

Serjeant Security

Policy Manual

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This Policy Manual is for the general Perusal, we would suggest that in particular all Employees of Serjeant Security Ltd take the time to read this and make themselves aware of the company policies to ensure their conduct is compliant with Company Policy at all times. This document is not a controlled document all policies are correct and fully up to date at time of publishing. This manual will be reviewed updated where appropriate at least every 12 Months.

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Quality Policy

Serjeant Security Ltd's quality policy has been established specifically to enable the company to achieve sustainable and profitable growth by providing security services which routinely satisfy and where possible exceed the expectations and requirements of its customers and other key stakeholders (including employees of the company as internal customers).

This level of quality will be achieved through application of an audited system of company operating procedures that reflect the competence of the company to existing customers, potential customers, employees, stakeholders and independent auditing authorities of adherence to the recognised British Standards for the sectors of security in which it operates and the international standard ISO9001:2015.

Successful achievement of this policy involves all staff, all of whom are individually responsible for the quality of their work and have been made aware of this fact and how they may contribute towards overall organisational improvement through the quality of their work.

To achieve and maintain the required level of quality assurance the Head of Operations retains responsibility for the Quality System and oversees the management of the system with recourse to outsourced specialist advice in the form of consultancy services. All executive policy requirements are rolled out via the Head of Operations.

The objectives of the Quality Assurance System are:

- i. To maintain an effective Quality Assurance System complying with International Standard ISO9001: 2015 (Quality Systems) and other industry specific accreditation schemes such as the Security Industry Authority's Approved Contractor Scheme.
- ii. To achieve and maintain a level of service delivery quality which enhances the Company's reputation with customers, consumers, employees and other key stakeholders.
- iii. To ensure compliance with relevant statutory and safety requirements.
- iv. To routinely seek, at all times, to maximize customer satisfaction with the security services provided by Serjeant Security Ltd.

The Directors are committed to encouraging and maintaining a culture of continuous improvement and professional development within the company whereby all staff are required to comply with the requirements of the Quality Management System and are actively encouraged to suggest improvements.

The organisation defines risks and opportunities across the business and ensures suitable controls are implemented. These are periodically reviewed as and when changes take place and/or new risks and opportunities present themselves.

All staff are empowered with the relevant authority to perform their allocated responsibilities and are informed of such, via job descriptions and role specifications. All staff share the authority and responsibility of identifying non-compliances or possible improvements regarding the Quality Management System and should notify any and all concerns to the head office of Serjeant Security Ltd.

The Head of Operations continually reviews the company's performance and resources to ensure that adequate staff, equipment and materials are available to meet all quality service requirements.

This policy will be communicated to all existing and new staff, and other parties who may be impacted upon by the performance of Serjeant Security Ltd in the discharging of our business. This policy will be reviewed on a regular basis to ensure their continuing suitability.

Environmental Policy

It is the aim of Serjeant Security Ltd. to ensure that its operations and activities, in no way, adversely affects the environment. A commitment to continually improve environmental performance, with a view to reducing environmental impacts to levels not exceeding those corresponding to economically viable applications of best available practices and techniques, has been established by the Directors.

POLICY AIMS:

All new policies introduced into Company procedure will be assessed for their effects on the environment. The Company aims, where possible to minimize the use of energy in its own buildings, vehicles and equipment.

The company aims to follow the code of practice set down by EHRC (Equality and human rights commission code of practice).

The Company aims where possible to control the consumption of water to a level appropriate for efficient Operations only.

The Company will ensure that the drivers of all Company vehicles will adopt a sensible driving style to reduce noise levels and omissions reducing air and noise pollution.

Where and when economically viable the Company will endeavour to run its fleet on unleaded, high-octane fuel or diesel.

The Company will work towards a reduction in air pollution in our operational areas.

The Company will encourage employees and personal contacts to reduce their negative impact on the environment.

The Company will ensure that the Company requirements necessitate minimal use of solvents to reduce water pollution.

The Company will ensure that a strict policy is adhered to in the purchase of materials to meet operational needs and to minimize the production of waste.

The Company will where practicable ensure that all recyclable waste is disposed of in an appropriate way.

The Company will ensure that the condition of buildings, surroundings and facilities available to both employees and Company contacts are operating in accordance with our environmental policy.

The Company will endeavour to educate with information its employees and contractors of the Company and local operating Councils Environmental policies.

Recruitment and Selection Policy

This policy sets out the recruitment process to be observed when identifying, assessing and appointing human resources for Serjeant Security Ltd, to ensure that a consistent methodology exist to appoint appropriately skilled staff into vacancies within the Company.

Policy Statement

The recruitment and selection process plays a fundamental and crucial role in the functioning and development of the Company and is therefore considered an integral part of the overall business strategy.

Serjeant Security Ltd is committed to establishing the following recruitment practice principles:

- To recognise that personnel selection decisions are an investment and that ill-considered decisions can lead to high employee turnover, inefficiency, disciplinary and ill health costs etc.
- To identify the criteria against which to select the most suitable candidate by use of an up to date job description and person specification, which determines the precise mix of qualifications, experience, aptitude and competencies needed by applicants and the appropriate customer.
- To use only appropriate, professional and effective interview techniques.
- To make employment decisions against pre-determined selection criteria ensuring the recruitment process, being both efficient and cost effective.
- Ensure consistency of treatment for all applications across the Company.
- Ensure that Serjeant Security Ltd meets all legislative obligations arising through relevant employment legislation.

Recruitment Procedures:

Prior to commencing recruitment, details of the post, customer requirements, the person specification and the method of recruitment should be carefully considered.

Equal Opportunities:

Serjeant Security Ltd is committed to its Equal Opportunities Policy. Managers should therefore ensure that they do not discriminate either directly or indirectly at any stage of the recruitment and selection process.

Job Descriptions:

Before the recruitment process commences, a job description should be drawn up which should summarise the main responsibilities of the job and the contribution to the Company for which the jobholder will be held accountable.

The following requirements should be identified:

- The qualifications necessary to do the job

- The skills, aptitudes, knowledge and experience
- The personal qualities relevant to the job, e.g. the ability to work as part of a team
- The person specification should not include unnecessary or marginal requirements that might in anyway discriminate.
- Overall competency to do the job as far as practicable.

Recruitment Sources:

Internal Adverts/ Candidates Serjeant Security Ltd policy is to encourage employee development and to promote from within the Company wherever possible. Vacancies may therefore be advertised internally in the first instance.

External Sources

Unsolicited Applications – Unsolicited speculative applications may be received from time to time. The suitability of the applicants can then be ascertained if a vacancy arises.

Advertising – Advertisements should be clear and state briefly:

- The requirements of the job
- The necessary and desirable criteria for job applicants
- The job location
- The salary/wage rate
- The benefits package
- The application procedure
- The length of the contract if not permanent.

Advertisements may be placed in a variety of media including the Company website; trade press; local/national press and the Company newsletter.

Short listing

In reviewing applications each should be considered objectively and where applicable a short-list drawn up (the company acknowledges that short listing may not always be necessary). The following points should be remembered if short listing is to be used:

- Use objective criteria and only shortlist those who meet the selection criteria as outlined on the person specification.
- Avoid any form of discrimination on race, religion, sex, sexual orientation, disability, age, trade union membership or other grounds.
- If the first short listing does not produce applicants meeting the criteria, consider a review of the specification or review the effectiveness of the media used.
- Carry out the short-listing as soon as possible after the receipt of all applications to preclude unnecessary delays. A closing date for applications for certain roles is good practice.

Referring Candidates for Interview

Candidates should be required to bring the following items to interview:

- Evidence of qualifications relevant to the role applied for.
- Birth certificate/passport or driving licence and other documentation that satisfies the requirements of BS7858 and prevailing UK legislation immigration/residency requirements.

All interviews must be confirmed in writing to the candidates. In order to avoid disability discrimination, it is advisable for candidates to be given the opportunity before the interview to indicate whether they have specific requirements and therefore any necessary and reasonable adjustments, which need to be made in advance.

Interviews

The purpose of the interview is to:

- Exchange information in order to predict how successfully the candidate would perform in the job and assess his/her suitability against predetermined criteria.
- Provide the candidate with details of the job and the organisation.

During the interview, the interviewer(s) should:

- Put the candidate at ease and ensure they do not feel intimidated or threatened.
- Question the information given in the CV or application form and be aware that it may be untrue and/or exaggerated.
- Ask probing questions to verify facts and responses and not accept everything that is said at face value.
- Ask open questions - avoid closed questions, which prompt a "yes" or "no" answer or leading questions, which indicate the appropriate answer.
- Ask questions which are linked to the person specification and job description.
- Investigate any gaps in employment.
- Ask specific questions on health if these relate to the applicant's capability to do the job. Questions about health should be kept separate from questions about disability throughout the recruitment process. Disability is **not** synonymous with ill health. It may be helpful to ask 'If you have a disability that may affect the way you could do the job, are there any reasonable adjustments which can be made?' (It is discriminatory not to employ someone solely because of a medical condition if that condition meets the definition of a disability as defined in the Disability Discrimination Act 1995, as updated by the Disability Discrimination Act 1999).
- Not ask any discriminatory questions.
- Offer the candidates the opportunity to ask questions.
- Also take the opportunity to verify professional registrations.
- Confirm the identity of the candidate by taking a copy of the identification they have brought to the interview e.g. passport, birth certificate, or driving licence. [For the successful candidate, this will later form part of their vetting file.]
- Take the opportunity to verify that the candidate possesses qualifications required for the position by having sight of documentary evidence and/or taking copies for future reference.

All candidates should be advised how long it is likely to be before they hear about the outcome.

Appointment Procedures

Candidates should be informed of the outcome of their application as quickly as possible.

Unsuccessful candidates at interview stage should be informed in writing that they have been unsuccessful. This should be done sympathetically. On occasions, it may also be appropriate to offer unsuccessful candidates constructive feedback.

Job offers should be made as soon as possible after the selection process has been completed. Offers should be made formally in writing and candidates should be told they are subject to the receipt of satisfactory vetting covering the preceding 5 years.

Once offered a provisional place, the prospective employee must complete the employee evaluation. This is to ascertain what skills they have and identify any areas of weakness. This covers numeracy and literacy as well as general knowledge and understanding of their role as a security officer.

Serjeant Security Ltd accepts that there may be circumstances where an employee who has left its employment wishes to be re-employed. With the exception of employees who have been dismissed for disciplinary reasons. When considering whether to re-employ an ex-employee managers should give careful consideration to the reasons why he/she left Serjeant Security Ltd.

Licence Linked Process

As part of the recruitment process we will ensure that all employees are subject to a licence linked review. This purpose of this is to ensure that regardless of qualification the suitability of the candidate is well understood. This will be tested through targeted questions/role plays and also practicals e.g. completion of an incident report. The results of which shall be reviewed and recorded by management. This may instigate additional training before personnel are deployed to site.

Training Policy

Serjeant Security Ltd is committed to providing the necessary training and support to ensure that all persons employed are appropriately trained and competent in their specific job roles, to ensure the continued effective operations of the organisation and the continued delivery of services that meet and where possible, exceed, our customers expectations.

Training Objectives

- To ensure that all employees are provided with the necessary basic training relevant to their job to ensure that they become competent, as are assessed as such within a reasonable time.
- To ensure that those employees who exhibit a desire to further develop their skill and knowledge have the necessary support to do so.
- To provide employees with an opportunity to work towards a National Vocational Qualification in security.
- To identify and develop those employees who have leadership/managerial potential to establish career paths and succession planning internally as far as possible.
- To establish training applications into everyday activities and promote the importance of continuous learning amongst all employees.

SERJEANT SECURITY LTD aims to ensure that:

- its stated objectives are met
- each member of staff understands what his or her work role involves
- each person is developed to enable them to achieve their work objectives
- staff are prepared and equipped to deal with changes in SERJEANT SECURITY LTD
- each individual is encouraged to develop his or her potential, both personally and professionally
- lifelong learning is supported and encouraged for all staff.

Principles of the training policy

- Training and development makes SERJEANT SECURITY LTD a more effective organisation. SERJEANT SECURITY LTD's continued success depends upon meeting the objectives set by the Board in consultation with key stakeholders. This will be achieved through staff who are competent in their roles.
- Training and development can be defined as any activity designed to help individuals become more effective at their work by improving, updating or refining their knowledge and skills. It encompasses a range of activities including, for example, involvement in various projects, attendance at training courses, conferences or seminars, visits to other institutions, formal study, coaching and mentoring.
- SERJEANT SECURITY LTD believes that training and development is a continuous process. There is an expectation that staff will keep abreast of developments within their own area of expertise, and all staff are encouraged to undertake development activities throughout their working lives.

- The SERJEANT SECURITY LTD performance review system allows for specific input from individuals in relation to suggestions for development.
- SERJEANT SECURITY LTD's approach to the provision of training and development is to consider the development needs identified and how these should be met. This is in line with SERJEANT SECURITY LTD's definition of training and development, and it focuses attention on development activities that add value to the business, enabling SERJEANT SECURITY LTD to meet its strategic objectives.
- The responsibility for identifying training and development needs and carrying out agreed training and development activity is shared between the line manager and member of staff. SERJEANT SECURITY LTD will encourage and support appropriate training and development.
- Line managers are responsible for providing support and guidance in relation to the training and development of those reporting to them, particularly in relation to the identification of training and development needs and making sure that appropriate action can be taken as a result.
- Each member of staff is expected and encouraged to take ownership and responsibility for their personal development in relation to their work, within the framework of support provided by SERJEANT SECURITY LTD. This includes analysing one's own skills, aptitudes and potential development needs, as well as having a positive attitude and proactive approach to development.
- SERJEANT SECURITY LTD is committed, through its performance review process, to the creation of training and development opportunities for all staff, and will work to ensure equality of opportunity across all training and development activity. Equal opportunities will be monitored specifically and reported on annually to the Board.
- SERJEANT SECURITY LTD will monitor and evaluate training and development activity so as to continually learn and improve provision. All staff are expected to participate in the evaluation of training and development.
- Managers and supervisors are supportive of releasing frontline licensable staff for required training.
- All internal and external trainers are suitably qualified.

The training policy provides a framework within which decisions can be made and supported with regard to the development of individuals and groups within SERJEANT SECURITY LTD.

Health and Safety Policy

The Company is fully committed to meeting its responsibilities under the Health & Safety at Work Act 1974 and associated protective legislation. To Achieve those objectives it has appointed a designated member of staff to be responsible to the Company for health and safety and to keep workplace, health, safety & welfare procedures under constant review.

The Company will liaise with the Health & Safety Executive where necessary, to keep the Company abreast of new legislation, EU Directives, Regulations and British Standards in order to ensure on-going compliance with the law.

The main responsibility of Health & Safety lies with the Managing Director and Directors. The Company is bound by any acts and/or omissions of the Managing Director and Directors giving rise to legal liability, provided that such acts and/or omissions arise out of and in the course of Company business.

Company Employees agree, as part of their Contract of Employment to comply with individual duties under the Health & Safety at Work Act and Management of Health & Safety at Work Regulations. Consultation facilities will be made available to all Employees to ensure work carried out does not adversely affect Employee's health and safety.

The Company will comply with its duties towards Employees under the Health & Safety at Work Act and the Management of Health & Safety at Work Regulations so far as is reasonably practicable in order to:-

- Provide systems of work that are safe without risk to health and a safe place of work
- Ensure the safety and absence of risk to health in connection with the use, handling, storage and transportation of articles and substances
- Provide such information, instruction, training and supervision as may be necessary to ensure the health and safety at work of its Employees
- Make regular Risk Assessments available to Employees
- Take appropriate preventative/protective measures
- Provide Employees with health surveillance where necessary
- Appoint competent personnel to secure compliance with statutory duties and to undertake reviews of the policy as necessary

This policy has been prepared in compliance with Section 2(3) of the Health & Safety at Work, Etc. Act 1974 and binds all Directors and Employees. In the interest of Employees and Clients, we request our Clients, visitors and Sub Contractors respect this Policy, a copy of which can be obtained on demand.

Serjeant Security Data Protection Policy

Serjeant Security Data Protection Policy

Introduction

Purpose

Serjeant Security Ltd is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out our commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of Job Applicants, Employees, Contractors, Volunteers, Apprentices and former Employees, referred to as HR-related personal data. This policy does not apply to the personal data of Clients or other personal data processed for business purposes.

Serjeant Security Ltd has appointed **P Driver** as the person with responsibility for data protection compliance within the organisation. He can be contacted at cs@serjeantsecurityltd.co.uk for Questions about this policy, or requests for further information, should be directed to him.

Surveillance and Security Data

CCTV, and Electronic Access Control is used for maintaining the security of property and premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties. For these reasons the information processes may include visual images, personal appearance and behaviours. This information may be about staff, customers and clients, offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary, or required, this information is shared with the data subject themselves, employees and agents, service providers, police forces, security organisations and persons making an enquiry.

Definitions

"Personal data" is any information that relates to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

Data Protection principles

- Serjeant Security Ltd processes HR-related personal data in accordance with the following data protection principles:
- Serjeant Security Ltd processes personal data lawfully, fairly and in a transparent manner

- Serjeant Security Ltd collects personal data only for specified, explicit and legitimate purposes
- Serjeant Security Ltd processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing
- Serjeant Security Ltd keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay
- Serjeant Security Ltd keeps personal data only for the period necessary for processing
- Serjeant Security Ltd adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage

We will let you know the reasons for processing your personal data, how we use such data and the legal basis for processing in our Privacy Notices. We will not process personal data for other reasons. Where we rely on our legitimate interests as the basis for processing data, we will carry out an assessment to ensure those interests are not overridden by the rights and freedoms of any individuals.

Where we process special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data.

Serjeant Security Ltd will update HR-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Personal data gathered during the employment is held within the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which the organisation holds HR-related personal data are contained in its Privacy Notices.

We keep a record of our processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

Individual rights

As a data subject, you have a number of rights in relation to your personal data.

Subject Access Requests

You as an individual have the right to make a Subject Access Request. Should you do this, we will tell you:

- whether or not your data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from yourself
- to whom your data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers
- for how long your personal data is stored (or how that period is decided)
- your rights to rectification or erasure of data, or to restrict or object to processing
- your right to complain to the Information Commissioner if you think Serjeant Security Ltd has failed to comply with your data protection rights; and

- whether or not we carry out automated decision-making and the logic involved in any such decision-making

Serjeant Security Ltd will also provide you with a copy of the personal data undergoing processing. This will normally be in electronic form if this request has been made electronically, unless you agree otherwise.

[If the individual wants additional copies, the organisation will charge a fee, which will be based on the administrative cost to the organisation of providing the additional copies.]

To make a Subject Access Request, you should send the request to cs@serjeantsecurityltd.co.uk. In some cases, we may need to ask for proof of identification before the request can be processed. Serjeant Security Ltd will inform you if we need to verify your identity and the documents we require.

We will normally respond to a request within a period of one month from the date it is received. In some cases, which include processing large amounts of data, we may respond within three months of the date the request is received. We will write to you within one month of receiving the original request to tell you if this is the case.

If a Subject Access Request is manifestly unfounded or excessive, we are not obliged to comply with it. Alternatively, we can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A Subject Access Request is likely to be manifestly unfounded or excessive where it repeats a request to which we have already responded. If a request is submitted that is unfounded or excessive, we will notify you that this is the case and whether or not we will respond to it.

Other rights

You have a number of other rights in relation to your personal data. They can require us to:

- rectify inaccurate data
- stop processing or erase data that is no longer necessary for the purposes of processing
- stop processing or erase data if the individual's interests override Serjeant Security Ltd's legitimate grounds for processing data (where Serjeant Security Ltd relies on legitimate interests as a reason for processing data)
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not your interests as an individual override Serjeant Security Ltd's legitimate grounds for processing data

To ask Serjeant Security Ltd to take any of these steps, you should send the request to cs@serjeantsecurityltd.co.uk.

Data Security

Serjeant Security Ltd takes the security of HR-related personal data seriously and has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties, including internal policies and controls i.e. systems restrictions and IT policy.

Where Serjeant Security Ltd engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Data Breaches

Should Serjeant Security Ltd discover there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. We will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

International data transfers

The organisation will not transfer HR-related personal data to countries outside the EEA.

Individual responsibilities

You as an individual are responsible for helping Serjeant Security Ltd keep your personal data up to date. You should let the HR Department know if data provided changes i.e. should you move house or change bank details.

You may have access to the personal data of other individuals and of our customers and clients in the course of your employment. Where this is the case, we rely on individuals to help meet our data protection obligations to staff and to customers and clients.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation
- to keep data secure (i.e. by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction)
- not to remove personal data, or devices containing or that can be used to access personal data, from Serjeant Security Ltd's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device
- not to store personal data on local drives or on personal devices that are used for work purposes; and
- to report data breaches of which they become aware to cs@serjeantsecurityltd.co.uk immediately

Further details about Serjeant Security Ltd's security procedures can be found in our Data Security Policy.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under Serjeant Security Ltd's Disciplinary Procedure. Significant or deliberate breaches of this policy, such as accessing Employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Training

Serjeant Security Ltd will provide training to all individuals about their data protection responsibilities as part of the Induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

Tupe Policy

TUPE (Transfer of Undertakings and Protection of Employment) will apply to all applicable contracts that fall under legislative guidelines.

As soon as notification of contractual award is announced the Company will ensure that a full and meaningful consultation of staff, through the recognised trade unions/staff associations, at the earliest practicable time is conducted. All security personnel will be made aware of their rights under the Transfer of Undertakings Regulations 1981. The Company will observe contractual positions with regards to pay and holidays with the objective of improving employee terms and conditions where practicable.

A Head Office representative will be assigned to every new contract and will be the point of contact to discuss terms and conditions of employment and to ensure the smooth transition of employees from one company to another. A meeting will be made prior to any transfer date at the appropriate assignment where possible to engage with transferring employees, with the agreement of the customer.

In accordance BS 7858, the Company is obliged to carry out full screening on all employees employment history during the first 12 weeks of the transfer period. Anyone that is unable to satisfy the Company requirements in relation to the screening will be invited to attend a meeting to discuss their position within the Company. The following checklist will be referred to in all instances where TUPE is held to apply:

| HR Area | Considerations |
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| Length of service (employment starting date) | With a TUPE transfer, the employee's continuity of service transfers to the new employer. This could have future knock-on implications for such benefits as redundancy, annual holiday, sick pay etc. |
| Job descriptions (are they accurate or up to date) | Employees may be performing duties over and above their written job descriptions. Consequently they may allege they are entitled to pay over and above their normal remuneration rate or scale. |
| Salary/Wage Rate | What is the current salary/wage rate, is it linked to any external pay scale? Are there incremental pay scale rises due to staff as part of the contract? When are pay rises due? How are pay rises agreed with staff? |
| Benefits | The provision of benefits can be very open ended and hence needs a thorough investigation. Whereas many employment benefits have an underlying statutory entitlement, many employers often "enhance" them at a higher level or for a longer period of time. Such benefits to be determined could be: paid holiday, sick pay terms, maternity/paternity benefits, redundancy payments, travel expenses, essential car user allowances, car parking fees, travel season tickets, private health insurance etc. |
| Notice periods | What are the notice periods of both the employer and the employee? Although there are statutory minimum entitlements, contractually employees may be entitled to a longer length of notice. Some senior staff members may be on a six months notice period. If redundancy or dismissal was an issue this could be very costly to honour. |

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| Pensions | TUPE legislation protects the pension rights of employees, thus if the employee was a member of a very generous local authority pension scheme, there could be a very high cost implication to provide a "similar pension" if not exactly the same. |
| TUPE obligations | Has consultation been carried out? How detailed has this been? When did consultation start? Have all relevant employment records been |

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| | transferred? Are more than 20 employees affected by the transfer? If so have collective consultation rights been agreed? |
| Employment tribunal cases | Has any situation arisen in the last six months that could potentially result in an employment tribunal? Are there any outstanding Tribunal cases? Are there any staff members on long term sick leave? Are there any employees who are protected under the Disability Discrimination Act? Upon the effective TUPE transfer date, all employment liabilities transfer to the new employer. Thus if there was a pending Tribunal case, which subsequently agreed compensation or damages to an employee after the Transfer date, the new employer would be totally liable. |
| Staff appraisal | Are comprehensive staff appraisal notes/records, supervision notes etc available? Staff appraisal records can be crucial in demonstrating the good/satisfactory performance of an employee. Poor or non-existent appraisal records could result in a very long or protracted capability process subsequently if this was necessary later. |
| Recruitment procedures | Does the Transferor have a recruitment policy? Do they have an Equality and Diversity policy? Do they have all the recruitment selection notes for employees recruited within the last six months? Have all necessary immigration and identity checks been carried out and documentary proof retained? Has vetting to BS7858 been completed successfully? As all employment liability also transfers at the effective TUPE transfer date, any poor recruitment practice could result in liability to the Company at a later date. |
| Disciplinary procedures | Does the Transferor have a disciplinary policy? Is the policy up to date with current ACAS Codes of Practice? Are there any ongoing disciplinary processes underway? Do any employees have disciplinary warnings still live? As all employment liability transfers, it is crucial to determine if there is any potential dispute between the Transferor and any employees. |
| Grievance procedures | Does the Transferor have a grievance policy? Is the policy up to date with current ACAS Codes of Practice? Has any employee lodged a grievance within the last six months? Has any employee (or their representative) submitted a written letter, email etc outlining any complaint or disagreement with you, within the last six months? As all employment liability transfers, it is crucial to determine if there is any potential dispute between employees and the Transferor. |

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| Union involvement | Does any Trade union have recognised bargaining rights? Has any employee or Trade Union asked for recognised bargaining rights? Are there any relevant Collective Agreements in place? Upon the TUPE transfer, any Trade Unions "rights" also transfer. If more than 20 employees are affected by the transfer and there is a recognised trade union, collective consultation will be required. |
| Staff associations | Is there any recognised staff association? Have any employees asked to have a staff association recognised? If more than 20 employees are affected by the transfer and there is a recognised staff association, collective consultation will be required. |

Where Serjeant Security Services Ltd is the transferor, all legal obligations to provide written information to the transferee about the employees who are to transfer will be met in a timely manner. In all cases, it will be expected that both transferor and transferee must inform their employees who are affected by the transfer.

Considering dismissing employees or changing their terms and conditions for a reason connected with the transfer is strictly prohibited without documented legal advice from the Company's appointed solicitors – such actions are permitted in only limited circumstances.

New employees transferred in under a TUPE process will be subject to a Company induction and 3 month probationary review, at which specific items relating to the TUPE process will be discussed to ensure that bedding in is progressing effectively. During the first 3 months of a new transferee's employment, their file will be distinguished to enable more effective monitoring.

In areas where the TUPE process comes into direct conflict with the Private Security Industry Act 2001, the PSIA will generally prevail, however qualified legal advice should once again be sought.

It is recognised by the Company that affected staff may be anxious about a transfer situation and therefore all efforts to reassure them will be made.

All new transferring employees shall be fully integrated into the organisation. This shall be achieved by one to one discussions or team discussions where possible. Consideration will be given to their understanding of the role, their position in the company and the training needed.

Corporation Social Responsibility Policy

This document sets out the Company's approach to the responsibilities it has for its staff, its partners and clients, consumers and for the community and environment in which it operates. It provides an overview of our corporate responsibilities, some of which are detailed in other documents.

We recognise the unique and important contribution made by every individual person with whom we involve ourselves, to our work, to their own organisations and to the wider community. We welcome human diversity in all its forms and see diversity as fundamental in all our dealings with clients, partners, associates and the wider community.

We accept responsibility for caring for our staff, providing them with meaningful employment, with the opportunity to provide for themselves and their families and for ensuring, as far as we can, their continuing health, safety and welfare in the workplace.

We recognise the need of our clients to a safe and secure environment and regard their property, including intellectual property as being as important as our own.

We recognise that we must contribute to maintaining and improving the environment in which we operate through the application of our Environmental Policy, our policy on Equality and Diversity and our Health and Safety Policy. In addition we regard as unacceptable the employment of child labour and forced labour.

It is the aim of Serjeant Security Ltd. to ensure that its operations and activities, in no way, adversely affects the environment. A commitment to continually improve environmental performance, with a view to reducing environmental impacts to levels not exceeding those corresponding to economically viable applications of best available practices and techniques, has been established by the Directors.

We will deal with our business partners and employees in an honest and honourable manner at all times.

Anti-Harassment Policy

Policy statement

The Company seeks to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment and bullying based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

Employees must not harass, bully or intimidate other employees on these grounds. Such harassment not only contravenes the Company's policy but it may also constitute unlawful discrimination. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure and could render the employee liable to summary dismissal. Employees should bear in mind that they can be held personally liable for any act of unlawful harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

All employees are responsible for conducting themselves in accordance with this policy and the Company will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees or by outside third parties who do business with the Company.

Employees should draw the attention of their line manager to suspected cases of harassment, bullying or intimidation. They must not victimise or retaliate against an employee who has made allegations or complaints of harassment or who has provided information about such harassment. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, business trips and work-related social events.

Bullying and harassment

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

Harassment occurs where, on the ground of an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability, a person engages in unwanted conduct that:

- has the purpose of violating the employee's dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee; or
- is reasonably considered by the employee to have the effect of violating his or her dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee, even if this effect was not intended by the person responsible for the conduct.

Conduct may be harassment whether or not the person intended to offend. Something intended as a 'joke' or as 'office banter' may offend another person. This is because different employees

find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Harassment also occurs where, on the ground of the employee's rejection of or submission to unwanted conduct of the kind specified above, a person treats the employee less favourably than he or she would treat him or her had he or she not rejected, or submitted to, the unwanted conduct.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour covered by this policy include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature.
- Subjection to obscene or other sexually suggestive or racist comments or gestures.
- The offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- Jokes or pictures of a sexual or racial nature.
- Demeaning comments about an employee's appearance.
- Questions about a person's sex life.
- The use of nick names related to an employee's sex, sexual orientation, gender reassignment, race, religion, age or disability.
- Picking on or ridiculing an employee.
- Isolating an employee or excluding him or her from social activities or relevant work-related matters.

Reporting and investigation of complaints

All allegations of harassment or bullying will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of harassment from members of a particular race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation or age or from employees who have undergone gender reassignment, are married, have entered into a civil partnership or have a disability.

While the Company encourages employees who believe they are being harassed or bullied to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognizes that actual or perceived power and status disparities may make such confrontation impractical.

In the event that such informal, direct communication between employees is either ineffective or impractical or the situation is too serious to be dealt with informally, the following steps should be followed in reporting a complaint of harassment or bullying:

1. Any employee who believes he or she has been or is being harassed or bullied in violation of this policy, or who wishes to report an incident of harassment or bullying, should report the

situation to their line manager. If the employee does not wish to speak to their line manager, they can instead speak to an alternative manager or to a member of the Personnel Department.

2. Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.
3. All allegations of harassment or bullying will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, the employee will be interviewed and asked to provide a written witness statement setting out the nature and details of the incident or complaint and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. For example, the identity of the complainant and the nature of the allegations must be revealed to the alleged harasser so that he or she is able to fairly respond to the allegations. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom the employee raised the matter.
4. The Company will also invite the employee to attend at least one meeting at a reasonable time and place at which his or her complaint can be discussed and the employee must take all reasonable steps to attend that meeting. The employee has the right to be accompanied at that meeting by either a trade union official or a fellow employee of their choice.
5. Once the investigation has been completed and after the meeting with the employee has taken place, the employee will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. The employee will also be notified in writing of his or her right to appeal against the Company's decision if he or she is not satisfied with it. The Company is committed to taking appropriate action with respect to all complaints of harassment or bullying which are upheld. If appropriate, disciplinary proceedings will be brought against the alleged harasser (see below).
6. If the employee wishes to appeal against the Company's decision, he or she must appeal in writing to a more senior manager or to a Director of the Company within five working days of the Company's decision. On receipt of such a request, a more senior manager or a Director (who may not be the person to whom the employee addressed their appeal) shall make arrangements to hear the appeal at an appeal meeting and at that meeting the employee may again, if they wish, be accompanied by either a trade union official or a fellow employee of their choice.

The employee must take all reasonable steps to attend that meeting. Following the meeting, the relevant manager or Director will inform the employee in writing of the Company's final decision on the employee's appeal.

7. If an employee's complaint is upheld and the harasser remains in the Company's employment, the Company will take all reasonable steps to ensure that the employee does not have to continue to work alongside the harasser if he or she does not wish to do so. The Company will discuss the options with the employee.
8. If an employee's complaint is not upheld, arrangements will be made for the employee and the alleged harasser to continue or resume working and to repair working relationships.
9. Employees will not be penalized or victimized for raising a complaint, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

Alternatively, the employee may use the Company's grievance procedure to make a complaint.

Disciplinary action

Any employee of the Company who is found to have harassed another employee in violation of this policy will be subject to appropriate disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as potential gross misconduct and could render the employee liable to summary dismissal.

In addition, line managers who had knowledge that such harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Training

The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction to enable line managers to deal more effectively with complaints of bullying and harassment.

The Company will also provide training to all employees to help them understand their rights and responsibilities under this policy and what they can do to create a work environment that is free of bullying and harassment.

Please sign below to show that you have read and understood this document.

Equal Opportunities Statement

Serjeant Security Ltd is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

Serjeant Security Ltd is similarly committed to eliminating discrimination and encouraging diversity amongst our workforce. Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

Serjeant Security Ltd will follow the recommendations and guidance of the Equality and Human Rights Commission and ACAS in all our employment policies, procedures and practices, and in dealing with customers, consumers and members of the public.

Equal Opportunity Policy

The aims of this policy are to ensure that:

- No-one receives less favourable treatment, on grounds of any protected characteristic (including age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation); or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds.
- No-one is victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.
- Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

1. The policy will be a priority for the organisation.
2. Mr Paul Driver Head of Operations will be responsible for the day to day operation of the policy.

3. The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet and website.
4. Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.
5. All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation. Unacceptable conduct includes discrimination and harassment at work-related social functions.
6. Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
7. Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The grievance procedure will be published in a form that is easily accessible.
8. Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability, age, religion or belief.
9. All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation. All employees carrying out work of 'equal value' will receive equal pay, regardless of their sex, race or any other protected characteristic, and equal pay audits will be carried out as necessary.
10. Selection criteria will be entirely related to the job or training opportunity.
11. We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
12. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or employees.
13. Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored. Monitoring may include promotion and training if necessary.
14. If the data shows that people from particular groups are under-represented in particular areas of work, lawful positive action training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.

15. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, may also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation if necessary.
16. Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds. We will also regularly review advertising, recruitment and application materials and processes, and this policy.
17. All contracts between **Serjeant Security Ltd** and contractors to supply goods, materials or services will include a clause prohibiting unlawful discrimination or harassment by contractors and their staff, and by any sub-contractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
18. The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the website, the staff newsletter, notice boards, and the annual report.
19. Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.

20. Fair and equal treatment will be given to customers and members of the public by all staff. The business will investigate any complaints from staff that they are being harassed by a customer for reasons linked to protected characteristics, and take suitable action to prevent further incidents.

21. The business will take all necessary steps to ensure that employees are legally entitled to work in the UK, making sure that employees from outside the EU have permission to work here by checking the validity of documents and keeping copies of them for two years after the employment has come to an end.

This policy has been endorsed by _Mr Paul Driver Head of Operations and has the full support of the management / board.

The policy is formulated and approved following consultation with senior managers, workers and workers' representatives.

Overall responsibility for the effectiveness of the policy lies with Mr Paul Driver.

Serjeant Security Ltd Complaints Policy

Serjeant Security Ltd is committed to providing good quality services. We recognise however, that we sometimes get things wrong or make mistakes. To deal with this we have a complaints procedure.

We will deal with your complaint

We do not look on complaints as unwanted. In fact, they may help us to see where our services or procedures might be improved. So do let us know where you feel we have made a mistake or done something which you found unsatisfactory or unacceptable. Even if you do not think your particular concern amounts to a 'complaint' we would still like to know about it. You may help us to deal with something we would otherwise overlook.

How to complain

Step 1: Contacting us

The first step is to talk to a member of Serjeant Security Ltd staff. This can be done quite informally, either directly or by telephone.

Usually, the best staff member to talk to will be the person who dealt with the matter you are concerned about, as they will be in the best position to help you quickly and to put things right. If they are not available, or you would prefer to approach someone else, then ask for their relevant line manager.

We will try to resolve the problem on the spot if we can. If we can't do this, for example, because information we need is not to hand, then we will take a record of your concern and arrange the best way and time for getting back to you. This will normally be within five working days or we will make some other arrangement acceptable to you.

Step 2: Taking your complaint further.

We hope you will only feel the need to make a formal complaint as a last resort and that you will complain to the person dealing with the matter first to give them a chance to put things right. However, if you are still unhappy, the next step is to put your complaint in writing to the Operations Manager of Serjeant Security Ltd, setting out the details, explaining what you think went wrong and what you feel would put things right. If you are not happy about writing a letter, you can always ask a member of staff to take notes of your complaint. You should make sure you

agree with what they have recorded and that they provide you with your own copy for reference. This record will be passed promptly to the Operations Manager to deal with.

Once the Operations Manager receives a written complaint, he will arrange for it to be fully investigated. Your complaint will be acknowledged in writing within five working days of receiving it and the letter will say when you can expect a full response. This should normally be within three weeks unless the matter is very complicated, such as where other organizations need to be contacted. Where this is the case, we will still let you know what action is being taken and tell you when we expect to provide you with a full response.

Step 3: The next stage

If you are not satisfied with the Operations Manager's investigation you can take your complaint to the Managing Director of Serjeant Security Ltd. He will let you know within seven working days that they have received your complaint and tell you when to expect a full response from them.

Taking your complaint outside the organisation.

If you are not satisfied with the Board's response, you can always seek advice from outside the organization. It may be possible to seek help from an advice agency or other organization.

Serjeant Security Ltd will provide you with details of any services local to your area if we can.

All Complaint should be at first instance directed to Our 24 Hour Control Centre by way of Telephone/ Fax or email.

Contact Details as follows:

Telephone 01322315501

Fax 01322315502

Email: info@serjeantsecurityltd.co.uk (please place complaint in subject line)

Adverse Publicity Policy

Definition

Adverse publicity is that exposure that Serjeant Security Services Ltd may incur due to a particular, or a variety of circumstances, which may lead to potentially significant consequences. It is recognised that this may result in the Company's reputation among its customers, competitors and wider consumers being damaged, with possible collateral brand and commercial implications.

Potential Sources of Adverse Publicity:

The Directors have identified that the most probable sources of adverse publicity may be:

- Disillusioned (ex) employee
- Disgruntled customers
- Misleading interpretations of website posts/interview excerpts
- Competitors spreading unsubstantiated rumours.

Methodology:

The Directors of the Company have established the following methodology to address circumstances where adverse publicity is, or has the potential to, impact upon Serjeant Security Services Ltd:

- Investigate the problem to ensure that a comprehensive understanding of the issue is obtained, including but not necessarily limited to business area; source; causation; potential exposure; potential impacts.
- Establish a robust remedial route to mitigate or eradicate the effects of any adverse publicity, including any statement to be made to the media. Only Directors of the Company are authorised to speak to media agencies without exception.
- Provide concrete affirmations refuting allegations where possible.
- The effectiveness of actions taken will be continually followed up until the Directors are satisfied that as positive a conclusion as possible has been reached.
- Feedback on preventative action will be given to the business to preclude reoccurrences where this is possible.
- We shall involve customers in the planning of responses.
- We shall keep records of any responses made to ensure lessons are learnt.

Contractual Dispute Management

Serjeant Security Services Ltd's Contractual Dispute Management Policy has been established to detail the informal and formal methodologies that will be followed when dealing with any contractual disputes with Clients that may arise.

Disputes may arise over decisions about contractual sanctions and termination. Under such circumstances Clients have the right to request that it is resolved through a series of dispute resolution processes. This policy sets out the procedures that must be undertaken by Serjeant Security Services Ltd. It is expected that most contractual disputes will be resolved informally as part of the normal contractual relationship before entering into any formal procedures.

Informal Procedure

Where a Client is not happy with the performance of Serjeant Security Services Ltd, in the first instance, this must be flagged to the Head of Operations. A meeting will be arranged as soon as practicable and the issues discussed with a view to effecting a mutually agreed remedy in the form of an action plan.

A timeframe for review of this plan needs to be agreed by both parties, and documented. The action plan should be signed by both parties to show agreement to the plan.

Within the time frame specified, if there is no further improvement, then the formal Contractual Dispute Management policy should be instigated.

Formal Procedure

Where the informal procedure is non-effective, a written Formal Dispute Management statement will be produced by the Head of Operations, stating clearly what corrective and preventative actions will be taken by the Company in the short, medium and long term with key milestones and responsibilities identified. This will be presented to the Client within 5 days of the beginning of the process.

If the dispute is still not resolved satisfactorily and mutually agreed as such by both parties, further resolution can be sought by the following methods:

Mediation - is a form of structured, assisted negotiation in which the parties find their own solution to a dispute with the help of an independent facilitator (the mediator). The mediation will be administered by a mutually agreeable selected mediation Company.

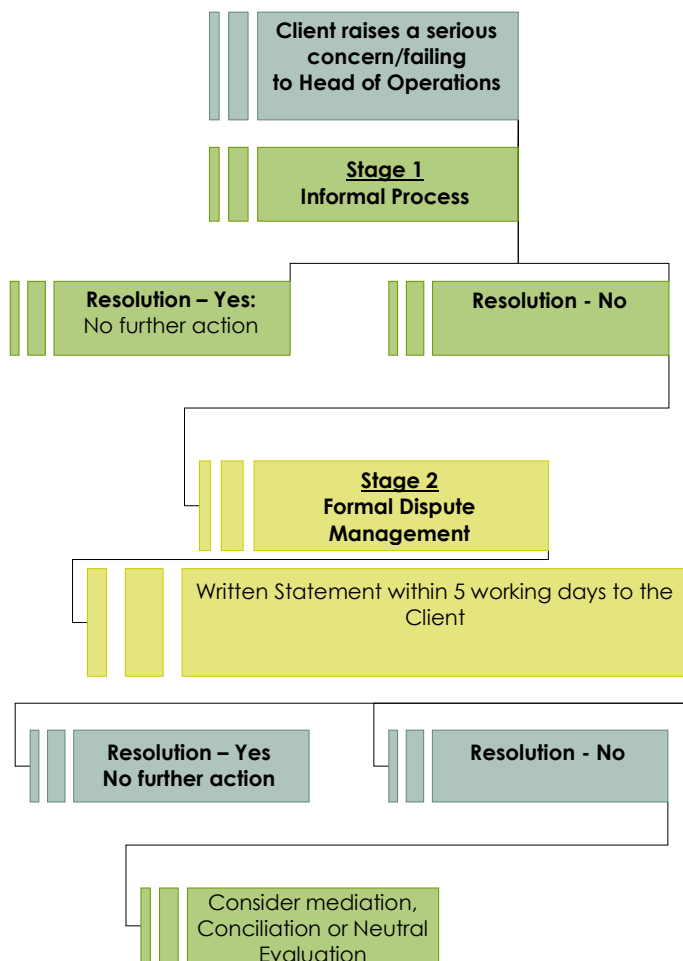
Conciliation - is similar to mediation but the independent facilitator (the conciliator) generally plays a more active role in directing the parties towards an agreed resolution and assist by giving their opinion about the topic in hand.

Neutral Evaluation - differs from both mediation and conciliation in that both parties present information to an evaluator (who will be a person with expertise in relation to the matters in dispute), who then gives their views on the relative strengths and weaknesses of each party's submissions. The evaluator may also offer an opinion as to how the dispute could be resolved.

The views expressed by an evaluator are not binding on the Client or on Serjeant Security Services Ltd, but they will obviously inform any further discussions or negotiations we may have in relation to the dispute. They will also guide both of us in thinking about how to deal with any outstanding matters in dispute.

NB. Costs - Serjeant Security Services Ltd will not seek to recover any costs we incur ourselves as a result of our participation in the processes (e.g. fees for professional advice, costs of management time, etc). Similarly, the Client will need to cover all of its own costs of participating in a dispute resolution process.

Contractual Dispute Management Process Map



Industrial Injury Policy

Serjeant Security Services Ltd's Industrial Injury Policy is in place to protect all employees should an accident occur whilst at work or on Company related business.

This policy is in place for all work related injuries only. A work related injury is one in which the injury arises out of the course of your employment during working hours. Any injury to an employee during working hours must be reported immediately to Head Office and to the Head of Operations. A full incident report and accident report (from an Accident Book) must be completed and returned to Head Office within 24 hours of the injury occurring.

The objectives of the Industrial Injury Policy are:

- To ensure that all Industrial Injuries are fully investigated with results published.
- To ensure compliance with relevant statutory and safety requirements.
- To endeavour, at all times, to look after the best interests of employees with no detrimental effect to the Company's operations.

Calculating Pay for Sick Leave Due to an Industrial Injury

If an injury occurs at work, where time off is necessary, the employee will be paid full pay as per their normal roster pattern. If the employee does not follow a strict roster pattern, then payment will be calculated as the average hours worked per day over the previous 17 weeks. The previous 17 weeks will not take into account any periods of short term absence or holiday/unauthorised leave.

Where the injury results in absence of more than 3 working days, SSP (Statutory Sick Pay) will continue after this point upon submission of a valid Doctors certificate.

Investigation Relating to Industrial Injury

Head Office must be notified immediately of any accident during working hours. Within 24 hours of the injury, a completed Incident Report and Accident Form must be with a Director for an investigation in to the cause and to assess any preventative or corrective measures that will preclude the injury from re-occurring. If no Incident Report or Accident Form is received within 24 hours of the injury, any payments made will be at the discretion of a Director.

Upon receipt of the completed forms, the Head of Operations will open an investigation file and fully investigate the injury. If an employee is off work due to the injury sustained whilst at work, the employee is expected to make themselves available to meet with the Head of Operations (normally at home address) to discuss and further investigate the incident. Unless there is a valid medical reason for any meetings not to take place (which must be supported by a doctor's note) failure to comply with any reasonable management request may result in disciplinary action being taken against the employee.

False Claims

Following an investigation, where a claim is found to be false, the employee will be expected to re-pay all monies paid to them whilst not attending work. In addition, any false claims may lead to the Company's disciplinary procedure being instigated.

Notifying Absence

The Company Absence policy must be adhered to in full for the duration of the absence from work due to an Industrial Injury.

Smoke Free Workplace Policy

PURPOSE

This policy has been developed to protect all employees, service users, customers and visitors from exposure to second-hand smoke and to assist compliance with the Health Act 2006.

Exposure to second-hand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

POLICY

It is the policy of Serjeant Security Services Ltd that all our workplaces are smoke free, and all employees have a right to work in a smoke free environment. The policy shall come into effect on Sunday, 1 July 2007. Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes company vehicles. This policy applies to all employees, consultants, contractors, customers or members and visitors.

IMPLEMENTATION

Overall responsibility for policy implementation and review rests the Head of Operations.

However, all staff are obliged to adhere to, and support the implementation of the policy. The person named above shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also give all new personnel a copy of the policy on recruitment/induction.

Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke free vehicles.

NON-COMPLIANCE

Local disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the smoke free law may also be liable to a fixed penalty fine and possible criminal prosecution.

HELP TO STOP SMOKING

The NHS offers a range of free services to help smokers give up. Visit gosmokefree.co.uk or call the NHS Smoking Helpline on 0800 169 0 169 for details. Alternatively you can text 'GIVE UP' and your full postcode to 88088 to find your local NHS Stop Smoking Service.

Lone Workers Policy

General Statement of Policy

Serjeant Security Ltd understands that within the security industry, the requirement for lone working can routinely occur. Where lone working is necessary, the Company will take all reasonable steps to ensure the health and safety of employees engaged in lone tasks. The Company will ensure that a risk assessment is conducted, documented, made available to employees and that arrangements are in place prior to employees beginning to work alone.

Procedure

The Company will ensure that:

- Regular mobile supervisory welfare visits will be undertaken.
- Emergency procedures are in place so that members of staff working alone can obtain assistance if required;
- A risk assessment is completed by a person competent to do so prior to employees working alone;
- Any employee working alone is capable of undertaking the work alone;
- Arrangements are in place so that someone else is aware of a lone worker's whereabouts at all times;
- Persons working alone are provided with adequate information, instruction and training to understand the hazards and risks and the safe working procedures associated with working alone;
- Training records are kept and reviewed regularly.

The person who conducts the lone worker assessment will:

- Involve the employee who is working alone in the assessment process and seek their involvement in the development of safe working methods;
- Advise the employee undertaking the lone working of the findings of the assessment and ask for their feedback;
- Maintain a record of all lone working assignments.

Employees working alone will:

- Follow the safe working arrangements developed by the Company for lone working;
- Take reasonable steps to ensure their own safety at all times;
- Inform their line manager/assessor of any incidents or safety concerns that they may have from time to time.

Appraisal Policy

Serjeant Security Ltd believes that all employees should be given a clear understanding of the organisational objectives and how their role and personal contribution help to achieve these. Ensuring employees feel involved and thus develop a deeper interest in their working environment can contribute to enhancing individual performance and therefore overall organisational success.

Our organisation relies on its people to deliver the best possible service and attention in order to meet our objectives. Therefore, just as we monitor and audit other areas of the business, it is important to systematically review the performance of all our people against appropriate benchmarks, performance indicators and objectives.

One of the main outcomes of reviewing individual performance is the establishment of development needs and targets in order that our people are better able to perform their immediate role as well as helping with the overall succession planning for the local environment and organisation as a whole.

It is therefore the policy of Serjeant Security Ltd that all employees receive an annual performance review linked to past, present, and future objectives conducted by their Line Manager. The Performance Appraisal is the tool that is used to record and evidence an employee's performance for the year. Future development needs and targets will be set at the annual performance review and a midyear review will monitor how an employee is progressing against these.

A performance review will also be held for those employees who are due to complete their 12 week probationary period. The 3 month Probation Review form will be the tool that is used to record that the employee has successfully fulfilled the criteria set by the Company.

There are a number of benefits to establishing a common performance management and review system across the organisation. These include: increasing the consistent communication of organisational objectives; promoting development and movement of individuals across the organisation; ensuring equal opportunities to training and development and helping the organisation to identify and develop individual potential.

The Performance Appraisal and the 3 month Probation Review forms have been designed to "fit all". The same can be used at all levels but with appropriate interpretation and amount of detail. This enables a common approach and consistent use of the system.

Recognised Benefits of Effective Performance Review

There are many benefits to both the organisation and the individual. These include:

Organisation

- Identifies individuals who are ready for promotion
- Identifies training and development needs so that appropriate action can be taken
- Encourages communication at all levels
- Sets standards of performance

- Provides a formal opportunity to review the content of the job description to ensure it is still relevant

Head of Operations

- Ensures there is a clear understanding between the individual and the Manager of the agreed objectives and the responsibility of the individual to achieve, given the appropriate support
- Individuals can become more motivated and interested and therefore achieve more
- Individuals are better developed and so can accept more delegation and adapt to change
- Managers are better able to identify and reward success
- Managers receive feedback on their own performance

Individual

- Individuals know where they stand and what is expected of them and how they fit into the overall picture for organisational success
- Individuals have clear objectives and actions agreed
- Provides an opportunity for Managers and individuals to discuss their achievements and ambitions
- Individuals receive devoted personal, uninterrupted attention and time.

Focus on Outcomes

The focus of Serjeant Security Ltd's system is on development and improvement and within this remit there is a need to review past performance. Outcomes will be placed in individual development plans and used to ensure that individuals are constantly and progressively evolving in terms of skills and job knowledge.

Customer Service Policy Statement

Policy Statement

Serjeant Security Ltd endeavours to provide exemplary levels of service to each of our customers. It is our intention to ensure that every customer and consumer can expect the highest quality of service and to be treated in a courteous and professional manner at all times.

Our Customer Service policy has been introduced to ensure that all members of the Company, frontline and non-frontline, act as ambassadors for the Company and complete all tasks effectively whilst ensuring the needs of the customer are met at all times.

We aim to:

- Meet and where possible exceed customer expectations
- Provide the highest quality services to all our customers that are commensurate with their requirements.
- Continually improve service quality with well-trained and supportive staff that genuinely feel the need to take care of and engage with our customers
- Appreciate and understand that each Customer is unique
- Put our Customer's needs first
- Treat our internal and external Customers with courtesy and respect at all times
- Provide qualified and supportive staff available to deal with Customers directly
- Listen and respond in an appropriate manner to Customer feedback, positive and negative.
- Deal with any issues or queries efficiently, consistently, fairly and with integrity
- Provide internal and external customers with relevant written information
- Have a transparent and effective Complaints Management System managed in accordance with BS ISO 10002 Guidelines for Complaints Handling in Organisations.
- Be reliable and flexible where possible to meet Customer needs

Expectations of our Customers

Serjeant Security Ltd are focussed on a partnering approach when providing security solutions, and throughout our working relationship, are keen to ensure that this partnering approach is reciprocated.

We would appreciate it if our Customers would:

- Provide us with all the information we need to provide a bespoke service to meet their needs
- Treat all employees of Serjeant Security Ltd appropriately and with respect
- Help us to improve by giving us their views and suggestions
- Trust in our service
- Accept our decisions with regards to our employees
- Engage with us to enable the continual improvement of the service that we provide.
- Pass on any consumer feedback received concerning the service that we provide.

Policy Monitoring

As a Company committed to a strong culture of continuous improvement, we are constantly reviewing our internal processes and improving on our service where possible. In order to do this effectively, we will:

- Provide customers with full details of how to make a complaint
- Provide a transparent and effective Complaints Management system in accordance with BS ISO 10002.
- Monitor complaints and learn from our mistakes
- Take positive feedback on board to increase the value of the service that we provide
- Use customer satisfaction surveys to regularly gather customer feedback and publish the results.
- Establish regular meetings with customers and complete Service Level Agreements ensuring that the minimum target is met.

Workplace Violence Policy

Workplace Violence Policy

Serjeant Security Limited is committed to providing a safe and healthy workplace that as far as possible, is free from violence or threats of violence – both actual and perceived. For the purposes of this policy, workplace violence is any violent or potentially violent behavior that arises from or occurs in the workplace and affects employees, customers, contractors, sub-contractors and visitors to our office or contracted premises and sites.

All of our employees have the right to be able to perform their duties without fear of abuse or violent acts. Serjeant Security Limited employees should not consider violence or abuse to be an acceptable part of their employment.

Individuals who engage in violent behavior will be subject to dismissal, other disciplinary action or potentially criminal prosecution. This policy applies to all work locations including offices, work sites, vehicles, and all operational locations.

Serjeant Security Limited treats all incidences of threatening or violent workplace incidents very seriously. Employees, supervisors and managers are expected to report actual or alleged incidents of violence in the workplace.

In addition to this policy all employees must adhere to any site, contract or customer specific policy relating to this issue.

Violent Behaviour

Serjeant Security Limited will not tolerate any behaviour, whether direct or through the use of company property or resources that:

- Is violent;
- Has the potential to be violent;
- Threatens violence;
- Harasses or intimidates others;
- Encourages violent behaviour by others;
- Interferes with an individual's legal rights of movement or expression; or,
- Disrupts the workplace, the working environment or the company's ability to provide a service to the customer.

Violent or threatening behavior can include physical acts, oral or written statements, harassing telephone calls, gestures and expressions or other associated behavior.

Dealing with Violent Behavior

If possible move away from the situation and move to a place of safety.

Do not adopt aggressive or confrontational mannerisms or body language.

Never put yourself or your colleagues at risk – ensure that you are non-confrontational at all times – If required retreat to a safe location and await the Police.

Reporting Requirements

Employees who report incidents of workplace violence may request to do so confidentially, employees who are concerned about confidentiality should discuss their concerns with the Office Manager or Company Director.

Reports must contain:

- An account of what happened;
- Details of the victim(s), the assailant(s) and any witnesses;
- The outcome, including working time lost to both the individual(s) affected and to the organisation as a whole;
- The details of the location of the incident.

Incidents must also be classified as:

- Fatal injury;
- Major injury;
- Injury or emotional shock requiring first aid, out-patient treatment or counselling,
- Absence from work (record number of days);
- Feeling of being at risk or distressed

Each site/contract is responsible for reporting incidents of violent or threatening behavior involving any employee or appointee as follows:

1. Supervisors and managers who receive reports of violent or threatening behaviour must notify head office immediately.
2. Contact head office; if out of hours do not leave a message and call the duty manager as specified in your assignment instructions.

If a report must be made after normal office hours, use the procedure for using Incident Reports.

The Head of Operations will apportion the appropriate resources and assist supervisors and managers in their response to allegations of and/or actual violent or threatening conduct. If allegations of violent behavior are made against Serjeant Security Limited or it's employees, the Head of Operations will notify the Directors.

Serious Incident Debriefing

Serious Incident debriefing is the process by which individuals who have experienced or been exposed to a traumatic event can be professionally helped to resolve any concerns or anxieties that such an experience often causes. Debriefing will be provided based upon the nature and seriousness of any incident, if deemed necessary professional guidance will be provided.

Ethical Business Practice

Policy Statement

Serjeant Security Ltd is committed to ensuring that its business is conducted in all areas according to ethical, professional and impacting legislative standards.

Serjeant Security Ltd standards of business ethics are founded upon:

- Consistent commitment to fair and reasonable business practices
- Consistent commitment to transparent business practices
- Policy against Child or forced labour directly or indirectly through our suppliers
- Ensuring the Health, Safety and well being of all those who work directly under our supervision
- Expectation that Suppliers will commit to working in line with our Ethical Business Practice and the objectives within this policy document
- Fair pay for employees
- Promotion of Anti Discrimination and freedom of association
- Promotion of Anti Corruption
- Reasonable working hours in line with the Working Time Directive
- Consideration of our Environmental impact
- Respecting the confidentiality of all information provided to the Company
- Satisfying the requirements of the law and all prescriptive regulatory requirements
- Commitment to accurate and honest reporting to customers and wider stakeholders where appropriate.

Purpose

The purpose of this policy is to set out the business standards which the Directors of Serjeant Security Ltd will commit to support and that the Company will be guided by in the conduct of its business and operations.

Scope

This policy applies to all operational processes and activities of Serjeant Security Ltd. Additionally; the Company expects equivalent minimum standards of ethical practice from its business partners and service suppliers.

Failure to comply with the standards of business ethics will be taken seriously and, depending upon the circumstances, could result in dismissal or other disciplinary action for employees and termination of relationships with business partners or suppliers.

Guiding Philosophy

Supporting the standards of business ethics is essential for Serjeant Security Ltd, which seeks to conduct its business in a socially responsible and accountable manner. Maintaining exemplary standards in all business operations is viewed as fundamental in ensuring continued customer, employee and consumer trust in the Company and brand.

Corporate objectives

To ensure that the Company manages and conducts operations in line with the standards of this business, all staff are expected to be aware of their responsibilities within this policy and to discharge them accordingly. Key responsibilities are detailed in the following section.

Responsibilities

The Directors are the main sponsors of the policy.

Staff are encouraged to make suggestions or raise serious business concerns.

Examples of what Serjeant Security Ltd expects to see as the operational expression of this policy include, are (but not necessarily limited to):

- Fair business practices in our relationships with our customers and employees (internal customers).
- Dealing with customer complaints courteously, seriously and promptly and according to the published complaints management process.
- Promptly correct any misunderstandings if they are thought to have taken place through unclear or fractured communication.
- The Company gives equal respect, consideration and opportunities to all its employees. Colleagues, customers, consumers and suppliers will be treated in the same and appropriate manner. Individuals will be selected for employment and promotion based on ability and experience, free from any form of discrimination.
- The Company will respect and comply with business partners/suppliers' contracts, pay business partners/suppliers within the timeframe agreed in the contract, comply with non-disclosure of information, comply with terms of any licenses to use products such as the prohibition of unlicensed copying of computer software, etc.
- The Company will not give or accept money, gifts, entertainment, loans or any other benefit or preferential treatment from any existing or potential customer, supplier or business associate of the Company, other than occasional gifts of a modest value and entertainment on a modest scale as part of customary business practice. Gifts and entertainment should not place the recipient under any obligation and they should not be capable of being misconstrued. If in doubt, consult with a relevant senior manager who will decide on the action to be taken.
- The Company will not make agreements to purchase goods or services from a prospective supplier on condition that the supplier purchases products or services from the Company. Suppliers may be customers of the Company should they wish.

Interpretation of Terms:

Honest business practices

Avoid situations in which financial or other personal interests or dealings are or may be in conflict with the interests of the Company. When it is impossible to avoid such conflicts of interest, it should be ensured that these are clearly disclosed. Advice from a relevant senior manager in cases where a potential conflict of interest might occur e.g. any business or financial arrangements with a family member, an associate, a friend or close acquaintance who conducts business with the Company, should be sought.

Confidentiality of information

Unless proper written authority is given, no employee will access, modify, disclose or make use of any confidential customer data, group, personal or supplier data for any purpose other than legitimately carrying out work-related duties.

No employee will disclose unpublished "price-sensitive" information to any other person except where it is necessary to do so to carry out your duties. If it is necessary to disclose this information, that person must first be advised that the information is confidential and that he or she will become subject to the Company's confidentiality arrangements. All employees will act with integrity regarding information obtained and held on behalf of the Company and avoid careless or inadvertent disclosures which may damage the Company's business or that of its customers, consumers or suppliers.

Accurate and honest reporting

The Company will record all transactions in a timely manner in the accounting records of the Company according to generally accepted accounting principles.

The Company will provide supporting documents for all payments and transactions, clearly identifying and describing their nature and purpose.

The Directors will undertake to ensure that all Company funds and bank balances of any kind are reflected in the books and records of the Company. Accounting practices that suppress records, misstate operating results, obscure the nature of transactions or otherwise alter the substance of any transaction must not be adopted.

Code of Conduct

AIM

The aim of this Code of Conduct is to specify the Company disciplinary rules, instructions and procedures applicable to all Security Officers and to provide a fair and known method of dealing with those who fail to observe them or who fail to attain an acceptable standard in the performance of the duties under their contract. The term "Security Officers" includes salaried staff who are directly or indirectly employed on security duties. The Company reserve the right to alter or add to this code at anytime without prior notice.

ASSIGNMENT INSTRUCTIONS

Security Officers will carry out the Assignment Instructions, which are provided at each site and follow other lawful and reasonable customer and Company rules and instructions, which may be issued from time to time.

All officers must be in full, approved uniform and ready to assume full operational duties immediately from the time the shift commences. Lateness will not be tolerated as it places an unacceptable burden not only upon colleagues who are waiting to be relieved, but also upon the service as a whole. Adequate time for an effective handover of duties should be accommodated.

It is also very important that Officers arrive on post at the correct time. Lateness to location is not only inconsiderate to ones colleagues but could also severely compromise the service. Lateness to post cannot be tolerated and repeated incidents may result in disciplinary procedures.

ABSENTEEISM AND TIME KEEPING

Absence from or lateness for security duty could endanger property or even life.

Absenteeism must be notified to the duty manager as early as possible, but no later than 6 (six) hours before the commencement of duty. It is also the responsibility of Security Officers to notify head office of their intention to return to work, having been absent, by 12.00hrs before their next operational duty. Failure to do so will mean that the Security Officer will not be permitted to work that duty and the shift will be re-allocated.

Absence without good reason and poor timekeeping are breaches of Company discipline. A Security Officer may be subject to disciplinary action if absent from duty without justification.

UNIFORM

All duties will be carried out in uniform unless instructed otherwise. Your uniform helps to instil pride and authority and makes you recognisable as a professional security officer to those who may need your assistance.

All security personnel must ensure that their uniforms are clean, well pressed and in good repair at the start of each duty. All corporate ties must be secured, neatly fitted, clean and in good repair.

Shoes/boots must be clean and black. Suede is not permissible.

Socks/stockings/tights must be black or dark grey.

Security Personnel are to project a professional and confident bearing. Personal presentation is key to accomplishing this, therefore the following presentation guidelines must be adhered to:

Hair: Hair should be kept neat and tidy so as to avoid appearing unkempt. Beards and moustaches should be maintained at a moderate length and neatly trimmed. All clean-shaven male Security Officers must be freshly shaven when commencing their duties.

Jewellery: Security Officers must not wear earrings while in uniform and other jewellery should be restricted to rings, in moderation and preferably only wedding rings. Female Officers are requested to keep jewellery other than wedding rings to a minimum.

Security Officers of BOTH sexes must not wear facial studs, rings or any other style of jewellery in their nose, eyebrows, lips or other facial area whilst in uniform or on duty.

This is to ensure that our presentation is consistently excellent and reflect your status as professional Security personnel and to also ensure that you are not at additional risk of injury during the course of your duty.

SIA License

All security personnel must ensure their SIA Licenses are adequate for any role they may be asked to undertake. Serjeant security must also ensure appropriate checks take place for compliance.

All personnel must ensure they wear their SIA Badge at all times whilst on duty, if an officer can not produce a license whilst on duty they will be sent home without pay for the rest of their shift and subsequent shifts until such time they can produce their license.

All personnel have a responsibility to notify the SIA if they have a change of address or circumstances they feel may have an effect on their license status.

All staff must notify Serjeant security ltd if they have any issued raised by the SIA such as license being revoked or an appeal status.

All staff must Notify SIA and Serjeant security immediately if their license is lost or stolen.

All staff must allow good time for their license renewal, if this is not done and their license expires they will be put on unpaid suspension until such time they can produce evidence their new license has been granted.

In a case the officer does not notify the SIA of any of the above and this leads to license being revoked they will be suspended without pay until any disputes can be resolved and evidence of a new license can be produced.

Suspension will last for a maximum of 6 months, if not resolved within this period serjeant security can terminate employment.

CUSTOMER'S GOODS AND SERVICES

Security Officers are not to use any vehicles, goods, services, telephones or reproduction equipment of the customer without the express permission in writing from the customer.

ALCOHOL AND DRUGS

Alcohol or drugs will not be consumed during or immediately before any period of duty. Anyone suspected of being unfit because of alcohol or drugs when on duty or when reporting for duty will be suspended at once without pay for the remainder of the duty period. Offenders will be liable to disciplinary action.

COMMUNICATIONS

Telephones

All telephones must be answered politely, using the correct salutation. All telephones should be answered within 3 rings wherever practicable.

Client telephones must never be used for personal use without express written permission.

Radio Usage

Radios must only be used for operational duty purposes. Correct call signs must be utilised at all times and no slang or abusive language may be used at any time.

Officers should speak clearly, concisely and use phonetic alphabet at all times when providing details.

| | | | | | |
|----|--------|----|----------|----|---------|
| A: | Alpha | B: | Bravo | C: | Charlie |
| D: | Delta | E: | Echo | F: | Foxtrot |
| G: | Golf | H: | Hotel | I: | India |
| J: | Juliet | K: | Kilo | L: | Lima |
| M: | Mike | N: | November | O: | Oscar |
| P: | Papa | Q: | Quebec | R: | Romeo |
| S: | Sierra | T: | Tango | U: | Uniform |
| V: | Victor | W: | Whiskey | X: | X-ray |
| Z: | Zulu | | | | |

Officers must ensure that radios are signed out correctly and are maintained in good order during usage. Any faults must be escalated to the duty manager / nominated Client contact immediately.

DISCIPLINARY PROCEDURES

The following procedure will be carried out if the Company is not satisfied with your performance or conduct. You have the right to be accompanied and supported at disciplinary interviews by an appropriate Company colleague of your choice, subject to their agreement, or union representative.

DISCIPLINARY INVESTIGATION AND HEARING

INVESTIGATIONS

You are required to co-operate fully with any disciplinary investigation being carried out by the Company, whether in relation to you or any other person. You may be required by the Company to give evidence at any hearing and/or to provide a written statement(s).

DISCIPLINARY PREPARATION

If your manager undertakes an investigation into your performance or conduct you will normally be informed in writing. A meeting will take place to enable you to respond to the issue. The letter will give the date and location for the meeting and a brief description of the issue to be investigated with you. The letter will remind you of your right to be accompanied by a fellow employee of your choice or union representative. It is your responsibility to arrange for any such person to be present at the meeting. A minor infringement may be dealt with without an initial letter and the meeting arranged verbally.

SUSPENSIONS

Where there is a requirement for suspension, for example, for carrying out an investigation or arranging interviews, employees may be suspended, with pay at the discretion of the Company, initially for up to three days. A suspension may be extended by the Company at any time and for any period.

STAGES

If following the disciplinary interview, the Company concludes that disciplinary action against you is appropriate; this will take one of the following forms;

- A formal verbal warning.
- A written warning.
- A final written warning.
- **Dismissal.**

The disciplinary process may commence at any stage.

The Client will be kept informed throughout of all stages of the disciplinary procedure.

DISCIPLINARY ACTION

In addition to the stages outlined, your Manager or his/her superiors may take the following action against Security Officers who commit breaches of discipline after appropriate warnings; issue further warnings and if appropriate, change your employment or site. The manager may also demote you. Both these actions may involve a reduction in pay.

A record of all disciplinary action will be kept and statement of the action taken will be given to you.

WARNINGS

If you fail to perform to the standard required in your job or commit an act of misconduct you will be advised of your shortcomings by your Manager. Informal warnings need not be issued in sequence. Serious offences may merit immediate written or final written warning.

Formal verbal warnings will be recorded and retained in your personnel file.

Written warnings. Failure to reach the required standard of job performance. A repetition of the behaviour, which gave rise to a formal verbal warning. Misconduct or a breach of discipline will result in a written warning. Letters will be retained in your personnel file. There is no prescribed number of warnings or set period of retention on your file before removal.

Final written warnings will clearly state that repetition of a specified misdemeanour or any further breaches of discipline, or failure to reach a required standard of job performance by a specified time will result in dismissal without notice. Letters will be retained on your personal file.

Dismissal for failure to observe a final warning for poor job performance or misconduct. A Security Officer may also be summarily dismissed for gross misconduct. After investigation the dismissal may be made without prior warnings and without notice.

All dismissals require the authority of a Senior Manager or a Director.

The following list, which is not exhaustive, gives examples of gross misconduct. Misconduct will result in dismissal without notice;

- Being unfit for duty through alcohol or drugs.
- Leaving an assignment without authorisation.
- Sleeping on duty.
- Booking on or off duty from a place other than your work place.
- Booking another employee on or off duty.
- Submission of false expense claims or time sheets. Falsely booking on or off via the automated system. Falsifying reports or other documentation, booking another employee on who is absent. Failure to report unauthorised or inaccurate compensation for hours not worked. Falsification of any employment records, whilst applying for employment or at any time during employment.
- Act(s) of harassment or discrimination on grounds of race, religion, ethnic origin, disability, sexual orientation or gender.
- Failure to follow or wilful disobedience of a reasonable legitimate duty instruction.
- Serious neglect of duty.
- Committing a criminal offence or being charged with having committed a criminal offence.
- Taking, using or misusing, or permitting another person to use or misuse customer's or Company equipment, property, vehicle's, goods or services without express permission
- Any act that undermines the contract between the company and its customer.
- Whilst on duty, being absent from assignment without proper authority or reasonable excuse.

- Bringing or permitting to be brought on to the Company's and/or client's premises, literature that in the Company's views is pornographic or likely to otherwise cause offence on any other grounds.
- Failure to report or action reports of serious incidents or occurrences, which may affect the Company's legal duties or legal obligations. Failure to report an incident involving the police.
- Refusing to consent to a personal, vehicle or baggage search without reasonable excuse
- Refusing to submit to a drug or alcohol test without reasonable excuse
- Loss of keys through negligence.
- Making false or malicious statements about the Company.
- Working in competition with the Company.
- Unlawful use of a hand held mobile telephone whilst driving a company vehicle.
- Knowingly damaging company property or failure to report damage to company property.
- Failure to devote the whole of your time, attention and abilities to your duties due to use of personal mobile phones / laptops/ entertainment devices whilst on duty.
- Unauthorised use or attempted use of computer passwords.
- The installation of, or use of, unapproved computer software.
- Mishandling and or misuse of electronically stored information is an offence under the provisions of The Data Protection Act.
- Your attention is drawn to the Company's Policy on data protection.
- Non-display of an SIA license whilst on duty (Section 9 offence, Private Security Industry Act 2001)
- Not being in possession of a valid and appropriate SIA licences and reporting for duty.

APPEAL AND SUPPORT

You have the right of appeal at all stages of the disciplinary procedure. Appeals should be made in writing within seven days to the manager or the person who will be named in the written notice of the disciplinary meeting outcome. Appeal hearings will be conducted by a Senior Manager or Director.

COMPANY VEHICLES (as appropriate)

Company vehicles are an expensive asset to the company. As a mobile operative, you have a duty to respect and care for these vehicles; they should be kept clean at all times to ensure the company brand is promoted in a professional manner.

It is your responsibility to check the vehicles on a daily basis such as oil, water and brake fluid levels, tyre pressure and general wear and tear on the vehicle. It is your responsibility to report all defects and repair requirements for the vehicle.

All vehicles are to be driven in a safe manner at all times. Non-employees are not permitted to drive the vehicles and you must obtain the written permission from a Director to allow non-employees to travel in the vehicle with you.

All fixed penalties/fines incurred by you whilst driving or otherwise in control of a company vehicle will be your responsibility to pay/accept liability for.

Safeguarding Policy

Policy Statement

Serjeant Security Ltd recognises that protecting and safeguarding children, young people and vulnerable adults is a collective responsibility and is founded upon effective collaborative working between the company and customers to maximise the effectiveness of different roles and expertise.

Purpose

The company recognises that a written policy and specific procedures are required in order to enable that safeguarding children, young people and vulnerable adults is achieved with comprehensive understanding, uniformity and absolute clarity in application where our staff come into contact with vulnerable groups.

Scope

Specific objectives within the scope of this policy include:

1. Ensuring that a responsible person is nominated as a focal point for Safeguarding issues., being the Head of Operations.
2. Ensuring that a Safeguarding Policy is in place, reviewed at least annually and that the Policy is appropriately updated in line with any changes to national legislation, business requirements or any national and local policy developments.
3. Ensuring that all aspects of the Safeguarding Policy are considered during the recruitment process for members of staff and referenced in the selection process for subcontractors.
4. Ensuring that where appropriate parents, tutors/teachers, children young people and vulnerable adults are informed in writing how to report concerns about a child, young person or vulnerable adults.
5. Ensuring that all members of staff who are in contact with vulnerable groups have passed enhanced level CRB clearance checks.

Guiding Philosophy

It is the policy of the company to take into account national guidance and implement it as far as possible. The following national guidance will be of relevance.

- The Children Act (1989)
- The Children Act (2004).
- Every Child Matters

- Working Together To Safeguard Children: A Guide to Inter-Agency Working To Safeguard and Promote the Welfare of Children (HM Government 2006).
- Human Rights Act 1998
- Criminal Justice & Court Services Act 2000
- The Protection of Children Act 1999
- The Sexual Offences Act 2003
- What To Do If You're Worried A Child Is Being Abused (Department of Health, Home Office, Department for Education & Skills, the Lord Chancellor's Department, the Office of the Deputy Prime Minister & the Department for Culture, Media & Sport 2003)

It is not the role of the company staff or agents to make an assessment of whether children, young people or vulnerable adults have suffered harm. However, members of staff recognise their duty to report any concerns about harm in accordance with this policy.

The harm or possible harm of a child, young person or vulnerable adult may come to the attention of a member of staff in a number of ways.

It is the policy of the company to ensure that relevant members of staff are aware of these types of abuse and what to do should they become aware of them.

Allegations against Company Staff

It is the policy of the company to take extremely seriously any concerns about the behavior or conduct of individuals working within or for the organization.

Specifically, any member of staff who has concerns about the behavior or conduct of another individual working within organization is required to report the nature of the allegation or concern to the Head of Operations immediately.

In cases where there is an immediate risk to any child, young person or vulnerable adult, the information will be passed to the appropriate authority or the Police, as soon as possible.

It is the policy of the company to ensure that all relevant members of staff are fully aware of the guidelines on self protection when working with children, young people and vulnerable adults.

The aim of following the guidelines is to minimise the risk of vulnerable situations where false allegations can be made.

Recruitment

Without prejudice to the general recruitment procedures

All members of staff with access to children and young people or sensitive information relating to children will be required to undertake an enhanced CRB check.

Whistleblowing Policy

(Making a Disclosure in the Public Interest)

Introduction

Serjeant Security Ltd is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

Scope of Policy

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

i. Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

ii. Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

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

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Head of Operations unless the complaint is against the Head of Operations or is in any way related to the actions of the Head of Operations. In such cases, the complaint should be passed to a Director for referral.
- In the case of a complaint, which is any way connected with but not against the Director, they will nominate a Senior Manager to act as the alternative investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Managing Director. The Managing Director has the right to refer the complaint back to management if he feels that the management without any conflict of interest can more appropriately investigate the complaint.

Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and

trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Managing Director
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Managing Director as appropriate.
- The Managing Director will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Managing Director, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

Ethical Purchasing

It is the aim of Serjeant Security Ltd. to ensure that its operations and activities, in no way, adversely affects the environment. A commitment to continually improve environmental performance, with a view to reducing environmental impacts to levels not exceeding those corresponding to economically viable applications of best available practices and techniques, has been established by the Directors.

POLICY AIMS:

All new policies introduced into Company procedure will be assessed for their effects on the environment. The Company aims, where possible to minimize the use of energy in its own buildings, vehicles and equipment.

The company aims to follow the code of practice set down by EHRC (Equality and human rights commission code of practice).

The Company aims where possible to control the consumption of water to a level appropriate for efficient Operations only.

The Company will ensure that the drivers of all Company vehicles will adopt a sensible driving style to reduce noise levels and omissions reducing air and noise pollution.

Where and when economically viable the Company will endeavour to run its fleet on unleaded, high-octane fuel or diesel.

The Company will work towards a reduction in air pollution in our operational areas.

The Company will encourage employees and personal contacts to reduce their negative impact on the environment.

The Company will ensure that the Company requirements necessitate minimal use of solvents to reduce water pollution.

The Company will ensure that a strict policy is adhered to in the purchase of materials to meet operational needs and to minimize the production of waste.

The Company will where practicable ensure that all recyclable waste is disposed of in an appropriate way.

The Company will ensure that the condition of buildings, surroundings and facilities available to both employees and Company contacts are operating in accordance with our environmental policy.

The Company will endeavour to educate with information its employees and contractors of the Company and local operating Councils Environmental policies.

Anti-Bribery Policy

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy).

This policy covers:

Bribes;
Gifts and
hospitality;
Facilitation

payments;
Political
contributions;
Charitable
contributions.

3.2 **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

3.3 **Gifts and hospitality**

Employees must not offer or give any gift or hospitality:

which could be regarded as illegal or improper, or which violates the recipient's policies; or
to any public employee or government officials or representatives, or politicians or political parties; or
which exceeds £0.00 in value for each individual gift or £0.00 in value for each hospitality event (not to exceed a total value of £0.00 in any financial year), unless approved in writing by the employee's manager.

Employees may not accept any gift or hospitality from our business partners if:

it exceeds £0.00 in value for each individual gift or £0.00 in value for each hospitality event (not to exceed a total of £0.00 in any financial year), unless approved in writing by the employee's manager; or
it is in
cash;
or
there is any suggestion that a return favour will be expected or implied.

Where a manager's approval is required above, if the manager is below Director level then approval must be sought from an appropriate Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approvals.

3.4 **Facilitation payments and kickbacks**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

3.5 **Political Contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 **Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation must be offered or made without the prior approval of [the compliance manager.

All charitable contributions should be publicly disclosed.

4. **Your responsibilities**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager **OR** the Company Secretary or the confidential helpline as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third

parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager **OR** the Company Secretary or through the confidential helpline.

7. What to do if you are a victim of bribery or corruption

It is important that you tell the Company Secretary or the confidential helpline as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform [the compliance manager] immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

9. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

10. Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

11. Monitoring and review

The Company Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

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

Alcohol and Drugs Policy

Alcohol and Drugs policy

Our Policy applies to Security Officers/Employees responsible for security and safety of the public

Due to the nature of our business, we have to have a zero tolerance approach to the use of drugs and alcohol when on duty. All our employees are required to attend work in a fit and appropriate state with no impairment from the effects of drugs or alcohol.

Use of drugs or alcohol consumption, and drug or alcohol misuse during working hours is strictly prohibited and will be subject to the company's disciplinary procedure and is likely to render the employee liable to summary dismissal.

Misuse of alcohol and/or drugs may have a detrimental effect on an employee's attendance and work performance to the extent that our business interests and the interests and safety of the public and our employees can be affected.

Any employee who notices obvious signs of a colleague being under the influence of either drugs or alcohol has a duty to report it to a manager immediately – the safety of the public could be at risk.

If you have any questions in relation to this policy, please contact your line manager.

Testing

In relation to those employees who have a direct responsibility for the security and safety of the public, the company reserves the right to arrange for testing on all employees in the following circumstances.

- After an accident or incident where there is suspicion of drug use or drinking that contravenes the company's regulations
- Where an employee is suspected of reporting to work under the influence of drugs or alcohol.
- Witnessed evidence of erratic behaviour, which is suspected, may put the health and safety of a member of the public or another employee at increased risk, or which could cause damage through, for example, the driving of a company vehicle, or property damage.

In addition, the company may carry out random testing and therefore you should be aware that this could be at any time during your working hours. Employees will be randomly selected for testing by a nominated organisation. A positive test will mean probable suspension from duties, and the invoking of the disciplinary process, and you should be aware that your employment is likely to be at risk.

IAM Security will always use a reputable company to carry out For Cause, Post Incident and Random drug testing, who have properly trained personnel and strict procedures in place to ensure professionalism and confidentiality in the process.

Employees should consider that drinking the night before attending work might mean failure of a urine test the next day, and consider the amount of time substances can remain in the bloodstream.

If you are prescribed any medication from your GP, you are required to report it immediately to your manager who will investigate the potential impact of the medication on your ability to carry out your duties and any impact on the results of a test, should you be tested.

For Cause / Post Incident

In the event of a safety-related incident, or if you there is reason to suspect that an employee is under the influence of drugs or alcohol whilst at work, IAM will remove the employee from their position with immediate effect and nominate our appointed agency to carry out the relevant tests. The professional agency that we choose to use will be on-site within 2 hours. Samples will be collected and sent for urgent analysis, working to a strict chain of custody protocol.

Should the results of a 'for cause' test prove positive, the employee would be liable for any costs incurred because of the testing process.

Guidance Notes to Supervisors/Managers

If there is a suspicion that a member of staff is under the influence of drugs or alcohol the following steps should be taken:

- Ask the member of staff if there is a possibility that they are under the influence of drugs or alcohol.
- If the employee answers yes or the supervisor/manager still suspects this to be the case, the member of staff must be immediately removed from his post and replaced. This should be communicated to the Control Room and escalated to a member of the Senior Management Team with immediate effect.
- The employee must be requested to take a test, which will be carried out by the specialist company appointed by IAM. This test will take place within 2 hours.
- The employee will be suspended from duty pending the results of the test and will also be liable for any costs incurred for testing, should be results be positive.

For Cause Drug and Alcohol Testing - 24 hour telephone line