise to conflicting evidence, meaning that it can be difficult to get to the truth of the matter. Though complaints will be treated in good faith there is nevertheless risk in bringing a complaint of harassment or bullying.

### Investigation

You must also understand that the person against whom you are raising a complaint has rights also. They have a right to know about the allegations against them and the right to offer explanations. In practice, this will not be possible without revealing who has made the allegations.

The person dealing with the complaint will carry out a thorough investigation. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

When the investigation has been concluded, a draft report of the findings and of the proposed decision will be sent, in writing, to you and to the alleged harasser or bully.

If you or the alleged harasser or bully is dissatisfied with the draft report or with the proposed decision this should be raised with the investigator within five working days of receiving the draft. The investigator will consider any points of concern before a final report is sent, in writing, to you and to the alleged harasser or bully.

### Action

If the report concludes that the allegation is well founded, the harasser or bully will be subject to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal against the disciplinary action by using our disciplinary appeal procedure.

If you bring a complaint of harassment you will not be victimised for having brought the complaint. However, if the report concludes that the complaint is both untrue and has been brought with malicious intent, disciplinary action may be taken against you.

## Making a Protected Disclosure (whistle-blowing policy)

### Introduction

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice.

The Employer takes malpractice very seriously. We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards too. We encourage open communication from all those who work for us and we want everyone to feel secure about raising concerns.

All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection.

It does not matter if an individual who raises a concern is mistaken about it—staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

This policy does not form part of any contract of employment and the Employer may amend it at any time.

### When to use this policy

There is a difference between whistleblowing and raising a grievance:

- whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens customers, third parties or the public generally; but
- a grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work.

This policy does not set out the procedure that applies to general grievances. If an employee has a complaint about their own personal circumstances, then they should use the Employer's Grievance Procedure instead.

### Malpractice covered by this policy

Whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to the Employer's activities.

The kinds of malpractice covered by this policy include:

- criminal offences
- miscarriages of justice;
- danger to the health and safety of any individual;
- damage to the environment;
- breach of any legal or professional obligation
- deliberately concealing any of the above.

### Employers Obligations

The Employer is committed to the principles set out in this policy. If an employee uses this policy to raise a concern the Employer gives them its assurance that they will not suffer any form of retribution or detrimental treatment. The Employer will treat their concern seriously and act according to this policy.

If an individual asks for a matter to be treated in confidence, the Employer will respect this request and, unless the law requires otherwise, will only make disclosures to third parties or other staff with the individual's consent.

### Procedure for raising a concern

If an individual is concerned about any form of malpractice covered by this policy, the individual should normally raise the issue with their immediate superior.

If an individual feels they cannot tell their immediate superior, for whatever reason, they should raise the issue with Kanopi Contract Services.

If an individual has raised concerns and is still concerned, or the matter is so serious that they feel they cannot discuss it with either of the two persons named above, they should raise the matter with the following member of the board of management: [*insert name and contact details, eg the Chief Executive*].

A concern can be raised by telephone, in person or in writing. It is preferable if it is made in writing. Although the individual is not expected to prove the truth of their concern beyond doubt or provide evidence, the individual will generally need to provide the following information as a minimum:

- the nature of the concern and why the individual believes it to be true; and
- the background and history of the concern (giving relevant dates where possible).

## Responding to concerns raised

The Employer is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally.

The Employer will arrange a meeting as soon possible to discuss the concern raised. The Employer may ask the individual for further information about the concern raised, either at this meeting or at a later stage.

After the meeting, the Employer will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.

The Employer will endeavour to complete investigations within a reasonable time.

## Confidentiality

All concerns raised will be treated in confidence and every effort will be made not to reveal the identity of an individual who raises a concern if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without the help of the individual who raised the concern, so the individual may be asked to come forward as a witness. If they agree to this, they will be offered advice and support.

The Employer hopes that all staff will feel able to voice their concerns openly under this policy. Although a concern may be made anonymously, the Employer encourages individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for the Employer to protect the individual's position or to give feedback on the outcome of investigations.

Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. The Employer will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

## Raising your concern externally (exceptional cases)

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. The Employer would expect that in almost all cases raising concerns internally would be the most appropriate course of action.

However, if for whatever reason, an individual feels they cannot raise their concerns internally and they reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for them to raise the matter with another prescribed person, such as a regulator or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available from Public Concern at Work website and on the GOV.UK website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>.

The Employer strongly encourages any individual to seek appropriate advice before reporting a concern to anyone external.

Public Concern at Work is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline.

## Further information and contacts

Public Concern at Work is a source of further information and advice at [www.pcaaw.co.uk](http://www.pcaaw.co.uk). It also provides a free helpline offering confidential advice on 020 7404 6609.

## Time off work for Study and Training

### Introduction

The Company is committed to training and developing staff to assist the business and its objectives.

This document sets out the Company's policy on the provision of training and study leave for all employees, including the procedures to be followed when requesting courses and study leave.

The Company is committed to equality of opportunity in employment for all its employees and will ensure that no employee is prevented from receiving training on grounds of race, colour, nationality, ethnic or national origin, gender, disability, sexual orientation, religion or belief or age.

This policy is designed to be as comprehensive as possible. However, if you have any queries which are not answered or, if you have any other questions about the policy, please contact the Employer.

### Eligibility Conditions

You are entitled to make an application for time off work for study and training provided you are an employee of the Company (not an agency worker) and have been continuously employed for a period of not less than 26 weeks and are not of compulsory school age or a young person who already has a statutory right to paid time off to undertake study or training or 16–18 years old and already expected to take part in education or training.

The training you request must be training leading to a qualification or training to help you develop skills relevant to your job, workplace or the Company.

### The Application

In order to request time off work for study or training you must make an application to the Employer. The request must be in writing and dated and must state that it is an application under Section 63D of the Employment Rights 1996 for time off work for study or training. The subject matter of the study or training you would like to undertake, where and when the study or training will take place, who will provide or supervise the study or training (for example, a training provider, or someone at work supervising on-the-job training) and the name of the qualification the training will lead to (if any). There must be an explanation of how you see this study or training making you more effective at work and improving the performance of the business.

It must say whether you have made a previous request and, if so, the date the request was made and whether it was emailed, posted, or delivered by hand. You can only make one application for time off for study and training in any 12 month period, unless you have requested that the Company ignore any earlier application you made in the preceding 12 months (see paragraph 12 below).

If your application is invalid, the Company will notify you within 28 days of the reason.

### Financial Support for Study and Training

The Company will not meet the costs of the training nor will the Company continue to pay your salary.



# Modern Slavery Statement and Policy 2022

## 1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

## 2 How is it relevant to us?

2.1 Modern slavery is complex and can only be tackled if we all play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

2.2 At a very basic level, preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2.4.3 cleaning and catering suppliers

## 3 Responsibilities

3.1 The company, our managers and colleagues have responsibilities to ensure that fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

3.3 The company

3.3.1 We will:

(a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation

(b) be clear about our internal recruitment policy (see Recruitment)

(c) check our supply chains (see Supply chains)

(d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us

(e) ensure we have in place an open and transparent grievance process for all staff

(f) raise awareness so colleagues know what we are doing to promote their welfare

3.4 Managers

3.4.1 Managers will:

(a) listen and be approachable to colleagues

(b) respond appropriately if they are told something that might indicate a colleague is in an exploitative situation

(c) remain alert to indicators of slavery (see Identifying slavery)

- (d) raise the awareness of colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- (e) use their experience and professional judgement to gauge situations

### 3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or position, you must:

- (a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- (c) tell us if you think there is more we can do to prevent people from being exploited

## 4 The risks

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

4.1.1 Supply chains

4.1.2 General recruitment

4.2 We manage these risk areas through our procedures set out in this policy and elsewhere.

## 5 Anti-slavery statement

5.1 We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

5.2 We make this statement and publish this policy on our website.

5.3 Any historic statements remain available on our website.

## 6 Supply chains

6.1 We are able to check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

6.2 We are able to tell the companies we do business with that we do not accept any form of exploitation.

6.3 We ensure we can account for each step of our supply processes, we are able to define who provides services to us and we have processes in place to allow us to risk assess and audit suppliers.

## 7 Recruitment

7.1 General recruitment

- (a) We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- (b) We always ensure staff are legally able to work in the UK.
- (c) We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- (d) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

7.2 If, through our recruitment process, we suspect someone is being exploited, then we follow our reporting procedures (See Reporting slavery).

## 8 Identifying slavery

8.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

8.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- 8.2.1 The person is not in possession of their own passport, identification or travel documents.
  - 8.2.2 The person is acting as though they are being instructed or coached by someone else.
  - 8.2.3 They allow others to speak for them when spoken to directly.
  - 8.2.4 They are dropped off and collected from work.
  - 8.2.5 The person is withdrawn or they appear frightened.
  - 8.2.6 The person does not seem to be able to contact friends or family freely.
  - 8.2.7 The person has limited social interaction or contact with people outside their immediate environment.
- 8.3 This list is not exhaustive.
- 8.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 8.5 If you have a suspicion, report it.
- 9 Reporting slavery**
- 9.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 9.2 If you think that someone is in immediate danger, dial 999.
- 9.3 Otherwise, you should discuss your concerns with Lucy Farrell who will decide a course of action and provide any further advice.
- 9.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Lucy Farrell before taking any further action.
- 10 Training**
- 10.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.
- 10.2 More general awareness training is provided to all staff via their team leaders and managers.
- 11 Monitoring our procedures**
- 11.1 We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.