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EQUAL OPPORTUNITIES AND DIVERSITY POLICY

GENERAL

1.1 Staffing Network Limited embraces diversity and will seek to promote the benefits of diversity in all of our business activities. We will seek to develop a business culture that reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee and candidate base as possible. We will strive to make sure that our clients meet their own diversity targets.

1.2 Staffing Network Limited is committed to diversity and will promote diversity for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an on-going basis all aspects of recruitment to avoid unlawful or undesirable discrimination. Staffing Network Limited will treat everyone equally irrespective of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy. Staffing Network Limited is committed to providing training for its entire staff in equal opportunities practice.

1.3 Staffing Network Limited shall not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. Staffing Network Limited will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy.

1.4 Staffing Network Limited will not accept instructions from clients that indicate an intention to discriminate unlawfully.

DISCRIMINATION

Unlawful discrimination occurs in the following circumstances:

Direct discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favourably on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs ("the protected categories").

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of a protected category: -

in the terms on which the recruitment consultancy offers to provide any of its services;

by refusing or deliberately omitting to provide any of its services;

in the way it provides any of its services.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer which states that certain persons are unacceptable due to a protected category, unless one of the exceptions applies, for instance, the job demands a genuine occupational requirement or in the case of age, the discrimination can be lawfully justified.

Indirect Discrimination

Indirect discrimination occurs where an agency or employer applies a provision, criterion or practice generally, which disadvantages a minority group in the community on the basis of a protected category.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to a genuine occupational requirement or the instruction is lawfully discriminatory due to a statutory exception or objective justification, Staffing Network Limited will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

2.3 DISABLED PERSONS

2.3.1 Direct Discrimination

Direct discrimination against a person occurs where, if for a reason which relates to the disabled person's disability, an individual:

treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and, the employer cannot show that the treatment in question is justified.

Or

If on the ground of a disabled person's disability, he treats the disabled person less favourably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person.

This type of direct discrimination can never be justified.

2.3.2 Duty to make reasonable adjustments and to provide auxiliary aids and services

This is a similar protection to indirect discrimination in the other protected categories.

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of an employer to take such steps as are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

Agencies must take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services.

For instance, an appropriate auxiliary aid or service can include the provision of information on audiotape or provision of a sign language interpreter.

Staffing Network Limited will not discriminate against a disabled person on the grounds of disability -

in the arrangements i.e. application form, interview or arrangements for selection for determining to whom a job should be offered; or

in the terms on which employment or engagement of temporary workers is offered; or by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or by subjecting him or her to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Staffing Network Limited will accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible Staffing Network Limited will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

3. AGE DISCRIMINATION

Staffing Network Limited will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not age.

Staffing Network Limited is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

No age requirements will be stated in any job advertisements on behalf of the company.

Staffing Network Limited will request age as part of its recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process.

4. PART-TIME WORKERS

This Diversity Policy also covers the treatment of those employees and workers who work on a part-time basis, Staffing Network Limited recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis)

in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. STAFFING NETWORK LIMITED also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

5 HARASSMENT POLICY

5.1 Staffing Network Limited is committed to providing a work environment free from unlawful harassment on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or any other basis protected by legislation is unlawful and will not be tolerated by STAFFING NETWORK LIMITED

5.2 This policy prohibits unlawful harassment by any employee or worker of Staffing Network Limited.

5.3 Examples of prohibited harassment are: -

5.3.1 Verbal or written conduct containing derogatory jokes or comments,

5.3.2 Slurs or unwanted sexual advances

5.3.3 Visual conduct such as derogatory or sexually orientated posters,

5.3.4 Photographs, cartoons, drawings or gestures which some may find offensive,

5.3.5 Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected category basis,

5.3.6 Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours

5.3.7 Retaliation for having reported or threatened to report harassment.

5.4 If you believe that you have been unlawfully harassed, you should make an immediate report to The Branch Manager followed by a written complaint as soon as possible after the incident. Your complaint should include:

Details of the incident

Name(s) of the individual(s) involved

Name(s) of any witness(es)

5.5 Staffing Network Limited will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

5.6 Any employee(s) who Staffing Network Limited finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. A person who discriminates or harasses may be personally liable for payment of compensation to the person offended, in addition to any compensation payable by Staffing Network Limited. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months.

Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment.

6. GENDER REASSIGNMENT POLICY

6.1 Staffing Network Limited recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

6.2 Staffing Network Limited will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and STAFFING NETWORK LIMITED has access to any relevant medical reports.

6.3 Staffing Network Limited will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

6.4 All employees and workers will be expected to comply with Staffing Network Limited's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.

6.5 Where an employee is engaged in work where the gender change imposes genuine problems Staffing Network Limited will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

6.6 Any employee or worker suffering discrimination on the grounds of gender reassignment should make recourse to the Company's grievance procedure.

7. COMPLAINTS AND MONITORING PROCEDURES

Staffing Network Limited has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from The Branch Manager and will be made available immediately upon request

Any discrimination complaint will be investigated fully.

Information Security And Data Protection

As a recruitment company Staffing Network Limited processes personal data in relation to its own staff, work-seekers and individual client contacts. It is vitally important that we abide by the principles of the Data Protection Act 1998 set out below.

Staffing Network Limited holds data on individuals for the following general purposes:

Staff Administration

Advertising, marketing and public relations

Accounts and records

Administration and processing of work-seekers personal data for the purposes of work-finding services

The Data Protection Act 1998 requires Staffing Network Limited as data controller to process data in accordance with the principles of data protection. These require that data shall be: -

Fairly and lawfully processed

Processed for limited purposes

Adequate, relevant and not excessive

Accurate

Not kept longer than necessary

Processed in accordance with the data subjects rights

Kept securely

Not transferred to countries outside the European Economic Area without adequate protection.

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Staffing Network Limited.

Processing means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, palm top etc.

Data should be reviewed on a regular basis to ensure that it is accurate, relevant and up to date and those people listed in the appendix shall be responsible for doing this.

Data may only be processed with the consent of the person whose data is held. Therefore if they have not consented to their personal details being passed to a third party this may constitute a breach of the Data Protection Act 1998. By instructing Staffing Network Limited to look for work and providing us with personal data contained in a CV work-seekers will be giving their consent to processing their details for work-finding purposes. If you intend to use their data for any other purpose you must obtain their specific consent. However caution should be exercised before forwarding personal details of any of the individuals on which data is held to any third party such as past, current or prospective employers; suppliers; customers and clients; persons making an enquiry or complaint and any other third party.

Data in respect of the following is “sensitive personal data” and any information held on any of these matters MUST not be passed on to any third party without the express written consent of the individual:

Any offence committed or alleged to be committed by them
 Proceedings in relation to any offence and any sentence passed
 Physical or mental health or condition
 Racial or ethnic origins
 Sexual life
 Political opinions

Religious beliefs or beliefs of a similar nature
 Whether someone is a member of a trade union

From a security point of view, only those staff listed in the appendix should be permitted to add, amend or delete data from the database. However all staff are responsible for notifying those listed where information is known to be old, inaccurate or out of date. In addition all employees should ensure that adequate security measures are in place. For example:

Computer screens should not be left open by individuals who have access to personal data

Passwords should not be disclosed

Email should be used with care

Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed. They should not be removed from their usual place of storage without good reason.

Personnel files should always be locked away when not in use and when in use should not be left unattended

Any breaches of security should be treated as a disciplinary issue.

Care should be taken when sending personal data in internal or external mail

Destroying or disposing of personal data counts as processing. Therefore care should be taken in the disposal of any personal data to ensure that it is appropriate. For example, it would have been more appropriate to shred sensitive data than merely to dispose of it in the dustbin.

It should be remembered that the incorrect processing of personal data e.g. sending an individual’s details to the wrong person; allowing unauthorised persons access to personal data; or sending information out for purposes for which the individual did not give their consent, may give rise to a breach of contract and/or negligence leading to a claim against Staffing Network Limited for damages from an employee, work-seeker or client contact. A failure to observe the contents of this policy will be treated as a disciplinary offence.

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request and after payment of a fee. All requests to access data by data subjects i.e. staff, members, customers or clients, suppliers, students etc should be referred to a Director whose details are also listed on the appendix to this policy.

Any requests for access to a reference given by a third party must be referred to a Director and should be treated with caution even if the reference was given in relation to the individual making the request.

This is because the person writing the reference also has a right to have their personal details handled in accordance with the Data Protection Act 1998, and not disclosed without their consent. Therefore when taking up references an individual should always be asked to give their consent to the disclosure of the reference to a third party and/or the individual who is the subject of the reference if they make a subject access request. However if they do not consent then consideration should be given as to whether the

details of the individual giving the reference can be deleted so that they cannot be identified from the content of the letter. If so the reference may be disclosed in an anonymised form.

Finally it should be remembered that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be respected at all times:

Right to respect for private and family life [Article 8]
 Freedom of thought, conscience and religion [Article 9]
 Freedom of expression [Article 10]
 Freedom of assembly and association [Article 11]
 Freedom from discrimination [Article 14]

Drug & Alcohol Policy

The Company recognises that alcohol and drug abuse problems can have a detrimental effect on work performance and behaviour.

The Company has a responsibility to its employees and customers to ensure that this risk is minimised. Staffing Network Limited and its clients may from time to time perform drug and alcohol tests.

Accordingly, Company policy involves the following:-

Disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects performance or behaviour at work, and where either (1) an alcohol or drug abuse problem does exist.

Disciplinary Action

1. In line with the Company's disciplinary rules, the following will be regarded as serious misconduct:

- a) Attending work and/or carrying out duties under the influence of alcohol or drugs.
- b) Consumption of alcohol or drugs whilst on duty (other than where prescribed or approval has been given).

Breach of these rules will result in summary dismissal, and only in exceptional cases will either notice or the reduced disciplinary action of a final written warning be applied.

Situations where use of the Disciplinary Procedure is Appropriate Recognition of the existence of a possible alcohol or drug abuse problem.

1. Abuse of alcohol or drugs can affect performance and behaviour at work, i.e., either through serious misconduct at work, (where there is a direct and demonstrable breach of the disciplinary rules regarding alcohol or drug abuse at work), or where there is a falling off of standards of work performance or behaviour, and abuse of alcohol or drugs is a possible cause.
2. The immediate line manager will be responsible for responding to such situations, carrying out either counselling or disciplinary investigations and interviews, supported as appropriate by a more senior Manager.
3. In such interviews the possible existence of an alcohol or drug abuse problem should be explored. The line manager is not required to diagnose the existence of an alcohol or drug abuse problem, merely to assess whether such abuse is a possible factor.
4. Any requirements of the Disciplinary Procedure regarding Trade Union representation will be observed.

Environmental Policy

Staffing Network Limited is committed to reducing its impact on the environment by continuously improving the way in which it uses natural resources and reducing waste.

To achieve this Staffing Network Limited will seek when possible to:

- A) Make the most efficient use of energy
- B) Reduce the need for movement of both people and goods and encourage walking, cycling and use of public transport as alternatives.
- C) Minimise and where possible, eliminate, all forms of pollution
- D) Avoid waste and encourage the appropriate conservation, re-use and recycling of resources
- E) Promote a sense of responsibility and understanding for the environment and participation in environmental issues, by raising staff awareness
- F) Review and where possible, improve our performance each year with positive action in any areas of non-compliance.

Examples of activities currently undertaken:

Purchasing of recycled and lower emissions products where possible, Such as recycled paper, lower energy consumption equipment

Reduction, in use of electricity. Ex; all equipment and lights switched off while not in use.

Reuse of materials where possible, Ex; donation of old computers, laptops and mobile phones to charities.

Recycling

HIV and AIDS Policy

1. The Staffing Network Limited expects all employees to treat anyone suffering from the HIV virus (or AIDS) in the same manner they would treat any other employee.
2. Any employee who fails to comply with the provisions of this policy will be regarded as being in breach of the disciplinary rules of Staffing Network Limited.
3. Anyone suffering from HIV/Aids is protected from discrimination by the Disability Discrimination Act 1995.
4. [In relation to healthcare workers employees should refer to the HSC publication "Guidance on the Management of AIDS/HIV Infected Healthcare Workers & Practice Notification" 1998/226 together with any updated and revised guidance.]

Public Interest Disclosure by Staffing Network Limited Employees: 'Whistleblowing' Policy

Advice and Instructions for Staff

The term 'whistleblowing' has no legal definition within EC or UK law; however, it has been used to describe incidents where an employee (which for these purposes includes not only employees but workers and other staff members) reports some alleged wrongdoing within an organisation.

The Public Interest Disclosure Act 1998 aims to promote greater openness in the workplace and, by amending the Employment Rights Act 1996, protects 'whistleblowers' from detrimental treatment, i.e. victimisation or dismissal, for raising concerns about matters they reasonably believe to be in the public interest.

This statement sets out the Staffing Network Limited's Policy and provides in some detail advice and guidance to staff on the scope of the Policy. It explains that a member of staff, who has a reasonable belief that serious malpractice relating to any of the protected matters specified in the Policy has occurred or is likely to occur, may raise a concern under the procedure agreed by the Council and which is described in this statement. There is also information about the rights of staff to raise the matter externally and the protection afforded to them if they choose to do this.

Introduction

1. All persons employed by the Staffing Network Limited are under an obligation implied in their contract of employment to give honest and faithful service to their employer. This includes an obligation not to disclose to external sources any trade secrets or confidential information acquired during the course of employment or act in a manner that will undermine the mutual trust and confidence on which the employment relationship is based. The [Public Interest Disclosure Act 1998](#) complements those obligations by providing protection to employees for disclosures made in the public interest of certain specific types of information, which in most cases will be of a confidential nature. These are outlined below in paragraph 3. The purpose of this policy is to provide a means by which staff are enabled to raise concerns with the appropriate Staffing Network Limited authorities if they have reasonable grounds for believing serious malpractice has occurred or is likely to occur. The Staffing Network Limited encourages staff to raise matters of concern responsibly through the procedures laid down in this policy statement.

Scope of the Policy

2. The policy is designed to deal with concerns raised in relation to the specific issues which are in the public interest and are detailed in paragraph 3 below, and which fall outside the scope of other Staffing Network Limited policies and procedures. The policy is not intended to apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under existing procedures on grievance, bullying and harassment, discipline and misconduct in research. Details of these procedures will be found in the relevant staff handbook and/or in Statute C. They are also published on the web.

3. The policy may be used to deal with specific concerns which are in the public interest and specifically where a staff member has a reasonable belief that one of the following has occurred or is likely to occur:

- a criminal offence
- failure to comply with legal obligations
- financial or non-financial maladministration or malpractice or impropriety or fraud
- academic or professional malpractice
- a risk to the health or safety of any individual
- environmental damage
- a miscarriage of justice
- attempts to suppress or conceal any information relating to any of the above.

If in the course of investigation any concern raised in relation to the above matters appears to the investigator to relate more appropriately to a grievance, bullying or harassment, or discipline, those procedures will be invoked, instead of or, where appropriate, in addition to this procedure.

Who can raise a concern?

4. Any member of staff who has a reasonable belief that there is serious malpractice relating to any of the protected matters specified in paragraph 3 above, may raise a concern under the procedure detailed in paragraph 6 below. The issues raised under the protected list may relate to another member of staff, a group of staff, the individual's own Institution or another part of the Staffing Network Limited. The individual must reasonably believe that the relevant failure or malpractice has occurred or is likely to occur and that matter is in the public interest. The Staffing Network Limited will ensure that any member of staff who makes a disclosure in such circumstances will not be penalised or suffer any adverse treatment for doing so. However, a member of staff who makes an allegation maliciously or vexatiously without having reasonable grounds for believing that the relevant failure or malpractice has occurred or is likely to occur and that the matter is in the public interest may be subject to disciplinary proceedings.

5. In view of the protection afforded to a member of staff raising a concern about matters they reasonably believe to be in the public interest, it is hoped that individuals will feel able to put his/her name to any disclosure. The identity of the person raising the matter will be kept confidential, if so requested, for as long as possible provided that this is compatible with a proper investigation. Proper investigation may be more difficult or impossible if further information cannot be obtained from the person raising the complaint. It is also more difficult to establish whether any allegations are credible. Anonymous complaints will be investigated and acted upon as the person receiving the complaint sees fit, having regard to the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint.

Procedure

6. In many cases it will be appropriate for the member of staff to raise any concerns informally with their line manager in the first instance, either in person or in writing. It may be possible to agree a way of resolving the concern quickly and effectively.

However, where the matter is more serious, or the member of staff feels that their line manager has not addressed the concern, or they prefer not to follow that informal step for any reason, they should contact one of the following:

The Board Of Directors

Tel 01543622570

directors@staff-network.co.uk

If the disclosure is about either of those Officers, the member of staff may raise the concern with the Director (tel. 01543622570, e-mail simon.powell@staff-network.co.uk)

If the disclosure concerns the Director, the member of staff may raise the concern with the Operations Manager. The person to whom the disclosure is made will decide whether the matter should be dealt with under this procedure. If he or she considers that the matter should be dealt with under a different Staffing Network Limited procedure, s/he will advise the person making the disclosure as to the appropriate steps which should be taken.

Process

7. The person to whom the disclosure is made will normally consider the information and decide whether there is a prima facie case to answer. He or she will decide whether an investigation should be conducted and what form it should take. This will depend on the nature of the matter raised and may be

- investigated internally
- referred to the External Auditors
- the subject of independent enquiry

Some matters, will need to be referred to the relevant outside body, e.g. the Police, Funding Council.

If the person to whom the disclosure is made decides not to proceed with an investigation, the decision will be explained as fully as possible to the individual who raised the concern.

Investigation

8. Any investigation will be conducted sensitively and promptly. The employee will be notified of the intended timetable for the investigation. The person to whom the disclosure is made may authorise an initial investigation to establish the relevant facts. The investigator will report his or her findings to the person to whom the disclosure was made, who will then decide if there is a case to answer and what steps, if any, should be taken. This may include setting up a special internal independent investigation or reference to some external authority, such as the police, for further investigation. The decision may be that the matter would be more appropriately handled under existing procedures for grievance, bullying and harassment, or discipline.

Where a disclosure is made any person or persons potentially implicated in wrongdoing will be told at an early stage of it and of the evidence supporting it, and they will be allowed to respond.

Should an investigation or referral lead the appropriate Staffing Network Limited authority to conclude there has been a breach of Staffing Network Limited discipline, the member or members of staff responsible may, in addition to any civil or criminal proceedings, be subject to disciplinary action in accordance with the appropriate disciplinary procedures for the relevant category of staff.

The individual making the disclosure will be informed of what action is to be taken where possible although the need for confidentiality means it may not be possible to share some of the details including, for example, specific information about any disciplinary action taken against another member of staff.

Staff should treat any information about the disclosure, the investigation or its outcome as confidential.

If an individual is not happy with the way in which their concern has been handled or the outcome, it is open to the individual to raise this with one of the other persons specified in paragraph 6 above.

Records

9. An official written record will be kept of each stage of the procedure (see also paragraph 10 below).

Reporting of outcomes

10. A report of all disclosures and subsequent actions taken will be made by the persons deciding on the issues. This record should be signed by the Investigating Officer and the person who made the disclosure, and dated. Where appropriate the formal record need not identify the person making the disclosure, but in such a case that person will be required to sign a document confirming that the complaint has been investigated. Such reports will normally be retained for at least five years. In all cases a report of the outcome will be made to the General Board and Council, which will refer the report on appropriately if necessary.

Advice for staff raising a concern

11. The Staffing Network Limited acknowledges the difficult choice a member of staff may have to make in raising a concern. As the issues that prompt the concern are likely to be complex, how the member of staff proceeds with his or her concern will vary from situation to situation. The following advice is recommended if a member of staff wishes to make a disclosure:

- make any objections to illegal, unsafe or unethical practices promptly so as to avoid any misinterpretation of the motives for doing so;
- focus on the issues and proceed in a tactful manner to avoid unnecessary personal antagonism which might distract attention from solving the problem;
- be accurate in his/her observations and claims and keep formal records documenting relevant events.

Members of staff may also wish to seek independent legal advice.

Complaints of retaliation as a result of disclosure

12. The Staffing Network Limited accepts that it has an obligation to ensure that staff who make a disclosure in accordance with this policy are protected, regardless of whether or not the concern raised is upheld. A member of staff who has made a disclosure and who feels that, as a result, he or she has suffered adverse treatment should submit a formal complaint under the relevant grievance procedure for their staff group detailing what has been done to him or her.

13. Where it is determined that there is a prima facie case that a member of staff has suffered adverse treatment, harassment or victimisation as a result of his or her disclosure, a further investigation may take place and disciplinary action may be taken against the perpetrator in accordance with the relevant procedure.

External disclosure

14. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the member of staff should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to certain external bodies including:

- Such body or person (if any) prescribed by the Secretary of State under Section 43F of the Employment Rights Act 1996, as amended by Section 1 of the Public Interest Disclosure Act 1998 as being a prescribed person to whom the particular type of issue in question can be disclosed (a 'Prescribed Person'). An up to date list is available at the following link <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>;
- a Government Minister;
- a legal adviser in the course of taking legal advice.

It will very rarely if ever be appropriate to alert the media.

15. A member of staff who makes an external disclosure of the kind described in section 3 to a Prescribed Person who reasonably believes that the information disclosed, and any allegations contained in it, are substantially true, and that the default lies within the remit of the prescribed person in question, will be protected against victimisation or other adverse treatment.

16. Wider disclosure to any other person will only be protected if it is not made for personal gain, and the employee making the disclosure:

- has previously disclosed substantially the same information to the Staffing Network Limited or to a prescribed person; or
- reasonably believes, at the time of the disclosure, that they will be subjected to a detriment if they make disclosure to the Staffing Network Limited or a prescribed person; or
- reasonably believes (where there is no prescribed person) that material evidence will be concealed or destroyed if disclosure is made to the Staffing Network Limited

and in all the circumstances, it is reasonable for them to make the disclosure.

17. Complaints under this policy will usually relate to the conduct of Staffing Network Limited staff, but they may sometimes relate to the actions of a third party. In some circumstances the law will also protect staff who raise the matter with the third party directly. However, the Staffing Network Limited encourages reporting such concerns internally first.

Smoking Policy

Introduction

This policy has been developed to protect all employees, service users, customers and visitors from exposure to passive smoking and to assist compliance with the Health Act 2006 and other legislation.

Restrictions on Smoking

Smoking is not permitted in all parts of the company's premises, entrance or grounds at any time by any person regardless of their status or business with the company. There are designated areas at each premises which is available upon request if you require.

Visitors

All visitors, contractors and deliverers are required to abide by the no-smoking policy. Staff members are expected to inform customers and visitors of the no-smoking policy politely but firmly to ensure that such visitors comply with the smoking ban. No members of staff are expected to enter into any confrontation which may put their personal safety at risk.

Vehicles

Smoking is not permitted by any person in any company vehicle (including pool vehicles) or any other vehicles being used on company business where the user

does not have exclusive, unrestricted use of that vehicle. If an employee uses their own vehicle for company purposes, this vehicle would be exempt from the scope of this policy under the legislation.

Support for Smokers

The organisation understands that some of its employees may feel unwilling or unable to give up smoking. Such people may request permission from their immediate manager/supervisor to step outside the building/grounds during coffee/tea breaks to smoke a cigarette. However they must return to their workplace at the due time.

Help to Stop Smoking

The NHS offers a range of free services to help smokers give up. Visit www.gosmokefree.co.uk or call the NHS Smoking Helpline on 0800 169 0 169 for further details.

Disciplinary Action

Any employee who ignores the smoking ban will be treated in accordance with the company's disciplinary procedure and in the case of repeated offences, may be dismissed from the company's employ. Employees are also reminded that it is a criminal offence for employees to smoke in smoke-free areas, with a fixed penalty of £50 or prosecution and a fine of up to £200.

Signage

The company displays signs that make it clear that smoking is prohibited on its premises. These signs are located throughout the premises. The company also requires that no-smoking signs are displayed in those of its vehicles that are subject to the ban.

Maintaining this policy

The company will monitor the effectiveness of this policy and its general compliance within the organisation. This policy will be kept up to date and amend accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the top management of the company. In support of this intent, the policy will be reviewed annually. The company will ensure that the necessary resources are given for the full implementation of this policy.

General Health and Safety Policy Statement

It is the policy of the Company to provide and maintain safe and health working conditions, equipment and systems of work for all our employees, and to provide such information and training as they need for this purpose.

Appropriate preventative and protective measures are, and will continue to be implemented following the identification of work-related hazards and assessment of the risks related to them. It is also the policy of the Company to ensure that its business is conducted in a manner so as to reduce the risks to members of the public.

The Company may require you to attend such training and/or induction programmes in order to meet the aims of the Company.

The Company accepts its responsibility for health and safety of other persons who may be affected by the Company's activities.

The allocation of duties for safety matters, the identity of competent persons appointed with particular responsibilities, and the arrangements made to implement this policy are set out herein and in associated health and safety documented records.

Anti-slavery and anti-trafficking policy

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act'). The Staffing Network Limited is committed to a zero tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with the Staffing Network Limited including all its wholly owned companies, contractors, and suppliers.

The Staffing Network Limited acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the Staffing Network Limited as an employer considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Staffing Network Limited or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.

- The Staffing Network Limited encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. The Staffing Network Limited has a whistleblowing policy which can be used to report any instances of modern slavery.
- Wherever possible, the Staffing Network Limited will obtain warranties from suppliers that they are free of modern slavery (which can be passed on to subcontractors). These warranty clauses are contained in its standard procurement contract documentation available as Annex A to this policy
- The Staffing Network Limited's Anti-slavery and Anti-trafficking Statement is published annually on the website if required
- The Staffing Network Limited has equal opportunities policies and is committed to upholding human rights.
- The Staffing Network Limited will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate.

Any breaches of this policy may result in the Staffing Network Limited taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

Annex A:

Where we receive goods or services (to be inserted in all procurement contracts)

The Contractor acknowledges that as an organization carrying out business in the UK it is required to comply with the Modern Slavery Act 2015. The Contractor warrants that it does so and will take steps to ensure its operations and supply chains are trafficking- and slavery-free, including without limitation imposing substantially similar obligations to those in this clause where it is permitted to subcontract its obligations under this Agreement so that multi-level supply chains are addressed. The Contractor acknowledges and agrees that any breach of this warranty will constitute a material remediable breach of contract.

The Contractor further warrants that neither it nor any of its officers, employees, nor so far as it is aware any subcontractor or other persons associated with it, have been convicted of any offence involving slavery and human trafficking. The Contractor acknowledges and agrees that any breach of this warranty will constitute an irreparable breach of contract.

Where we provide goods or services

The Staffing Network Limited acknowledges that it is an organization carrying out business in the UK. It is required to comply with the Modern Slavery Act 2015 and that pursuant to Section 54 of that Act it will publish annually the steps it is taking to ensure its operations and supply chains are trafficking- and slavery-free.

Disciplinary, Dismissal And Grievance Policies

GENERAL PRINCIPLES

The following general principles will apply to both the disciplinary, dismissal and grievance procedures

- Each step and action will be taken without unreasonable delay.
- Whenever the employee is invited by the company to attend a meeting, the employee must take all reasonable steps to attend.
- At all stages of the procedure the employee will have the right to be accompanied by a trade union representative or a work colleague of your choice. If your companion is unable to attend any such meeting you may suggest an alternative date, provided it is within 5 working days of the original date.
- Timing and location of meetings must be reasonable.
- Meetings will be conducted in a manner that enables both the company and employee to explain their case.
- For appeal hearings following a decision the company will as far as reasonably practicable, be represented by a more senior manager than attended the first meeting (unless the most senior manager attended that meeting).
- Whenever the company or employee is required to send the other a statement, the original or a copy will suffice.

DISCIPLINARY AND DISMISSAL PROCEDURES PURPOSE

The Disciplinary and Dismissal procedures are designed to help and encourage all employees to achieve and maintain standards of conduct, attendance and job performance. The company rules and these procedures apply to all employees. The aim is to ensure consistent and fair treatment for all in the organisation.

PRINCIPLES

- No disciplinary action will be taken against an employee until the case has been fully investigated
- The Company may suspend you with or without pay while an investigation takes place. Such a suspension will be reviewed as soon as possible and will not normally exceed 20 working days.
- An employee will not be dismissed for a first breach of discipline except in the case of gross misconduct (when the penalty may be dismissal without either notice or payment in lieu of notice).
- Misconduct will generally fall into two categories, namely "general" misconduct (in respect of which the general disciplinary action procedure described below applies) and "gross" misconduct, which is of so serious a nature that it justifies instant dismissal for a first offence. Listed below are examples which would normally be considered to be either general misconduct or gross misconduct. However, it

should be recognised that neither list can be regarded as complete to meet every case, and also that action described as general misconduct may amount to and be treated as gross misconduct if the circumstances or the manner of the misconduct are such as to warrant serious disciplinary action. These lists should be regarded therefore as being illustrative rather than exhaustive.

· Examples of “gross” misconduct:

Summary dismissal (dismissal without notice or pay in lieu of notice) may be necessary in cases of gross misconduct. For guidance, the following are examples of the offences which may be regarded as gross misconduct and will normally result in summary dismissal. It is emphasised that this is not an exhaustive list:-

- Unauthorised use or disclosure of confidential information or business matters relating to the company, its clients, temporary workers or applicants.
- Acts of violence, including physical assault; unlawful discrimination; drunkenness; taking of non-prescribed drugs in such a way as to impair the ability to carry out work; conduct of any kind which endangers the health and safety of others.
- A criminal offence committed at work other than a minor road traffic offence committed in the course of the employment, or an offence committed outside work which is incompatible with the employee remaining in employment.
- Falsification of information or references on appointment.
- Theft or fraudulent activity.
- Unauthorised absence or gross negligence in the performance of duties.
- Acceptance of any bribe, secret profit or unauthorised commission.
- Any conduct tending to bring the company, or the employee into disrepute or which results in the loss of custom of a client, temporary or applicant or a loss of business.
- Working for or assisting a competitor of the company or seeking to establish a business which is likely to compete with the company or divulging confidential information concerning the company and its business.
- Refusal to obey a lawful instruction in connection with the employment.
- Disclosing details of his/her salary and remuneration to other employees of the company.
- Examples of “general” misconduct

The following may be regarded as reasons for disciplinary action in that they deviate from accepted standards and constitute general misconduct. The employee’s first offence will usually result in a verbal or written warning as appropriate. Repetition of offences following a warning could lead to a written warning or a final written warning as appropriate. Thereafter any repetition will result in dismissal. It is again emphasised that this is not an exhaustive list

- Poor job performance.
- Poor time-keeping.
- Failure to comply with the conditions of your employment contract.
- Unseemly or disruptive conduct.

DISCIPLINARY ACTION PROCEDURE

The following is the disciplinary action that may be taken against an employee in cases of misconduct or unsatisfactory performance. The disciplinary and dismissal procedure may be implemented at anyone of the following stages if the seriousness or repetitive nature of the employee’s misconduct or unsatisfactory performance warrants such action:

STAGE 1 – INFORMAL ACTION: ORAL WARNING

If an employee’s conduct or performance is unsatisfactory, they will be given an informal oral warning. However this will be recorded in writing on their personnel file. The warning will be disregarded after 6 months’ satisfactory service.

STAGE 2 – FORMAL WRITTEN WARNING

If the offence is serious, or if there is no improvement in standards after informal action has been taken in cases of minor misconduct or unsatisfactory performance or there has been further misconduct within 6 months of any informal action, a written warning will be given. This written warning will include the reason for the warning and a note that, if there is no improvement after a specified period, a final written warning will be given. A copy of the written warning will be given to the employee and a copy will be placed on their personnel file. The warning will be disregarded after 6 months satisfactory service.

STAGE 3 – FORMAL FINAL WRITTEN WARNING

If following a written warning, conduct or performance remains unsatisfactory, or if a serious incident occurs, a final written warning will be given making it clear that any recurrence of the offence or other serious misconduct within a specified period will result in dismissal. A copy of the written warning will be given to the employee and a copy will be placed on their personnel file. The warning will then be disregarded after 12 months satisfactory service.

STAGE 4 – DISMISSAL OR OTHER SANCTION

If there is no satisfactory improvement or if further serious misconduct occurs within 12 months, the final step in the procedure may be dismissal, either with or without notice or payment in lieu of notice, or some other action short of dismissal such as disciplinary suspension or transfer. If the employee faces dismissal or certain actions short of dismissal, such as loss of pay, the minimum statutory procedure will be followed as detailed below.

MINIMUM STATUTORY PROCEDURES

The standard and modified dismissal and disciplinary procedures are set out below. The standard procedure will be used when the company contemplates dismissing or taking formal disciplinary action against an employee such as that set out in stage 4 above. The modified procedure will be used in the event that there has been a dismissal without notice for gross misconduct, in which case it will apply after such a dismissal.

STANDARD PROCEDURE

Step 1 - Written Statement

The company will set out in writing the employee's alleged conduct or characteristics, or other circumstances, which lead the company to contemplate dismissing or taking disciplinary action against the employee. The company will send the statement or a copy of it to the employee and invite the employee to attend a meeting to discuss the matter.

Step 2 - Meeting

- 1) The meeting will take place before any action is taken, except in the case where the disciplinary action consists of a suspension on full pay, to consider and discuss the allegation.
- 2) The meeting will not take place unless:
 - The company has informed the employee of the ground or grounds for contemplating disciplinary action or dismissal in the form of a written statement
 - The employee has had a reasonable opportunity to consider his response to that information
- 3) The employee has the right to be accompanied at the meeting by a work colleague or a Trade Union representative.
- 4) After the meeting, the company will inform the employee in writing of its decision and notify him of the right to appeal against the decision if he is not satisfied with it.

Step 3 - Appeal

- 1) If the employee does wish to appeal, he must inform the company within 5 working days of receiving the decision, and on doing so the company will invite him to attend a further meeting.
- 2) The appeal meeting may not necessarily take place before the dismissal or disciplinary action takes effect but it will be arranged within a reasonable period of time.
- 3) The appeal will be dealt with by a more senior manager than at the Step 2 meeting. Where this is not practicable, the company will hear the appeal and decide the case as impartially as possible.
- 4) After the appeal meeting, the company will inform the employee of its final decision.

MODIFIED PROCEDURE

Step 1 - Written Statement

The company will:

- 1) Set out in writing:
 - The employee's alleged misconduct which has led to the dismissal,
 - What the basis was for thinking at the time of the dismissal that the employee was guilty of the alleged misconduct,
 - The employee's right to appeal against dismissal, and
- 2) Send the statement to the employee.

Step 2 - Appeal

- 1) If the employee does wish to appeal, he must inform the company within 5 working days of receiving the statement, and if he does so the company will invite him to attend a meeting.
- 2) After the appeal meeting, the company will inform the employee of its final decision.

GRIEVANCE PROCEDURE

If an employee has a problem or concern about their work, working conditions or relationships with colleague, they should aim to settle their grievance informally with their line manager.

If an employee's grievance cannot be settled informally, or a formal approach is preferable, the employee should raise it formally with management by following the minimum statutory procedure below.

MINIMUM STATUTORY PROCEDURES

STANDARD PROCEDURE

Step 1 - Written statement

The employee must set out their grievance in writing and send this statement to the company

Step 2 - Meeting

- 1) The company will invite the employee to attend a meeting to discuss the grievance.

2) The meeting will not take place unless:

- the employee has informed the company of the basis for the grievance set out in the statement under step 1
- the company has had a reasonable opportunity to consider its response to that information

3) After the meeting the company will inform the employee of its decision, and the company will notify the employee of his right to appeal if he is not satisfied with it.

Step 3 – Appeal

If the employee does wish to appeal, he must inform the company within 5 working days of receiving the decision, and on doing so the company will invite him to attend a further meeting. After the appeal meeting, the company will inform the employee of its final decision.

MODIFIED PROCEDURE

The modified procedure will only be used in the rare circumstances where an employee has already left the company's employment and wishes to raise a grievance, provided that both the employee and company agree to follow the modified procedure in writing.

Step 1 – Written Statement

The employee must set out in writing their grievance, and the basis for it, and send their statement to the company.

Step 2 - Written Response

The company will set out its response in writing and send it to the employee.

Digital Data Privacy Statement

Staffing Network Limited will collect the personal details that you provide to us on our website for the purposes of providing you with services and/or information. In providing such services and/or information to you we will only use your data in accordance with the terms of the following statement.

This statement sets out below:

1. How personally identifiable information of yours is collected from you through the website.
2. How the information is used by us
3. With whom the information may be shared and for what purpose(s)
4. What choices are available to you regarding collection, use and distribution of the information.
5. The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected through our website
6. How you can correct any inaccuracies in the information.

If you feel that this company is not abiding by its posted privacy policy, you should first contact info@staff-network.co.uk.

Information Collection and Use

Staffing Network Limited is the sole owner of the information collected on this site. We will not sell, share, or rent this information to others. Staffing Network Limited collects information from our users at several different points on our website.

Registration

We request information from the user on our online registration forms. Here a user must provide contact information and information regarding the type of work you are seeking and your skills, qualifications and experience. This information is used to enable us to provide you with work-finding services. If we have trouble processing your application, this contact information is used to get in touch with you. Staffing Network Limited does not use this information for any other purpose.

Cookies

A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie is in no way linked to any personally identifiable information while on our site. Once the user closes their browser, the cookie simply terminates. For instance, by setting a cookie on our site, the user would not have to log in a password more than once, thereby saving time while on our site. If a user rejects the cookie, they may still use our site.

Log Files

We use IP addresses to analyse trends, administer the site, track user's movement, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

Sharing

We may share aggregated demographic information with our clients. This is not linked to any personal information that can identify any individual person.

We partner with other parties to provide specific services. When the user signs up for these services, we will share names, or other contact information

that is necessary for the third party to provide these services.

These parties are not allowed to use personally identifiable information except for the purpose of providing these services.

Links

This web site contains links to other sites. Please be aware that Staffing Network Limited is not responsible for the privacy practices of such other sites.

We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information.

This privacy statement applies solely to information collected by this Web site.

Security

This website takes every precaution to protect our users' information. When users submit sensitive information via the website, your information is protected both online and off-line. When our registration form asks users to enter sensitive information (such as information about your health), that information is encrypted and is protected with iolo technologies. While on a secure page, the lock icon on the bottom of Web browsers such as Firefox, Safari and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when you are just 'surfing'. While we use encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our accounts clerk or a marketing assistant) are granted access to personally identifiable information.

If you have any questions about the security at our website, you can send an email to info@staff-network.co.uk

All messages sent by and to any @staff-network.co.uk e-mail address or via the Staffing Network webpages is subject to the following statements:-

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Correction/Updating Personal Information:

If your personally identifiable information changes (such as office address), we will endeavour to provide a way to correct, update or remove the personal data provided to us. This can usually be done by emailing info@staff-network.co.uk

Notification of Changes

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Our full policies and schedules are available upon request.

These policies will be kept up to date, to reflect changes in the nature and size of the business. To ensure this, the policies and effectiveness will be reviewed from time to time.