

WELCOME TO

# MARISCO

MAINTAIN • RESTORE • DEVELOP

POLICY MANUAL

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# Section 1 - Using the manual, company history and responsibility for the manual

## Using the policy manual

This policy manual sets out the main policies and procedures that you will need to be aware of whilst working for us. You should familiarise yourself with it and comply with it at all times. Any questions you may have with regard to its contents or what you have to do to comply with it should be referred to the Director or Operations Manager.

The policies and procedures set out in this manual apply to all staff unless otherwise indicated. They **do not** form part of the terms of your contract with us, which are provided to you separately. We reserve the right to amend, vary, add to or remove any policies and procedures in this manual at any time, you will be notified of any changes.

The manual contains important information relating to your employment with us. It has been designed as an easy reference guide.

## Marisco background

Marisco started in Christchurch as a painting and decorating service with two employees and a van. We now directly employ more than 70 staff with plans to double our workforce over the next three years. From the outset, we focused on developing a lean-management, social housing property maintenance service. Our ambition, dedication and passion has seen us successfully complete a series of council and housing association tender contracts for planned and responsive property repair and refurbishment works in Dorset, Hampshire and stretching across most of the South of England.

We quickly pushed into all areas of building services, construction, employing experienced staff to ensure we could offer our clients the best advice on top of our incredibly high standards.

By investing in our staff, paying a good wage and developing skills through training, we have created an efficient and cost-effective business that frequently exceeds our clients' empty home standards, void turnaround times and expectations across the construction industry as well as meeting high health and safety compliance to protect the welfare of our employees.

In addition, in just a short time frame, we have become a strong player in our sector, having completed projects for numerous clients and frequently winning new business through word of mouth because of our exceptional standards. Check out our testimonials to see how we consistently maintain a 5-star rating.

## **Responsibility for the policy manual**

The Director has overall responsibility for this policy manual and for ensuring that its policies and procedures comply with our legal obligations.

The policy manual is reviewed regularly to ensure that its provisions continue to meet our legal obligations and reflect best practice.

Everyone should ensure that they take the time to read and understand the content of this manual and act in accordance with its aims and objectives. Managers must ensure all staff understand the standards of behaviour expected of them and to take action when behaviour falls below those requirements.

## Section 2 – Joining us

### Recruitment and selection

We are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

Our methods of recruitment and selection aim to ensure that candidates are treated courteously, fairly and with dignity and respect.

### Induction

Employees will have an induction designed to acquaint them with the following:

- their role;
- our clients;
- our rules, policies and procedures;
- health and safety policy and procedures;
- use of equipment;
- job specific induction and training.

Our induction aims to ensure employees are introduced to aspects of our working environment to help them settle in during their first few weeks of employment.

### Probation

Our normal probationary period for new employees is 6 months during which you will have progress reviews, with your Line Manager. These reviews will take place at 1 week, 1 month and 3 months.

In the event of unsatisfactory performance or for other business reasons, probation may be extended or your employment terminated.

## Section 3 – Your time with us

### Change of personal details

The Office Manager is responsible for maintaining up to date personal details.

We will request this information when you start work and it is your responsibility to inform us of any changes straight away. This includes but is not limited to any changes to your address, contact details, next of kin, bank details, medical or medication requirements, driving status or restrictions and anything that may affect your employment with the Company. Information is held in confidence and used in accordance with our Data Protection Policy.

### Our values and behaviour

We are committed to providing a positive, collaborative and supportive working environment. During your time with us, you should:

- To be punctual for the start of work, keep within the break times and not leave before your normal end time.
- To give regular attendance at work and to minimise all absenteeism.
- To be courteous, helpful and polite to all those with whom you have contact.
- To devote all your time and attention, whilst at work, to the Company and ensure that all its property including confidential information, records, equipment, information technology, etc., is kept safe and used correctly. You should raise with your line manager or the Operations Manager if there are any issues that may be affecting your performance at work.
- To comply with all the Company rules and regulations and to observe and perform all the terms of your employment as set out or referred to in your Contract of Employment.
- Employees are to ensure they have no conflict of interest regarding competitors with the Company.
- Employees should conduct themselves at work and in other settings so as to not bring disrepute to themselves or the company.

### Car parking

Cars, motorcycles and cycles will be parked only in the areas provided and we accept no liability for any damage caused to vehicles so parked, nor for any items stolen from vehicles whilst they are on our premises. No one has the right to an allocated parking place.

### Personal property

We do not accept responsibility for private vehicles, valuables or other personal property. Lost and found property must be reported to your line manager or the Operations Manager. Failure to report finding of property will be regarded as 'stealing by finding' and may be subject to disciplinary action. Property handed in but not claimed after three months shall be disposed of.

## Performance, review and training

Marisco encourages and supports your personal development. Your performance and progress will be regularly discussed and reviewed.

You will receive work related training and support during your employment (unless otherwise notified of any additional training requirements in writing). You will be entitled to take part in various training courses which we may provide from time to time in-house.

Online health and safety training and awareness courses will be issued to you throughout the year.

If you are interested in any other courses, training or general knowledge sharing and do not want to wait for a performance review, speak to your line manager and/or the Operations Manager. Approval and funding will be at the absolute discretion of the Director, and all arrangements will be confirmed to you in writing.

## Health and Safety

You must read, understand and observe the Company's health and safety policies, procedures and guidelines in place. You must adhere to any additional health and safety requirements applicable to your role and duties at work.

Please visit the following link to access our health and safety documents:

- [www.mariscosouth.co.uk](http://www.mariscosouth.co.uk)
- [www.atlas-hub.co.uk/health-and-safety](http://www.atlas-hub.co.uk/health-and-safety)

## Use of drugs, alcohol and prescribed medicine

Marisco is committed to maintaining a healthy, safe and productive working environment for its employees. The Company recognises the impact that drugs and alcohol may have on an individual's ability to work safely and correctly and aims to ensure a working environment free from the inappropriate use of substances and where employees are able to carry out their duties in a safe and efficient manner.

If you are concerned that you or any of your colleagues are misusing drugs, medication and/or are excessively consuming alcohol, you are encouraged to speak to your line manager as soon as possible.

The Company will not accept employees being at work under the influence of alcohol or drugs, and/or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who



consume alcohol or take drugs (other than prescription or over the counter medication, as directed) on our premises.

If you are prescribed with medication by your doctor that may affect your ability to work or to operate vehicles or machinery, you must immediately inform your line manager or in their absence the Operations Manager.

## **ATLAS**

Marisco uses an online platform called Atlas. It is a smart online hub packed full of all the tasks, training, tools, and insights you need. Here you can log holiday requests, check outstanding tasks and upcoming reviews, read risk assessments, complete e-learning and read and sign documents.

## **External suppliers**

The Company reserves the right to instruct external independent persons in the conduct of any Company or personnel (or otherwise) matters, where it deems it appropriate or necessary in the performance of our employment requirements or needs.

## **Mental health and wellbeing, stress at work**

Your wellbeing is really important to us. We would encourage anyone who is experiencing difficulties with their wellbeing, is facing any personal difficulties which are impacting upon them at work, home or otherwise, or are experiencing work-related pressures or stresses, to reach out to their manager and discuss any concerns with them.

We appreciate that talking can be difficult, so if you do not feel able to speak to or reach out to your manager, then please speak to the Operations Manager so that any necessary help or support can be given to you.

Please note that any matters raised will be treated sensitively and, unless otherwise necessary, confidentially. We may have to discuss matters relating to you with others in order to properly assist and support you in the workplace (subject to them adhering to confidentiality requirements), in circumstances where how you are feeling is having an impact on your work or if additional medical information is required to support you in the workplace. All personal information will be treated in accordance with our data protection policy.

If you do not feel comfortable confiding in your manager or the Operations Manager, please do seek support from your doctor, a qualified medical practitioner or our confidential Bupa helpline (0800269616), or any recognised wellbeing support charity, such as:

Dorset Mind - <https://dorsetmind.uk/>

Mind - <https://www.mind.org.uk>

The Samaritans - <https://www.samaritans.org>

## Medical and dental appointments

The Company recognises that employees will from time to time need to attend medical, hospital, dental, optician and other similar appointments. Whenever it is possible to do so, employees (both full-time and part-time) should endeavour to arrange such appointments in their own time or, if this is not possible, then at times that will cause the minimum amount of absence from work or inconvenience to the Company.

However, because the Company accepts that it is not always possible or practical to arrange medical and other similar appointments outside working hours, it is the Company's policy to permit reasonable time off work for such appointments.

Employees must obtain approval from their manager in advance of any appointment. The manager reserves the right to ask an employee to reschedule an appointment if its timing would cause disruption to the business. The manager may also ask the employee to produce an appointment card.

Provided that an employee gives their manager reasonable notice of the date and time of an appointment, time off without pay will normally be granted, although this is subject to the discretion of the employee's manager.

## Section 4 – Our policies and procedures

Please familiarise yourself with our policies and procedures. If you have any questions in relation to these, then please speak with your line manager or the Director immediately.

*You will also need to ensure that you are comfortable with all other guidelines or rules in place from time to time.*

## Dress code policy

### 1. About this policy

We encourage everyone to maintain an appropriate standard of dress and personal appearance at work. The purpose of our dress code is to establish basic guidelines on appropriate clothing and appearance at our workplace, so that we:

- a. promote a positive and professional image;
- b. respect the needs of men and women from all cultures and religions;
- c. make any adjustments that may be needed because of disability;
- d. take account of health and safety requirements; and
- e. help staff and managers decide what clothing it is appropriate to wear to work.

Managers are responsible for ensuring that this dress code is observed and that a common-sense approach is taken to any issues that may arise. Any enquiries regarding the operation of our dress code (including whether an article of clothing is suitable to wear to work) should be made to your line manager.

Failure to comply with the dress code may result in action under our Disciplinary Procedure.

We will review our dress code periodically to ensure that it reflects appropriate standards and continues to meet our needs.

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

### 2. Appearance

While working for us you represent us with clients and the public. Your appearance contributes to our reputation and the development of our business.

It is important that you appear clean and smart at all times when at work, particularly when you may be in contact with clients, other business contacts or the general public.

Different departments may have specific clothing requirements, for example, because their work is customer-facing or raises particular health and safety concerns. It is important that you dress in a manner appropriate to your working environment and the type of work you do.

Any employees with facial hair should refer to the health and safety policy concerning breathing equipment and masks. Employees who have been given a uniform or name badge should wear them at all times whilst on Company business. Uniforms must be kept clean, pressed and presentable. You will be asked to sign a Deduction from Pay form, this will give consent to cover any loss or damage to uniform

and the replacement cost will be deducted from your salary. Any personal protective equipment that is issued by the Company must be worn at the relevant time. Failure to wear this equipment may result in disciplinary action. When you are issued PPE and boots, you will be required to keep these in a good clean condition and will be asked to sign a Deduction from Pay form, this will give consent to cover any loss or damage to PPE and the replacement cost will be deducted from your salary.

You should not wear gym or beach wear to work. This includes track suits, sweat-shirts, t-shirts or shorts, combat trousers, jogging bottoms, denim, or leggings. Clothing should not be dirty, frayed or torn. Tops should not carry wording or pictures that might be offensive or cause damage to our reputation. It is inappropriate to wear cut-off shorts, crop tops, see-through material or clothing that exposes areas of the body normally covered at work.

Footwear must be safe and clean and take account of health and safety considerations. Trainers, and flip-flops are not acceptable.

Where we provide safety clothing and equipment, including protective footwear, it should be worn or used as appropriate and directed.

You should not wear clothing or jewellery that could present a health and safety risk.

### **3. Religious and cultural dress**

You may wear appropriate religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans) unless it creates a health and safety risk to you or any other person or otherwise breaches this policy.

Where necessary your line manager can give further information and guidance on cultural and religious dress in the workplace.

Priority is at all times given to health and safety requirements. Where necessary, advice will be taken from the Health and Safety Officer.

## Expenses policy

### 1. About this policy

This policy deals with claims for reimbursement of expenses, including travel, accommodation and hospitality.

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

### 2. Reimbursement of expenses

We will reimburse expenses properly incurred in accordance with this policy. Any attempt to claim expenses fraudulently or otherwise in breach of this policy may result in disciplinary action.

Expenses will only be reimbursed if they are:

- a. submitted to the Office Manager on the appropriate claim form;
- b. submitted within 28 days of being incurred;
- c. supported by relevant documents (for example, VAT receipts, tickets, and credit or debit card slips);  
and
- d. authorised in advance where required.

Claims for authorised expenses submitted in accordance with this policy will be paid directly into your bank/building society account via payroll.

Any questions about the reimbursement of expenses should be put to your line manager before you incur the relevant costs.

### 3. Travel expenses

We will reimburse the reasonable cost of necessary travel in connection with our business. The most economic means of travel should be chosen if practicable and you should use existing travelcards or season tickets wherever possible. The following are not treated as travel in connection with our business:

- a. travel between your home and usual place of work;
- b. travel which is mainly for your own purposes; and
- c. travel which, while undertaken on our behalf, is similar or equivalent to travel between your home and your usual place of work.

**Trains.** We will reimburse the cost of standard class travel on submission of a receipt with an expense's claim form.

**Taxis.** We do not expect you to take a taxi when there is public transport available, unless it is cost effective due to a significant saving of journey time or the number of staff travelling together. A receipt should be obtained for submission with an expense's claim form.

**Car.** Where it is cost effective for you to use your car for business travel, and you have been authorised to do so, you can claim a mileage allowance on proof of mileage. Details of the current mileage rates can be obtained from the Financial Controller. You can also claim for any necessary parking costs which must be supported by a receipt or the display ticket.

**Air travel.** If you are required to travel by plane in the course of your duties you should discuss travel arrangements with the Director or Operations Manager in advance.

We will not reimburse penalty fares or fines for parking or driving offences, other than at our discretion in exceptional circumstances.

#### **4. Accommodation and other overnight expenses**

If you are required to stay away overnight in the course of your duties you should discuss accommodation arrangements with your line manager in advance.

## Equal opportunities policy

### 1. Equal opportunities statement

Marisco is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

### 2. About this policy

This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

The Director is responsible for this policy and any necessary training on equal opportunities.

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

### 3. Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- a. Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- b. Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others; and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- c. Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- d. Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.



- e. Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

#### **4. Recruitment and selection**

Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting will be done by more than one person if possible.

Vacancies will generally be advertised to a diverse section of the labour market. Advertisements will avoid stereotyping or using wording that may discourage particular groups from applying. They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants will not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

#### **5. Disabilities**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

#### **6. Part-time and fixed-term work**

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

#### **7. Breaches of this policy**

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

## Anti-harassment and bullying policy

### 1. About this policy

Marisco is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

### 2. What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- a. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- b. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- c. offensive e-mails, text messages or social media content;
- d. mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

### 3. What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority; but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- i. physical or psychological threats;
- ii. overbearing and intimidating levels of supervision;
- iii. inappropriate derogatory remarks about someone's performance;

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

#### **4. If you are being harassed or bullied**

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

#### **5. Protection and support for those involved**

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

#### **6. Record-keeping**

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

## Anti-corruption and bribery policy

### 1. About this policy

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

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

### 2. Who must comply with this policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### 3. What is bribery?

**Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

**Bribery** includes offering, promising, giving, accepting or seeking a bribe.

**All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or the Operations Manager.**

Specifically, you must not:

1. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
2. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else
3. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

#### **4. Gifts and hospitality**

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

#### **5. Record-keeping**

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

#### **6. How to raise a concern**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

## Whistleblowing policy

### 1. About this policy

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

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

### 2. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### 3. How to raise a concern

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Operations Manager. Contact details are at the end of this policy. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

### 4. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### 5. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you 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 an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

### 6. Protection and support for whistle-blowers

We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Director immediately.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

However, if we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower may be subject to disciplinary action.

Protect operates a confidential helpline. Their contact details are at the end of this policy.

**7. Contacts**

Operations Manager	Ken Mantock 07712 532 839 Ken.Mantock@mariscosouth.com
Protect-advice (Independent whistleblowing charity)	Helpline: 0203 117 2520 Website: <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>



## Holidays policy

### 1. About this policy

This policy sets out our arrangements for staff wishing to take holidays (also known as annual leave).

This policy covers all employees at all levels and grades, including full-time, part-time, permanent and fixed-term employees, managers, directors, trainees, and homeworkers.

This policy does not form part of any employee's contract of employment and we may amend it at any time. We may also vary the policy as appropriate in any case.

### 2. Your holiday entitlement

The Company's holiday year runs from 1 April to 31 March. If your employment starts or finishes part way through the holiday year, your holiday entitlement during that year shall be calculated on a pro-rata basis rounded up to the nearest half day.

Your holiday entitlement is set out in your contract of employment. Holidays are to be requested through the Atlas platform, after first speaking with your line manager.

Except as set out in this policy, holiday entitlement must be taken during the holiday year in which it accrues. Any holiday not taken by the end of the holiday year will be lost and you will not receive any payment in lieu.

Unused holiday can only be carried over to another holiday year:

- a. in cases involving sickness absence (as set out below);
- b. in cases of maternity, paternity, adoption, parental or shared parental leave (as set out below);
- c. in any other case where the Director has given permission in writing; and
- d. if otherwise required by law or government regulation.

### 3. Taking holiday

All holiday must be approved in advance by your line manager. You should normally give at least four weeks' notice of holiday requests to allow planning of rotas or work schedules where necessary. You must not make travel bookings until approval has been given.

We may require you to take (or not to take) holiday on particular dates, including when the business is closed (ie between Christmas and New Year), particularly busy, or during your notice period or garden leave.

### 4. Sickness during periods of holiday

If you are sick or injured during a holiday period and would have been incapable of work, you may choose to treat the period of incapacity as sick leave and reclaim the affected days of holiday.

Employees already on sick leave before a pre-arranged period of holiday may choose to cancel any days of holiday that coincide with the period of incapacity and treat them as sick leave.

Dishonest claims or other abuse of this policy will be treated as misconduct under our disciplinary procedure.

#### **5. Long-term sickness absence and holiday entitlement**

Holiday entitlement continues to accrue during periods of sick leave.

If you are on a period of sick leave which spans two holiday years, or if you return to work after sick leave is so close to the end of the holiday year that you cannot reasonably take your remaining holiday, you may carry over unused holiday to the following leave year.

Any holiday that is carried over under this rule but is not taken within 18 months of the end of the holiday year in which it accrued will be lost.

Alternatively, you can choose to take your paid holiday during your sick leave, in which case you will be paid at your normal rate.

#### **6. Family leave and holiday entitlement**

Holiday entitlement continues to accrue during periods of maternity, paternity, adoption, parental or shared parental leave (referred to collectively in this policy as family leave).

If you are planning a period of family leave that is likely to last beyond the end of the holiday year, you should discuss your holiday plans with your manager in good time before starting your family leave. Any holiday entitlement for the year that cannot reasonably be taken before starting your family leave can be carried over to the next holiday year.

For the avoidance of doubt this covers your full holiday entitlement.

Any holiday carried over should be taken immediately before returning to work.

#### **7. Arrangements on termination**

On termination of employment you may be required to use any remaining holiday entitlement during your notice period. Alternatively, you will be paid in lieu of any accrued but untaken holiday entitlement for the current holiday year to date, plus any holiday permitted to be carried over from previous years under this policy or as required by law. You are entitled to be paid at a rate of 1/260th of your basic salary for each day of untaken entitlement.

## Disciplinary and capability procedure

### 1. About this procedure

This procedure is intended to help maintain standards of conduct and performance and to ensure fairness and consistency when dealing with allegations of misconduct or poor performance.

Minor conduct or performance issues can usually be resolved informally with your line manager. This procedure sets out formal steps to be taken if the matter is more serious or cannot be resolved informally.

This procedure applies to all employees. This procedure does not apply to agency workers or self-employed contractors.

The Company reserves the right to dismiss you without warning for any act of misconduct, unsatisfactory performance or for any other reason during your first two years of employment without following all or any part of this procedure or any other formal process.

This procedure does not form part of any employee's contract of employment and we may amend it at any time.

### 2. Investigations

Before any disciplinary hearing is held, the matter will be investigated. Any meetings and discussions as part of an investigation are solely for the purpose of fact-finding and no disciplinary action will be taken without a disciplinary hearing.

In some cases of alleged misconduct, we may need to suspend you from work (paid) while we carry out the investigation or disciplinary procedure (or both). While suspended, you should not visit our premises or contact any of our clients, customers, suppliers, contractors or staff, unless authorised to do so. Suspension is not considered to be disciplinary action.

### 3. The hearing

We will give you written notice of the hearing, including sufficient information about the alleged misconduct or poor performance and its possible consequences to enable you to prepare. You will normally be given copies of relevant documents and witness statements.

You may be accompanied at the hearing by a trade union representative or a colleague, who will be allowed reasonable paid time off to act as your companion.

You should let us know as early as possible if there are any relevant witnesses you would like to attend the hearing or any documents or other evidence you wish to be considered.

Where it is not possible to hold a face-to-face meeting, we will conduct the disciplinary hearing remotely. We will ensure that you have access to the necessary technology for participating in the process. Your rights will not be affected, and we will ensure that the procedure remains fair and reasonable.

We will inform you in writing of our decision, usually within one week of the hearing.

#### **4. Disciplinary and capability action, and dismissal**

The usual penalties for misconduct or poor performance are:

- a. Stage 1: First written warning. Where there are no other written warnings on your disciplinary record, you will usually receive a first written warning. It will usually remain active for 6 months.
- b. Stage 2: Final written warning. In case of further misconduct or failure to improve where there is an active first written warning on your record, you will usually receive a final written warning. This may also be used without a first written warning, for serious cases of misconduct or poor performance. The warning will usually remain active for 12 months.
- c. Stage 3: Dismissal or other action. You may be dismissed for further misconduct or failure to improve where there is an active final written warning on your record, for significantly serious misconduct where there is an active first written warning on your record or for any act of gross misconduct. Examples of gross misconduct are given below. You may also be dismissed without a warning for any act of misconduct or unsatisfactory performance during your probationary period.

We may consider other sanctions short of dismissal, including demotion or redeployment to another role (where permitted by your contract), and/or extension of a final written warning with a further review period.

#### **5. Appeals**

You may appeal in writing within one week of being told of the decision.

The appeal hearing will, where possible, be held by someone senior to OR other than the person who held the original hearing. You may bring a colleague or trade union representative with you to the appeal hearing.

We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. There is no further right of appeal.

#### **6. Gross misconduct**

Gross misconduct will usually result in dismissal without warning, with no notice or payment in lieu of notice (summary dismissal).

The following are examples of matters that are normally regarded as gross misconduct:

- a. theft or fraud;

- b. physical violence or bullying;
- c. verbal abuse or threats;
- d. deliberate and serious damage to property;
- e. serious misuse of the organisation's property or name;
- f. deliberately accessing internet sites containing pornographic, offensive or obscene material;
- g. serious insubordination;
- h. unlawful discrimination or harassment;
- i. bringing the organisation into serious disrepute (including, but not limited to, through dealings outside or work, misuse of social media, reputational damage);
- j. serious incapability at work brought on by alcohol or illegal drugs;
- k. causing loss, damage or injury through serious negligence;
- l. misuse or disclosure of company or client information or documentation;
- m. a serious data protection breach;
- n. a serious misuse of the internet, email, telephone or social media;
- o. a serious breach of health and safety rules;
- p. any serious breach of regulations applicable to the industry;
- q. a serious breach of confidence.
- r. Falsification of timesheets
- s. Misuse of company property including company vehicles
- t. Arriving late or leaving work early without permission

This list is intended as a guide and is not exhaustive.

## Grievance procedure

### 1. About this procedure

Most grievances can be resolved quickly and informally through discussion with your line manager or the Operations Manager. If this does not resolve the problem, you should initiate the formal procedure set out below.

This procedure applies to all employees regardless of length of service. It does not apply to agency workers or self-employed contractors.

This procedure does not form part of any employee's contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case.

### 2. Step 1: written grievance

You should put your grievance in writing and submit it to your line manager. If your grievance concerns your line manager, you may submit it to the Operations Manager.

The written grievance should set out the nature of the complaint, including any relevant facts, dates, and names of individuals involved so that we can investigate it.

### 3. Step 2: meeting

We will arrange a grievance meeting, normally within two weeks of receiving your written grievance. You should make every effort to attend.

You may bring a companion to the grievance meeting if you make a reasonable request in advance and tell us the name of your chosen companion. The companion may be either a trade union representative or a colleague, who will be allowed reasonable paid time off from duties to act as your companion.

If you or your companion cannot attend at the time specified you should let us know as soon as possible and we will try, within reason, to agree an alternative time.

We may adjourn the meeting if we need to carry out further investigations, after which the meeting will usually be reconvened.

We will write to you, usually within one week of the last grievance meeting, to confirm our decision and notify you of any further action that we intend to take to resolve the grievance. We will also advise you of your right of appeal.

#### **4. Step 3: appeals**

If the grievance has not been resolved to your satisfaction you may appeal in writing to the Director, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within two weeks of receiving the appeal. This will be dealt with impartially by a more senior manager who has not previously been involved in the case. You will have a right to bring a companion as set out above.

We will confirm our final decision in writing, usually within one week of the appeal hearing. There is no further right of appeal.

## Sickness absence policy

### 1. About this policy

This policy sets out our arrangements for sick pay and for reporting and managing sickness absence.

Abuse of sickness absence, including failing to report absence or falsely claiming sick pay will be treated as misconduct under our Disciplinary Procedure.

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

### 2. Reporting when you are sick

If you cannot attend work because you are sick or injured, you should telephone your manager as early as possible and no later than 30 minutes before the time when you are normally expected to start work (and subsequent days of absence). You should inform your manager of your expected length of absence. Contact can be made via the email to [absence@mariscosouth.com](mailto:absence@mariscosouth.com). When you are fit to return to work, you must inform your line manager the day before your return so work can be arranged for you.

### 3. Evidence of incapacity

You must complete a self-certification form for sickness absence of up to seven calendar days.

For absence of more than a week you must obtain a certificate from your doctor stating that you are not fit for work, giving the reason. You must also complete a self-certification form to cover the first seven days. If absence continues beyond the expiry of a certificate, a further certificate must be provided.

If your doctor provides a certificate stating that you "may be fit for work" you must inform your manager immediately. We will hold a discussion with you about how to facilitate your return to work, taking account of your doctor's advice. If appropriate measures cannot be taken, you will remain on sick leave and we will set a date for review.

### 4. Statutory sick pay

You may be entitled to Statutory Sick Pay (SSP) if you satisfy the relevant statutory requirements. Qualifying days for SSP are your normal working days, or as set out in your employment contract. The rate of SSP is set by the government in April each year. No SSP is payable for the first three consecutive days of absence. It starts on the fourth day of absence and may be payable for up to 28 weeks.

### 5. Return-to-work interviews

After a period of sick leave your manager will hold a return-to-work interview with you. The purposes include:

- a. ensuring you are fit for work and agreeing any actions necessary to facilitate your return;



- b. confirming you have submitted the necessary certificates;
- c. updating you on anything that may have happened during your absence;
- d. raising any other concerns regarding your absence record or your return to work.

## **6. Managing long-term or persistent absence**

The following paragraphs set out our procedure for dealing with long-term absence or where your level or frequency of short-term absence has given us cause for concern. The purpose of the procedure is to investigate and discuss the reasons for your absence, whether it is likely to continue or recur, and whether there are any measures that could improve your health and/or attendance. We may decide that medical evidence, or further medical evidence, is required before deciding on a course of action.

We will notify you in writing of the time, date and place of any meeting, and why it is being held. We will usually give you a week's notice of the meeting.

Meetings will be conducted by your line manager and may be attended by a HR representative.

If you cannot attend at the time specified you should let us know as soon as possible and we will try, within reason, to agree an alternative time.

If you have a disability, we will consider whether reasonable adjustments may need to be made to the sickness absence meetings procedure, or to your role or working arrangements.

## **7. Medical examinations**

We may ask you to consent to a medical examination by a doctor or occupational health professional or other specialist nominated by us (at our expense).

You will be asked to agree that any medical report produced may be disclosed to us and that we may discuss the contents of the report with the specialist and with our advisers. All medical reports will be kept confidential and held in accordance with our Data Protection Policy.

## **8. Initial sickness absence meeting**

The purposes of a sickness absence meeting or meetings will be to discuss the reasons for your absence, how long it is likely to continue, whether it is likely to recur, whether to obtain a medical report, and whether there are any measures that could improve your health and/or attendance.

In cases of long-term absence, we may seek to agree a return-to-work programme, possibly on a phased basis.

In cases of short-term, intermittent absence, we may set a target for improved attendance within a certain timescale.

### **9. If matters do not improve**

If, after a reasonable time, you have not been able to return to work or if your attendance has not improved within the agreed timescale, we will hold a further meeting or meetings. We will seek to establish whether the situation is likely to change and may consider redeployment opportunities at that stage. If it is considered unlikely that you will return to work or that your attendance will improve within a short time, we may give you a written warning that you are at risk of dismissal. We may also set a further date for review.

### **10. Final sickness absence meeting**

Where you have been warned that you are at risk of dismissal, and the situation has not changed significantly, we will hold a meeting to consider the possible termination of your employment. Before we make a decision, we will consider any matters you wish to raise and whether there have been any changes since the last meeting.

### **11. Appeals**

You may appeal against the outcome of any stage of this procedure. If you wish to appeal you should set out your appeal in writing to the Director, stating your grounds of appeal, within one week of the date on which the decision was sent or given to you.

If you are appealing against a decision to dismiss you, we will hold an appeal meeting, normally within two weeks of receiving the appeal. This will be dealt with impartially and, where possible, by a more senior manager who has not previously been involved in the case.

We will confirm our final decision in writing, usually within one week of the appeal hearing. There is no further right of appeal.

The date that any dismissal takes effect will not be delayed pending the outcome of an appeal. However, if the appeal is successful, the decision to dismiss will be revoked with no loss of continuity or pay.

## Family friendly policies

All family friendly rights (including, but not limited to, maternity, adoption, shared parental, paternity, parental leave) will be adhered to in accordance with statutory responsibilities. For the avoidance of doubt, any family friendly pay entitlement will be paid in accordance with the statutory payment provisions in place at the time.

Please speak to your line manager or the Operations Manager if you would like to discuss any family friendly matters, alternatively please see the relevant Government website for details of yours and our responsibilities, and what needs to be done to apply for these rights.

- **Maternity Leave and Pay:** Please visit the Government's website for guidance: <https://www.gov.uk/employers-maternity-pay-leave/eligibility-and-proof-of-pregnancy>
- **Adoption Leave and Pay:** Please visit the Government's website for guidance: <https://www.gov.uk/adoption-pay-leave/overview>
- **Paternity Leave and Shared Parental Leave and Pay:** Please visit the Government's website for guidance: <https://www.gov.uk/paternity-pay-leave>

## Time off for dependants policy

### 1. About this policy

The law recognises that there may be occasions when you need to take time off work to deal with unexpected events involving one of your dependants.

This time off for dependants policy gives all employees the right to take a reasonable amount of unpaid time off work to deal with certain situations affecting their dependants.

No-one who takes time off in accordance with this policy will be subjected to any detriment.

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

### 2. Reasonable unpaid time off

2.1 You have a right to take a reasonable amount of unpaid time off work when it is necessary to:

- a. provide assistance when a dependant falls ill, gives birth, is injured or assaulted;
- b. make longer-term care arrangements for a dependant who is ill or injured;
- c. take action required in consequence of the death of a dependant;

- d. deal with the unexpected disruption, termination or breakdown of arrangements for the care of a dependant (such as a child-minder falling ill); and/or
- e. deal with an unexpected incident involving your child while a school or another educational establishment is responsible for them.

2.2 A **dependant** for the purposes of this policy is:

- a. your spouse, civil partner, parent or child;
- b. a person who lives in the same household as you, but who is not your tenant, lodger, boarder or employee; or
- c. anyone else who reasonably relies on you to provide assistance, make arrangements or take action of the kind referred to above.

2.3 This policy applies to time off to take action which is necessary because of an immediate or unexpected crisis. This policy does not apply where you need to take planned time off or provide longer-term care for a dependant. If this is the case, you should take advice from your line manager.

2.4 Whether action is considered necessary will depend on the circumstances, including nature of the problem, the closeness of the relationship between you and the dependant, and whether anyone else is available to assist. Action is unlikely to be considered necessary if you knew of a problem in advance but did not try to make alternative care arrangements.

2.5 Reasonable time off in relation to a particular problem will not normally be more than one day. However, we will always consider each set of circumstances on their facts.

### **3. Exercising the right to time off**

You will only be entitled to time off under this policy if, as soon as is reasonably practicable, you tell your line manager:

- a. the reason for your absence; and
- b. how long you expect to be away from work.

If you fail to notify us as set out above, you may be subject to disciplinary proceedings under our Disciplinary Procedure for taking unauthorised time off.

We may in some cases ask you to provide evidence for your reasons for taking the time off, either in advance or on your return to work. Suspected abuse of this policy will be dealt with as a disciplinary issue under our Disciplinary Procedure.

## Carer's Leave policy

### 1. About this policy

We respect and the law recognises that there may be occasions when you will need to take time off work to provide or arrange care for a dependant with a long-term care need. The purpose of this policy is to set out the circumstances in which we will give employees unpaid (unless at our absolute discretion) time off work to deal with these situations. For time off for dependants to deal with unexpected events, please see our Time off for Dependants Policy.

It is important to recognise that no-one who takes time off in accordance with this policy will be subjected to any detriment.

This policy applies to employees only. It does not apply to agency workers, consultants, self-employed contractors, volunteers or interns.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Any questions you may have about the day-to-day application of this policy should be referred to the Operations Manager in the first instance.

### 2. Time off

You have a right to take up to one week of unpaid time off work in each rolling 12-month period to provide or arrange care for a dependant with a long-term care need.

A dependant for the purposes of this policy is:

- a. your spouse, civil partner, child or parent;
- b. a person who lives in the same household as you, but who is not your tenant, lodger, boarder or employee; or
- c. anyone else who reasonably relies on you to provide or arrange care for them.

A dependant has a long-term care need for the purposes of this policy if:

- a. they have an illness or injury (whether physical or mental) that requires, or is likely to require, care for more than three months;
- b. they have a disability for the purposes of the Equality Act 2010; or
- c. they require care for a reason connected with their old age.

### 3. Amount of time off

You may take a minimum of half a working day's leave under this policy and up to a maximum of one week's leave. You do not need to take the days consecutively, provided that you take no more than the equivalent of one working week's leave in each rolling 12-month period.

If the amount of time you work varies from week to week, a week's leave will be an average of a week's work:

If you have been employed for at least a year, this will be calculated by dividing the total of the periods for which you were normally required to work during the course of a week in the previous 12 months by 52.

If you have been employed for less than a year, this will be calculated by dividing the total of the periods for which you were normally required to work during the course of a week by the number of weeks you have been employed.

#### **4. Exercising the right to time off**

To take leave under this policy you must give to your manager the longer of: three days' notice or twice as many days' notice as the number of days you want to take off.

The notice must:

- a. specify that you are entitled to take carer's leave in accordance with this policy; and
- b. specify the days you intend to take carer's leave and if you will take a full or a half day.

If you fail to notify us as set out above, you may be subject to disciplinary proceedings under our Disciplinary Procedure for taking unauthorised time off.

In some circumstances, where the operation of the business would be disrupted if you took leave, we may need to postpone your carer's leave. If we do this, we will allow you to take the same amount of leave you have requested at a mutually convenient time within one month of the first day you requested to take leave under this policy. If this happens, we will write to you within seven days of your request to take leave, setting out the reason for the postponement and the days we have agreed you can take carer's leave.

If you take carer's leave and any other statutory leave (for example, maternity or adoption leave) consecutively, carer's leave does not count when calculating the period of time you have been away from work in respect of your right to return to the job in which you were previously engaged.

## Compassionate leave policy

### 1. About this policy

Compassionate leave is designed to help you deal with traumatic personal circumstances such as the death of a close relative or where a close relative has a life-threatening illness or injury.

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

### 2. When compassionate leave may be available

You may take unpaid compassionate leave of up to 5 days where a close relative has died, is critically ill with a life-threatening illness, or has suffered a life-threatening injury.

In the event of the death of a child, including a stillbirth, please see our Parent Bereavement Leave Policy which applies instead of this policy. We may grant further unpaid compassionate leave in this situation at our discretion.

We will consider requests for compassionate leave due to other traumatic events or difficult personal circumstances on a case by case basis.

If you are still unable to return to work following compassionate leave you should contact your line manager. We may at our discretion grant you further unpaid compassionate leave in those circumstances. Alternatively, you may be able to take a period of annual leave, subject to your manager's approval.

### 3. Requesting compassionate leave

We recognise that it may not always be possible to request compassionate leave in advance. However, where it is possible, you should make a request to your line manager. You should tell them the reasons for your request and the number of days leave you would like to take.

Where it is not possible to request leave in advance you should contact your line manager as soon as possible to tell them the reason for your absence and the number of days you expect to be absent. Someone can do this on your behalf if necessary.

In exceptional circumstances we may have to refuse a request for compassionate leave and will give you a written explanation of the reasons. If you are dissatisfied with this decision you may make a complaint under our Grievance Procedure.

## Parental bereavement leave policy

### 1. About this policy

This policy sets out the arrangements for parental bereavement leave, which is a type of compassionate leave intended to help employees deal with the death of a child or a stillbirth after at least 24 weeks of pregnancy. For compassionate leave in other circumstances please see our Compassionate Leave Policy.

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

### 2. Entitlement to parental bereavement leave

You may be entitled to parental bereavement leave if your child or a child in your care has died or been stillborn after 24 weeks of pregnancy.

Parental bereavement leave can be one week, two consecutive weeks, or two separate weeks. It can be taken at any time during the first 56 weeks after the child's death.

Further unpaid compassionate leave may be available under our Compassionate Leave Policy at our discretion. Please speak to your manager if you require further time off in addition to parental bereavement leave.

### 3. Parental bereavement pay

You may qualify for statutory parental bereavement pay (SPBP) during parental bereavement leave if:

- a. you have at least 26 weeks' continuous employment ending on the Saturday before the child died; and
- b. you earn at least the lower earnings limit for class 1 national insurance contributions.

SPBP is only payable in respect of whole weeks of leave, at the same rate as statutory paternity pay. The rate is set by the government each tax year.

### 4. Leave in the first eight weeks

In the first eight weeks after a child has died, there is no need to give advance notice to take parental bereavement leave. Please notify your line manager as soon as you can on the day you want your leave to start, preferably before the time you would normally start work, where possible. Someone can do this on your behalf if necessary.

If you have already started work, then your parental bereavement leave period will start on the following day. We would usually allow you to take the rest of the day off as compassionate leave.



You can cancel any planned parental bereavement leave in the first eight weeks by telling us at any time before the leave starts, and no later than the time you would normally start work on the first day of the leave period. You cannot cancel leave once it has started.

#### **5. Leave after more than eight weeks**

To take parental bereavement leave more than eight weeks after the child has died, please give your line manager at least a week's notice.

Parental bereavement leave can be cancelled with a week's notice, and can be re-booked by giving a week's notice.

#### **6. Written confirmation**

We will ask you to confirm the following information in writing within 28 days of starting any period of parental bereavement leave:

- a. your name;
- b. the date the child died or was stillborn;
- c. the dates of paid or unpaid parental bereavement leave taken; and
- d. your relationship to the child.

## Flexible working policy

### 1. About this policy

Our flexible working policy gives eligible employees an opportunity to request a change to their working pattern.

We will deal with flexible working requests in a reasonable manner and within a reasonable time. In any event, the time between making a request and notifying you of a final decision (including the outcome of any appeal) will be less than two months unless we have agreed a longer period with you.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### 2. Eligibility

To be eligible to make a flexible working request, you must:

- a. be an employee;
- b. not have made two flexible working requests during the last 12 months (which includes requests that have been withdrawn); and
- c. not make a request to work flexibly if a request you made previously has not been concluded.

### 3. What is a flexible working request?

A flexible working request under this policy means a request to do any or all of the following:

- a. to reduce or vary your working hours;
- b. to reduce or vary the days or times you work; or
- c. to work from a different location (for example, from home).

### 4. Making a flexible working request

Your flexible working request should be submitted to the Operations Manager in writing and dated. It should:

- a. state that it is a flexible working request;
- b. explain the change being requested and propose a start date; and
- c. state whether you have made any previous flexible working requests.

### 5. Meeting

We will arrange a meeting at a convenient time and place to discuss your request. You may be accompanied at the meeting by a colleague of your choice or trade union representative. They will be entitled to speak and confer privately with you, but may not answer questions on your behalf.

We may decide to grant your request in full without a meeting, in which case we will write to you with our decision.

## **6. Decision**

We will inform you in writing of our decision as soon as possible after the meeting.

If your request is accepted, we will write to you with details of the new working arrangements and the date on which they will commence. You will be asked to sign and return a copy of the letter.

If we cannot immediately accept your request we may require you to undertake a trial period before reaching a final decision on your request.

Unless otherwise agreed, changes to your terms of employment will be permanent.

We may reject your request for one or more of the following business reasons:

- a. the burden of additional costs;
- b. detrimental effect on ability to meet customer demand;
- c. inability to reorganise work among existing staff;
- d. inability to recruit additional staff;
- e. detrimental impact on quality;
- f. detrimental impact on performance;
- g. insufficiency of work during the periods that you propose to work; or
- h. planned structural changes.

If we are unable to agree to your request, we will write to tell you which of those reasons applies in your case. We will also set out the appeal procedure.

## **7. Appeal**

You may appeal in writing within 14 days of receiving our written decision.

Your appeal must be dated and must set out the grounds on which you are appealing.

We will hold a meeting with you to discuss your appeal. You may bring a colleague to the meeting.

We will tell you in writing of our final decision as soon as possible after the appeal meeting, including reasons. There is no further right of appeal.

## Time off for public duties policy

### 1. About this policy

We wish to enable employees to perform any public duties that they may be committed to undertake and so will give them time off to do so where it does not conflict with the operational needs of our business.

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

### 2. Jury service

You should tell your line manager as soon as you are summoned for jury service and provide a copy of your summons if requested.

Depending on the demands of our business we may request that you apply to be excused from or defer your jury service.

We are not required by law to pay you while you are absent on jury service. You will be advised at court of the expenses and loss of earnings that you can claim.

### 3. Voluntary public duties

Employees are entitled to a reasonable amount of unpaid time off work to carry out certain public duties, including duties as a tribunal member, magistrate, local councillor, member of an NHS Trust, prison visitor, police station lay visitor or school governor.

If you are unsure whether a public service that you perform is covered by this policy, you should speak to your line manager.

As soon as you are aware that you will require time off for performance of a public service you should notify your line manager in writing, providing full details of the time off that is being requested and the reasons for your request. In order that arrangements can be made to cover your duties in your absence you should make your request in good time.

Each request for time off will be considered on its merits taking account of all the circumstances, including how much time is reasonably required for the activity, how much time you have already taken, and how your absence will affect the business.

### 4. Reserve forces duties

We are aware that employees who are members of the Reserve Forces (the Territorial Army, Royal Navy Reserve, Royal Marines Reserve or Royal Auxiliary Air Force) may be called-up at any time to be deployed on full-time operations, and are expected to attend regular training.

We are under no obligation to offer leave (either paid or unpaid) for reservists to undertake training and you should use existing holiday entitlement to meet training commitments. In exceptional circumstances we may grant additional unpaid leave in order for these commitments to be met.

If we receive notice that you have been called-up for active service we may apply to an adjudication officer for the notice to be deferred or revoked if your absence would cause serious harm to our business (which could not be prevented by the grant of financial assistance).

Once your military service has ended you may submit a written application for reinstatement to your employment. This should be made by the third Monday following the end of your military service and you should notify us of the date on which you will be available to restart work.

If it is not reasonable and practicable to reinstate you into your former employment, we will offer you the most favourable alternative on the most favourable terms and conditions which are reasonable and practicable.

## Smoking/Vaping policy

### 1. At this policy

We are committed to protecting your health, safety and welfare and that of all those who work for us by providing a safe place of work and protecting all workers, service users, customers and visitors from exposure to smoke.

All of our workplaces (including our vehicles) are smoke-free in accordance with the Health Act 2006 and associated regulations. All staff and visitors have the right to a smoke-free environment.

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

If you wish to suggest improvements to the policy or experience particular difficulty complying with it you should discuss the situation with your line manager or the Office Manager.

### 2. Where is smoking banned?

Smoking/vaping is not permitted anywhere in our workplace. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

No-smoking signs are displayed at the entrances to our workplace.

Anyone using our vehicles, whether as a driver or passenger, must ensure the vehicles remain smoke-free.

### 3. Where is smoking permitted?

You may only smoke/vape outside in designated areas during breaks. When smoking outside, you must dispose of cigarette butts and other litter appropriately.

### 4. Breaches of the policy

Breaches of this policy by any employee will be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution.

## IT and communications systems policy

### 1. About this policy

Our IT and communications systems are intended to promote effective communication and working practices. This policy outlines the standards you must observe when using these systems, when we will monitor their use, and the action we will take if you breach these standards.

The Director has overall responsibility for this policy, including keeping it under review.

Breach of this policy may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

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

### 2. Equipment security and passwords

You are responsible for the security of the equipment allocated to or used by you, and you must not allow it to be used by anyone other than in accordance with this policy. You should use passwords on all IT equipment, particularly items that you take out of the office. You should keep your passwords confidential and change them regularly.

You must only log on to our systems using your own username and password. You must not use another person's username and password or allow anyone else to log on using your username and password.

If you are away from your desk you should log out or lock your computer. You must log out and shut down your computer at the end of each working day.

### 3. Systems and data security

You should not delete, destroy or modify existing systems, programs, information or data (except as authorised in the proper performance of your duties).

You must not download or install software from external sources without authorisation from the Office Manager. Downloading unauthorised software may interfere with our systems and may introduce viruses or other malware.

You must not attach any device or equipment including mobile phones, tablet computers or USB storage devices to our systems without authorisation from the Office Manager.

We monitor all e-mails passing through our system for viruses. You should exercise particular caution when opening unsolicited e-mails from unknown sources. If an e-mail looks suspicious do not reply to it, open any attachments or click any links in it.

Inform the Office Manager and SPC IT at support@spcit.co.uk immediately if you suspect your computer may have a virus.

#### **4. E-mail**

Adopt a professional tone and observe appropriate etiquette when communicating with third parties by e-mail. You should also include our standard e-mail signature and disclaimer.

Remember that e-mails can be used in legal proceedings and that even deleted e-mails may remain on the system and be capable of being retrieved.

You must not send abusive, obscene, discriminatory, racist, harassing, derogatory, defamatory, pornographic or otherwise inappropriate e-mails.

You should not:

- a. send or forward private e-mails at work which you would not want a third party to read;
- b. send or forward chain mail, junk mail, cartoons, jokes or gossip;
- c. contribute to system congestion by sending trivial messages or unnecessarily copying or forwarding e-mails to others who do not have a real need to receive them; or
- d. send messages from another person's e-mail address (unless authorised) or under assumed name.

Do not use your own personal e-mail account to send or receive e-mail for the purposes of our business. Only use the e-mail account we have provided for you.

We do not permit access to web-based personal e-mail such as Gmail or Hotmail on our computer systems at any time due to additional security risks.

#### **5. Using the internet**

Internet access is provided solely for business purposes.

You should not access any web page or download any image or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral. Even web content that is legal in the UK may be in sufficient bad taste to fall within this prohibition. As a general rule, if any person (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that our software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.

We may block or restrict access to some websites at our discretion.



## **6. Personal use of our systems**

We permit the incidental use of our systems to send personal e-mail, browse the internet and make personal telephone calls subject to certain conditions. Personal use is a privilege and not a right. It must not be overused or abused. We may withdraw permission for it at any time or restrict access at our discretion.

Personal use must meet the following conditions:

- a. it must be minimal and take place exclusively outside of normal working hours (that is, during your lunch break, and before or after work);
- b. personal e-mails should be labelled "personal" in the subject header;
- c. it must not affect your work or interfere with the business;
- d. it must not commit us to any marginal costs; and
- e. it must comply with our policies including the Equal Opportunities Policy, Anti-harassment and Bullying Policy, Data Protection Policy and Disciplinary Procedure.

## **7. Monitoring**

### ***IT and Communication systems***

Our systems enable us to monitor telephone, e-mail, voicemail, internet and other communications. For business reasons, and in order to carry out legal obligations in our role as an employer, your use of our systems including the telephone and computer systems (including any personal use) may be continually monitored by automated software or otherwise.

We reserve the right to retrieve the contents of e-mail messages or check internet usage (including pages visited and searches made) as reasonably necessary in the interests of the business, including for the following purposes (this list is not exhaustive):

- a. to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy;
- b. to find lost messages or to retrieve messages lost due to computer failure;
- c. to assist in the investigation of alleged wrongdoing; or
- d. to comply with any legal obligation.

### ***CCTV***

We have CCTV installed in order to provide a safe, secure environment for employees and to prevent vandalism and theft. It is essentially used for:

- the prevention, investigation and detection of crime;
- the apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings),
- safeguarding employee safety;
- monitoring the security of the site.
- CCTV is located in the kitchen and the store area.

Images can only be viewed by approved employees. The Company reserves the right to use images captured on CCTV where there is activity that it cannot be expected to ignore such as criminal activity, potential misconduct or gross misconduct, or behaviour which puts others at risk.

Images are retained for a period of 30 days unless otherwise required by law.

The Company do not use CCTV for covert monitoring.

### ***Vehicle tracking***

Vehicle tracking devices are fitted to some company vehicles.

The overall aims of the use of tracking devices are:

*Safety and legal compliance* – to increase driver safety and security, through safer and compliant driving as well as helping ensure the safety and consideration for other road users;

*Operational efficiencies* – to provide data that supports operational improvements e.g. start and finish times;

*Vehicle cost efficiencies* – to reduce maintenance costs, reduce the frequency of accidents and other associated costs e.g. hire costs associated with vehicle downtime;

*Environmental* – to improve fuel efficiency and other environmental benefits.

The Company reserves the right to use the information obtained where there is activity that it cannot be expected to ignore such as criminal activity, potential misconduct or gross misconduct, or behaviour which puts others at risk.

### **8. Prohibited use of our systems**

Misuse or excessive personal use of our telephone or e-mail system or inappropriate internet use will be dealt with under our Disciplinary Procedure. Misuse of the internet can in some cases be a criminal offence.

Creating, viewing, accessing, transmitting or downloading any of the following material will usually amount to gross misconduct (this list is not exhaustive):

- a. pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature);
- b. offensive, obscene, or criminal material or material which is liable to cause embarrassment to us or to our clients;
- c. a false and defamatory statement about any person or organisation;

- d. material which is discriminatory, offensive, derogatory or may cause embarrassment to others (including material which breaches our Equal Opportunities Policy or our Anti-harassment and Bullying Policy);
- e. confidential information about us or any of our staff or clients (except as authorised in the proper performance of your duties);
- f. unauthorised software;
- g. any other statement which is likely to create any criminal or civil liability (for you or us); or
- h. music or video files or other material in breach of copyright.

## Social media policy

### 1. About this policy

This policy is in place to minimise the risks to our business through use of social media.

This policy deals with the use of all forms of social media, including Facebook, LinkedIn, X, Google+, Wikipedia, Snapchat, Instagram, TikTok, and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.

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

### 2. Personal use of social media

Personal use of social media is never permitted during working hours or by means of our computers, networks and other IT resources and communications systems.

### 3. Prohibited use

You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

You must not use social media to defame or disparage us, our staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.

You must not express opinions on our behalf via social media, unless expressly authorised to do so by the Director or Operations Manager. You may be required to undergo training in order to obtain such authorisation.

You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media.

You are not permitted to add business contacts made during the course of your employment to personal social networking accounts.

Any misuse of social media should be reported to the Operations Manager.

#### **4. Guidelines for responsible use of social media**

You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal e-mail address.

Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.

If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you have been authorised to speak on our behalf as set out above). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.

If you see social media content that disparages or reflects poorly on us, you should contact the Operations Manager.

#### **5. Breach of this policy**

Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation.

You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

# Data protection policy for employees

## 1. About this policy

The Company is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out the Company's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of job applicants, employees, workers, contractors, volunteers, interns, apprentices and former employees, referred to as HR-related personal data. This policy refers to employees, workers, contractors, volunteers, interns, apprentices use and processing of the personal data of clients or other personal data for business purposes. Where personal data is processed as part of someone's role, the business will provide training and set out business procedures.

The Company has appointed Ralph Elliott-King, Finance Controller as the person with responsibility for data protection compliance within the Company. He can be contacted at [Ralph.King@mariscosouth.com](mailto:Ralph.King@mariscosouth.com). Questions about this policy, or requests for further information, should be directed to him.

We encourage our workforce to speak with us if they have any questions, queries or concerns about anything relating to data protection.

## 2. Definitions

In this policy, the following definitions apply:

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

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

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

## 3. Data protection principles

The Company processes HR-related personal data in accordance with the following data protection principles:

- The Company processes personal data lawfully, fairly and in a transparent manner.
- The Company collects personal data only for specified, explicit and legitimate purposes.
- The Company processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.

- The Company keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The Company keeps personal data only for the period necessary for processing.
- The Company adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

The Company tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons. Where the Company relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of individuals.

Where the Company processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with our obligations in relation to processing of special categories of data and criminal records data.

The Company will update HR-related personal data promptly if an individual advises that their information has changed or is inaccurate.

Personal data gathered during the employment, worker, contractor or volunteer relationship, or apprenticeship or internship is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems (where applicable).

The Company keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

#### **4. Data protection principles**

As a data subject, individuals have a number of rights in relation to their personal data.

##### ***Subject access requests***

Individuals have the right to make a subject access request. If an individual makes a subject access request, the Company will tell them:

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

- whether or not the Company carries out automated decision-making and the logic involved in any such decision-making.

The Company will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless they agree otherwise.

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

To make a subject access request, the individual should contact Ralph Elliott-King, Finance Director. In some cases, the Company may need to ask for proof of identification before the request can be processed. The Company will inform the individual if it needs to verify their identity and the documents it requires.

The Company will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the Company processes large amounts of the individual's data, it may respond within three months of the date the request is received. The Company will write to the individual within one month of receiving the original request to tell them if this is the case.

If a subject access request is manifestly unfounded or excessive, the Company is not obliged to comply with it. Alternatively, the Company can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the Company has already responded. If an individual submits a request that is unfounded or excessive, the Company will notify them that this is the case and whether or not it will respond to it.

### ***Other rights***

Individuals have a number of other rights in relation to their personal data. They can require the Company to:

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

To ask the Company to take any of these steps, the individual should send the request to the person responsible for this policy (see above).



## **5. Retention of data**

The Company will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## **6. Data security**

The Company takes the security of HR-related and all other personal data seriously. The Company has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

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

## **7. Impact assessments**

Where processing personal data would result in a high risk to individual's rights and freedoms, the Company will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

## **8. Data breaches**

If the Company discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The Company will record all data breaches regardless of their effect.

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

## **9. Transferring information outside the UK**

The Company may transfer the personal information we collect about you to other countries outside the UK (a list is available upon request) in order to perform our contract with you. There are adequacy

regulations in respect of those countries. This means that the countries to which we may transfer your data are deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place appropriate measures and data protection due diligence to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection

#### **10. Updating your personal data**

Individuals are responsible for helping the Company keep their personal data up to date. Individuals should let the Company know, by using the personal details update form, if data provided to the Company changes, for example if an individual moves house or changes their bank details.

#### **11. Individual responsibilities for handling others personal data**

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, the Company relies on individuals to help meet its data protection obligations to staff and to customers and clients.

##### Individuals who have access to personal data are required to:

- ensure data is collected stored and handled appropriately and in accordance with Company guidelines and procedures;
- only access data that they have authority to access and only for the specified lawful purpose for which it was obtained;
- not share personal data informally (you must only share data in accordance with Company procedures where necessary);
- not to disclose data except to individuals (whether inside or outside the Company) who have appropriate authorisation (if unsure seek permission from your Line Manager);
- keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to make unnecessary copies of personal data. Where copies are made for legitimate purposes, copies should be kept and disposed of securely;
- lock computer screens when away from desks;
- not to remove personal data, or devices containing or that can be used to access personal data, from the Company's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- not to store personal data on local drives or on personal devices that are used for work purposes;
- ensure personal data is encrypted before being transferred electronically to authorised external contacts. Speak to SPC IT for more information on how to do this;
- ask for help from the designated Data Protection person if they are unsure about data protection or if they notice any areas of data protection or security the Company can improve upon; and

- report data breaches of which they become aware to the person responsible for this policy immediately. If they are not available, escalate to the Director.

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

Please note it is a criminal offence to conceal or destroy personal data which is part of a subject access request. This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.

Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you in accordance with our disciplinary procedure.

Where your role entails processing of personal data of staff, clients or otherwise, you must adhere to the procedures and guidelines in place. If you have any queries in relation to the processing of personal data of others and/or related procedures, these must be directed to your line manager immediately so that the appropriate training can be provided.

## **12. Training**

The Company will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter if applicable to their role.

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

## **13. Changes to this policy**

The Company reserves the right to change this policy at any time without notice to you so please ensure you remain up to date with all data protection responsibilities and requirements.

## **14. Breaches of data protection**

If you become aware of any concerns in relation to data protection rules or the use of personal data (for example yours, colleagues, clients or others), you must inform the Finance Controller (or the Director in his absence) immediately.

Breaches of data processing requirements by any employee will be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

## Health and safety handbook

Our health and safety handbook sets out arrangements for ensuring we meet our health and safety obligations to staff and anyone visiting our premises or affected by our work.

Our health and safety handbook can be found on our intranet at [www.mariscosouth.co.uk](http://www.mariscosouth.co.uk) or on the HR platform at [www.atlas-hub.co.uk](http://www.atlas-hub.co.uk). All employees must read and then confirm they have read and understood the document on their Atlas platform.

## Environment policy

There is a growing awareness of the need to protect the environment, a view supported by Marisco.

Employees should make every effort within their sphere of control to minimise any adverse effect of the Company on the environment. Examples include:

- Turning off lights when not required.
- Turning down heating levels.
- Planning journeys to minimise the fuel used on Company business.
- Co-operating with any recycling systems for waste paper etc. that are introduced.