

EQUALITY & WELFARE POLICY

Contents

1. Our commitment	3
2. Objectives	3
3. Scope	4
4. Key Contacts.....	4
5. Definitions	4
6. Our responsibility	5
7. Safer Recruitment	5
8. Equal Opportunities & Human Rights Act	7
9. Physical Security.....	9
10. Reporting a concern	14
11. Training and Educating Employees	14
12. Associated policies	14
13. Reporting procedure for Equality or Welfare concerns	15
14. Understanding & Commitment Confirmation	15
15. Management Review and Self-certification	16

1. Our commitment

All Campbell & Kennedy employees have a right to work in a safe and secure environment protected from physical and mental abuses.

We are also committed to a policy of equality and to the elimination of discrimination in all aspects of its work. Campbell & Kennedy is opposed to any display, within any part of the business, of racial or gender prejudice, either by word or conduct, by any person in his or her dealings with any other person.

2. Objectives

The aim of the policy is to ensure you are aware of and understand your responsibilities that of others, along with the reporting procedures for all welfare concerns.

POLICY OBJECTIVE ONE

We aim to provide our staff with the understanding, skills and knowledge to allow them to deal with all reports of Bullying, Violent, Racist or other Offensive Incidents in an informed, sensitive and effective manner.

POLICY OBJECTIVE TWO

We aim to accurately record all Bullying, Violent, Racist or other Offensive Incidents, monitoring them carefully and investigating them with diligence. We will make any relevant findings available, where appropriate. (See Section 4: Key Contacts).

POLICY OBJECTIVE THREE

We will act to ensure members of minority ethnic communities and those registered as disabled are not hindered in any way in seeking employment with Campbell & Kennedy.

3. Scope

This policy covers all persons either employed, or contracted, including visitors, whilst on company premises and/or conducting works/services on behalf of the company. This policy will be reviewed annually by both the designated person and deputy designated person (see below) to ensure it, and the content within, is still relevant, applicable, valid and complying with current legislature.

4. Key Contacts

Designated person

Sharon Stephen, Business Resource Manager: s.stephen@campbellkennedy.co.uk, (0141) 952 1933

Deputy Designated person:

Den Cooke, Quality Manager: d.cooke@campbellkennedy.co.uk, (0141) 435 7760

5. Definitions

This Policy is in place for the protection of our staff, customer, representatives and/or visitors from any form of abuse or neglect, thus ensuring safe environment and supportive procedures for all concerned.

Abuse/Discrimination can be:-

- Cultural Religious Sexual Physical Psychological Neglect Financial Emotional
- Violation of rights

CHILD: A 'child' is defined as anyone under the age of 18.

VULNERABLE ADULT: A Vulnerable adult is defined by the activities that person either receives or carries out meaning that the adult will be considered vulnerable at that specific time. (See Campbell & Kennedy Ltd 'Vulnerable Groups' Policy).

6. Our responsibility

We all have a responsibility to ensure that all C&K staff, visitors and customers are protected from harm/discrimination and to minimise the risk of allegations of such against you or anybody else. To assist you in this, on-going training and awareness, as well as continuous Information, advice and guidance from your Line Manager will help you to feel confident in proactively promoting safe working and discrimination free workplace by the understanding of your individual role and responsibilities in this respect.

The responsibilities of particular individuals are detailed below:-

- You – to ensure that you fully understand and uphold the standards and expectations whilst working with/representing Campbell & Kennedy.
- The Company Directors - to ensure we have effective policies
- The Company Managing Director - to ensure policies are implemented and followed, and sufficient time and resources are allocated to employees to carry out their responsibilities.
- The company designated person, and supporting person (as detailed in this policy) shall ensure all policies and procedures are up-to-date and maintain knowledge and awareness of relative training and development requirements as well as deal with safeguarding queries and concerns from Campbell & Kennedy Ltd staff members.

7. Safer Recruitment

Campbell & Kennedy Ltd carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with our customers.

7.1 Disclosure and Barring Service (DBS) checks

The DBS check is a recognised check for employment engagement suitability and will be progressed before employment commences and at regular intervals whilst employed by the company.

7.2 Confidentiality

Information provided in a DBS disclosure report must be kept confidential and only on a need-to-know basis. Such information will be handled in accordance with the Data Protection Act (DPA) requirements and Campbell & Kennedy's data retention policy.

7.3 Failure to disclose

Failure to disclose information relevant to the DBS check may delay or cancel any agreed employment/contract commencement agreements.

Having a criminal record does not necessarily preclude an individual from working at Campbell & Kennedy Ltd. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors.

7.4 Exploring a conviction and its relevance

All discussions relating to convictions must take place after the selection process has been completed and will involve the line manager and the Business Resource Manager. As part of the decision-making process they will normally meet with the individual to gain more information from the person about the nature and circumstances of any conviction.

The suitability for employment of a person with a criminal record will clearly vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out.

The following job-related factors should be taken into account:

- Does the post involve direct contact our customers or other members of the public? What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to re-offend in the place of work?
- Does the post involve any direct responsibility for finance or items of value? Does the post involve any contact with children or other vulnerable groups or employees?

The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):-

- The seriousness of the offence(s) and relevance to the safety of other employees and the public etc;
- The length of time since the offence(s) occurred;
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties;

- The degree of remorse, or otherwise, expressed by the person and their motivation to change;
- Whether the offence was a one-off, or part of a history of offending;
- Whether person's circumstances have changed since the offence(s) was committed, making re-offending less likely;
- Whether the offence has since been decriminalised.

Following careful and thorough consideration of all these matters and consultation with the Business Resource Manager and the Line Manager, a decision will be made as to whether the individual should be appointed. If appropriate we may seek further information from relevant bodies when reaching this decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases the Campbell & Kennedy Ltd would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with the company's Disciplinary Policy (or Probationary Policy if in probationary period).

8. Equal Opportunities & Human Rights Act

Equal Opportunities and race relations concern everyone involved at Campbell & Kennedy, staff, management and Directors. It is the responsibility of every member of staff to ensure that the policy is carried out in relation to members of staff and/or to anyone who may visit any one of our locations or are recipients of any service we deliver.

All customers, members of staff and anyone else in contact with the business should be treated equally, fairly and impartially, with humanity, respect and courtesy and without discrimination on grounds of colour, gender, race, nationality, ethnic or national origins, religion or disability. Insulting, abusive or derogatory language or actions towards any person is wholly unacceptable. Indeed any form of discrimination, whether verbal, written or by action, will be treated as a disciplinary offence.

No particular racial or ethnic group, however defined, should be allowed to dominate any activity in any part of the business to the unfair exclusion of others.

This Policy will be monitored and evaluated regularly and will be amended as necessary in line with any amendments to the terms of the Race Relations Act (1976), the Race Relations (Amendment) Act 2000 and/or the Human Rights Act (1998).

8.1 Human Rights Act 1998 Policy Statement

It is the policy of Campbell & Kennedy to comply with the guidelines set out in the Human Rights Act 1998. We believe that human rights are the basic rights and freedoms that belong to everyone, which mean that everyone should be treated fairly, with dignity and respect.

We also acknowledge that we live in an unequal society in which many people face discrimination. Campbell & Kennedy believe that equality of opportunity and freedom from discrimination are fundamental human rights. We actively oppose all forms of discrimination and are committed to the principle that no person shall face discrimination by being treated unfairly or being denied access to services or employment opportunities.

Campbell & Kennedy recognise the basic human rights under the Human Rights Act 1998 as follows:

- The Right to Life
- The Right to freedom from torture and inhuman or degrading treatment or punishment
- The Right to freedom from slavery or compulsory labour
- The Right to liberty and security
- The Right to a fair trial
- The Right not to be punished without law
- The Right to have one's family life and private life respected
- The Right to freedom of thought, conscience and religion
- The Right to freedom of expression
- The Right of assembly and association
- The Right to education
- The Right not to be subjected to the death penalty
- The Right not to be discriminated against
- The Right to marry
- The Right to protection of property

- The Right to free elections

The Company recognises and accepts its duty to respect the Human Rights of all employees and visitors to the company, as well as any member of the public who might be affected by its operations. The company will ensure that all Campbell and Kennedy employees are fully aware and trained on the latest legislation for the protection of human rights, and that this legislation is incorporated into day to day operations of the business.

9. Physical Security

We (Campbell & Kennedy) will promote best practice in all aspects of physical security provision so that they contribute effectively to the safety and welfare of all C&K Staff as well as supporting and enhancing business performance.

The key elements of this policy are: -

Identification – all staff & visitors are required to visibly wear and use a company ‘Security ID Card’ while at work.

Access Control – all staff are required to use the installed security systems in the correct way and to ensure all visitors and guests are signed in and escorted at all times while on the company premises.

Protection of assets – Campbell & Kennedy operates a developed risk reduction strategy designed to minimise the exposure of our assets to loss. This is made up of various initiatives which individuals require to be aware of including but not limited to, Clear Desk Guidelines, random (senior staff) patrols and safe working policies and procedures.

Reporting – The effective and accurate reporting of loss and ‘near miss’ events by C&K staff allows us to maintain our physical security at the optimum levels helping to ensure your safety and security. This policy should be read in conjunction with Campbell & Kennedy’s Data Protection Policy and all other relevant data protection, security, information systems and HR policies which are located on the company intranet as well as hard copies within the head office canteen.

9.1 Physical Security Management and Responsibilities

Physical Security within Campbell & Kennedy is managed on behalf of the Managing Director by the company designated persons (as detailed within this policy), who will manage the physical security needs of the company in line with the relevant legislation and company Security requirements.

C&K Staff are individually responsible for security within the business and are encouraged to maintain an active interest and awareness of all security related matters, this is to be supported by the noted designated persons noted within this policy.

All cases of dishonesty, fraud, suspected fraud or criminal damage as well as any other criminal acts occurring within company premises or affecting C&K Staff while at work are to be reported to the Managing Director.

Any approach to C&K Staff by Police or any other Law Enforcement Agency should be notified to the Managing Director as soon as it is known.

The Registered Data Controller and designated persons will maintain a relevant security audit, survey and security management plan process to support ongoing business flexibility.

9.2 Campbell & Kennedy Staff: Access and Identification Cards

C&K Staff are issued with a photographic identification and access card (Security Card) to help ensure only authorised people are permitted access to company premises. This card will allow the employee to access the relevant areas they need to access to do their job.

Security cards must be prominently displayed at all times using the supplied lanyard and produced for inspection when asked to do so by any other authorised person.

Any person not having in their possession or refusing to display a current and valid Security Card may be asked to leave the premises.

It is your responsibility to ensure that your card remains secure in your possession and is not shared or used by others.

You are responsible for updating your Security card if your employment or personal details change or if your picture is not identifiable anymore. You may be liable to a charge (by direct deduction from your salary) for any lost Security card. To report your card lost or stolen and obtain a new card, please contact the HR Business Manager.

The Campbell & Kennedy Security card remains the property of Campbell & Kennedy and must be returned to the company when leaving employment or finishing your assignment at Campbell & Kennedy. The holder's line manager is responsible for ensuring this occurs.

Cards not used for a period of 6 months will be removed from the system.

9.3 Visitors and Contractors: Access and Identification Cards

All visitors / contractors must be met, signed in and escorted at all times by their host while on Campbell & Kennedy premises. At all times while on company premises, visitors/contractors must prominently display the relevant security cards over the outer layer of clothing using the supplied coloured lanyard.

As a host you are to ensure your visitors/contractors do not have access to any Campbell & Kennedy/Sky or other such information or area beyond that which has been approved as necessary.

It is your responsibility to ensure your visitors and contractors leave site safely on the completion of their visit and that the pass issued is recovered and handed into to the local security / reception team as part of signing the visitor off site. Visitors / contractors are the personal responsibility of their host for the duration of their visit.

9.4 Premises

The physical security strategy guiding the protection of premises is based upon a premise of monitored, layered access to work spaces for authorised persons.

Any person present within any building who is deemed as unauthorised should be reported to your Line Manager. "Unauthorised" would include any person without the correct Campbell & Kennedy Security Card or access rights to that space

For security purposes personal property not secured and deemed to be at risk may be removed.

Some buildings or areas will require a higher degree of physical security than ordinary offices. Only people authorised by the manager responsible for that area are permitted unaccompanied entry to these areas.

9.5 Keep Safe

Keep Safe is the Physical Security initiative complementing the Clear Desk Guidelines; it is designed to identify areas and items at risk of theft and to:

- Remove them for safe keeping
- Identify hot spot areas allowing proactive security management mitigation to take place

9.6 Keys

If you occupy an office you are responsible for ensuring it is locked and secure during your absence.

C&K Staff are fully responsible for the security of keys that they may hold and for the events that may occur as a result of the negligent loss or use of such keys.

Keys are issued by the local HR Business Manager.

9.7 Vehicles

Only authorised vehicles are permitted to park on company premises.

9.8 Company Property

Company equipment, machinery and documentation, must not be removed from the company premises without permission from your line manager.

All C&K Staff have the full responsibility to ensure all company property is safeguarded against theft, damage or loss whether in the workplace, travelling or if working from home.

Campbell & Kennedy reserves the right to search all individuals at any time while on, entering or leaving company premises as well as any office, vehicle, desk or locker.

Campbell & Kennedy recognises that on occasion due to the constraints of the business it may be necessary to arrange to have personal items of mail or parcels delivered to your work address; prior to this being done you should seek permission from your Line Manager. Individuals should be aware that Campbell & Kennedy will not accept any liability in respect of personal items being delivered to the premises nor should you arrange for the delivery of any illegal or dangerous items to any Campbell & Kennedy location. Any individual found to be abusing the facility of having personal items delivered to any sky premises may be subject to disciplinary action.

9.9 Clear Desk Guidelines

Clear Desk guidance is recommended by Campbell & Kennedy in all of its locations. It is your individual responsibility to ensure your working area is secure and your desk is cleared of business correspondence, confidential material and valuable company or personal items when absent from your working area, desk, or office space.

The sensitivity of documentation and the protective measures required can be ascertained by reference to the Information Classification Standard which should be used with Data Protection guidance which is available on the policy section of the intranet.

Sensitive information, Campbell & Kennedy/Sky assets and / or personal effects should be locked securely inside desks or pedestals and the keys kept secure.

There is no right to privacy within unlocked storage items and as such the authorised management may remove valuable company and personal property not secured and deemed to be at risk as part of the 'Keep Safe' initiative (see below).

Laptops should be secured within working hours with locking (Kensington) cables (available through the stationary supplier) – these are NOT suitable for securing laptops overnight. Out of hours laptops should be removed from desks and secured within lockable containers such as office pedestals or cupboards.

9.10 Protection of Information and Data

All C&K Staff have full responsibility for the information and data that they may handle on a daily basis. Further advice is contained within the company data protection policy:

- **Information Classification Standard**
- **Data Protection Policy**

All information and documentation held by Campbell & Kennedy must be treated in accordance with the Data Classification Standard and only passed to those authorised to receive it.

All information or material which is confidential must be disposed of by using either the confidential waste bins or shredding machines. This includes the requirement to properly and securely dispose of information in accordance with its sensitivity as documented in the Data Classification Standard.

10. Reporting a concern

a) If a colleague raises a concern/ allegation with you then you are expected to listen and record all information given, making no judgement or assumptions.

You must report the issue to the designated person, regardless of whether the staff member agrees. The designated person will then decide the appropriate course of action, and if a referral outside the organisation is appropriate. The designated person will ensure that the matter is treated with full and appropriate sensitivity and confidentiality.

b) If a colleague has a concern/allegation that they choose not to raise with you then they are to contact Campbell & Kennedy's designated person. Contact details for the designated person are available within this policy. Again, the designated person will ensure that the matter is treated with full and appropriate sensitivity and confidentiality.

c) If a colleague has concerns over another colleague: Follow procedure set out as point (a).

d) If experiencing or becoming the victim of an offsite security/welfare incident then the local Police should be contacted if it is reasonable to do so. If the incident is considered an emergency then contact with the emergency services (999 emergency services) should be made immediately. If this is a work related incident or involves Campbell & Kennedy's property or equipment then please also inform your Line Manager as soon as is practical.

11. Training and Educating Employees

All employees undertake the 'Equality & Welfare Policy' awareness at induction and will be expected to fully understand, accept and commit to the standards and principles contained within.

12. Associated policies

- Ethical Codes of Business Policy Equality and Diversity Policy Vulnerable Groups Policy Grievance Policy
- Disciplinary Policy Capability Policy Young Persons Policy
- Data Protection Act Policy
- Whistle Blowing Policy

13. Reporting procedure for Equality or Welfare concerns

Detailed Procedure for dealing with Equality/Welfare Concerns: -

13.1 Recognition Response Report Record Refer

a. Recognition

Signs of abuse/discrimination can be difficult to spot, as can a colleague trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the staff member from what you have seen, heard, discussed with the individual or you have noticed changes in their behaviour and cause you welfare concerns you must report it to the designated person.

b. Response

No report or concerns about possible abuse/discrimination should be ignored. If a colleague discusses a concern with you record all the details they disclose to you. Your main role here is to listen and record with no judgements or leading questions; you must stay calm and not let them know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the Designated Person within Campbell & Kennedy Ltd and that we will do everything we can to help

c. Record and Report

Report the concerns to the Designated Person (see section 4: Key Contacts), ensuring you have recorded all details of the conversation. These documents will remain confidential between the Designated Person and individual that has reported it, unless the Designated Person deems it appropriate to take further action and involve other agencies

d. Referral

The Designated Person will then take the decision of what course of action should be taken. Only the Designated Person should be taking the decision to make referrals outside of the organisation.

14. Understanding & Commitment Confirmation

Your Line Manager/Trainer should ensure that you have fully understood the requirements and principles within this policy. You will also receive a hard copy of this policy to take with you.

The aim of this Policy is inform all Campbell & Kennedy People of their role and responsibilities in relation to the physical security of the business by promoting and maintaining consistent and proportional physical security measures throughout the company.

However, should you require further guidance please raise this with your Line Manager or a designated person as noted within this policy.

Our commitment to providing a safe and positive working environment is unwavering as we feel that a happy and content workforce is a productive and forward looking workforce which can only be a good thing for staff and customers alike.

15. Management Review and Self-certification

All relevant departments should have in place arrangements to periodically review compliance with this Policy and should maintain evidence in support of such compliance. Each relevant department will be responsible for completing self-certification that this policy has been implemented where reasonable and appropriate. For further information on self-certification please contact the Registered Data Controller.

In addition to the management reviews and self-certification, Campbell & Kennedy senior Management may periodically audit relevant departmental adoption of this Policy. Business departments will be required to fully co-operate with these audits.

Failure to comply with this policy could lead to formal action up to and including dismissal.