



## POLICY BOOKLET 2024 - 2025



*"Working safely for our future"*

Policy Booklet

# POLICY BOOKLET CONTENTS

|     |   |     |
|-----|---|-----|
| 1.  | Organisational Chart - KpH Deconstruction       | 3   |
| 2.  | Alcohol and Drugs Policy                        | 4   |
| 3.  | Anti-Bribery and Corruption Policy              | 6   |
| 4.  | Harassment and Bullying Policy                  | 9   |
| 5.  | Business Continuity Plan                        | 13  |
| 6.  | Carbon Policy Statement                         | 20  |
| 7.  | Code of Ethics Policy                           | 21  |
| 8.  | Corporate Social Responsibility                 | 23  |
| 9.  | Customer Service Policy                         | 24  |
| 10. | Data Protection Policy                          | 28  |
| 11. | Environmental Policy Statement                  | 53  |
| 12. | Equal Opportunities Action Plan                 | 54  |
| 13. | Equal Opportunity Statement                     | 59  |
| 14. | Equality and Diversity Policy                   | 60  |
| 15. | Health and Safety Policy Statement              | 61  |
| 16. | Health & Safety Induction for Young Person      | 62  |
| 17. | Information Security Policy                     | 63  |
| 18. | Migrant Worker Policy & Procedure               | 70  |
| 19. | Modern Slavery and Human Trafficking Statement  | 100 |
| 20. | Non-English-Speaking Personnel Policy Statement | 102 |
| 21. | On-Site Mobile Phone Policy                     | 103 |
| 22. | Penalty Charge Notice                           | 104 |
| 23. | Pollution Prevention Plan                       | 105 |
| 24. | Quality Policy Statement                        | 112 |
| 25. | Right to work in the UK                         | 113 |
| 26. | Social Media Policy                             | 120 |
| 27. | Staff Well-Being Policy                         | 124 |
| 28. | Sustainable Timber Procurement Policy Statement | 127 |
| 29. | Tight Fitting RPE Facial Hair Policy            | 128 |
| 30. | Whistle-Blowing Policy                          | 130 |
| 31. | Work Safe Policy Statement                      | 136 |

BOARD OF DIRECTORS - Decides the direction the group will take and oversees its running



Kevin Potter  
Founding Director  
07764 605946  
Kevin.potter@kph.co.uk



Lyndsey West  
Managing Director  
07787 131265  
Lyndsey.West@kph.co.uk

SENIOR LEADERSHIP TEAM - Informs strategy, advises the board of directors, runs the company



Andrew Mackie  
Operations Director  
07824 438 140  
Andrew.mackie@kph.co.uk



James Kelly  
Operations Director  
07824 819 520  
James.Kelly@kph.co.uk



Pre-Con Director  
(Planned for the future)



Steve Peterson  
Dev & Logistics Director  
07584 597809  
Steve.Peterson@kph.co.uk



Jordan Wells  
SHEQ Director  
07990 075 390  
Jordan.Wells@kph.co.uk



Finance Director  
(Planned for the future)

OPERATIONS

PRE CON

LOGISTICS

SHEQ

FINANCE

Andy Lester  
Operations  
Manager

Danny Huggins  
Operations  
Manager

James Wrest  
Project  
Manager

Flavio Spahiu  
Assistant  
Project Manager

Jo Scheepers  
Assistant  
Project Manager

Phil Dunt  
Site Manager

Megan McDonald  
Team Leader

Mario Viggor  
Estimator

Omar Younis  
Estimator

Hannah Mortlock  
Bus Dev  
Coordinator

Grace Colley  
Document  
Controller

Neil Creasey  
Yard  
Manager

Alex Terinte  
Logistics  
Coordinator

Tracy Millis  
Labour  
Coordinator

Cage Drivers

Mel Speller  
H&S  
Administrator

Arjun  
Ramachandran  
H& S Advisor

Marta Popescu  
Training &  
Development

Charlie Morris  
Sustainability &  
Social Value  
Co-Ordinator

Steve Delloway  
Commercial  
Manager

Gill Thornton  
Accounts  
Manager

Sarah Molla  
Accounts  
Administrator

Lorraine  
Rodrigues  
Waste/Reuse  
Administrator

Donna Taylor  
Personal  
Assistant

LYNDSEY WEST  
MANAGING DIRECTOR: *ML*



## Alcohol and Drugs Policy

KpH Group is committed to providing a safe and secure environment for all persons affected by its work activities. It recognises the inherent risks associated with drug, alcohol and solvent abuse and is intent on safeguarding its workplaces and work activities from these risks. In respect of any person carrying out work at any location on behalf of KpH Group, the Company has adopted a policy of zero tolerance in that no one shall:

- be in possession of drugs or substances capable of abuse;
- consume or be under the influence of alcohol, drugs or substances of abuse;
- take prescribed drugs without informing their supervisor and having first confirmed with their doctor that the drugs would not affect their fitness for work;
- take medication that carries a warning advising against driving or operating plant or machinery when working;
- trade in or supply alcohol, drugs and substances of abuse, or permit their presence or use by others.
- Drug testing may take place Pre-Employment, on Probation, at Random, on Promotion, and With Cause or With Suspicion

The company defines the consumption of alcohol as being at or in excess of:

10 µg/100ml BrAC, this is zero,  
or  
22 µg/100ml BrAC, the Scotland and EU drink drive level,  
or  
35 µg/100ml BrAC, the England and Wales drink drive level.

### With Cause or Suspicion

Any incident or suspicion must be reported to a manager and will require an alcohol and a drug screen or if deemed necessary by the manager.

With Suspicion screening takes place because a suspicion has arisen and the company would like to eliminate the possibility of the involvement of drugs or alcohol.

### Random drug testing

The company reserves the right under this policy to exercise random alcohol and drug testing of its employees, contractors, and clients at any of our workplace locations. Such individuals may be randomly selected and tested throughout the course of the year. This process applies regardless of the individual's status or job function. The external provider that carries out the testing or the company itself will select workplace locations where random testing is to be carried out. Random screening will be performed with a random selection of payroll numbers on one random day each week on each and every site in the company. Once an individual has been randomly selected, they will be contacted and immediately escorted to the testers' location for testing. The individuals will be asked to declare if they are taking any medicine(s) which may legitimately affect the outcome of the test.

The company aims to achieve an annual percentage of 10% across all departments. Random screening will involve up to 10% of the work force who will be chosen at random during site / office visits in order to achieve this target.





All screening and testing will be performed in a confidential and discrete manor to respect employee confidentiality. Alcohol testing will be with the calibrated breathalyser and Drug testing will be by an on-site DrugWipe Dual screen on the skin and/or in saliva.

All testing will be performed by a trained screener following the operator instructions. Any non-negatives will be confirmed by the taking a further sample for examination. Alcohol confirmation is as per breathalyser instructions on-site 20 minutes after the initial screen.

Failure to comply with this policy and the Company’s procedures is a serious matter and anyone found to be in breach will be the subject of disciplinary action under the Company’s Disciplinary Procedure, which may lead to Summary Dismissal for Gross Misconduct.

It is company policy to always involve the police where illegal drugs are found to have been used or sold on the premises or on a client’s site.

Witness for both sides are not required, but should a witness be requested, they may be present for the screen or for the confirmation sampling. However, waiting for a particular person; who may not be on shift or at a different location is not acceptable and will be considered as an attempt to pervert the sample process.

The Company recognises alcohol or drug dependency as a treatable condition. Employees who suspect they have an alcohol or drug dependency are encouraged to seek advice and to follow appropriate treatment promptly before it results in job performance problems.


The Company is not looking to discriminate against employees who approach it for help with a drink or drug related problem and who are prepared to undergo an agreed form of treatment. However, approaches of this nature will not be considered acceptable when they have been made subsequent, or just prior to a Company check that has or would have, revealed recent consumption of alcohol, drugs or substances of abuse or possession of these.

If the shift or working day has ended, the employee (and Manager) will remain until the sample collection procedure is satisfactorily completed.

The policy applies to all direct and subcontract employees of KpH Group and KpH Deconstruction and to any other person who carries out work on its behalf. It is designed to protect such persons, visitors, and members of the public from the workplace hazards associated with alcohol consumption and drug or solvent abuse. It will be implemented at all UK workplaces and on the instruction of the Company board. In certain situations, like With Cause or With Suspicion, it may be necessary, as deemed by the company, to move directly to a laboratory confirmation method without a screening test being performed. The method of confirmation is open and at the discretion of the company.

This policy will be brought to the attention of all employees and persons working on behalf of the company and will be reviewed at least annually.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## Anti-Bribery and Corruption Policy

### 1. Introduction

KpH Group values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Company's staff as well as others acting on the Company's behalf are key to maintaining these standards.

The purpose of this document is to set out the Company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the KpH Group of companies, within all regions, areas and functions.

### 2. Understanding and Recognising Bribery and Corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

### 3. Penalties

The Bribery Act 2010 comes into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the Company.



#### 4. KpH Group's Policy

KpH Group will not tolerate bribery or corruption in any form.

The Company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the Company's Corporate Entertainment Policy;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Division Manager. If necessary, guidance should also be sought from the Group Commercial Manager and externally appointed HR consultants.

The Company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

#### 5. Key Risk Areas

Bribery can be a risk in many areas of the Company. Below are the key areas you should be aware of in particular:

**Excessive gifts, entertainment and hospitality:** can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they fall within the Company's Corporate Entertainment Policy.

**Facilitation payments:** are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The Company will not tolerate or excuse such payments being made.

**Reciprocal agreements:** or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments



to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the Company may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the Company’s behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.


Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

**6. Employee Responsibility and How to Raise a Concern**

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

KpH Group do not accept gifts, or invites to events, to individually named personnel. In the event that this happens, employees are to refer such matters to their Divisional Manager or Managing Director.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |





## Harassment and Bullying Policy

### **POLICY**

1. KPH Group recognises that all employees have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. It is committed to eliminating intimidation in any form.
2. The Policy applies to harassment on the grounds of disability, gender, marital status, sexual orientation, age, creed, colour, race or ethnic origin.
3. Harassment breaches KPH Group Policy as outlined and it is classified as a serious offence which may result in disciplinary action including summary dismissal under the Disciplinary Procedure.
4. The Policy applies to all staff employed by KPH Group.

### **DEFINITIONS**

5. Harassment is generally described as "unwanted conduct which affects the dignity of women or men at work; it encompasses unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory". The essential characteristic of harassment is that the action(s) is unwanted by the recipient.
6. The following interpretations and examples of harassment may be helpful in determining whether harassment has taken place.

### **General Harassment**

"Harassment can take many forms and may be directed in particular against women and ethnic minorities or towards people because of their age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation. It may involve action, behaviour, comment or physical contact which is found objectionable or which causes offence; it can result in the recipient feeling threatened, humiliated or patronised and it can create an intimidating work environment."

### **Sexual Harassment**

"Sexual harassment can be defined as an uninvited, unreciprocated and unwelcome behaviour of a sexual nature which is offensive to the person involved and causes that person to feel threatened, humiliated or embarrassed. Examples of sexual harassment are:

- requests for sexual favours, including implied or overt promises of preferential treatment or threats concerning present or future employment status;
- offensive gestures or comments;
- sexually-orientated jibes, innuendo or jokes;
- unwanted physical contact;
- the display of sexually offensive visual material such as calendars, photographs, books or videos.



Sexual harassment may be experienced by men or women as a result of the conduct of men or women. It applies equally regardless of grade or level of job and may also occur when dealing with external clients and/or members of the public".

### **Racial or Sectarian Harassment**

"In the workplace, racial or sectarian harassment may take the form of actual or threatened physical abuse or it may involve offensive jokes, verbal abuse, language, graffiti or literature of a racist or sectarian nature or offensive remarks about a person's skin colour, physical characteristics or religion. It may also include repeated exclusion of a person from an ethnic or religious minority from conversations, patronising remarks, unfair allocation of work or pressure about the speed and/or quality of their work in a way which differs from the treatment of other employees."

### **Bullying**

"Bullying is the intimidation or belittling of someone through the misuse of power or position which leaves the recipient feeling hurt, upset, vulnerable or helpless. It is often inextricably linked to the areas of harassment described above. The following are examples of bullying:

- Unjustified criticism of an individual's personal or professional performance, shouting at an individual, criticising an individual in front of others.
- Spreading malicious rumours or making malicious allegations.
- Intimidation or ridicule of individuals with disabilities and /or learning difficulties.
- Ignoring or excluding an individual from the team / group "

### **RESPONSIBILITIES OF MANAGERS**

7. Every manager has an obligation to prevent harassment / bullying and to take immediate action once it has been identified, whether or not a complaint has been made.
8. Allegations of harassment or bullying, received either informally or formally, must be dealt with promptly and sensitively.
9. It is important that managers recognise that sexual harassment is any sexual advance unwanted by the recipient or behaviour which causes offence to the recipient. Similarly, racial harassment is behaviour which is racially offensive to the recipient. Managers must therefore take care to ensure that they do not pre-judge situations based on their own sexual or racial attitudes and perceptions.
10. It may not always be appropriate for a line manager to be involved with specific complaints. For example, if the complainant is male and wishes to speak to a male, but the manager is female, or, if the complaint relates to the conduct of the line manager. The procedure below sets out the alternatives for such instances.

### **RESPONSIBILITIES OF ALL EMPLOYEES**

11. Every employee has a personal responsibility **NOT** to harass or bully other members of staff.
12. An employee who becomes aware of harassment or bullying occurring should bring the matter to the attention of his/her manager.

## REDRESS

13. An employee who feels that he/she has been harassed or bullied has a right to seek redress via the procedures set out below.

## PROCEDURE FOR DEALING WITH HARASSMENT

14. An employee who feels that he/she is being subjected to harassment or bullying may attempt to resolve the matter informally in the first instance. In some cases it may be possible and sufficient for him/her to explain clearly to the person(s) engaged in the unwanted activities that the behaviour is unwelcome, that it offends or makes him/her uncomfortable.
  - If at the initial informal discussion stage the circumstances are too difficult or embarrassing to approach the harasser alone, the complainant may wish to be accompanied by a friend or colleague;
  - the complainant may wish to write a letter to the harasser (research has shown this to be very effective);
  - the complainant should keep a record of any incidents, detailing when, where, what occurred, and witnesses (if any);
  - in some cases victims of harassment or bullying may not be sufficiently confident to tell the harasser that his or her behaviour is unacceptable. The Company emphasises therefore that staff **are not required** to approach the harasser in an attempt to resolve the problem informally, and are entitled to report the matter immediately if they so wish.
15. Where the steps outlined above are unsuccessful or inappropriate, the complainant should raise the matter informally and in confidence with his/her manager. Alternatively, the matter may be raised with a more senior manager (if felt necessary this could be of the same sex as the complainant).
16. If the complaint relates to the conduct of the complainant's manager, the complainant may choose to discuss the matter with his/her manager's line manager.
17. The Manager will discuss the matter with the complainant and agree a course of action. The complainant may be accompanied by a representative or work colleague at these meetings. The alleged harasser will also have the right to state their version of events to the manager and to also be accompanied by a representative or colleague.
18. The complainant must be assured that he/she will not be discriminated against or victimised for raising the complaint. Confidentiality will be observed throughout and the need for any disclosure of the details of the case will be discussed and agreed.
19. At any stage of the process the complainant, the manager dealing with the complaint or the accused may feel that they need the help of an independent person before deciding on the best course of action. The Company will seek the advice of a suitable trained persons who can give confidential advice and assistance, including:
  - advising on the nature of harassment;
  - offering guidance on resolving harassment problems, including acting as an independent broker
20. If the situation cannot be resolved informally then the complainant has the right to pursue his or her complaint formally via the Company's Grievance Procedure.



- 21. Where management consider that there may be evidence of harassment, they may consider it appropriate to undertake a full investigation of the circumstances. In this case a manager not connected with the department involved, or an individual external to the Company will be commissioned to undertake this investigation. Best practice in relation to confidentiality will be maintained during this investigation; and both the complainant and alleged harasser will have the opportunity to have their say. The investigator will also interview and take statements from any appropriate witnesses to the alleged harassment.
- 22. Where there is evidence that harassment has occurred, prompt and corrective action will be taken, including disciplinary action where appropriate. Harassment is a serious offence which may result in summary dismissal.

**COMMUNICATION**

- 23. All staff will be informed of the Harassment and Bullying Policy and Procedure. They must be re-assured regarding:
  - fear that others will consider the behaviour trivial and not take complaints of harassment seriously;
  - fear that no action will be taken against a person guilty of harassment;
  - fear of retaliation or victimisation in registering a complaint either informally or formally through the Grievance Procedure.
- 24. The Harassment and Bullying Policy will be part of staff induction.


**TRAINING**

- 25. Training will be provided for those employees who have a specific responsibility for implementing this Procedure or who may be involved in dealing with complaints which arise.

**MONITORING AND REVIEW**

- 26. In order to assess the effectiveness of the Procedure, statistics will be maintained in respect of the complaints of harassment. Strict confidentiality will be maintained and the monitoring process will comply with the Data Protection Act.
- 27. The effectiveness of this policy will be reviewed regularly.

Signed for KpH Group:

|   |  |
|---|--|
| <b>Lyndsey West</b><br><b>Managing Director</b> |  |
| <b>Review Date:</b>                             | 31/08/2025   |



# BUSINESS CONTINUITY PLAN

## EMERGENCY NOTIFICATION CONTACTS

| Name           | Division           | Home | Mobile                       |
|----------------|--------------------|------|------------------------------|
| Kevin Potter   | KpH Group          |      | 07764 605 946                |
| Lyndsey West   | KpH Deconstruction |      | 07787 131 265                |
| Steve Dellaway | KpH Group          |      | 07834 494 805                |
| Craig Taylor   | KpH Environmental  |      | 07814 532 182                |
| Mark Wallis    | KpH Group          |      | 07808 069 326                |
| Andrew Mackie  | KpH Deconstruction |      | 07824 438 140                |
| James Kelly    | KpH Deconstruction |      | 07824 819 520                |
| Neil Creasey   | KpH Group          |      | 07824 563 326 / 07966 929364 |

### AMENDMENT RECORD:

| Issue No. | Summary of Change                               | Date       | Author       | Initialled | Reviewed by        |
|-----------|---|------------|--------------|------------|--------------------|
| 01        | First Issue                                     | 03-11-2015 | Lyndsey East | LE         |                    |
| 02        | Updated Emergency Notification Contacts         | 28-02-2017 | Lyndsey West | LW         |                    |
| 03        | Updated Emergency Notification Contacts         | 01-11-2017 | Lyndsey West | LW         |                    |
| 04        | Updated Organisation Chart                      | 01-10-2021 | Lyndsey West | LW         | Marilla King-Smith |
| 05        | Chart and general wording                       | 01-10-2021 | Lyndsey West | LW         | Marilla King-Smith |
| 06        | Updated Organisational Chart & changed to Group | 22-07-2022 | Mel Speller  | MS         | Lyndsey West       |
| 07        | Updated Organisational Chart                    | 31-07-2023 | Mel Speller  | MS         | Lyndsey West       |
| 08        | Reviewed and updated                            | 30.07.2024 | H&S          | JW         | Lyndsey West       |



## Purpose

The purpose of this business continuity plan is to prepare KpH Group in the event of extended service outages caused by factors beyond our control (e.g., natural disasters, man-made events), and to restore services to the widest extent possible in a minimum time frame. In addition, the plan also considers the need for a process to be implemented when a more sustained interruption to the business' ability is likely. This takes the form of a Business Impact Assessment. All KpH Group sites are expected to implement preventive measures whenever possible to minimize operational disruptions and to recover as rapidly as possible when an incident occurs.

The plan identifies vulnerabilities and recommends necessary measures to prevent extended loss of communication. It is a plan that encompasses all KpH Group sites and Head Office.

## Scope

The scope of this plan is limited to ensuring data recovery and ongoing operations of the business. This is a business continuity plan, not a daily problem resolution procedures document.

### Plan Objectives:

- Serves as a guide for KpH staff and site teams.
- References and points to the location of critical data.
- Provides procedures and resources needed to assist in recovery.
- Identifies vendors and customers that must be notified in the event of a disaster.
- Assists in avoiding confusion experienced during a crisis by documenting, testing and reviewing recovery procedures.
- Identifies alternate sources for supplies, resources and locations.
- Documents storage, safeguarding and retrieval procedures for vital records.

### Assumptions:

- Key people (team leaders or alternates) will be available following a disaster.
- A national disaster such as nuclear war is beyond the scope of this plan.
- This document and all vital records are stored in a secure off-site location and not only survive the disaster but are accessible immediately following the disaster.

## Disaster Definition

Any loss of utility service (power, water), connectivity (system sites), or catastrophic event (weather, natural disaster, vandalism) that causes an interruption in the service provided by KpH Group's operations. The plan identifies vulnerabilities and recommends measures to prevent extended service outages.

### Recovery Teams:

- Emergency management team (EMT)
- Disaster recovery team (DRT)
- IT technical services (IT)

## Team Member Responsibilities:

COMPANY ORGANAGRAM

DATE: AUGUST 2024

Line Management



- Each team member will designate an alternate.
- All the members should keep an updated calling list of their work team members' work, home, and mobile phone numbers both at home and at work.
- All team members should keep this plan for reference at home in case the disaster happens after normal work hours. All team members should familiarize themselves with the contents of this plan.

### Instructions for using the Business Continuity Plan

#### Implementing the Plan

This plan becomes effective when a disaster occurs. Normal problem management procedures will initiate the plan and remain in effect until operations are resumed at the original location or a replacement location and control is returned to the appropriate functional management.

#### Disaster Declaration

The Managing Director and Senior Management Team are responsible for declaring a disaster and activating the various recovery teams as outlined in this plan.



## Emergency Management Standards

### Data Backup Policy

Full and incremental backups preserve corporate information assets and should be performed on a regular basis for audit logs and files that are irreplaceable, have a high replacement cost, or are considered critical. Backup media should be stored in a secure, geographically separate location from the original and isolated from environmental hazards.

Our IT Manager will follow these standards for its data backup and archiving:

### Tape Retention Policy

Backup media is stored at locations that are secure, isolated from environmental hazards, and geographically separate from the location housing the system.

### Off-Site Storage Procedures:

- Tapes and disks, and other suitable media are stored in environmentally secure facilities.
- Tape or disk rotation occurs on a regular schedule coordinated with the storage vendor.
- Access to backup databases and other data is tested annually.

## Emergency Management Procedures

### In the Event of a Fire

If fire or smoke is present at Head Office, evaluate the situation, determine the severity, categorize the fire as major or minor and take the appropriate action. If deemed necessary, dial 999.

- Personnel are to attempt to extinguish minor fires (e.g. single hardware component or paper fires) using hand-held fire extinguishers located throughout. Any other fire or smoke situation will be handled by the fire department.
- In the event of a major fire, call 999 and immediately evacuate the area.
- In the event of a major catastrophe affecting Head Office, immediately notify the Managing Director or senior management.

### In the Event of a Network Services Provider Outage

In the event of a network service provider outage to Head Office, the guidelines and procedures in this section are to be followed:

- Notify Managing Director and Senior Management of outage.
- Notify IT Manager of outage.
- Determine cause of outage and timeframe for its recovery.
- If outage will be greater than one hour, route all calls via alternate services i.e. mobile telephones.



### In the Event of a Flood or Water Damage

In the event of a flood or broken water pipe within an area where Computer Hardware is stored, the guidelines and procedures in this section are to be followed:

- Assess the situation and determine if outside assistance is needed.
- Immediately notify all other personnel within Head Office of the situation.
- Immediately notify all other personnel within Head Office of the situation and be prepared to cease operations if necessary.

Water detected below the raised floor may have different causes:

- If water is slowly dripping from an air conditioning unit and not endangering equipment, contact repair personnel immediately.
- If water is of a major quantity and flooding beneath the floor (water main break), immediately implement power-down procedures. While power-down procedures are in progress, evacuate the area and follow management's instructions.

### Personnel, Plant and Equipment

In the event of damage to Plant and Equipment the following procedures are to be followed:

- Report to Yard Manager as soon as safe to do so.
- Yard Manager to arrange under a third-party maintenance contract to assess the fault (if applicable).
- If the damage cannot be repaired, new equipment will be delivered from Head Office or a suitable alternative. If this is not available Equipment will be hired and delivered to site within 24 hours.

### In the Event of Illness or Injury

In the event of illness or injury to personnel the following procedures have been developed:

- Maintain exemplary Health and Safety Standards on site to ensure there is zero risk of injury to personnel.
- Ensure that culture of continuous improvement is adopted on site and throughout the company to ensure that we do not have only a few key skilled personnel.
- Maintain good relations with Labour Agencies to ensure that we have the resources to provide temporary staff cover when necessary.

### In the Event of a Major Health Epidemic

- Identification will be in place of specific senior management responsibilities that will ensure speedy and flexible response. Following that succession planning will be undertaken to ensure that key responsibilities are taken over on a timely basis if necessary by appropriate individuals.
- Identification of key individual's core functions to include the feasibility of remote working
- Effective Supply Chain Management ensuring available alternatives to customers and suppliers.
- Support of government and health service initiatives

## Plan, Review and Maintenance

The hard-copy version of the plan will be stored in a common location where it can be viewed by all company personnel. Electronic versions will be available via Head Office network resources as provided by IT.

A regular review of the listing of personnel and phone numbers contained within the plan will be undertaken.

## Business Impact Assessment

The aim of our Business Impact analysis is to predict the consequence of disruption to KpH Group’s associated business and its functions and processes.

Identifying and evaluating the impact of disasters on our business helps us to provide the basis for investment in recovery strategies as well investment in prevention and mitigation strategies.

# Business Impact Assessment

| Event  | Impact  | Contingency Action  |
|--|---|---|
| Loss of Building Due to Fire/Flood – Time to Replace at Current Site – <b>2 months</b>     | Without centralised office location and management of staff, lack of productivity. Server/IT damage could cause systems to be off line.   | Server is backed up in 2 locations and can be accessed using computer or lap top via the cloud.<br><br>Longer term solution would be to re-build PCs and download restored data to them.<br><br>Every 6 weeks random files are recovered from the system to check that the backup process works and would be accessible in both locations.<br><br>Insurance is in place in terms of disaster recovery and relocating to temporary premises. |
| Loss of Agency Resource Due to Changes in Immigration.<br><br>European Labour return home. | Lack of onsite resources resulting in the business being unable to fulfil existing commitment or resource future projects.<br><br>Rise in labour costs due to demand which in turn will have an impact on company margins and profit. | Investment into recruiting UK labour.<br>Employment of a dedicated Supply Chain Operations Manager. CPD investment into existing labour workforce to ensure that they remain with the business.<br><br>Employment of several key labour agencies to satisfy resourcing.<br><br>Look at innovative ways to cut costs on site, e.g., machinery offset with reduction in waste through re-use.   |
| Depending on Key Suppliers – Impact Due to   | Inability to tender and to secure specialised works (i.e. M & E/Asbestos).  | Ensure that we have a robust Supplier Matrix with at least 3 key suppliers in each area of specialised sub-contract works.  |

## Business Impact Assessment

| Event  | Impact   | Contingency Action   |
|--|--|--|
| Them Going Out of Business.  | Inability to complete contract works = loss of client and contractual LADs.<br>Loss of Revenue                             | Regular review by accountant into supplier's credit scoring and finances.  |
| Any Heavy Reliance on Key Customer – Going Out of Business.                                    | Loss of Revenue<br>Redundancies<br>Cash flow and credit control issues.  | Ensuring that not one client accounts for more than 20/25% of the company's annual turnover.<br>Investment into Business Development and Customer Relations to strengthen our client base.   |
| Changes in Legislation Impacting on Methods of Deconstruction.                                 | Reduction in profit margins due to legislative restraints and red tape.<br>Inability to secure work due to rise in costs.  | Ensuring that Management are at the forefront of understanding changes within the industry so that adequate measures can be put in place to mitigate impact including: <ul style="list-style-type: none"> <li>• Membership to key H &amp; S and Environment Forums.</li> <li>• Attendance at relevant industry conferences.</li> <li>• Constant high-level communication with industry professionals.</li> </ul> |
| Depending on Water, Electricity, Gas – Single Supply etc.                                      | Loss of productivity due to inability to work from the office.   | Ensuring that separate suppliers are utilised.<br>Remote working via the cloud available for all employees.  |
| Devaluation of the £   | Lack of foreign developers investing in the Commercial refurbishment sector = reduction in opportunities.                  | Ensuring that we continue to have a diverse client database in all sectors.  |
| Loss of phone lines.   | Inability for customers/suppliers to contact the business.   | Diverts to be put in place to key company mobile phones. 5 phone lines will be diverted to mobiles.  |
| Loss of Senior Management / Managing Director due to long term illness / death or resignation. | Day to day running of the business impacted, inability to make key business decisions which could impact business success. | Deputising roles have been assigned for all key management personnel. Cross training implemented across roles.   |



## Carbon Policy Statement

KpH Group recognises that the carbon emissions caused by its operations contribute to global warming and is committed to reducing these through environmentally sound business practices. Our operations generate carbon emissions in a number of ways, for example;

- Direct ('Scope 1') emissions from our road vehicles, on-site generators and off road mobile machinery;
- Indirect ('Scope 2') emissions from the generation of electricity we use, at our operating base and on site;
- Indirect ('Scope 3') emissions embodied in the materials and services we use and the wastes we generate.

In our Deconstruction business, we recognise that by careful planning for re-use and recycling, we can work with our partners to apply the waste hierarchy and save the embodied carbon in salvaged products and materials.


We will align our approach with the Net Zero and Construct Zero principles and commitments, aiming to meet or surpass national and industry timelines for carbon reduction. In this way, we intend to help our partners reduce their own Scope 3 carbon emissions. At company-level, we will:

- Quantify our carbon footprint, using industry standard tools and emission factors
- Implement a Carbon Reduction Strategy as part of our ISO14001 continual improvement processes
- Regularly review performance and share it with our partners

Senior Management will give this Policy equal priority with all other business objectives and will be responsible for its implementation.

This policy will be brought to the attention of all employees and persons working on behalf of the company and will be reviewed annually.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |





## Code of Ethics Policy

Ethical behaviour underpins the way we behave, do business and treat one other. Our values determine our behaviour and we must support and uphold them so they are an integral part of day to day life in KpH Group. This policy aims to guide our actions and those of people both with whom we work closely, encouraging a way of working which is honest, responsible and respectful, generating trust.

### Purpose

To ensure there is clarity in what is expected of each and every one of us in terms of ethical behaviour.

### Scope

This code applies to all employees of KpH and all those working alongside, in partnership and on behalf of KpH.

### Policy and Procedures

Every employee of KpH should:

- treat everyone with dignity and respect;
- treat the company's assets and equipment as you would your own;
- operate within the letter and the spirit of law, exercising power and influence responsibly;
- respect the laws and customs in countries in which we operate.

KpH is committed to achieving the highest standards of corporate responsibility in all its business dealings and relationships. This Code of Ethics is underpinned by a number of policies guiding the way we behave, including:

- Code of Professional Conduct
- KpH Supply Chain Code of Conduct
- Equal Opportunities
- Health and Safety
- Sustainable Development
- Information Security
- Socially Responsible Investment
- Whistle Blowing – “Speak Up”

These policies underpin KpH's acceptance of the principles of the Universal Declaration of Human Rights and the International Labour Organisation Conventions. These apply to the management and operation of KpH, and everyone involved. In addition, KpH's Ethics Committee has the role of considering any ethical issues which may arise in the business under this policy.



## Compliance


In establishing whether or not any conduct or activity may be in contravention of this code, ask yourself whether:

- It is legal?
- It is in breach of this or any other policies?
- It could be perceived as bringing you, your colleagues or KpH or associated companies into disrepute?
- It could be perceived as compromising you, your colleagues or KpH or associated companies?
- It could be considered by the public as ethical, appropriate and acceptable?

If you are in any doubt, stop and contact either your line manager or any member of Human Resources.

Contravention of this Code could lead to disciplinary action.

Signed for KpH Group:

|  |   |
|--|---|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025  |



## Corporate Social Responsibility Statement

KpH Group acknowledges their responsibilities towards society, the environment and our stakeholders.

Through managing our business in a fair and ethical manner we are able to demonstrate our consideration towards employees and the wider community.

We will provide a safe and healthy working environment for our employees and for visitors to our premises and sites and ensure sufficient information and training is made available in pursuance of their activities.

The ISO standard, to which we are accredited, provides a framework for continuous improvement in our environmental and quality management procedures and performance.


We are committed to managing our impact on the world's natural resources and strive to continually improve our environmental credentials.

We recognise our position within the community and acknowledge that our business activities have varying impacts upon the society in which we operate. We endeavour to manage these in a responsible manner.

We seek to build relationships with our suppliers, customers and stakeholders for mutual benefit and for the benefit of the community.

Through our policies and objective's we will manage our activities and environmental impacts to continuously develop and improve our Corporate Responsibility.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



# CUSTOMER SERVICE POLICY

## CONTENTS

|    |                                       |   |
|----|---------------------------------------|---|
| 1. | Policy                                | 2 |
| 2. | Our Principles                        | 2 |
| 3. | Behaving Courteously                  | 2 |
| 4. | Behaving Professionally               | 2 |
| 5. | Dressing Appropriately                | 3 |
| 6. | Respecting Confidentiality            | 3 |
| 7. | Answering Queries and Correspondence  | 3 |
| 8. | Out of Hours Emergency Service        | 3 |
| 9. | Monitoring and Continuous Improvement | 4 |



## 1. Policy

KpH Group value their customers and recognise that their continued success relies upon developing and maintaining excellent working relationships with its customers.

We acknowledge that they have a duty of care to their customers including to behave in ways that respect their interests and concerns.

KpH Groups customers include their clients and their client's customers including tenants and other residents.

Our proposal applies to all employees and associates and other temporary staff whilst they are employed on the company's business.

Our proposal sets out how the company will maintain excellent relationships with its customers including when working within customers homes.

## 2. Our Principles

KpH Group expects all of its employees to promote excellent customer care values:

- Behaving courteously at all times.
- Behaving in a professional manner.
- Dressing appropriately and maintaining a tidy appearance.
- Respecting customer confidentiality.
- Responding promptly and politely to customers enquiries.
- Behaving appropriately in customers offices and other premises.
- Respecting customers homes including their health and safety.
- Respecting the cultural and religious sensitivities of customers.

## 3. Behaving Courteously

**Our proposals ensure that employees will:**

- Respect clients and treat them as they would like to be treated themselves.
- Be polite at all times.
- Not swear or use offensive language whilst working with customers. They will not use aggressive behaviour.
- Will not behave inappropriately towards customers including customers of the opposite sex.

## 4. Behaving Professionally

KpH Group employees will act in accordance with their roles and responsibilities as defined within the project they are employed upon. They will not discuss their own political, religious or other personal beliefs with customers.

KpH Group employees will be helpful at all times.



## 5. Dressing Appropriately

Our employees will dress appropriately at all times while meeting or working with customers.

Where a uniform has been provided our employees will wear this when working with customers.

KpH employees will be clean and tidy at all times.

## 6. Respecting Confidentiality

Our employees will respect customers confidentiality at all times. They will not share confidential information with any third party without the express permission of the customer.

We will comply with the Data Protection Act 2018 at all times.

Our employees will respect the privacy of tenants in their own homes. They will not share information about a customer's home other than information directly related to the work or inspection being carried out.

The only exception will be where the non-sharing of information would lead to the customer, employee or other person being at risk, or where there would be a significant risk to property.

## 7. Answering Queries and Correspondence

During office hours, we will answer telephone calls promptly and politely. Our employees will identify the company and their name when answering the telephone.

Outside office hours a telephone messaging facility will be available. Telephone messages will be retrieved and responded to first thing each working day.

All employees are provided with a mobile telephone and the mobile telephone numbers of the designated contacts for each assignment will be supplied to the relevant clients.

Emails will normally be responded to within no more than one working day.

Postal correspondence will normally be responded to within 3 working days.

All correspondence will be polite, relevant and in plain language. Where appropriate, alternative versions will be made available.

## 8. Out of Hours Emergency Service

A dedicated Out of Hours mobile contact number will be provided to the client for distribution as they see fit.

A secondary emergency contact number will be provided in the event that the first point of contact cannot be reached.

We will mobilise our workforce to attend the site within 2 hours to undertake an initial assessment and make safe where possible.






## 9. Monitoring and Continuous Improvement

Our customer care performance will be monitored through its client feedback arrangements.

Complaints will be treated as non-compliance within our Quality Assurance arrangements and will be responded to by our Quality Manager.

Customer care will be considered along with other aspects of each assignment as part of the assignment wrap and evaluation process so that any required improvements can be identified and addressed.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



# DATA PROTECTION POLICY

**FOR:**

**KPH GROUP**

**KPH ENVIRONMENTAL SERVICES LTD  
AND KPH DECONSTRUCTION LTD**

**AS REQUIRED BY:**

**GENERAL DATA PROTECTION REGULATIONS**

**AND**

**DATA PROTECTION ACT 2018**

**OFFICE COPY (CONTROLLED DOCUMENT)**

|                        |                            |
|------------------------|----------------------------|
| <b>DOCUMENT TITLE:</b> | DATA PROTECTION POLICY     |
| <b>DOCUMENT NO:</b>    | KpH Data Protection Policy |
| <b>DATE:</b>           | 01 AUGUST 2024             |
| <b>ISSUE NO:</b>       | 7                          |

**AMENDMENT RECORD:**

| Issue No. | Summary of Change                   | Date       | Author         | Initialled | Reviewed by    |
|-----------|-------------------------------------|------------|----------------|------------|----------------|
| 01        | First Issue                         | 25/05/2018 | Amy Hathaway   | AH         | LW PB MW SD KP |
| 02        | Annual Review                       | 31/08/2019 | Steve Dellaway | SD         | LW MW KP       |
| 03        | GDPR Process Additions              | 21/01/2020 | Amy Hathaway   | AH         | LW SD          |
| 04        | Annual Review – Legislative Changes | 03/08/2021 | Lyndsey West   | LW         | MW KP SD       |
| 05        | Annual Review                       | 01/08/2022 | Lyndsey West   | LW         | MW             |
| 06        | Annual Review                       | 01/08/2023 | Lyndsey West   | LW         | MW             |
| 07        | General review and update           | 05/08/2024 | H&S            | JW         | MW             |
| 08        |                                     |            |                |            |                |
| 09        |                                     |            |                |            |                |
| 10        |                                     |            |                |            |                |
| 11        |                                     |            |                |            |                |
| 12        |                                     |            |                |            |                |

## CONTENTS

|     |   |    |
|-----|---|----|
| 1.  | INTRODUCTION  | 4  |
| 2.  | DATA PROTECTION PRINCIPLES                                  | 4  |
| 3.  | LAWFUL FAIR AND TRANSPARENT DATA PROCESSING                 | 5  |
| 4.  | PROCESSED FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES   | 5  |
| 5.  | ADEQUATE, RELEVANT AND LIMITED DATA PROCESSING              | 5  |
| 6.  | ACCURACY OF DATA AND KEEPING DATA UP TO DATE                | 5  |
| 7.  | TIMELY PROCESSING   | 6  |
| 8.  | SECURE PROCESSING   | 6  |
| 9.  | ACCOUNTABILITY  | 6  |
| 10. | PRIVACY IMPACT ASSESSMENT                                   | 6  |
| 11. | THE RIGHTS OF DATA SUBJECTS                                 | 7  |
| 12. | KEEPING DATA SUBJECTS INFORMED                              | 7  |
| 13. | DATA SUBJECT ACCESS REQUEST (SAR)                           | 8  |
| 14. | RECTIFICATION OF PERSONAL DATA                              | 9  |
| 15. | ERASURE OF PERSONAL DATA (“REQUEST TO BE FORGOTTEN”)        | 9  |
| 16. | RESTRICTION OF PERSONAL DATA PROCESSING                     | 10 |
| 17. | DATA PORTABILITY  | 10 |
| 18. | OBJECTIONS TO PERSONAL DATA PROCESSING                      | 10 |
| 19. | AUTOMATED DECISION-MAKING                                   | 11 |
| 20. | PROFILING   | 11 |
| 21. | PERSONAL DATA   | 12 |
| 22. | DATA PROTECTION MEASURES                                    | 12 |
| 23. | ORGANISATIONAL MEASURES                                     | 14 |
| 24. | TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA     | 14 |
| 25. | DATA BREACH NOTIFICATION                                    | 15 |
| 26. | IMPLEMENTATION OF POLICY                                    | 16 |
|     | APPENDIX 1 - DEFINITIONS                                    | 17 |
|     | APPENDIX 2 – WORKFLOW PROCESS: SUBJECT ACCESS REQUEST (SAR) | 20 |
|     | APPENDIX 3 – WORKFLOW PROCESS: REQUEST TO BE FORGOTTEN      | 22 |
|     | APPENDIX 4 – WORKFLOW PROCESS: DATA BREACH                  | 24 |

## 1. INTRODUCTION

- 1.1 This Policy sets out the obligations of KpH Group (“the Company”) regarding data protection and the rights of direct employees, agency staff, customers, sub-contractors, business contacts, members of the public (“data subjects”) in respect of their personal data under the UK-GDPR and 2018 Data Protection Regulation (“the Regulation”).
- 1.2 The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 1.3 This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.
- 1.4 The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

## 2. DATA PROTECTION PRINCIPLES

- 2.1 This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:
  - a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
  - b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
  - c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
  - d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
  - e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
  - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 3. LAWFUL FAIR AND TRANSPARENT DATA PROCESSING

- 3.1 The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:
- a) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
  - b) processing is **necessary for the performance of a contract** to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
  - c) processing is necessary for **compliance with a legal obligation** to which the controller is subject;
  - d) processing is necessary **to protect the vital interests of the data subject** or of another natural person;
  - e) processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller;
  - f) processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### 4. PROCESSED FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES

- 4.1 The Company collects and processes the personal data set out in Part 21 of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties (for example, contact details or training records from a Sub-Contractor).
- 4.2 The Company only processes personal data for the specific purposes set out in Part 21 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

### 5. ADEQUATE, RELEVANT AND LIMITED DATA PROCESSING

- 5.1 The Company will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 4, above.

### 6. ACCURACY OF DATA AND KEEPING DATA UP TO DATE

- 6.1 The Company shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter.





Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

## 7. TIMELY PROCESSING

- 7.1 The Company shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

## 8. SECURE PROCESSING

- 8.1 The Company shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

## 9. ACCOUNTABILITY

- 9.1 The Company's Data Protection Manager is Steve Dellaway and his contact details are Telephone: 01883 346604 and Email: [steve.dellaway@kph.co.uk](mailto:steve.dellaway@kph.co.uk).
- 9.2 The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
- a) The name and details of the Company, its Data Protection Manager, and any applicable third-party data controllers.
  - b) The purposes for which the Company processes personal data.
  - c) Details of the categories of personal data collected, held, and processed by the Company; and the categories of data subject to which that personal data relates.
  - d) Details (and categories) of any third parties that will receive personal data from the Company.
  - e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards.
  - f) Details of how long personal data will be retained by the Company.
  - g) Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

## 10. PRIVACY IMPACT ASSESSMENT

- 10.1 The Company shall carry out Privacy Impact Assessments when and as required under the Regulation. Privacy Impact Assessments shall address the following areas of importance:
- a) The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data.



- b) Details of the legitimate interests being pursued by the Company.
- c) An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed.
- d) An assessment of the risks posed to individual data subjects.
- e) Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

## 11. THE RIGHTS OF DATA SUBJECTS

11.1 The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed.
- b) The right of access.
- c) The right to rectification.
- d) The right to erasure (also known as the 'right to be forgotten').
- e) The right to restrict processing.
- f) The right to data portability.
- g) The right to object.
- h) Rights with respect to automated decision-making and profiling.

## 12. KEEPING DATA SUBJECTS INFORMED

12.1 The Company shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of the Company including, but not limited to, the identity of its Data Protection Manager.
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing.
- c) Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data.
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed.
- e) Where the personal data is to be transferred to one or more third parties, details of those parties.

- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 24 of this Policy for further details concerning such third country data transfers).
  - g) Details of the length of time the personal data will be held by the Company (or, where there is no predetermined period, details of how that length of time will be determined).
  - h) Details of the data subject’s rights under the Regulation.
  - i) Details of the data subject’s right to withdraw their consent to the Company’s processing of their personal data at any time.
  - j) Details of the data subject’s right to complain to the Information Commissioner’s Office (the ‘supervisory authority’ under the Regulation).
  - k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it.
  - l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.
- 12.2 The information set out above in Part 12.1 shall be provided to the data subject at the following applicable time:
- 12.3 Where the personal data is obtained from the data subject directly, at the time of collection;
- 12.4 Where the personal data is not obtained from the data subject directly (i.e. from another party):
- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
  - b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
  - c) In any event, not more than one month after the time at which the Company obtains the personal data.

### 13. DATA SUBJECT ACCESS REQUEST (SAR)

- 13.1 A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which the Company holds about them. The Company is normally required to respond to SARs within 28 days of receipt (this can be extended by up to 56 days in the case of complex and/or numerous requests, and in such cases, the data subject must be informed of the need for the extension).
- 13.2 All subject access requests received must be forwarded to Steve Dellaway, the Company’s Data Protection Manager ([steve.dellaway@kph.co.uk](mailto:steve.dellaway@kph.co.uk)), to process the request and record the outcome on the **Access Log**.



- 13.3 The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.
- 13.4 Please see **Appendix B** for a Workflow Process Diagram on Subject Access Requests (SAR).

## 14. RECTIFICATION OF PERSONAL DATA

- 14.1 If a data subject informs the Company that personal data held by the Company is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 14.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

## 15. ERASURE OF PERSONAL DATA ("REQUEST TO BE FORGOTTEN")

- 15.1 Data subjects may request that the Company erases the personal data it holds about them (otherwise known as a "request to be forgotten") in the following circumstances:
- It is no longer necessary for the Company to hold that personal data with respect to the purpose for which it was originally collected or processed.
  - The data subject wishes to withdraw their consent to the Company holding and processing their personal data.
  - The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 18 of this Policy for further details concerning data subjects' rights to object).
  - The personal data has been processed unlawfully.
  - The personal data needs to be erased in order for the Company to comply with a particular legal obligation.
- 15.2 The Data Protection Manager must be notified of the request so that arrangements can be made for the request to be processed within the appropriate timeframe and recorded on the Request to be Forgotten Log.
- 15.3 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within 28 days of receipt of the data subject's request (this can be extended by up to 56 days in the case of complex requests; however, in such cases, the data subject must be informed of the need for the extension).



15.4 In the event that any personal data that is to be erased (in response to a data subject request) has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

15.5 Please see **Appendix C** for a Workflow Process Diagram on Requests to be Forgotten.

## 16. RESTRICTION OF PERSONAL DATA PROCESSING

16.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

## 17. DATA PORTABILITY

17.1 Where data subjects have given their consent to the Company to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between the Company and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers e.g. other organisations).

17.2 To facilitate the right of data portability, the Company shall make available all applicable personal data to data subjects in the following format[s]:

- a) electronic;
- b) as requested.

17.3 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another data controller.

17.4 All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

## 18. OBJECTIONS TO PERSONAL DATA PROCESSING

18.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), [and processing for scientific and/or historical research and statistics purposes].

18.2 Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing forthwith, unless it can be demonstrated that



the Company's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.

- 18.3 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing forthwith.
- 18.4 Where a data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

## 19. AUTOMATED DECISION-MAKING

- 19.1 In the event that the Company uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from the Company.
- 19.2 The right described in Part 19.1 does not apply in the following circumstances:
- The decision is necessary for the entry into, or performance of, a contract between the Company and the data subject.
  - The decision is authorised by law.
  - The data subject has given their explicit consent.

## 20. PROFILING

- 20.1 Where the Company uses personal data for profiling purposes, the following shall apply:
- Clear information explaining the profiling will be provided, including its significance and the likely consequences.
  - Appropriate mathematical or statistical procedures will be used.
  - Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
  - All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 and 23 of this Policy for more details on data security).





## 21. PERSONAL DATA

21.1 The following personal data may be collected, held, and processed by the Company:

| Data Category     | Reason the Data Collected, Held and Processed  |
|-------------------|--|
| Marketing         | Information is collected to keep current and prospective clients up to date with our services, work and achievements.                                |
| Accounts          | Information is collected to process payroll and financial transactions.  |
| Health and Safety | Information is collected and shared as required to maintain regulation Health and Safety standards and practices.                                    |
| Human Resources   | Information is collected and processed to manage staff contracts and welfare.  |
| Operations        | Information is collected, shared and distributed to maintain health and safety standards and carry out our services as contracted.                   |
| Quality           | Information is processed to meet Quality standards, maintain health and safety practices and evidence compliance with industry regulations.          |
| Tendering         | Information is presented to potential clients, providing evidence of our standards and experience, to win work.                                      |
| Yard              | Information is collected and processed to manage the assets and equipment movement in the yard and maintain appropriate Health and Safety standards. |

21.2 Please see our **Document Longevity Retention Matrix** for a comprehensive list of personal data and full descriptive details.

## 22. DATA PROTECTION MEASURES

22.1 The Company shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be encrypted using Microsoft 365 mail encryption services.
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely using S Delete or Windows Cipher.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable.

- e) Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data.
- f) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent in the post by recorded delivery, marked private and confidential.
- g) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from Steve Dellaway, Data Protection Manager.
- h) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar.
- i) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of Data Protection Manger, Steve Dellaway (Email: [steve.dellaway@kph.co.uk](mailto:steve.dellaway@kph.co.uk)).
- j) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time.
- k) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.
- l) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Company or otherwise [without the formal written approval of Data Protection Manger, Steve Dellaway (Email: [steve.dellaway@kph.co.uk](mailto:steve.dellaway@kph.co.uk)) and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary].
- m) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken.
- n) All personal data stored electronically should be backed up daily onsite and offsite. All backups should be encrypted using AES encryption.
- o) All electronic copies of personal data should be stored securely using passwords and AES data encryption.
- p) All passwords used to protect personal data must comply with the company's **Information Security Policy**.
- q) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords.

- r) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Business Development and Quality Co-Ordinator to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked as and when required.

## 23. ORGANISATIONAL MEASURES

- 23.1 The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:
- a) All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy.
  - b) Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company.
  - c) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so.
  - d) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised.
  - e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed.
  - f) The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.
  - g) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract.
  - h) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Regulation.
  - i) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

## 24. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

- 24.1 The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

- 24.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:
- a) The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data.
  - b) The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the Regulation); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority.
  - c) The transfer is made with the informed consent of the relevant data subject(s).
  - d) The transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject).
  - e) The transfer is necessary for important public interest reasons.
  - f) The transfer is necessary for the conduct of legal claims.
  - g) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent.
  - h) The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

## 25. DATA BREACH NOTIFICATION

- 25.1 All personal data breaches must be reported immediately to the Company's Data Protection Manager for investigation and recording on the Data Breach Log.
- 25.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Manager must ensure that the Information Commissioner's Office (ICO) is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 25.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 25.2) to the rights and freedoms of data subjects, the Data Protection Manager must ensure that all affected data subjects are informed of the breach directly and without undue delay.



25.4 Please see **Appendix D** for a Workflow Process Diagram on Data Breaches.


25.5 Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned.
- b) The categories and approximate number of personal data records concerned.
- c) The name and contact details of the Company's Data Protection Manager (or other contact point where more information can be obtained).
- d) The likely consequences of the breach.
- e) Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

## 26. IMPLEMENTATION OF POLICY

26.1 This Policy shall be deemed effective as of 25 May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

|                           |   |
|---------------------------|---|
| <b>Name:</b>              | Lyndsey West  |
| <b>Position:</b>          | Managing Director   |
| <b>Date:</b>              | 05/08/2024  |
| <b>Due for Review by:</b> | 31/08/2025  |
| <b>Signature:</b>         |  |

In case of any queries or questions in relation to this policy please contact us [info@kph.co.uk](mailto:info@kph.co.uk).

## APPENDIX 1 - DEFINITIONS

- (1) **‘personal data’** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- (2) **‘processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- (3) **‘restriction of processing’** means the marking of stored personal data with the aim of limiting their processing in the future;
- (4) **‘profiling’** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- (5) **‘pseudonymisation’** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- (6) **‘filing system’** means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- (7) **‘controller’** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- (8) **‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- (9) **‘recipient’** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the 4.5.2016 L 119/33 Official Journal of the European Union EN framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- (10) **‘third party’** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- (11) **‘consent’** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

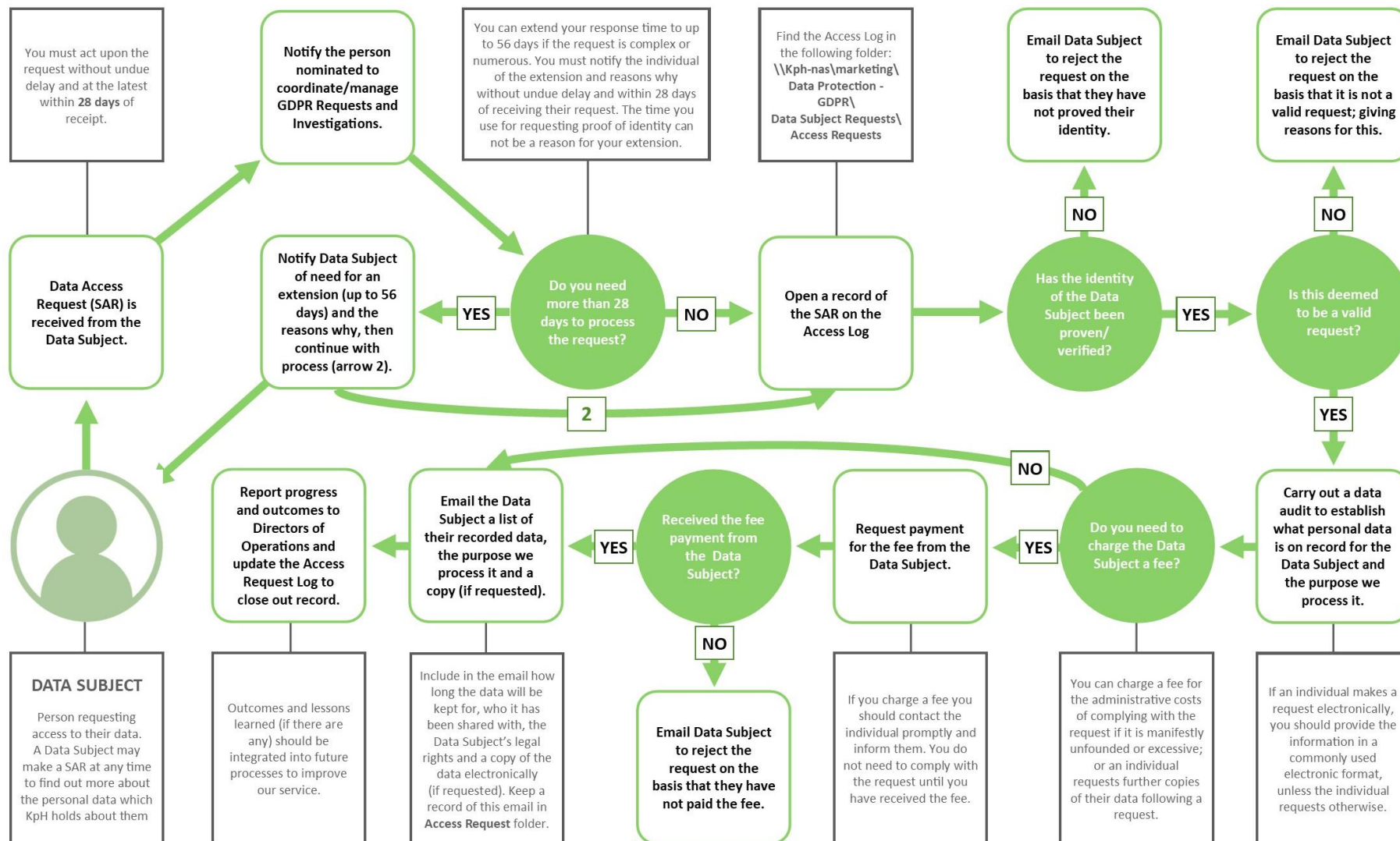


- (12) **‘personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- (13) **‘genetic data’** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- (14) **‘biometric data’** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- (15) **‘data concerning health’** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- (16) **‘main establishment’** means:
- as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;
  - as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;
- (17) **‘representative’** means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;
- (18) **‘enterprise’** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- (19) **‘group of undertakings’** means a controlling undertaking and its controlled undertakings;
- (20) **‘binding corporate rules’** means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- (21) **‘supervisory authority’** means an independent public authority which is established by a Member State pursuant to Article 51; 4.5.2016 L 119/34 Official Journal of the European Union EN;

- (22) **‘supervisory authority concerned’** means a supervisory authority which is concerned by the processing of personal data because:
- a) the controller or processor is established on the territory of the Member State of that supervisory authority;
  - b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
  - c) a complaint has been lodged with that supervisory authority;
- (23) **‘cross-border processing’** means either: (a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.
- (24) **‘relevant and reasoned objection’** means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;
- (25) **‘information society service’** means a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council (1);
- (26) **‘international organisation’** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

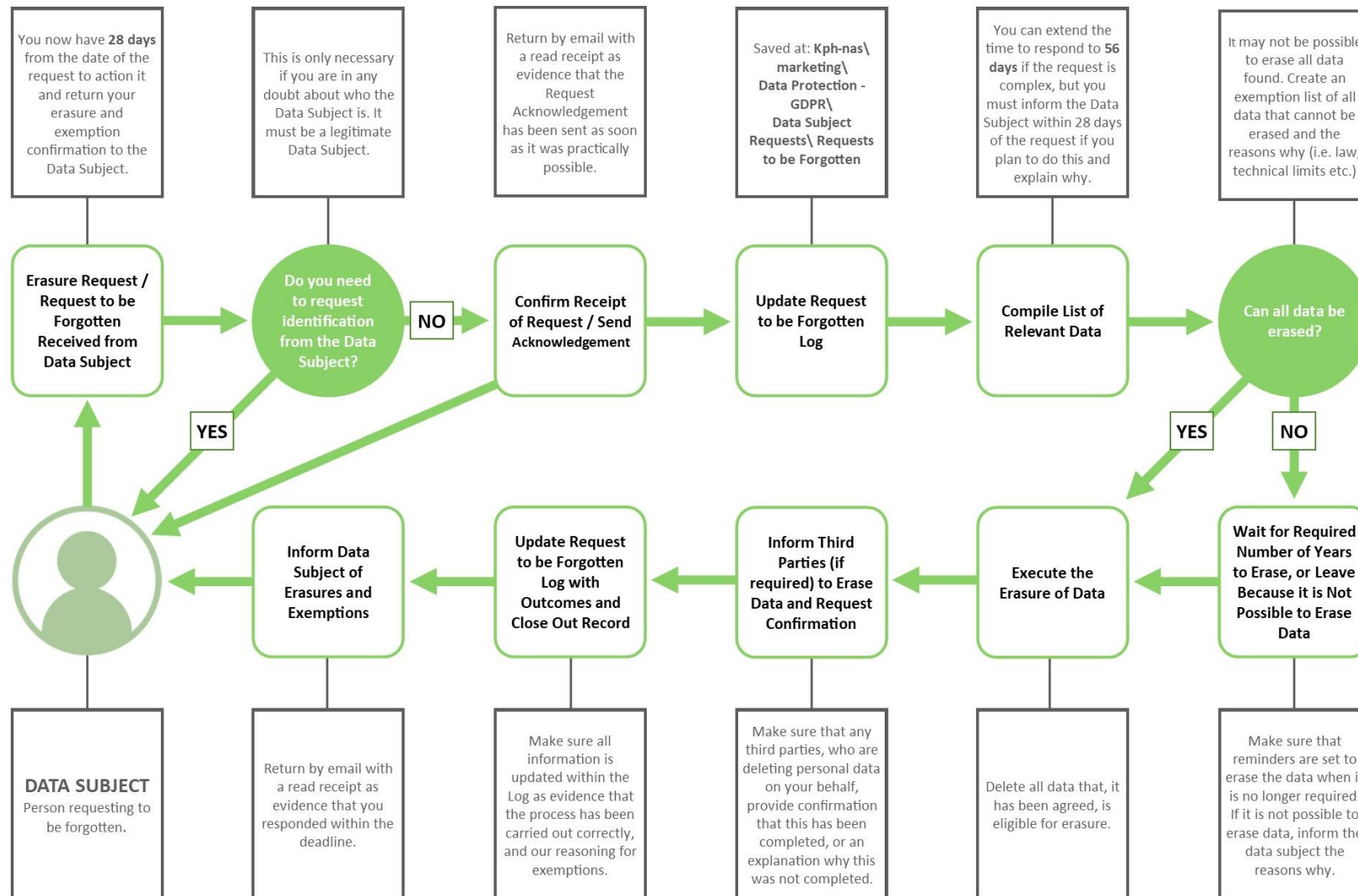


**APPENDIX 2 – WORKFLOW PROCESS: SUBJECT ACCESS REQUEST (SAR)**





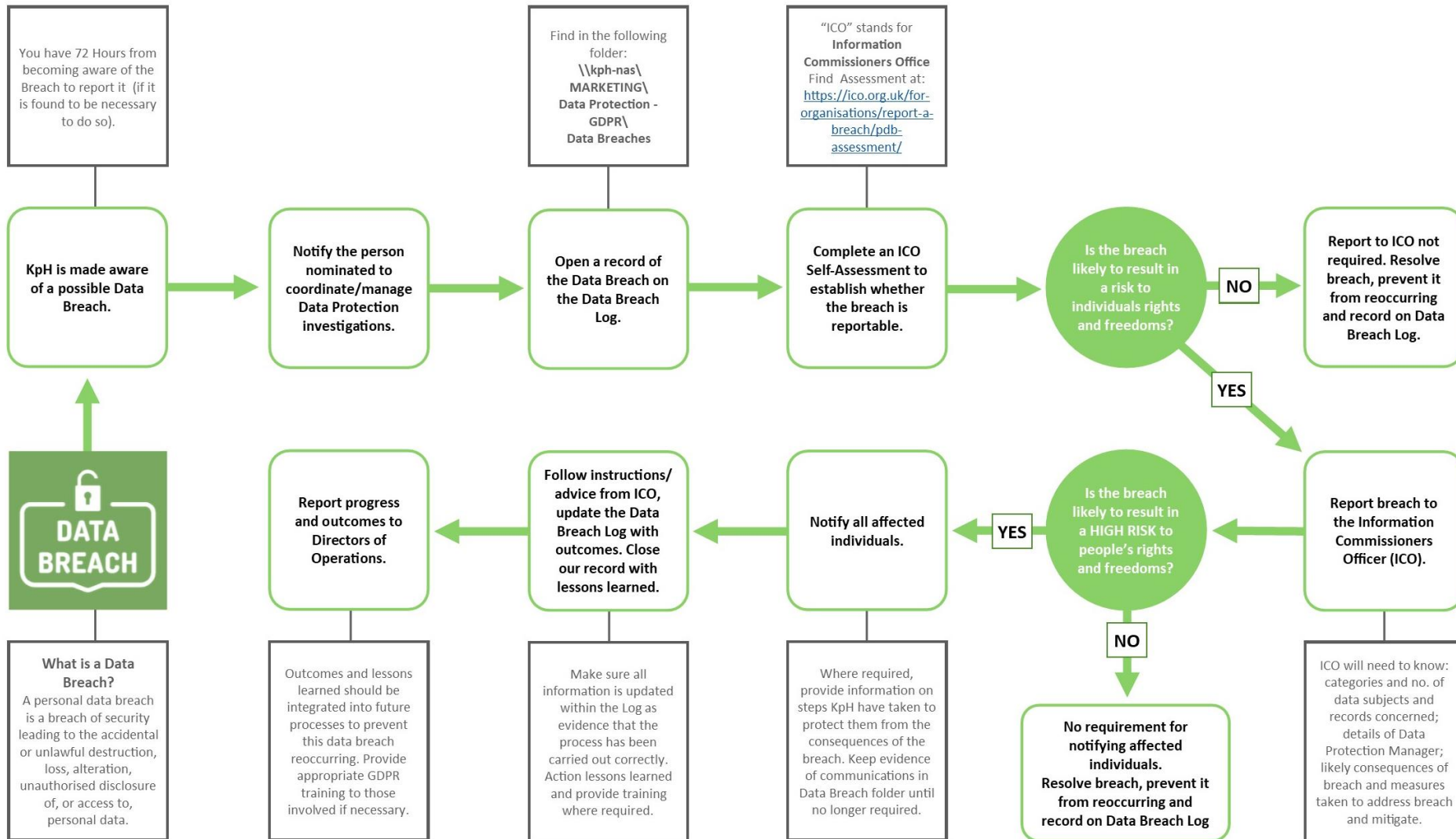
**APPENDIX 3 – WORKFLOW PROCESS: REQUEST TO BE FORGOTTEN**





**APPENDIX 4 – WORKFLOW PROCESS: DATA BREACH**







## Environmental Policy Statement


KpH Group is committed to high standards of performance in relation to the Environment. In performing our duties our goal is to protect people, minimise harm to the Environment, integrate biodiversity considerations and reduce disruption to our neighbouring communities. KpH also strive to achieve continuous improvement in our Environmental performance.

KpH has established an Environmental Management System based on the requirements of ISO 14001:2015 to ensure that:

- The Management team are committed to the Prevention of Pollution and Protecting the Environment.
- We organise and plan for the Environment efficiently and effectively.
- We aim to minimise discharges, emissions and waste that adversely affect the Environment.
- Staff are given appropriate training to perform their tasks competently, safely and with due regard for the Environment.
- Risks to the Environment from our activities are assessed and either eliminated or reduced to acceptable levels.
- We comply with all applicable Environmental legislation and regulations and apply responsible standards where the legislation is inadequate or non-existent.
- We are comprehensively prepared to respond effectively in the event of an emergency.
- We promote a culture of reporting and investigating accidents, incidents, near misses and the sharing of lessons learned.
- We have an audit programme which verifies compliance with this policy and monitors our Environmental performance.
- Top Management will regularly set and review our Environmental objectives & targets, with the aim of driving continuous improvement in Environmental knowledge and performance.
- This policy is reviewed periodically to ensure its ongoing suitability and effectiveness.

Everyone in KpH has individual authority, responsibility and accountability for protecting the Environment.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## EQUAL OPPORTUNITIES ACTION PLAN

### Our Aim

KpH Group is committed to promoting and embedding Equality and Diversity and preventing discrimination in all areas of our work through our Equality and Diversity Policy and annual Equality Action Plan.

KpH Group aims to:

- Ensure that the entire organisation (site and office) owns and actively implements the Equality and Diversity Policy and promotes an ethos and image that positively reflects KpH Group commitment to Equality and Diversity.
- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by the Equality Act 2010.
- Advance Equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.



| Actions                            |  | Person Responsible                         | Timescale | Progress Against Action  | July 2024 Review  |
|------------------------------------|--|--|-----------|--|---|
| <b>Recruitment / Advertisement</b> | <ul style="list-style-type: none"> <li>Review procedures to ensure that the recruitment process is applied consistently and fairly to all applicants.</li> <li>Social value recruitment</li> </ul> | <b>Lyndsey West,<br/>Managing Director</b> | Annual    | <ul style="list-style-type: none"> <li>To be reviewed at year financial end – 31<sup>st</sup> July 2025</li> </ul> | <ul style="list-style-type: none"> <li>Lyndsey West (LW) confirmed identical questions are asked with weight of answers being used to choose most appropriate candidate. Competency based questions asked. Template questions seen. 1st interview: 30 minutes on teams, 2nd interview face to face.</li> <li>Recent roles have been advertised both externally and internally with an equal and fair process across all candidates.</li> <li>Delivered careers talk at a local school</li> <li>Social value recruitment / job fair sessions held at The Edge &amp; 10 Piccadilly projects</li> <li>School walks around site to encourage construction careers</li> <li>Attended HMP Thameside Prison to discuss future work opportunities to prisoners</li> </ul> |



| Actions          |  | Person Responsible  | Timescale | Progress Against Action  | July 2024 Review  |
|------------------|--|---|-----------|--|---|
|                  | <ul style="list-style-type: none"> <li>Implement a supplementary and optional Equal Opportunities Monitoring Form.</li> </ul>  | <b>Lyndsey West,<br/>Managing Director</b>                    | Bi-Annual | <ul style="list-style-type: none"> <li>Equal Opportunities Monitoring Form created and roll out of new process now complete</li> </ul> | <ul style="list-style-type: none"> <li>LW confirmed that this is in place for all new employees. N/A to CV applicants.</li> </ul>   |
| <b>Induction</b> | <ul style="list-style-type: none"> <li>Provide new staff access to Equality and Diversity Policy and Grievance Procedures. Ensure their complete understanding.</li> </ul> | <b>Steve Dellaway,<br/>Commercial and<br/>Quality Manager</b> | Annual    | <ul style="list-style-type: none"> <li>Signed recorded acceptance of policy documents held by Quality Manager</li> </ul>               | <ul style="list-style-type: none"> <li>SD checked Induction Acknowledgement Form for Flavio Spahiu signed in February 2024 and confirmed these policies and procedures had been read and understood. Our equality policies are now kept on a shared drive for access by all site managers and they are also provided within the online induction portal.</li> <li>Policies included in online induction with inductees reading and signing prior to starting works</li> </ul> |



| Actions           |  | Person Responsible  | Timescale | Progress Against Action  | July 2024 Review   |
|-------------------|--|---|-----------|--|--|
| Current Workforce | <ul style="list-style-type: none"> <li>Monitor Progression and Achievement.</li> </ul>   | <b>Steve Dellaway,<br/>Commercial and<br/>Quality Manager</b> | Annual    | <ul style="list-style-type: none"> <li>Annual Appraisal</li> <li>Training Needs Review</li> </ul>                  | <ul style="list-style-type: none"> <li>LW confirmed Annual Appraisals were completed in March 2024. Probation Review and Training Needs. Review carried out for all staff.</li> <li>Consideration to be given to the appointment of dedicated training and development coordinator.</li> <li>Upskilling assessment to be created for supervisors and site managers.</li> </ul> |
|                   | <ul style="list-style-type: none"> <li>Undertake Annual Report of Equality Monitoring within workforce.</li> </ul>   | <b>Lyndsey West,<br/>Managing Director</b>                    | Annual    | <ul style="list-style-type: none"> <li>Management Review Meeting disseminating results of Annual Report</li> </ul> | <ul style="list-style-type: none"> <li>SD presented Equality Monitoring register to Kevin Potter 10/05/2024 - Last entry is Flavio Spahiu dated 02/02/2024.</li> </ul>   |
|                   | <ul style="list-style-type: none"> <li>Equality and Diversity Training for all Supervisors and Managers to better assist them when undertaking recruitment and selection.</li> </ul> | <b>Steve Dellaway<br/>Commercial and<br/>Quality Manager</b>  | Annual    | <ul style="list-style-type: none"> <li>Training through TBT targeted for all staff by quarter 3 2024.</li> </ul>   | <ul style="list-style-type: none"> <li>LW confirmed use of HR Consultant, Nikki McLaughlin, for ad-hoc training and advice.</li> <li>All operatives are briefed on the policy at the point of induction and annually upon review.</li> </ul>   |



| Actions                             |   | Person Responsible                                    | Timescale | Progress Against Action  | July 2024 Review   |
|-------------------------------------|---|---|-----------|--|--|
| <b>Subcontractors and Suppliers</b> | <ul style="list-style-type: none"> <li>To ensure that all external partners, training providers and external contractors actively embed Equality and Diversity within the ethos of their organisation.</li> </ul> | <b>Steve Dellaway, Commercial and Quality Manager</b> | Ongoing   | <ul style="list-style-type: none"> <li>Internal and External Audits show that this target is continuously met</li> </ul> | <ul style="list-style-type: none"> <li>LW confirmed use of HR Consultant, Nikki McLaughlin, for ad-hoc training and advice.</li> <li>All approved sub-contractors and suppliers must go through an approval process and this form part of the PQQ</li> </ul> |
|                                     | <ul style="list-style-type: none"> <li>Make available the Equal Opportunities Statement on all sites and within all site packs.</li> </ul>  | <b>H&amp;S Team</b>                                   | Ongoing   | <ul style="list-style-type: none"> <li>Copy to be sent out in all site job packs</li> </ul>                              | <ul style="list-style-type: none"> <li>SD checked two job packs 10 Piccadilly &amp; The Edge. Each contained both these statements and they were also available as displayed information on site</li> </ul>  |
|                                     | <ul style="list-style-type: none"> <li>Ensure on-site training induction incorporates our Equality and Diversity ethos.</li> </ul>  | <b>Site / Operations Managers</b>                     | Bi-Annual | <ul style="list-style-type: none"> <li>Review of Process every 6 months by Quality Manager.</li> </ul>                   | <ul style="list-style-type: none"> <li>SD checked two returned job packs: 10 Piccadilly &amp; The Edge. Both contained Induction Manual with Operatives signatures to confirm training. Also included in the annual policy briefing.</li> </ul>              |

**Date of Next Annual Review:** 31 August 2025





## Equal Opportunity Statement


KpH Group is aware of its duties and responsibilities and is an equal opportunities employer.

None of our managers or employees may discriminate against any individual in the course of any aspect of employment or recruitment, on the basis of their race, nationality, colour, creed, religion, belief, disability, marital status, sex, sexuality, age, part time status or political beliefs, including the right to belong to a trade union of their choice.

Any employee who feels that they are being discriminated against in any way, should report it to a senior person at once. The Company has a duty to investigate the matter and deal with it accordingly.

Any individual who feels that the matter has not been dealt with satisfactorily, should use the grievance procedure. Any individual who is found to have discriminated against another will be subject to the disciplinary procedure.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## Equality and Diversity Policy

Embracing equality has been central to the way we deliver services. KpH Group aim is to promote a safe, supportive and welcoming workplace with values, respect and diversity so people can achieve maximum potential. Considering the needs of our employees and customers in the decisions we have to make as an organisation is vital.

### Maintaining a Corporate and Professional Commitment to Equality Issues

We aim to review our Equality scheme annually to ensure that the goals we have set using our action plan at the beginning of the year continue to be relevant priorities for us both as an employer and a service provider.

Having discussions with our clients about our current scheme helps to identify a number of areas where updates need to be made. These updates will be concluded in our action plan.

Equality within our organisation continues to start from the top with our Managing Director identified as the corporate leader for Equality. Senior Managers are informed on any equality implications with reports being presented.

Senior Managers also have the responsibility for overseeing activities and progress in regards to equality. Legislative changes are kept up to date in order to ensure best practice which has an effect on our organisation, employees and our customers.

Every employee is required to adhere to our policy and rules relating to equal opportunity. Any breaches of this policy are dealt with through the disciplinary procedure.


A requirement is placed on our contractors to follow our equality principles and values in order to prove they are demonstrating to us they are meeting the requirements that we have set out.

### Training

As an organisation we recognise that training and raising awareness is vital to ensure that our employees understand our Equality principles and that this is reflected in their behaviour.

We encourage all members of staff to highlight any gaps in their knowledge and understanding of the policy and will then provide the necessary training to ensure they understand both legal obligations and good practice.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## Health and Safety Policy Statement

KpH Group (Also called The Company) will take all reasonably practical precautions to ensure the health and safety at work of its employees whether at the company premises or when carrying out its business elsewhere> KpH Group also recognise that a duty of care extends to other persons whilst they are on company premises.


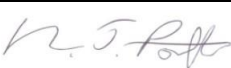
The responsibility for safety at work belongs to all company employees be they upper management, managers, supervisors or operatives, this also extends to employees of sub-contractors who are completing works on our behalf. The Company, through its employees, also accepts responsibility for the health and safety of others affected by its undertakings.

To achieve these aims, the company will:

- Provide a safe working environment in the operation and maintenance of all plant, equipment and facilities in order to prevent workplace injury or ill-health
- Establish a Safe System of Work (SSOW), risk assessments and method statements for activities being carried out to reduce and eliminate OH&S risks
- Ensure that all persons are competent to perform the duties expected of them by ensuring that they have the relevant training, competency and experience
- Provide information, instruction, training, and supervision where appropriate along with PPE at point of induction
- Co-operate with their clients, employees, sub-contractors and others who may be affected by our works and undertakings
- Ensure safety arrangements are in place for the use, handling, storage and transportation of articles and substances, equipment and materials
- Provide a safe place of work including access and egress, escape and emergency routes as well as walkways and transit routes
- Ensure that suitable and sufficient resources are made available in order to achieve intended outcomes.
- Establish a frame work for setting, reviewing and achieving OH&S objectives and targets
- Ensure a commitment to fulfilling legal and other requirements is in place and adhere to
- Ensure that continual improvement of the OHS management system is planned and achievable via it's objectives and targets
- Ensures that a commitment is in place to communicate the policy, consult and encourage the participation of its workforce with regards to the policy and its intended outcomes
- And finally, ensure that Health & Safety is never compromised for other objectives.

The Company expects employees to adhere to this, and other relevant policies and with The Health and Safety at Work etc. Act 1974 and to exercise all reasonable care for their own health and safety and that of others who may be affected by their acts or omissions.

This policy will be reviewed annually to reflect any changes in the nature and size of the business or to incorporate new or amended legislation. The Managing Directors have the ultimate authority and responsibility in relation to all health and safety topics affecting The Companies.

|                |   |                                |   |
|----------------|---|--------------------------------|---|
| <b>Signed:</b> |  | <b>Company &amp; Position:</b> | KpH Deconstruction Ltd<br>Managing Director/Director Responsible for Safety         |
| <b>Name:</b>   | Lyndsey West  | <b>Date:</b>                   | 31/08/2025  |
| <b>Signed:</b> |  | <b>Company &amp; Position:</b> | KpH Environmental Services Ltd<br>Managing Director/Director Responsible for Safety |
| <b>Name:</b>   | Kevin Potter  | <b>Date:</b>                   | 31/08/2025  |



## HEALTH & SAFETY INDUCTION FOR YOUNG PERSONS

This Health and Safety Induction is the commencement of the KpH Group training programme to explain the hazards of the job and the precautions that young people must observe to ensure a safe working environment.

KpH Group have incorporated into their Health and Safety Policy, the Health and Safety (Young Persons) Regulations 1997 (SI 1997 No.135) which was introduced on 3<sup>rd</sup> March 1997, to safeguard the health and safety of young workers (aged under 18).

Young people may be at particular risk in the workplace because they lack experience and trained judgement. Young people should not be required to undertake tasks where their lack of experience may put their own or other people's health and safety at risk. There must be proper arrangements for supervision of young people and any work operations that require constant supervision must be clearly identified.

Young Persons working in industry have a duty to take reasonable care for the health and safety at work of themselves and any other people who might be affected by their acts or omissions. Young persons are also under a duty to co-operate with their employers and others to enable them to comply with statutory duties and requirements. Young Persons must not intentionally or recklessly misuse anything provided by the employers or others in the interest of health, safety or welfare and must report any misuse to their manager / supervisor at the earliest opportunity.

The Company has assessed the type of work that it asks young people to undertake and provided a standalone risk assessment for this, which will be reviewed for each individual, agreed, briefed and signed.

The Company will also assess that the Young Person is capable to undertake the tasks and will provide appropriate supervision to ensure that the tasks are undertaken safely.


The Company, as part of its Health and Safety responsibilities undertakes risk assessments for the activities of the Company and will decide whether or not young persons should be engaged in certain types of work. The Company will reduce any risks to the lowest practicable level. When the work is necessary for a young person's training, the Company will ensure that the work is properly supervised.

Young People are prohibited to undertake and are restricted in some tasks in industry, unless they are fully trained or being supervised. i.e. cleaning of machinery in motion, working on a prescribed dangerous machine, abrasive cutting tools, lifting excessive weights, operating equipment which requires a licence.

Further guidance and legislation can be found on the HSE website: <https://www.hse.gov.uk/young-workers/employer/index.htm>

I \_\_\_\_\_ PRINT NAME \_\_\_\_\_ acknowledge receipt of the Health and Safety Induction for Young Persons and agree to abide by KpH Group's Health and Safety rules and procedures.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |

# INFORMATION SECURITY POLICY

## Table of Content

|            |   |          |
|------------|---|----------|
| <b>1</b>   | <b>MOTIVATION</b>                                     | <b>2</b> |
| <b>2</b>   | <b>PURPOSE</b>  | <b>2</b> |
| <b>3</b>   | <b>SCOPE</b>  | <b>2</b> |
| <b>4</b>   | <b>POLICY</b>   | <b>2</b> |
| <b>4.1</b> | <b>GUIDELINES FOR VISITOR ACCESS</b>                  | <b>2</b> |
| <b>4.2</b> | <b>GUIDELINES FOR PHYSICAL SECURITY</b>               | <b>3</b> |
| <b>4.3</b> | <b>PASSWORD POLICY</b>                                | <b>3</b> |
| <b>4.4</b> | <b>GUIDELINES FOR MEDIA DISPOSAL AND RECYCLING</b>    | <b>4</b> |
| <b>4.5</b> | <b>GUIDELINES FOR UNATTENDED WORKSTATIONS</b>         | <b>4</b> |
| <b>4.6</b> | <b>GUIDELINES FOR WORKING FROM HOME</b>               | <b>4</b> |
| <b>4.7</b> | <b>DATA TYPES</b>                                     | <b>5</b> |
| <b>4.8</b> | <b>DATA CLASSIFICATIONS</b>                           | <b>5</b> |
| <b>5</b>   | <b>SUMMARY</b>  | <b>6</b> |
| <b>6</b>   | <b>ACKNOWLEDGEMENT OF INFORMATION SECURITY POLICY</b> | <b>6</b> |
| <b>7</b>   | <b>REVIEW</b>   | <b>6</b> |
| <b>8</b>   | <b>PROCEDURE</b>                                      | <b>6</b> |
| <b>9</b>   | <b>SIGNATURE</b>                                      | <b>6</b> |



## 1 MOTIVATION

- 1.1.1 The information owned and used to operate KpH Group required a substantial investment in human and financial resources to develop. The intellectual property and information assets of the company are all valuable company resources and need to be properly protected.
- 1.1.2 To help KpH Group maintain acceptable information security protection, all employees are responsible for following the steps outlined in this Information Security Policy.

## 2 PURPOSE

- 2.1.1 The purpose of this policy is to create a KpH Group standard for:
- Visitor Access
  - Physical Security
  - Password Policy
  - Media Disposal and Recycling
  - Unattended Workstations
  - Safe Keeping of Data

## 3 SCOPE

- 3.1.1 Everyone who has visitors coming to see them at KpH Group (“The Company”) premises, or who has access to any non-public company information, is expected to follow the guidelines outlined in this policy. This includes people who have access to Company customer database, sales and marketing plans, designs and patents, financial records, any other business information not in the public domain and customer data.

## 4 POLICY

### 4.1 GUIDELINES FOR VISITOR ACCESS

- 4.1.1 Access to company information is restricted to Company employees who require access to perform their jobs. Visitors can present a security risk because there is an opportunity for intentional or unintentional access to confidential information. To manage this risk, visitors and staff should be aware of the following requirements:
- All visitors must report to the main reception desk on arrival.
  - All visitors are required to sign in at reception in the Visitors’ Register.
  - No visitors are allowed to walk around unaccompanied. All visitors must be met at reception by the person they have come to see.
  - No pets are permitted. However, assistance animals such as guide dogs are permitted.
  - As a rule, visitors are not permitted to take photographs. Exceptions might be made, with the permission of the Company Director, where photographs are required for documentation, auditing or marketing purposes.
  - Visitors should not be given information that does not pertain to the reason for their visit. Requests for inappropriate or confidential information should be reported immediately to the Company Director.



- On departure, visitors should sign out at reception in the Visitors' Register.
- In the event of an emergency, employees must ensure that their visitors remain in the evacuation marshalling area.
- Consultants or other visitors requiring Internet network access can use the guest network, if access is required to the company network and any shared resources they will need access set up by the IT Consultant.

## 4.2 GUIDELINES FOR PHYSICAL SECURITY

4.2.1 It is company policy to protect computer hardware, software, data, and documentation from misuse, theft, unauthorised access and environmental hazards. Employees and contractors should be aware that:

- Software and hardware should be kept away from environmental hazards such as heat, direct sunlight, and magnetic fields. In addition, hazards such as food, smoke, liquids, high or low humidity, and extreme heat or cold should be avoided.
- Critical computer equipment such as file servers should be protected by an uninterruptible power supply (UPS) and other computer equipment protected by a surge suppressor.
- Software, important data and other confidential information should be stored out of sight when not in use.
- Company equipment such as laptop computers should not be taken off the premises without the consent of their department Manager. The Manager should know what equipment is leaving, what data is on it, and for what purpose it will be used.
- Employees and contractors should exercise care to safeguard the valuable electronic equipment assigned to them. Employees and contractors who neglect this duty may be accountable for any loss or damage that may result.
- Critical equipment, like the server room, should be locked at all times, with access limited to a few authorised key-holders.

## 4.3 PASSWORD POLICY

4.3.1 The company has a strict password policy which must be adhered to at all times.

- Passwords must be a minimum of 8 characters, there is no maximum length.
- Passwords need to include at least one of the following: 1 Upper case, 1 Lower case, 1 Number and one Special Character.
- Your password should be memorable to you and It is not recommended to use the same password for home and work, additionally you:
  - should avoid using obvious passwords such as those based on easily discoverable information, such as pets and family members;
  - should also avoid using common passwords.
- Two-Factor Authentication will be used where possible and practicable.
- Passwords are required to be inputted correctly before any access is granted to company resources.
- We do not enforce a password expiry, however If you suspect your password is compromised you should immediately change your password and advise you Line Manager.
- Passwords inputted incorrectly will result in your account being locked out and this may require an Administrator to unlock your account after verification.



- If Passwords are recorded they must be stored in an encrypted form.

#### 4.4 GUIDELINES FOR MEDIA DISPOSAL AND RECYCLING

4.4.1 To ensure that confidential company information is not left on various media that the company no longer needs, these guidelines should be followed:

- No media such as old computers, hard drives, USB drives, Flash drives, backup media, CDs and DVDs should be discarded without first removing the data from the media as cleanly as possible.
- All old media to be disposed or recycled should be handed to the IT Consultant.
- The IT Consultant will be responsible for cleaning any data from media to be disposed of, by using hardware and software tools available to properly erase hard drives and USB devices before discarding them.

#### 4.5 GUIDELINES FOR UNATTENDED WORKSTATIONS

4.5.1 A clear desk and clear screen policy helps to create a culture of security awareness among employees and to prevent opportunistic access to confidential information. When away from their desks for meetings, or toilet or lunch breaks, all staff and contractors working at the Company should:

- Lock all papers and other media containing sensitive or confidential information away in a drawer or cabinet.
- Lock their computer screens and ensure computers require a password on resuming working.
- Clear desks and tidy away all papers before going home at the end of each day.
- Get into the habit of locking drawers and filing cabinets at the end of each day and when away from their workstations for extended periods.

#### 4.6 GUIDELINES FOR WORKING FROM HOME

4.6.1 The employee must carry out his/her work for the Company in a room used only for that purpose and must not allow members of his/her family, or third parties who are not employed by the Company, to access or use the Company equipment.

4.6.2 An employee who works at home must agree to not smoke in the room where the work is carried out.

4.6.3 Employees who work at home are responsible for keeping all documents and information associated with the Company's business secure at all times. Specifically, the employee is under a duty to:

- keep filing cabinets and drawers locked when they are not being used;
- keep all documentation belonging to the Company under lock and key at all times except when in use; and,
- set up and use a unique password for the computer.

4.6.4 The computer [and other equipment] provided by the Company for the employee must only be used for work-related purposes and must not be used by any other member of the family at any time, or for any purpose.



## 4.7 DATA TYPES

4.7.1 The Company deals with two main kinds of data:

- a) **Company-Owned Data** that relates to such areas as corporate financials, employment records, payroll, etc.
- b) **Private Data** that is the property of our clients and/or employees, such as social security numbers, bank account details, contact information, client network access passwords, etc.

## 4.8 DATA CLASSIFICATIONS

4.8.1 Company data is comprised of the following classifications of information:

1. **Public/Unclassified:** This is defined as information that is generally available to anyone within or outside of the company. Access to this data is unrestricted, may already be available and can be distributed as needed. Public/unclassified data includes, but is not limited to, marketing materials, annual reports and corporate financials.

Employees may send or communicate a public/unclassified piece of data with anyone inside or outside of the company.

2. **Private:** This is defined as corporate information that is to be kept within the company. Access to this data may be limited to specific departments and cannot be distributed outside of the workplace. Private data includes, but is not limited to, work phone directories, organisational charts, company policies, client lists.

**All information not otherwise classified will be assumed to be Private.**

**Employees may not disclose private data to anyone who is not a current employee of the company.**

3. **Confidential:** This is defined as personal or corporate information that may be considered potentially damaging if released and is only accessible to specific groups [e.g. payroll, HR, Support, etc]. Confidential data includes, but is not limited to, social security numbers, contact information, tax forms, accounting data, security procedures, server access details. The company considers it a top priority to protect the privacy of our clients and employees.

Employees may only share confidential data within the department or named distribution list.

4. **Secret/Restricted:** This is defined as sensitive data which, if leaked, would be harmful to the company, its employees, contractors and clients. Access is limited to authorised personnel and third parties as required. Secret/restricted data includes but is not limited to client data, audit reports, legal documentation, business strategy details, access details, machine information, client security audits and reports.

**Secret/restricted data cannot be disclosed by anyone other than the original author, owner or distributor.**

It is the responsibility of everyone who works at the company to protect our data. Even



unintentional abuse of classified data will be considered punishable in accordance with the extent and frequency of the abuse.

## 5 SUMMARY

5.1.1 This aim of this **Information Security Policy** is to secure the company's IT resources, and to enable the company to achieve its business objectives. Full co-operation with this **Information Security Policy** is an expected job requirement.

## 6 ACKNOWLEDGEMENT OF INFORMATION SECURITY POLICY

6.1.1 This forms an official acknowledgement by company employees that they have read and understood the company's **Information Security Policy** and agree to follow the guidelines outlined herein.

## 7 REVIEW

7.1.1 Management is responsible for keeping this policy current.

7.1.2 This policy will be reviewed annually or as circumstances arise.

7.1.3 A full security audit will be performed by the Quality Team annually to ensure that the policy is properly aligned with company directives, Data Protection Policy and Information Governance.

**Last Reviewed: 31 July 2020**

## 8 PROCEDURE

8.1.1 Complete the following steps:

- Read the **Information Security Policy**.
- Ask questions or request clarification if anything is unclear.
- Sign and date this page in the appropriate spaces below.
- Return this page only to the Quality Manager.


## 9 SIGNATURE

9.1.1 This agreement is between the undersigned employee and KpH Group ("The Company"). In signing below, I agree to the following:

- I have received and read a copy of the company's **Information Security Policy** and understand the contents.
- I understand that adhering to the guidelines outlined in the company's **Information Security Policy** is part of my job requirement as an employee of the company, and agree to do so.
- I understand and agree to adhere to the **Password Policy** and will not disclose my password to anybody and in the event that I suspect my password may have been compromised will immediately change my password and notify my Line Manager.



- I understand and agree that any computers, software, and storage media provided to me by the company contain proprietary and confidential information about the company, and its customers or vendors, and that this information remains the property of the company at all times.
- I agree that I shall not copy, duplicate (except for back-up purposes as part of my job at the company) or otherwise disclose, or allow anyone else to copy or duplicate any of this information.
- I agree that if I leave the company for any reason, I shall immediately return the original and copies of any and all software, computer equipment and materials that I may have received from the company.
- I understand that failure to observe these guidelines could result in disciplinary action by the company depending upon the type and severity of the violation, whether it causes any liability or loss to the company, and/or the presence of any repeated violation(s).

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review date:</b>                      | 31/08/2025   |

# MIGRANT WORKER POLICY AND PROCEDURE

## Fair Employment of Migrant Workers (Preventing Illegal Working)

### A. POLICY

#### 1. POLICY STATEMENT

- 1.1. This policy supports the fair employment of migrant workers and the prevention of illegal working in line with UK government legislation, namely the Immigration, Asylum and Nationality Act 2006 and good practice guidance.

#### 2. AIMS

- 2.1. The aims of this policy are to:
  - ensure the fair recruitment of employees from outside the EU or support those from the accession states (so called A8 states) within the EU who have employment requirements placed on them by the UK government;
  - ensure that checks are made in an appropriate manner, being mindful of the Data Protection Act, along with the requirements made under the Immigration, Asylum and Nationality Act 2006 and in line with best practice. These checks will include right to work; annual check of details; absence from work.

#### 3. PURPOSE

- 3.1. The purpose of this policy and procedure is to provide guidance on how as a company we comply with the Immigration, Asylum and Nationality Act 2006 and the responsibilities contained within.

#### 4. SCOPE AND ELIGIBILITY

- 4.1. This policy and procedure applies to the recruitment and engagement of all staff to ensure that KpH Environmental is fair in its processes and appropriate in its engagement of staff from outside the UK.
- 4.2. This policy supports the continued fair employment providing guidance on how KpH Group can ensure a continued right to work in the UK and the monitoring of staffing issues, such as absence from duty; changes in circumstances (domestic, contact and in employment terms) and the monitoring of this information.
- 4.3. This policy notes the responsibilities of the Company in terms of fair recruitment of students, however this policy does not cover the details of this activity.

## 5. GENERAL PRINCIPLES

5.1. This policy is made up of six sections:

|                   |  |
|-------------------|--|
| <b>SECTION 1:</b> | Introduction to Changes in Legislation Governing the Prevention of Illegal Working   |
| <b>SECTION 2:</b> | Preventing Illegal Working – Checking Identity and the Right to Work in the UK   |
| <b>SECTION 3:</b> | Sponsorship (Work Permit) for Employees from Outside the UK (EU)   |
| <b>SECTION 4:</b> | Worker Registration Scheme (A8 Country Regulations)  |
| <b>SECTION 5:</b> | Absence from Work – What to Do (guidance for Line Managers, HR and Employees) (this section should be read in conjunction with the Attendance Management Policy) |
| <b>SECTION 6:</b> | Information to Support the Procedural Aspects of this Policy   |

|                    |  |
|--------------------|--|
| <b>APPENDIX A:</b> | List A Documents   |
| <b>APPENDIX B:</b> | List B Documents   |
| <b>APPENDIX C:</b> | Human Resources Service Identity Check Procedure - Preventing Illegal Working  |
| <b>APPENDIX D:</b> | Reporting Absence (Migrant Workers) Form   |
| <b>APPENDIX E:</b> | Annual Check Form - Confirmation of Contact Details  |
| <b>APPENDIX F:</b> | Line Manager and Human Resources Checklist for Sponsorship   |
| <b>APPENDIX G:</b> | Checklist Regarding Employing Migrant Workers (Preventing Illegal Working) – all Procedures  |
| <b>APPENDIX H:</b> | Memorandum to Line Manager – New Member of Staff Responsibilities – Migrant Workers  |
| <b>APPENDIX I:</b> | Memorandum to Staff Member with Migrant Worker Status  |
| <b>APPENDIX J:</b> | Human Resources Procedures - Employing Migrant Workers (Preventing Illegal Working) (EXTRACT of Policy and Procedure - All Procedures in One Document) |

5.2. Information is included under each section in relation to employer duties, checking activities and record keeping

## 6. DISABILITY DISCRIMINATION

- 6.1. The Disability Discrimination Act 2005 places a positive duty on our organisation to promote equality of opportunity for disabled people and to eliminate discrimination.
- 6.2. Where a manager believes that a staff member may be disabled within the meaning of the Act or may none-the-less need additional support, advice must be sought from the Human Resources Department before any action is taken under this procedure.
- 6.3. Where necessary, reasonable adjustments to the process will be considered and made as appropriate.

## 7. EQUALITY IMPACT ASSESSMENT AND MONITORING

7.1. This policy and its implementation will be monitored in line with relevant legislation for its impact on different staff groups categorised for example by race, gender, age, disability and others as appropriate. This process will provide a check on whether there are any differences and allow KpH Environmental to assess whether these differences have an adverse impact on any particular group such that action can be taken accordingly.

## 8. DATA PROTECTION ACT 2018

8.1. In implementing this policy we will ensure that any personal data relating to the application of this policy will be obtained, processed and destroyed in line with the requirements of the Data Protection Act 2018.

## 9. ROLES AND RESPONSIBILITIES

9.1. In order to support the implementation of this policy, it is the responsibility of:

### 9.1.1. Managers

- Ensuring that fair recruitment processes are adhered to in line with our recruitment and selection procedures (including the attendance at compulsory training for all panel members).
- Ensuring that all relevant permissions are obtained prior to the engagement of any staff member, including those on temporary, casual or part time lectureship contracts such as sponsorship certificates (work permits), Resident Worker status confirmation etc.
- Ensuring that all absences are reported immediately to HR.
- Ensuring that all staff members adhere to KpH Group's annual leave request procedures.
- Ensuring that all staff resignations and retirements are informed immediately, upon written confirmation for the staff member, to the HR department.
- Engaging positively with all staff in a fair and dignified manner, ensuring compliance with the Race Equality policy and relevant legislation in this area.

### 9.1.2. Staff Members

- Ensuring that they do not engage in working KpH Environmental until such time as right to work has been established, namely ID checks for UK citizens (in line with the Human Resources Service procedure); successful sponsorship status (work permit) permission obtained; if an A8 accession EU state citizen ensuring application for Resident Worker status is obtained within one month of commencing employment.
- Ensuring that any absence is authorised, namely annual leave or sabbatical leave permission is obtained prior to taking such leave; sickness absence is reported and recorded.
- Ensuring that any change in circumstances are reported and carried out in line with the relevant Human Resources Policies.

### 9.1.3. Human Resources Department



- Ensuring that the Immigration, Asylum and Nationality Act 2006 is adhered to including the engagement of migrant workers obtaining the relevant permissions prior to work commencing or in the case of the Migrant Workers Status within one month of engagement; checking of information related to recruitment, changes in circumstances, annual checking, absence recording or resignation / redundancy.
- Ensuring that fair and transparent recruitment procedures are adhered to at all times allowing for the fair employment of migrant workers and the prevention of illegal working.
- Ensuring that all data and information is stored in an appropriate manner and any changes are checked to ensure that employment may continue under the relevant permission (such as sponsorship status (work permit)).

## B. PROCEDURAL GUIDELINES

The normal expectation is that the following procedural guidelines will apply. However, on occasions, and for exceptional / other good reasons, such as a change in best practice guidance from the UK Home Office, there may be the need to vary the procedures to suit individual cases / circumstances, and accordingly we reserve the right to amend the procedures.

The following sections provide information on the areas covered by the policy.

## SECTION 1: Introduction to Changes in Legislation Governing the Prevention of Illegal Working

### 1. INTRODUCTION

On 29 February 2008, the UK Government introduced new legislation in respect of the prevention of illegal working. This established a regime of civil penalties to be imposed on employers of illegal workers, and a criminal offence of knowingly employing an illegal worker. The new provisions are set out in ss.15 to 25 of the Immigration, Asylum and Nationality Act 2006, and replace provisions in the Asylum and Immigration Act 1996, which were effectively repealed on 29 February 2008. The new provisions apply only to individuals who commenced employment with their employer on or after 29 February 2008. The previous provisions apply to employees who commenced employment prior to this date.

The new provision on civil penalties provides that the Secretary of State may impose notice of liability to pay a civil penalty of a specified amount on an employer. A sliding scale for the calculation of penalties is set out in the “Civil penalties for employers: Code of Practice” (on the UK Border Agency website), although the actual amount payable will be decided on a case-by-case basis. **The maximum penalty is £10,000 per illegal employee.** The new offence of knowingly employing an illegal worker is set out in s.21 of the Immigration, Asylum and Nationality Act 2006. **On conviction the employer is liable to an unlimited fine and/or up to two years' imprisonment.**

#### 1.1. Level of Potential Civil Penalty

The factors that are taken into account include the level and nature of the checks carried out by the employer, on how many occasions the employer has failed to check workers' entitlement to work in the UK, and whether or not the employer has cooperated with the UK Border Agency in any investigation. Where an employer is found to have carried out only partial checks, and it is the first occasion on which it has been found to have illegal migrants in its workforce, it is likely to be issued with a warning letter rather than a penalty. If, however, it is the third occasion on which the employer has been found with illegal migrants among its workforce, and no checks have been carried out, the maximum penalty of £10,000 per illegal worker is likely to be imposed.

#### 1.2. Avoiding Discrimination

When carrying out the pre-employment checks that will enable the Company to establish the statutory excuse against paying a civil penalty, recruiters must take care to avoid possible race discrimination. It is, therefore, vital that for all recruitment activities the relevant documentation is requested from all prospective employees, not just those whom the recruiter suspects are not EU nationals or do not have permission to work in the UK.

#### 1.3. Transfer of Undertakings

Employers that acquire employees as the result of a TUPE transfer have a grace period of 28 days following the transfer in which to undertake the necessary document checks and establish the statutory excuse.

## SECTION 2: Preventing Illegal Working – Checking Identity and the Right to Work in the UK

### 2. CONDUCTING CHECKS ON THE IMMIGRATION STATUS OF PROSPECTIVE EMPLOYEES

In light of recent changes to the legislation, this guidance provides information to recruiters on behalf of the University about conducting checks on prospective employees' immigration status.

#### 2.1. Establishing a Statutory Excuse

If an employer is found to be employing an illegal migrant, but has complied with the relevant procedures on obtaining, copying and retaining specified documentation from the individual prior to his or her starting employment, the employer may be able to establish a statutory excuse from paying a civil penalty.

To establish a statutory excuse, employers must check and copy either one original document, or two of a specified combination, from list A or list B. The lists are set out in the Schedule to the Immigration (Restrictions on Employment) Order 2007. **(Appendix A, B and C refers).**

#### 2.2. Checking Documentation Procedure

Once the Company (i.e. the recruiter or the Human Resources Department, in line with the relevant procedures) has obtained the specified documents from either List A or List B **(Appendix A and B)**, we must carry out some basic checks to ensure that the documentation presented relates to the individual in question.

The recruiter will, therefore, need to check:

- any photograph in the document(s) against the individual to ensure that it bears a reasonable resemblance to him or her;
- that any date of birth on the document(s) appears to correspond to the individual's age;
- make sure that any expiry date regarding limited leave to enter or remain in the UK has not passed;
- that a document does not appear to be a forgery, or to have been altered in any way. There might, for example, be indications that a passport photograph has been replaced. However, the employer is not required to be an expert in identifying forged documents.
- Where two documents are provided and the names on the documents are different, the employer will need to ask the individual for an explanation, together with further documentary evidence to support this explanation - for example, a marriage certificate or a divorce decree.
- Once we have obtained and checked the relevant documentation, and are satisfied with it, we should make copies of the documentation. If the document is not a passport or other travel document, a copy of the entire document should be taken. If the document is a passport or other travel document, the pages that should be copied are:
  - the front cover;
  - any page containing the holder's personal details, including nationality;
  - any page containing the holder's photograph;
  - any page containing the holder's signature;



- any page containing the date of expiry; and
- any page containing endorsements by officials of the UK Border Agency or UK Visas [Appendix C refers].
- Copies of the documents need to be kept securely for a period of not less than two years after the employment has come to an end. The standard Human Resources archiving procedures apply, namely the keeping of all leavers files for the appropriate timescales as set out in the Data Protection Act and good practice procedures.

If an individual is not able to produce the relevant documents, or we is not satisfied with the documentation that has been presented to us, we may decline to proceed with the offer of work, and the onus is on the individual to establish that he or she does have permission to work in the UK [Appendix G refers].

The Company may be presented with documents that require verification by the Employer Checking Agency (a certificate of application or an Application Registration Card). Where an individual is unable to produce a document and indicates that this is the result of having an outstanding application for leave to remain, the Company should also use the Employer Checking Service to verify the individual's right to work in the UK. It is the Company's responsibility to inform the individual where it intends to make such checks with the service.

General advice on the prevention of illegal working can be obtained from the Employers' Helpline: 0845 010 6677.

Human Resources Department identity check procedure is attached: **Appendix C**

### 2.3. Ongoing Checks

Those individuals who have no restrictions on their stay in the UK, or are not subject to immigration control, should be able to produce the required document(s) from List A, while those who are time-restricted in terms of their leave to enter or remain will produce documents from List B.

Where an individual produces the required documentation from List A, and this has been checked and copied, the Company is not required to carry out any subsequent document checks on the individual.

### 2.4. Human Resources Department Responsibilities in Relation to Ongoing Checks.

The Human Resources Department will be responsible for:

- The ongoing obligation on the Company's to carry out checks where individuals produce documentation from List B. **This means that the HR Department needs to carry out a check at least once every 12 months if it is to retain the statutory excuse.** In relation to such individuals, the Company is excused from paying a penalty under s.15 for a period of 12 months from the date that the employee produced the documentation [Appendix G refers, Appendix I refers].
- If the employee's leave to remain expires sooner than 12 months from the last review date, the HR Department must ensure that it checks immigration status prior to the leave expiring. If the employee does not make a valid application for leave to remain prior to the expiry, he or she will automatically become an overstayer. If the individual continues in employment, the University will lose the protection of the statutory excuse and could be liable for a civil penalty and/or criminal liability [Appendix G refers].

- **Knowledge that an individual is not permitted to work.** Recruiters and the Human Resources Department should be aware that obtaining the relevant documentation, checking it and storing it will not establish a statutory excuse where they are aware that the individual in question does not, in fact, have the appropriate permission to carry out the job in question at any period throughout the employment. If this is the case, not only will the statutory excuse be invalidated, but the Company may also be rendered liable to prosecution under the new statutory offence under s.21 of knowingly employing an illegal worker. On conviction the Company will be liable to an unlimited fine and/or imprisonment for up to two years [Appendix G refers].

## SECTION 3: Sponsorship (Work Permit) for Employees from Outside the UK (EU)

### 3. SPONSORSHIP SCHEME

The Company has applied for sponsorship status, namely the ability to recruit staff and students from outside of the European Union, following appropriate recruitment procedures. A decision is awaited. The following information is provided to prepare the Company should approval be given.

#### 3.1. Sponsorship Duties

Sponsors must fulfil a range of duties to ensure that immigration controls are effective. The aims are to:

- prevent abuse of the assessment procedures;
- capture early, any patterns of migrant behaviour that may cause concern;
- address possible weaknesses in the process which can cause those patterns;
- monitor compliance with immigration rules.

#### 3.2. Generic Duties:

These are as follows:

##### 3.2.1. Record Keeping Duties:

All Sponsors must keep the following records or documents (namely the Human Resource Department), and make them available to officials of the UK Border Agency on request:

- i. A photocopy or electronic copy of each sponsored migrant's passport or UK immigration status document (and, in time, his or her ID card), showing evidence of his or her entitlement to work or study. For the Company this is in line with the responsibilities laid down by Regulations made under section 15 of the Immigration, Asylum and Nationality Act 2006 [Appendix I refers];
- ii. Each sponsored migrant's contact details (address, telephone number, mobile telephone number). These details must be updated as necessary [Appendix E refers].

All sponsors must provide such documents relating to sponsored migrants as the UK Government considers relevant. The UK Government might, for example, ask for details of the sponsor's recruitment practices to ensure that the Resident Labour Market Test is being applied correctly (namely a transparent and fair recruitment process free from bias and discrimination).

From 2008, the UK will be introducing **ID cards** for foreign nationals. This will be a new type of immigration status document which will contain details of the holder's immigration status, together with their fingerprints. Where the migrant has an ID card, the sponsor will be required to keep a copy of it [Appendix G refers].

### 3.2.2. Reporting Duties:

All Sponsors must report the following information or events to the UK Border Agency, within any time limit specified, namely the Human Resources Department for staff and MRC for students. Information about migrants' non-attendance, non-compliance or disappearance will be used to inform enforcement action against them:

- i. If a sponsored migrant does not turn up for his or her first day of work, or does not enrol on his or her course at the expected time. The report must be provided within 10 working days and must include any reason given by the migrant for his or her non-attendance/non-enrolment e.g. missed flight [Appendix D refers];
- ii. If a sponsored migrant is absent from work or study for more than 10 working days, without the Sponsor's reasonably granted permission. In this case, the report must be provided by the Human Resources Service to the Border and Immigration Agency within 10 working days of the tenth day of absence [Appendix D refers regarding line manager reporting of absence];
- iii. If a sponsored migrant discontinues his or her studies, or if the migrant's contract of employment or registration is terminated (including where the migrant resigns or is dismissed). Such a report must be given within 10 working days of the event in question, and should include the name and address of any new employer or institution that the migrant has joined, if the sponsor knows it [Appendix G refers];
- iv. If the sponsor stops sponsoring the migrant for any other reason e.g. if the migrant moves into an immigration route that does not require a sponsor [Appendix H refers];
- v. If there are any significant changes in the migrants' circumstances, for example a change of job or salary (but not job title or annual pay rise) or if the duration of a course of study shortens [Appendix G refers];
- vi. Any suspicions it may have that a migrant is breaching the conditions of his or her leave [Appendix D refers];
- vii. If there are any significant changes in the sponsor's circumstances - for example if the sponsor ceases trading or becomes insolvent, substantially changes the nature of its business, is involved in a merger or is taken over.
- viii. Details of any third party or intermediary, whether in the UK or abroad, that has assisted it in the recruitment of migrant employees or students.

The Sponsor must also give the police any information it may have that suggests that the migrant may be engaging in terrorism or other criminal activity.

### 3.3. Complying with the Law:

To ensure that they are complying with UK government immigration laws, sponsors must also fulfil the following duties:

- i. Ensure that a migrant who is coming to work is legally entitled to do the job in question and has the appropriate registration or professional accreditation where this is legally required. For



example, if the migrant is coming to work as a health professional, the Sponsor will need to ensure that he or she has the correct registration to entitle him or her to practice as such in the UK. The Sponsor must keep a copy of any appropriate registration document or certificate and supply it to the UK Border Agency on request [Appendix F refers]; *The Human Resources recruitment procedure regarding checking of qualifications will apply.*

- ii. Not to employ a migrant if the conditions on the migrant's leave (or the migrant's lack of leave) mean that he or she is not allowed to undertake the work in question, and to stop employing any migrant who ceases, for any reason, to be entitled to undertake the work [Appendix F refers, Appendix G refers];
- iii. Only to issue Certificates of Sponsorship to migrants who, to the best of the Sponsor's knowledge and belief, will meet the requirements of the Tier or category of Points Based System under which the certificate is issued, and are likely to comply with the conditions of their leave. The requirements and conditions of leave are set out in the immigration rules [Appendix F refers];

### 3.4. Co-operating with the UK Border Agency:

In order to allow the UK Border Agency to manage the Sponsorship system properly, all sponsors must also comply with the following duties:

- i. Allow the UK Border Agency's staff access to any of its premises on demand. Visits may be either prearranged or unannounced;
- ii. Adhere to any action plan set by the UK Border Agency;
- iii. Seek to minimise the risk of immigration abuse by complying with any good practice guidance that the UK Border Agency or that any sector body may produce for sponsors in particular Tiers or Sectors, with the UK Border Agency's agreement.

### 3.5. Duties specific to sponsors under particular parts of the Points Based System:

The above duties apply to all sponsors across the Points Based System. Those set out below apply only to certain routes.

#### 3.5.1. Skilled Workers (Tier 2):

Sponsors who are licensed to sponsor migrants under Tier 2 (general) should only issue a Certificate of Sponsorship to a migrant if the sponsor is satisfied that the migrant intends to and is able to do the specific skilled job in question, which must be of at least NVQ3 skill Level. The sponsor must indicate when issuing / applying for an individual certificate of sponsorship either:

- i. That the sponsor has carried out the Resident Labour Market Test (RLMT). Full details of the RLMT will be published in due course by the UK Border Agency, but it will include advertising the job in certain specified media at an appropriate salary for the UK and confirming that there were no suitable European Economic Area (EEA) applicants. For migrant workers in the arts and entertainments field it will also include compliance with any code of practice on protection of the domestic labour market that may be drawn up by the industry in question and approved by the UK Border Agency; *The Human Resources recruitment procedures apply.*

or

- ii. The job concerned appears on the list of shortage occupations published by the UK Border Agency at the date that the sponsor issues a certificate of sponsorship in respect of that job.



Currently the Company does not have any roles which could be considered under the shortage occupations.

## SECTION 4: Worker Registration Scheme (A8 Country Regulations)

### 4. WORKER REGISTRATION SCHEME

This section is in relation to arrangement for employment, as appropriate, of workers from the A8 countries of the European Union, namely those states which joined the EU after 2004. The full listing of countries covered is contained in the following paragraphs.

#### 4.1. Introduction and Scope of the Scheme

The Worker Registration Scheme was introduced in 2004 when new countries joined the European Union. It allows the UK government to monitor where citizens of those countries (except Malta and Cyprus) are coming into the UK labour market, the type of work they are doing, and the impact this has on the UK economy. European Community law gives citizens listed below the right to live in the United Kingdom if they are working in the UK or they have enough money to support themselves without help from public funds.

Normally, citizens from the following countries have to register under the Worker Registration Scheme if they wish to work for an employer in the United Kingdom for more than one month:

- Czech Republic;
- Estonia;
- Hungary;
- Latvia;
- Lithuania;
- Poland;
- Slovakia;
- Slovenia.

#### 4.2. Exceptions to the Scheme

There are some exceptions, namely those who:

- are self-employed;
- have been working legally in the United Kingdom for 12 months without a break in employment;
- are providing services in the United Kingdom on behalf of an employer who is not established in this country;
- have dual citizenship of the United Kingdom, another country within the European Economic Area (EEA) that is not listed above, or Switzerland;
- are the family member of a Swiss or EEA citizen (except the countries listed above) and that person is working in the United Kingdom; or
- are the family member of a Swiss or EEA citizen who is living in the United Kingdom as a student, or a retired or self-sufficient person;
- Citizens of Malta and Cyprus due to the small working populations of each of these countries.

#### 4.3. Working in the UK following Registration – Time Limits

Once a citizen of the country named above has been working in the United Kingdom legally for 12 months, without a break in employment, they will no longer have to register on the Worker Registration Scheme. They can then obtain a residence permit confirming their right to live and work in the United Kingdom.

#### 4.4. Latvian Non-Citizen (Alien) Passport Holders

A holder of a Latvian alien passport, does not have the right to work in the United Kingdom under the Worker Registration Scheme and must apply for permission to enter the country before they come to the United Kingdom to work.

This permission is called 'entry clearance'. It will be in the form of a visa or entry clearance certificate. To obtain it, they should apply to the British diplomatic post in the country where they live. For information about visas, see the UK Visa Services website: [www.ukvisas.gov.uk](http://www.ukvisas.gov.uk)

#### 4.5. Bulgarian and Romanian Nationals

There are restrictions on Bulgarian and Romanian nationals taking employment in the United Kingdom. Bulgarian and Romanian nationals are free to come to the UK to live so long as they are able to support themselves and any dependants without the help of public funds.

If Bulgarian and Romanian nationals want to work as an employee in the United Kingdom they will need UK Border Agency permission **before** they start work, namely a work permit applied for by the employer. Details of the type of work that can be undertaken and how to apply for permission to work can be found in the Bulgarian and Romanian web pages of the UK Border Agency website: [www.bia.homeoffice.gov.uk](http://www.bia.homeoffice.gov.uk)

Once a worker has been working legally as an employee in the United Kingdom for 12 months without a break they will have full rights of free movement and will no longer need UK government permission to take work.

If a Bulgarian or Romanian national is studying in the United Kingdom, they may take employment for up to 20 hours a week during term time and full-time work during vacation periods from their course but they must first obtain a registration certificate confirming that they are a student.

#### 4.6. When Should Registration Take Place?

Applications to register with the Worker Registration Scheme should take place as soon as the worker starts a new job in the United Kingdom. Applications cannot be made until they have started work.

If the worker does not apply within one month of starting a job, the employment will be unlawful after that date. It will then be unlawful until you are issued with a registration certificate and you may have to stop working. Any time you spend working here unlawfully will not count towards your 12-month qualifying period to become exempt from registration [Appendix G refers].

#### 4.7. How Should a Worker Apply to Register?

The worker needs to complete an application form WRS on the UK Border Agency website: [www.bia.homeoffice.gov.uk](http://www.bia.homeoffice.gov.uk) or by telephone: 0117 344 1471 (this number is only for application forms, not for enquiries about the scheme).

The fee for registration is £90 (as at June 2008), and the worker will be issued with a registration card and certificate. The fee is for the registration card, so no further payment will be necessary if the worker changes employer within the 12-month qualifying period and applies for a new registration certificate.

If the worker has more than one job at the same time, they will need a registration certificate for each employer they are working for.

Workers are obliged to pay tax and National Insurance contributions (NIC) (and have a National Insurance number) when their United Kingdom income reaches a certain level. Queries on payment matters can be directed to HM Revenue & Customs on 0845 915 4515. Queries on obtaining an NIC number should be made to the local office of the Department for Work and Pensions ([www.dwp.gov.uk](http://www.dwp.gov.uk)).

#### 4.8. Work Authorisation

For further information on working in the United Kingdom if the worker is a Bulgarian or Romanian national can be found at: <http://www.ukba.homeoffice.gov.uk/workingintheuk/wrs/workers/>

#### 4.9. Human Resources Responsibilities

The University's responsibilities are as follows:

- Upon employment of a migrant worker, the Human Resources Department must ensure that within one month of commencing employment the registration process has been successfully completed. Appropriate action would be taken, in line with current Human Resources and Home Office regulations if this registration has not taken place or refusal has been given [**Appendix G** refers].
- Individual workers are responsible for making an application. However, Human Resources may issue the worker a letter on company paper confirming the date on which he/she began working for the Company. The worker will need this to apply for registration [**Appendix G** refers].
- Ensuring that the Company is authorised to employ a worker from one of the eight accession countries. The Company is authorised to employ someone during the first month that he/she works for us. If that worker has applied for a registration certificate during the one-month period, the University will be authorised to employ him/her until the UK Border Agency makes a decision on that application. The Company will continue to be authorised to employ that person if the UK Border Agency issues the registration certificate.
- Keep a copy of the worker's completed application form to prove they have applied for registration within one month starting work for the Company [**Appendix G** refers].
- Receive and keep a copy of the valid registration certificate when the UK Border Agency issues it [**Appendix G** refers].

The Human Resources Department, on behalf of the Company recognises that it is a criminal offence, with a fine of up to £5000, if the Company continues to employ a worker if the worker does not apply for a registration certificate within one month of starting work for the Company or the Company do not have a copy of a completed application form.

The Border and Immigration Agency will send the Company a copy of the worker's registration certificate, if they approve his/her application, or a copy of the refusal letter. If the BIA refuses the persons application, the Company will no longer be authorised to employ him/her and the contract of



employment will be terminated with immediate effect [Appendix G refers]. All contracts will include the wording “*subject to a successful application for Resident Worker status approved by the Home Office, or other approved government agency.*”

The Human Resources Department will contact the Worker Registration Team if we have not received a copy of the worker's registration certificate within one month of employing him/her contact is via:

Phone: 0114 207 6022 Fax: 0114 207 3710

## APPENDIX A: List A Documents

|  |
|--|
| A passport showing that the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.  |
| A passport or national identity card showing that the holder, or a person named in the passport as the child of the holder, is a national of the European Economic Area (EEA) or Switzerland.  |
| A residence permit, registration certificate or document certifying or indicating permanent residence issued by the Home Office or the UK Border Agency to the family member of a national of an EEA country or Switzerland.   |
| A permanent residence card issued by the Home Office or the UK Border Agency to the family member of a national of an EEA country or Switzerland.  |
| A Biometric Immigration Document issued by the UK Border Agency to the holder that indicates that the person named in it is allowed to stay indefinitely in the UK, or has no time limit on his or her stay in the UK.   |
| A passport or other travel document endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on his or her stay in the UK.   |
| An Immigration Status Document issued by the Home Office or the UK Border Agency to the holder with an endorsement indicating that the person named in it is allowed to stay indefinitely in the UK, or has no time limit on his or her stay in the UK, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer. |
| A full birth certificate issued in the UK that includes the name(s) of at least one of the holder's parents, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.  |
| A full adoption certificate issued in the UK that includes the name(s) of at least one of the holder's adoptive parents, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.  |
| A birth certificate issued in the Channel Islands, the Isle of Man or Ireland, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.  |

An adoption certificate issued in the Channel Islands, the Isle of Man or Ireland, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.

A certificate of registration or naturalisation as a British citizen, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.

A letter issued by the Home Office or the UK Border Agency to the holder that indicates that the person named in it is allowed to stay indefinitely in the UK, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.

## APPENDIX B: List B Documents

A passport or travel document to show that the holder is allowed to stay in the UK and is allowed to do the type of work in question, provided that it does not require the issue of a work permit.

A Biometric Immigration Document issued by the UK Border Agency to the holder that indicates that the person named in it can stay in the UK and is allowed to do the work in question.

A work permit or other approval to take employment issued by the Home Office or the UK Border Agency, when produced in combination with either a passport or another travel document endorsed to show the holder is allowed to stay in the UK and is allowed to do the work in question, or a letter issued by the Home Office or the UK Border Agency to the holder or the employer or prospective employer confirming the same.

A certificate of application issued by the Home Office or the UK Border Agency to or for a family member of a national of an EEA country or Switzerland stating that the holder is permitted to take employment and that is less than six months old, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.

A residence card or document issued by the Home Office or the UK Border Agency to a family member of a national of an EEA country or Switzerland.

An Application Registration Card issued by the Home Office or the UK Border Agency stating that the holder is permitted to take employment, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.

An Immigration Status Document issued by the Home Office or the UK Border Agency to the holder with an endorsement indicating that the person named in it can stay in the UK, and is allowed to do the type of work in question, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.

A letter issued by the Home Office or the UK Border Agency to the holder or the employer or prospective employer that indicates that the person named in it can stay in the UK, and is allowed to do the type of work in question, when produced in combination with an official document giving the person's permanent national insurance number and his or her name issued by a government agency or a previous employer.

## APPENDIX C: Human Resources Service Identity Check Procedure - Preventing Illegal Working

### DOCUMENT CHECKING

All potential employees must have their right to work in the UK confirmed **before** employment commences. To do this the following documents should be checked – note these are illustrative examples of the most commonly available documents – a full listing is available in **Appendix A** and **Appendix B**.

| LIST 1 [SECURE DOCUMENTS]   | LIST 2  |
|---|---|
| <b>One of the original documents below:</b>   | <b>Document with Permanent NI Number and Name and ONE of the following:</b>   |
| <b>Passport Indicating:</b>   | Birth Certificate issued in the UK, Channel Islands or Isle of Man which includes Parental Names  |
| British Citizenship   | A certificate of registration to confirm British Citizenship  |
| Right to abode in the UK or to stay indefinitely  | Home office letter or Immigration Status Document indicating the right to stay indefinitely in the UK                                     |
| National of a EEAC*   | Home office letter or Immigration Status Document confirming the right to stay in the UK and undertake the type of work you are offering. |
| An endorsement indicating the holder can do the type of work offered regardless of holding a work permit.   | <b>A work permit or other approval to take up employment that has been issued by Work Permits UK and ONE of the documents below:</b>      |
| An endorsement stating the holder has a current right of residence in the UK as a family member of a UK, EEAC* or Swiss Resident. (Also could be confirmed by other relevant documents) | A passport or letter from the home office indicating the right to stay in the UK and take up the Work Permit                              |
| <b>Travel Document Indicating:</b>  |   |
| Right to abode in the UK or to stay indefinitely  |   |
| An endorsement indicating the holder can do the type of work offered regardless of holding a work permit.   |   |
| <b>National ID Card Indicating:</b>   |   |
| National of a EEAC  |   |
| <b>Application Registration Card:</b>   |   |

OR



|  |  |
|--|--|
| Issued by the Home Office to confirm an asylum seeker can take up employment |  |
|--|--|

**On receipt of the documents it is the interviewer's responsibility to check:**

1. Photographs are consistent with appearance of potential employee.
2. Birth dates are consistent with appearance of potential employee.
3. Expiry dates of documents have not passed.
4. If documents in list 2 have different names for the potential employee request further documentation to explain this

**You Should Photocopy:**

If the document is not a passport or other travel document, a copy of the entire document should be taken.

If the document is a passport or other travel document, the pages that should be copied are:

- the front cover;
- any page containing the holder's personal details, including nationality;
- any page containing the holder's photograph;
- any page containing the holder's signature;
- any page containing the date of expiry; and
- any page containing endorsements by officials of the UK Border Agency or UK Visas.

**Twelve Month Check**

If the documents provided are from List B (**Appendix B provides a full listing of acceptable documents**) then a further full check needs to be made at twelve months into employment and each twelve months following this unless we receive appropriate documents from List A [**Appendix A provides a full listing of acceptable documents**]. The Human Resources Department will prompt such checks [**Appendix I refers**].

**Further Details:**

Further details can be obtained by visiting [www.bia.homeoffice.gov.uk](http://www.bia.homeoffice.gov.uk)

**\* European Economic Area Countries**

Austria, Belgium, Cyprus, Czech Republic\*\*, Denmark, Estonia\*\*, Finland, France, Germany, Greece, Hungary\*\*, Iceland, Ireland, Italy, Latvia\*, Liechtenstein, Lithuania\*\*, Luxembourg, Malta, Netherlands, Norway, Poland\*\*, Portugal, Slovakia\*\*, Slovenia\*\*, Spain, Sweden, United Kingdom

Nationals from Switzerland have the same rights as EEAC.

\*\* Employees from these countries planning to work for more than one month must register with the Home Office on the Accession State Workers Registration Scheme.



## APPENDIX D: Reporting Absence (Migrant Workers) Form

Under the Asylum and Nationality Act 2006 (which came into force from 29 February 2008) **line managers have responsibility to report if any migrant workers in the Faculty / Service** (namely those who have a sponsorship certificate (previously known as a work permit) or those who have a Migrant Worker status (namely those EU nationals from the accession states (details available from Human Resources Service) **are absent from work on the first day of unauthorised absence (including self-certification illness).**

|                          |   |
|--------------------------|---|
| <b>Name of Employee:</b> | <b>Name of Service / Faculty:</b>       |
|                          |   |
| <b>Campus Location:</b>  | <b>Role Title of Employee:</b>          |
|                          |   |
| <b>Date of Absence:</b>  | <b>Information Known about Absence:</b> |
|                          |   |

Is this absence due to:

- Did not turn up on first day?
- Unauthorised absence?
- Absence due to illness not support by GP note?

|  |                               |
|--|-------------------------------|
| <b>Name of Line Manager:</b>               | <b>Role Title:</b>            |
|  |                               |
| <b>Contact Details (Telephone Number):</b> | <b>Any Other Information:</b> |
|  |                               |

This report **must** be sent to the Human Resources Department on the **first day** of absence so that UK Visas and Immigration reporting requirements can be adhered to.

Further information available from:

|                       |                         |              |
|-----------------------|-------------------------|--------------|
| <b>Steve Dellaway</b> | HR & Commercial Manager | 01883 346604 |
|-----------------------|-------------------------|--------------|

## APPENDIX E: Annual Check Form - Confirmation of Contact Details

This form is to confirm the up to date contact details of staff who are non-EU citizens working at the Company, in line with relevant UK Government legislation.

It is an obligation for staff to inform the Company of any changes in circumstances and a check will take place annually to ensure details are up to date.

|  |  |
|--|--|
| <b>Name of Employee:</b>   |  |
| <b>Role Title:</b>   |  |
| <b>Location:</b>   |  |
| <b>Work Telephone Number:</b>  |  |
| <b>Current Home Address:</b>   |  |
| <b>Home Telephone Number:</b>  |  |
| <b>Mobile Telephone Number:</b>  |  |
| <b>Have your circumstances above changed over the last 12 months?</b>  |  |
| <b>Has your status in the UK changed over the last 12 months i.e. have you got married to a UK citizen; achieved UK citizenship?</b><br>Please provide written evidence. |  |
| <b>Signed:</b><br>Sign if paper version.   |  |
| <b>Date:</b>   |  |

Can you also confirm that you understand:

- How to report absences (illness) under the Attendance Management policy? Yes / No
- How to request annual leave in advance of the date? Yes / No
- How to inform the University of a change of circumstances? Yes / No



Please send (with signature) or email (without signature) or refer any queries to:

|  |  |
|--|--|
| Human Resources Manager – Steve Dellaway |  |
| <b>Telephone Number:</b>                 | 01883 346604   |
| <b>Fax Number:</b>                       | 01883 349836   |
| <b>Email:</b>                            | <a href="mailto:Steve.dellaway@kph.co.uk">Steve.dellaway@kph.co.uk</a> |

## APPENDIX F: Line Manager and Human Resources Checklist for Sponsorship

The Human Resources Department will ensure that the Company will only issue Certificates of Sponsorship to migrants who, to the best of the Company's knowledge and belief, will meet the requirements of the Tier or category of Points Based System under which the certificate is issued, and are likely to comply with the conditions of their leave. The requirements and conditions of leave are set out below:

**This checklist should be completed by line managers and passed to the Human Resources Department for processing and confirmation of offer of employment for any non- UK citizens who require sponsorship (work permit):**

|  |   |                    |  |
|--|---|--------------------|--|
| <b>Name of Candidate:</b>  |   |                    |  |
| <b>Post No:</b>  |   | <b>Post Title:</b> |  |
| <b>Must be Able to Demonstrate</b>   | <b>How is this Achieved</b>   |                    | <b>Is this candidate able to demonstrate this?</b> |
| Proficient in English  | Interview process / application form.   |                    |  |
| Have sufficient funds and can support self without claiming benefits from the Government. Will need to demonstrate this on the basis of either savings or earning potential. | Direct question to candidate following offer of job to ensure non-biased selection criteria.<br><br>Copy of bank statement.   |                    |  |
| Intend to make the UK main home.   | Direct question to candidate following offer of job to ensure non-biased selection criteria.                                  |                    |  |
| never been made bankrupt or are considered to be a discharged bankrupt <b>and</b> never been convicted of any criminal offences.   | CRB check as appropriate.<br><br>Direct question to candidate following offer of job to ensure non-biased selection criteria. |                    |  |

**Note: the candidate may not be offered a post if he / she is:**

|  |              |
|--|--------------|
| Not proficient in English.   | Comment:     |
| UK to pay living expenses.   | Comment:     |
| Will continue to spend most of time outside the UK.                                  | Comment:     |
| Currently bankrupt <b>and</b> / <b>or</b> have been convicted of a criminal offence. | Comment:     |
| <b>Signed:</b><br>Line Manager   | <b>Date:</b> |

Please pass this form to the Human Resources Department immediately for consideration and processing. Please note that employment **must not** commence prior to formal permission being obtained.

## Appendix G: Checklist Regarding Employing Migrant Workers (Preventing Illegal Working) – All Procedures

| Activity  | Who Responsible   | Who Needs to be Informed   | Text or Comments  |
|---|---|--|---|
| <b>Compulsory Training</b>  | All recruiters need to attend prior to being allowed to recruit   | Staff Development will keep a list of all those who have attended training and date of training  | Training provides information on work permit and employing migrant workers and Company procedures to be followed (including employment of part time lecturers - namely in relation to Tier 5)   |
| Recruitment<br><b>Advertising a Vacancy</b>   | Line manager to complete <b>post approval form</b> HR1  | HR Adviser Nikki McLaughlin needs to be informed if the post may attract skills sourced outside the EU e.g. language skills or cultural awareness  | Advertisement needs to be for at least two weeks in a recognised publication (including electronically)<br><br>Exploration of other recruitment activities e.g. targeted advertisement in specialist publications or within specialist groups   |
| Recruitment<br><b>HR Procedures</b> – job description and person specification, advert, grading of role | HR to ensure no unfair bias or inappropriate role requirements  | HERA job evaluation team to confirm grade (HR6 form)   | Any queries with grade or role will be discussed with line manager / Head of Service / Faculty prior to advertisement   |
| Recruitment<br><b>Recruitment activity and provisional offer of employment</b>                          | Line manager to confirm ability to work in UK (ID checks (Appendix A,B,C) and Appendix F checks (points based system) | HR to be sent Appendix F immediately<br><br>HR Adviser – Nikki McLaughlin to be involved in relevant discussions / decisions along with HR Manager | Offer is made <b>“subject to satisfactory completion of relevant checks and permission to work in the UK”</b><br><br>Offer of work for Migrant worker is made <b>“subject to satisfactory completion of Worker Registration Scheme status within one month of commencing employment, as appropriate and in line with Border and Immigration Agency regulations”</b> |
| Recruitment<br><b>Work Permit / Sponsorship Certificate Status</b>                                      | HR Manager responsible for administrative process   | HR Manager – Steve Dellaway<br><br>Confirm to Line Manager re process  | Any additional information on role and process will be gathered from line manager. HR confirm that work cannot commence until permission to work in the UK is confirmed   |
| Identity Information<br><b>ID card</b>  | HR to receive a copy (and check original)   | Line manager to be informed if there are any restrictions or expiry date   | Contract may be offered subject to any restrictions on ability to work / live in the UK   |

| Activity   | Who Responsible   | Who Needs to be Informed  | Text or Comments  |
|--|---|---|---|
| Recruitment<br><b>Permission Gained</b>            | HR to inform candidate and confirm start date                                   | Line manager will be informed and provided with information on any restrictions and time scales   | Contract will be confirmed with timescales – note: the contract will run to one day before the expiry of the permission to allow for the employee to leave the country in the appropriate timescales.<br><br>Original document to candidate<br><br>Copy on personal file and copy on sponsorship file |
| Recruitment<br><b>Permission Not Given</b>         | HR to inform candidate and line manager of withdrawn offer                      | Line manager to inform recruitment panel and consider re-advertisement  | Letter from HR to confirm that as UK government permission is not approved (or documents presented are not considered appropriate or document not made available by candidate following reasonable request from the Company) and therefore offer of conditional employment is withdrawn               |
| Employment<br><b>Induction Information</b>         | Staff Development to deliver with partners (internal)                           | Line manager to ensure activity is successfully completed – to include check rules  | Memo Appendix H refers  |
| Checking Systems<br><b>Turning Up on First Day</b> | Line Manager<br>(Appendix D)  | HR to be informed immediately of absence.<br><br>HR to inform BIA, Home Office<br><br>Lead contact: HR Adviser responsible for information Nikki McLaughlin | Memo Appendix H refers also<br><br>10 working day timescales applies for informing BIA, Home Office   |
| Checking Systems<br><b>Absence – Illness</b>       | Line Manager to follow HR Attendance Management system if abuse<br>(Appendix D) | HR to be informed immediately of absence.<br><br>HR to inform BIA, Home Office<br><br>Lead contact: HR Adviser responsible for information Nikki McLaughlin | Attendance Management policy refers<br><br>10 working day timescales applies for informing BIA, Home Office   |
| Checking Systems<br><b>Absence – Annual Leave</b>  | Line manager to follow HR Attendance Management system if abuse                 | HR to be informed immediately of absence.<br><br>HR to inform BIA, Home Office  | Annual leave procedure refers<br><br>10 working day timescales applies for informing BIA, Home Office   |

| Activity   | Who Responsible  | Who Needs to be Informed   | Text or Comments   |
|--|--|--|--|
|  | (Appendix D)   | Lead contact: HR Adviser responsible for information Nikki McLaughlin  |  |
| Checking Systems<br><b>Annual Check</b>  | HR Service<br>(Appendix E)   | HR computerised system to incorporate diary prompt for review activity   | HESA annual check<br>Appendix E refers for annual check if check reveals differences HR to process and investigate as appropriate  |
| Checking Systems<br><b>List B Documents Only Presented at Original or at 12 Month Checks</b> | HR to prompt line manager to do document check at 12 month intervals | HR to be provided with copies of documents in line with the procedures   | List A or B documents checked and copied with review in 12 months if List B documents presented.<br><br>If List B documents presented with less than 12 months to expiry then contract will be offered as fixed term to expire 1 day prior to end of documents. A further review is scheduled to check documents prior to expiry of the contract to consider continuation if official UK government permission to work is available (Appendix A and B)<br><br>2 x copies made – 1 on personnel file; 1 on “work permit” file (confidentially locked away)<br><br>Personnel computerised system check at 9 months (or earlier if fixed term prior to 12 months) put on electronic diary |
| Leaving Employment<br><b>Resignations / Retirements</b>                                      | Line Manager to inform HR immediately                                | HR to process resignation in line with HR procedures<br><br>BIA, Home Officer to be informed in writing (via HR) |  |



## APPENDIX H: Internal Memorandum

|              |                            |
|--------------|----------------------------|
| <b>To:</b>   | [name] Line Manager        |
| <b>From:</b> | Human Resources Department |
| <b>Cc:</b>   | personnel file             |
| <b>Date:</b> | [ ]                        |

### RE: NEW MEMBER OF STAFF - RESPONSIBILITIES REGARDING MIGRANT WORKER

[name] has been confirmed as new member of your Service / Faculty. [name] is working with the Company under a sponsorship certificate (work permit). The contract runs from [date] to [date] in line with the permission under the sponsor certificate. In line with the Immigration, Asylum and Nationality Act 2006, the Company has an obligation to ensure the continued legitimate employment and attendance of migrant workers, therefore you will have a number of obligations to fulfil:

#### 1. First Day of Work

If [name] does not attend on the first day of work, please inform the Human Resources Department immediately. Please contact Steve Dellaway 01883 346604.

#### 2. Unauthorised Absence – Illness or Annual Leave

If [name] has unauthorised absence from work at any point, please inform your line Manager immediately.

#### 3. Resignation / Retirement

If [name] resigns from the Company please inform the Human Resources Department immediately. Please contact Steve Dellaway 01883 346604.

**For all the above circumstances please complete form Appendix D.**

#### 4. Annual Checks – 12 months

If the member of staff has provided evidence from List B (Appendix B) then a 12-month check should be made to ensure that the employee has a continued right to work in the UK. Human Resources Department will prompt you of this requirement, as necessary.

#### 5. Changes in Circumstances

Any changes in circumstances i.e. role change, must be in line with the Human Resources Department procedures. Please note that changes must be approved in advance in line with the UK Government legislation and right to work in the UK regulations.

Queries should be directed to Steve Dellaway, Commercial and Human Resources Manager 01883 346604.

## APPENDIX I: Memorandum to Staff Member with Migrant Worker Status

### INTERNAL MEMORANDUM

|              |                              |
|--------------|------------------------------|
| <b>To:</b>   | [name] new member of staff   |
| <b>From:</b> | Human Resources Department   |
| <b>Cc:</b>   | line manager, personnel file |
| <b>Date:</b> | [ ]                          |

### RE: NEW MEMBER OF STAFF - RESPONSIBILITIES REGARDING MIGRANT WORKER

You have been confirmed as new member of the [name] Service / Faculty. You are working with the Company under a sponsorship certificate (work permit). The contract runs from [date] to [date] in line with the permission under the sponsor certificate.

In line with the Immigration, Asylum and Nationality Act 2006, the University has an obligation to ensure the continued legitimate employment and attendance of migrant workers, therefore you will have a number of obligations to fulfil.

#### 1. First Day of Work

If you are unable to attend on the first day of work, please inform the Human Resources Department immediately. Please contact your line manager immediately.

#### 2. Unauthorised Absence – Illness or Annual Leave

You must get permission for any absence in line with the Attendance Management policy or the Annual leave arrangements (which must be approved in advance). Any sabbatical leave should be approved in advance also.

#### 3. Resignation / Retirement

If you resign from the Company you must put your resignation in writing and follow the notice periods within your contract of employment. Please contact the Human Resources Department for further information.

#### 4. Annual Checks – 12 months

If you have provided evidence from List B (Appendix B) then a 12 month check must be made to ensure that you have a continued right to work in the UK. Human Resources Department will prompt your line manager to undertake this check.

You must ensure that you provide the Company with all reasonable information in line with the relevant UK Government legislation; this includes the reporting of all the issues above.

## APPENDIX J: Human Resources Procedures - Employing Migrant Workers (Preventing Illegal Working) (EXTRACT of Policy and Procedure - All Procedures in One Document)

### 1. Checking Documentation Procedure

Once the University (i.e. the recruiter or the Human Resources Service, in line with the relevant procedures) has obtained the specified documents from either List A or List B (**Appendix A and B**), we must carry out some basic checks to ensure that the documentation presented relates to the individual in question.

The recruiter will, therefore, need to check:

- any photograph in the document(s) against the individual to ensure that it bears a reasonable resemblance to him or her;
- that any date of birth on the document(s) appears to correspond to the individual's age;
- make sure that any expiry date regarding limited leave to enter or remain in the UK has not passed;
- that a document does not appear to be a forgery, or to have been altered in any way. There might, for example, be indications that a passport photograph has been replaced. However, the employer is not required to be an expert in identifying forged documents;
- Where two documents are provided and the names on the documents are different, the employer will need to ask the individual for an explanation, together with further documentary evidence to support this explanation - for example, a marriage certificate or a divorce decree;
- Once we have obtained and checked the relevant documentation, and is satisfied with it, we should make copies of the documentation. If the document is not a passport or other travel document, a copy of the entire document should be taken. If the document is a passport or other travel document, the pages that should be copied are:
  - • the front cover;
  - • any page containing the holder's personal details, including nationality;
  - • any page containing the holder's photograph;
  - • any page containing the holder's signature;
  - • any page containing the date of expiry; and
  - • any page containing endorsements by officials of the UK Border Agency or UK Visas [**Appendix C** refers].
- Copies of the documents need to be kept securely for a period of not less than two years after the employment has come to an end. The standard Human Resources archiving procedures apply, namely the keeping of all leavers files for the appropriate timescales as set out in the Data Protection Act and good practice procedures.

If an individual is not able to produce the relevant documents, or we are not satisfied with the documentation that has been presented to us, we may decline to proceed with the offer of work, and the onus is on the individual to establish that he or she does have permission to work in the UK [**Appendix G** refers].

The Company may be presented with documents that require verification by the Employer Checking Agency (a certificate of application or an Application Registration Card). Where an individual is unable to produce a document and indicates that this is the result of having an outstanding application for leave to remain, the Company should also use the Employer Checking Service to verify the individual's right to work in the UK. It is the Company's responsibility to inform the individual where it intends to make such checks with the service.

General advice on the prevention of illegal working can be obtained from the Employers' Helpline: 0845 010 6677.

Human Resources Department identity check procedure is attached: **Appendix C**

## 2. Ongoing Checks

The Human Resources Department will be responsible for:

- The ongoing obligation on the Company is to carry out checks where individuals produce documentation from List B. **This means that the HR Dept needs to carry out a check at least once every 12 months if it is to retain the statutory excuse.** In relation to such individuals, the Company is excused from paying a penalty under s.15 for a period of 12 months from the date that the employee produced the documentation [**Appendix G** refers, **Appendix I** refers].
- If the employee's leave to remain expires sooner than 12 months from the last review date, the HR Dept must ensure that it checks immigration status prior to the leave expiring. If the employee does not make a valid application for leave to remain prior to the expiry, he or she will automatically become an overstayer. If the individual continues in employment, the Company will lose the protection of the statutory excuse and could be liable for a civil penalty and/or criminal liability [**Appendix G** refers].
- **Knowledge that an individual is not permitted to work.** Recruiters and the Human Resources Department should be aware that obtaining the relevant documentation, checking it and storing it will not establish a statutory excuse where they are aware that the individual in question does not, in fact, have the appropriate permission to carry out the job in question at any period throughout the employment. If this is the case, not only will the statutory excuse be invalidated, but the company may also be rendered liable to prosecution under the new statutory offence under s.21 of knowingly employing an illegal worker. On conviction the Company will be liable to an unlimited fine and/or imprisonment for up to two years [**Appendix G** refers].

## 3. Reporting Duties:

All Sponsors must report the following information or events to the UK Border Agency, within any time limit specified, namely the Human Resources Department. Information about migrants' non-attendance, non-compliance or disappearance will be used to inform enforcement action against them:

- If a sponsored migrant does not turn up for his or her first day of work, or does not enrol on his or her course at the expected time. The report must be provided within 10 working days and must include any reason given by the migrant for his or her non-attendance/non-enrolment e.g. missed flight [**Appendix D** refers];
- If a sponsored migrant is absent for work or study for more than 10 working days, without the Sponsor's reasonably granted permission. In this case, the report must be provided by the Human Resources Service to the Border and Immigration Agency within 10 working days of the tenth day of absence [**Appendix D** refers regarding line manager reporting of absence];
- If a sponsored migrant discontinues his or her studies, or if the migrant's contract of employment or registration is terminated (including where the migrant resigns or is dismissed). Such a report must be given within 10 working days of the event in question, and should include the name and address of any new employer or institution that the migrant has joined, if the sponsor knows it [**Appendix G** refers];
- If the sponsor stops sponsoring the migrant for any other reason e.g. if the migrant moves into an immigration route that does not require a sponsor [**Appendix H** refers];
- If there are any significant changes in the migrants' circumstances, for example a change of job or salary (but not job title or annual pay rise) or if the duration of a course of study shortens [**Appendix G** refers];
- Any suspicions it may have that a migrant is breaching the conditions of his or her leave [**Appendix D** refers];
- If there are any significant changes in the sponsor's circumstances - for example if the sponsor ceases trading or becomes insolvent, substantially changes the nature of its business, is involved in a merger or is taken over.

- Details of any third party or intermediary, whether in the UK or abroad, that has assisted it in the recruitment of migrant employees or students. *Note: the Company do not currently employ third parties to appoint staff. Should this change a procedure will be developed for such checks.*

The Sponsor must also give the police any information it may have that suggests that the migrant may be engaging in terrorism or other criminal activity.

#### 4. Complying with the Law:

To ensure that they are complying with UK government immigration laws, sponsors must also fulfil the following duties:

- Ensure that a migrant who is coming to work is legally entitled to do the job in question and has the appropriate registration or professional accreditation where this is legally required. For example, if the migrant is coming to work as a health professional, the Sponsor will need to ensure that he or she has the correct registration to entitle him or her to practice as such in the UK. The Sponsor must keep a copy of any appropriate registration document or certificate and supply it to the UK Border Agency on request [Appendix F refers]; *The Human Resources recruitment procedure regarding checking of qualifications will apply.*
- Not to employ a migrant if the conditions on the migrant's leave (or the migrant's lack of leave) mean that he or she is not allowed to undertake the work in question, and to stop employing any migrant who ceases, for any reason, to be entitled to undertake the work [Appendix F refers, Appendix G refers];
- Only to issue Certificates of Sponsorship to migrants who, to the best of the Sponsor's knowledge and belief, will meet the requirements of the Tier or category of Points Based System under which the certificate is issued, and are likely to comply with the conditions of their leave. The requirements and conditions of leave are set out in the immigration rules [Appendix F refers - Human Resources Checklist for Sponsorship]

#### 5. Migrant Workers Scheme

The Company's responsibilities are as follows:


- Upon employment of a migrant worker, the Human Resources Service must ensure that within one month of commencing employment the registration process has been successfully completed. Appropriate action would be taken, in line with current Human Resources and Home Office regulations if this registration has not taken place or refusal has been given [Appendix G refers].
- Individual workers are responsible for making an application. However, Human Resources may issue the worker a letter on company paper confirming the date on which he/she began working for the Company. The worker will need this to apply for registration [Appendix G refers].
- Ensuring that the Company is authorised to employ a worker from one of the eight accession countries. The Company is authorised to employ someone during the first month that he/she works for us. If that worker has applied for a registration certificate during the one-month period, the Company will be authorised to employ him/her until the UK Border Agency makes a decision on that application. The Company will continue to be authorised to employ that person if the UK Border Agency issues the registration certificate.
- Keep a copy of the worker's completed application form to prove they have applied for registration within one month starting work for the University [Appendix G refers].
- Receive and keep a copy of the valid registration certificate when the UK Border Agency issues it [Appendix G refers].

The Human Resources Service, on behalf of the Company recognises that it is a criminal offence, with a fine of up to £5000, if the Company continues to employ a worker if the worker does not apply for a registration

certificate within one month of starting work for the Company or the Company do not have a copy of a completed application form.

The Border and Immigration Agency will send the Company a copy of the worker's registration certificate, if they approve his/her application, or a copy of the refusal letter. If the BIA refuses the persons application, the Company will no longer be authorised to employ him/her and the contract of employment will be terminated with immediate effect [**Appendix G** refers]. All contracts will include the wording "*subject to a successful application for Resident Worker status approved by the Home Office, or other approved government agency.*"

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## Modern Slavery and Human Trafficking Statement

### Company Structure

KpH Deconstruction Services Ltd is a part of the KpH Group of Companies. The KpH Group of Companies consists of an Environmental Division and the Deconstruction Division. The Managing Director of KpH Deconstruction Services Ltd is Lyndsey West and the Managing Director of KpH Environmental Services is Kevin Potter who is also the Founding Director of KpH Deconstruction Services Ltd.

Primarily operating within London and the M25, KpH Group are able to mobilise anywhere within the UK. The group has 40 PAYE employees and on average 350 site personnel with a combined, joint turnover reaching approximately £32.2m.

Suppliers, Sub-contractors, and agencies to the group, work and operate within the UK and complete a pre-qualification questionnaire prior to be awarded any contract or works. With these checks and assurances in place and with the commitments set out below, together we're confident we can mitigate our risk in this area of our industry.

### Statement

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or our supply chains.

In order to ensure all those in our supply chain comply with our values, we require our supply chain to contractually commit to compliance with this Statement.

Our recruitment processes are both transparent and thorough. We have robust procedures in place for vetting new employees and ensuring we are able to accurately confirm their identities.

### Due Diligence

As part of KpH's on-going commitment to comply with the Modern Slavery Act 2015, KpH will both continue to monitor and mitigate any risks within KpH and our supply chain, so that effective controls and contingency plans can be put in place if required.

In 2019, we will commit to undertake, twice annually, an audit of our labour-only Supplier's processes (regarding recruitment and payment) to ensure that they continue to satisfy legislation and our own Modern Slavery and Human Trafficking policies. These audits will be random and unannounced.

The success of this policy is dependent upon all employees, supply chains and subcontractors playing an important part in helping to detect and eradicate slavery. As such, all individuals are encouraged to report any suspected slavery to our "Speak Out" email, the details of which are at all our sites and offices as part of a poster and awareness campaign.





### Training

To ensure a clear understanding of the Modern Slavery Act 2015 and the risks, we intend to roll out training to all relevant members of staff.

A specific Tool Box Talk has been created and will be delivered as part of our on-site training and development programme. Modern day slavery awareness training is provided for all new site Supervisors.

In our capacity as a member of the Supply Chain Sustainability School, we are able to download training videos modules on the Modern Slavery Act which will be made available to our supply chain and other partners, during the course of 2020-2021.

### Summary

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and serves as our Modern Slavery and Human Trafficking statement for the financial year ending 2021. This statement will be reviewed annually.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## Non English Speaking Personnel Policy Statement

This Policy sets out the ways in which KpH Group will seek to assist employees/sub-contractors on site who have difficulties understanding English, or employees who have low literacy levels.

There are a number of ways you can communicate with them to encourage their involvement. The aim is to achieve the same standard of understanding and involvement as for an English speaker.

KpH Group will commit to undertake one or more of the following which will ensure that the required assistance is given to involve and consult with such employees:

- Ensure adequate time to consult with employees where language and/or literacy may be issues so they can absorb the information and respond to you.
- Encourage employees to express their views in their preferred language by using interpreters.
- Ask a work colleague to interpret, although these employees may need training if they are asked to undertake this role.
- Get information translated and check that this has been done clearly and accurately by testing it with native speakers.
- Use pictorial information and internationally understood pictorial signs where appropriate.
- Where information has to be in English, use clear and simple materials, and allow more time.

KpH Group recognise that the key to individual consultation is to make sure that everybody is involved and will therefore take the necessary steps to ensure the methods adopted will reach all members of the workforce.

Signed for KpH Group:

**Lyndsey West**  
Managing Director

**Review Date:** 31<sup>st</sup> August 2025



### On-Site Mobile Phones Policy

The use of mobile phones (Calls, Texting, social media, streaming,) and other electronic devices (e.g. Apple watch or similar) have been implicated in a number of accidents at work (e.g. being distracted whilst working at height or at ground level being unable to hear a warning or the approach of a vehicle or item of plant).

Company Policy (and Site Rules) requires the use of mobile phones or other electronic devices to be restricted to the canteen, rest area or designated compound areas (green routes) and only during official breaks (other than as part of the Emergency Arrangements).


During induction all supervisors, workers and visitors (employees and subcontractors) must be made aware of this Policy and should be instructed to keep mobile phones and any other electronic devices switched off when they are in the work area.

The Policy should also be discussed with subcontractors at pre-order meetings to ensure everyone is aware of the arrangements prior to attending the site.

Exceptional circumstances would be reviewed on a case by case basis such as expectant parents where phones would be held by a supervisor in the event the operative requires contacting, such cases must be advised to the Site Manager during signing in each day.

If anyone is discovered using a mobile phone or any other electrical devices on site during working time it will be considered a breach of the Site Rules and Company Policy and will therefore be dealt with in accordance with the Company's Disciplinary Procedure which may result in being sent home, attending a new induction or removed from the project for repeated breaches of the site rules.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



## PENALTY CHARGE NOTICE POLICY

### Driver's Responsibility

This document has been produced to inform all Drivers of their responsibility when driving vehicles, and to assist and give guidance on how to avoid occurring Penalty Charge Notices for both the business and for the individual.

The purpose of this policy is designed to highlight and make drivers aware of the possibility of receiving a Penalty Charge Notice (PCN) which may be issued against the company or the driver for a number of varying reasons. It also stands to advise and instruct why and what may attract a PCN, and who is likely to issue the PCN, and what action should be taken in the event of a PCN being received.

### Reasons you may be issued with a Penalty Charge Notice


There are many reasons you can be issued with a PCN but the most common ways are as listed below:

- Parking in an unauthorised area or where there are markings which prevent you from stopping.
- Parking in a loading bay outside of the permitted time restrictions.
- Stopping or parking on a Red Route or clear way.
- Entering a Congestion Charge Zone in a vehicle which is non-compliant. Including the LEZ, ULEZ.
- Making a journey across or passing through a Toll Zone without paying the appropriate charge or exceeding the time limit applicable to making payment.
- Using Bus or Cycle Lane during prohibited hours.
- Failure to meet the required standards when stopped by the police and/or a government authority such as VOSA or the DVSA.
- CCTV footage which clearly shows that a contravention has been made.
- Stopping in moving traffic when not prohibited to do so i.e. stopping in a box junction.
- Travelling at a speed greater than that advertised or deemed safe for the road / conditions.

Employees and operatives who receive PCNs, shall be responsible for paying them. The company will not pay a PCN for individual unless circumstances dictate otherwise. This will be at the discretion of the Managing Director.

Contravention of this Code could lead to disciplinary action.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



# POLLUTION PREVENTION PLAN

## CONTENTS

| Section Ref. | Title                               | Page Number |
|--------------|-------------------------------------|-------------|
| 1.0          | Purpose                             | 2 of 8      |
| 2.0          | Scope                               | 2 of 8      |
| 3.0          | Pollution Prevention Principles     | 2 of 8      |
|              | A. Preventing Pollution of the Land | 2 of 8      |
|              | B. Preventing Pollution of the Air  | 4 of 8      |
|              | C. Preventing Pollution to Water    | 5 of 8      |
|              | D. Preventing Pollution by Noise    | 6 of 8      |
| 4.0          | Emergency Response Instructions     | 7 of 8      |



## 1. PURPOSE

This procedure has been prepared to ensure that KpH Deconstruction Services Ltd and KpH Environmental Services Ltd prevents pollution to the environment via land, air or water.

## 2. SCOPE

To provide pollution prevention measures for period of the project.

## 3. POLLUTION PREVENTION PRINCIPLES

This section describes the principal types of potential pollution to Land Air and Water and the measures to be adopted to prevent a pollution incident to land, air and water.

### A. PREVENTING POLLUTION OF THE LAND

#### 1. Storage and Handling of Fuels

- 1.1. Careful consideration shall be given to the location of the fuel tank taking into account the need for safety, security, access for deliveries and maintenance.
- 1.2. All fuel tanks and bowsers shall be constructed with an integral bund built to 110% capacity.
- 1.3. Mobile fuel bowsers shall be double skinned.
- 1.4. Dispensing nozzles and hose valves shall be locked within the bunded bowser when not in use.
- 1.5. Spill kit equipment shall be located next to any fuel tank and on all fuel bowsers. Fuel bowsers and storage tanks must also be labelled clearly with their contents and maximum capacity.
- 1.6. A competent member of the project team shall carry out refuelling plant and machinery using the correct equipment e.g. nozzles and funnels of an appropriate size.
- 1.7. Fuel bunds and drip trays need to be free from rainwater and kept clean. A competent member of the Project team shall be designated with executing this task, especially during periods of inclement weather. All static items of plant e.g. pumps, compressors and generators shall only be used with a drip tray underneath.
- 1.8. Any bund construction must be done in line with the EA Pollution Prevention Guidelines PPG2.
- 1.9. The transportation of fuel on site in drums or other plastic containers shall be avoided as far as possible.

#### 2. Hazardous Substances

- 2.1. All chemicals must be stored and segregated on spill trays in lockable containers. The container shall have a raised lip at the entrance designed to contain any spills that may occur within.
- 2.2. A nominated member of the project team shall hold the key and keep a record of quantities held and nature of contents.
- 2.3. Spill kit material should be kept within the container for use in an emergency along with the current incident procedure.



2.4. Details of the quantities and types of hazardous materials held at the site base must be passed onto the Safety Manager.

### **3. Cement and Wet Concrete**

- 3.1. Concrete coating – concrete and cement are alkaline and corrosive and have a highly polluting impact on land.
- 3.2. Concrete plinth construction – prevent wet concrete or cement from entering drains by placing sand or other absorbent materials around the drain.
- 3.3. The washing out of any concrete mixer and associated chute, tools or equipment should be carried out in a designated area away from drains and watercourses.
- 3.4. Delivery drivers should be made aware of the requirement on arrival at site.

### **4. General Construction Waste**

- 4.1. A member of the project team shall be nominated to carry out regular house keeping in the work area and site base.
- 4.2. Deconstruction Strip out projects – The site supervisor is to ensure all waste streams are sorted into waste categories and disposed of too recycling facilities, with no waste going to landfill.
- 4.3. All waste collected from these areas must be disposed of in accordance with the Waste Management procedure and in accordance with the Duty of Care.

### **5. Mud**

- 5.1. Mud on the public highways is a statutory nuisance and a Health and Safety hazard.
- 5.2. A nominated member of the project team must carry out regular checks on the state of the roads.
- 5.3. Road cleaning can be carried out using a mechanical brush or self propelled hopper type road sweepers or where the site is small manual sweeping may suffice.
- 5.4. Set up wheel wash facilities on site where practicable.

### **6. Plant Maintenance**

- 6.1. All plant/machinery prior to entry onto site shall be thoroughly inspected for leaks of fuel, hydraulic fluid and engine oil. Any item of plant deemed to be a possible pollution threat shall not be granted access to the site.
- 6.2. All mobile plant, including but not limited to excavators, cranes, side-booms etc shall be maintained and operated such that all potential leaks and spills of fuel/lubricants shall be absolutely minimised.
- 6.3. Plant maintenance shall only be carried out with a drip tray under the work area and with spill kit equipment to hand.





## B. PREVENTING POLLUTION OF THE AIR

### 1. Exhaust Fumes from Plant and Machinery

- 1.1. Check that machinery is in good operative condition before commencing work and that exhaust emission levels are acceptable. Any item of plant deemed to be a pollution threat shall not be granted access onto site.
- 1.2. Switch off plant and machinery when not in use.
- 1.3. Ensure that regular servicing is carried and recorded.
- 1.4. Use low sulphur diesel wherever possible
- 1.5. Ensure all vehicles on sites are fitted with catalytic converters and use an AdBlue Diesel system to treat emissions.
- 1.6. Ensure that suitable extraction is in place when machinery is in use within enclosed or poorly ventilated areas such as basements, loading bay or delivery areas.

### 2. Dust and Grit from Site Operations

- 2.1. During prolonged periods of dry weather all reasonable measures shall be taken to prevent annoyance and inconvenience to local residents, occupiers, road users and pedestrians due to blown dust and grit caused by KpH Group operations.
- 2.2. Mitigation measures shall include:
  - During Strip out works on Deconstruction sites dust from sweeping up activities will be suppressed with handheld water pumps.
  - Demolition of concrete block work walls to be carried out in a sealed tented area.
  - Damping down external sites using water spray facility.
  - Sheeting of haul Lorries, construction materials and storage piles of fine materials.
  - A 10 M.P.H. speed limit shall be enforced on site.
  - Shielding of grit blasting operations especially adjacent to Public Rights of Way i.e. Footpaths and Bridleways.

## C. PREVENTING POLLUTION TO WATER

### 1. Fuel Storage Tanks and Containers Storing hazardous Substances Shall Not be Located within 10 Meters of a Watercourse or Peaty Soil.

- 1.1. Refuelling shall not take place within 30 meters of any watercourse.
- 1.2. Where operations are adjacent to watercourses an absorbent boom shall be installed downstream prior to commencement of any work.

### 2. Disposal of Groundwater and Surface Water from Trenches and Excavations



- 2.1. Any discharge of water direct to a watercourse from construction activities is prohibited without prior consent from the EA.
- 2.2. Surface or groundwater from excavations shall not be pumped or allowed to drain into watercourses, field drains etc without adequate filtration or settlement as agreed by the EA.
- 2.3. Machinery shall not operate in a watercourse without prior consent of the EA.
- 2.4. Where watercourses traverse the construction site it may be necessary to divert watercourses around the working area (i.e. overpump) or temporarily culvert the watercourse through the working area (i.e. flume through). Both methods need consent from the EA.
- 2.5. Keep pumps as far away from any given watercourse as practicable and placed on drip trays on level ground.
- 2.6. Cut off drains shall be installed where necessary to intercept surface water and thereby preventing it entering the working area. In some areas consultation is required from the Internal Drainage Board (a department within the EA).
- 2.7. Blocking or diverting any stream shall be limited to a period agreed with the EA and shall be subject to Land Drainage Consent.
- 2.8. Where site traffic has to cross the watercourse, temporary bridges or culverts/flumes with retaining boards or sandbagged headwalls shall be installed. Again this must be agreed with the EA prior to carrying out the activity. Extreme care shall be taken whilst installing these structures so as to minimise silt in the watercourse.
- 2.9. Where necessary, measures shall be adopted to minimise direct sediment run off from the working width into watercourses. The implementation of 'slot trenches' or sediment traps filled with straw or similar filtering material. The construction of 'silt fences' from a suitable geotextile can be utilised to reduce silt levels in run -off water.
- 2.10. Internal drains shall be covered with debris netting or hessian sacks where there is a risk of arisings migrating into them. These shall be cleaned out and changed at regular intervals or as required depending on content and contamination.

### **3. Silty Water from Construction Activities**

- 3.1. Seek advice and agreement from the Operation Manager before any discharge is made off site.
- 3.2. When carrying out any of the construction activities outlined above ensure that there are suitable filtration media such as settlement lagoons/tanks, straw bales or grass plots on site. Landowner permission should be sought before any water is discharged off-easement.
- 3.3. Check any discharges from site regularly. Divert clean water away from bare ground. Divert silty water away from drains using sandbags for example.



## D. PREVENTING POLLUTION BY NOISE

- 1.1. Residents have been notified of the timing of the programme and given s contact phone number.
- 1.2. Liaison has taken place with the local council (Environmental Health) and client or site owner, asking approval for the proposed working hours, including the possibility of 24hr and Sunday operations.
- 1.3. All sensitive areas, or areas within 100m of construction, have been identified and that screening and preferred working hours have been implemented in these areas.
- 1.4. A Noise monitoring programme is in place.
- 1.5. All plant and machinery will have effective silencers fitted and kept in good condition. Checks are to be recorded in the Plant Maintenance programme.
- 1.6. All Vehicles and plane will be turned off when not in use.
- 1.7. Demolition operations are scheduled to take place during normal working hours
- 1.8. Noise pollution measures such as controlled venting, silenced equipment, preferred time of day and screening will be introduced at all sites.
- 1.9. EMERGENCY RESPONSE INSTRUCTIONS
- 1.10. This section prescribes what pollution equipment shall be available, the immediate actions to take in the event of a pollution incident and the method of reporting.

The emergency response plan shall be in place for all Principal Contractor sites, completed in full and briefed to those identified as having responsibilities under the plan.

### 2. Pollution Control Equipment

- 2.1. Pollution equipment must be available in all high risk areas. A nominated member of the project team shall carry out checks to ensure that the equipment is available and re stocked if used. The following is an example of the types and amounts of equipment required for dealing with small-scale incidents (5 litres or less) and medium scale incidents (6 – 20 litres) on a typical pipeline project. For larger incidents contact EA

***All vehicles will carry adequate spillage kits and recovery equipment.***

### 3. Response Strategies

- 3.1. The first stages of response in the event of a pollution incident are:

**Stop** - Stop all work in the affected area immediately.

**Notify** - Notify your Supervisor immediately

**Contain** - By using granules and spill kits, or inert material such as sand or earth or digging trenches etc.



**Recover** - By using absorbent pads, booms or skimmers. Bag all contaminated materials.

**Dispose** - By taking contaminated material back to the yard and depositing it in the appropriate container and in accordance with Waste Management Procedures.

#### 4. Incident Reporting

- 4.1. It is the responsibility of the person who discovers/causes the incident to report it. All staff shall report all spills immediately to the Site Manager who in turn shall complete an incident notification form and submit to the H&S team within 24 hours of being notified of the incident.
- 4.2. The Operations Manager shall inform the EA without delay of any pollution of watercourses or groundwater.

#### 5. Emergency Contact Numbers

|  |              |
|--|--------------|
| <b>EA emergency number (England and Wales)</b> | 0800 807 060 |
| <b>SEPA emergency number (Scotland)</b>        | 0345 737 271 |



## Quality Policy Statement

The scope of the company is primarily involved with specialist services to the Construction and Petro-Chemical Industries. We undertake Demolition works, Soft Strip and Enabling, Fuel Tank Cleaning and Removal, Land Remediation & Groundwork and Plant/Machinery Removal & Replacement and their associated services.

The quality policy of the Company is to maintain and improve its reputation for providing a high quality of service. The aim of the Company is to market and provide services of a high standard that will merit and earn client satisfaction in our competitive market. The Company is committed to comply with all the quality standard requirements and will seek to continually improve the effectiveness of the "Quality Management System".


The Company holds regular quality review meetings that monitor and maintain the Company's Quality Policy and Procedures in relation to the project work we undertake and have completed. The policy is assessed to ensure that it is still relevant to the Company's scope and activities as well as our current contractual requirements. The Company will ensure that all its staff are fully aware of the Company's quality policy and their duties and responsibilities to it. All personnel will receive Quality Policy training and receive regular updates and information to ensure that they adhere and comply with the Company's stated quality aims and objectives.

The Company stresses the importance of a complete quality service to all company personnel. All personnel are involved in carrying out the Quality Policy. The sections of the Quality Manual, which are relevant to each person's work, will be reviewed regularly and amended and then discussed with the employees and then incorporated into the Quality Procedures. The Quality Controller as part of the Company's quality management system will record all of the document control amendments.

The Management of the Company is committed to a policy of Quality Assurance throughout the Company's activities, by specifically ensuring that the product quality satisfies the specific contractual obligations of all our customers and complies with, although not accredited to, the Standards of Quality specified in ISO 9001:2015 (ISO 14001:2015) (Accredited) and also the relevant Health and Safety requirements together with any other relevant legislation and Codes of Practice which may augment these standards.

The Quality Manual and the associated Quality Procedures are approved by the undersigned and are the authoritative documents relating to Quality within the Company.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



# RIGHT TO WORK IN THE UK

## Checking Process and Checklist

### CONTENTS

|  |          |
|--|----------|
| <b>INTRODUCTION</b>  | <b>2</b> |
| <b>RIGHT TO WORK PROCESS</b>                                   | <b>3</b> |
| 1. Obtaining Acceptable Documents Showing Right To Work        | 3        |
| 2. Check the Validity of the Documents                         | 4        |
| 3. Seek Further Advice If:                                     | 5        |
| 4. Take a Copy of the Documents Sign and Date Each Page Copied | 5        |
| 5. Unsuccessful Candidates                                     | 6        |
| 6. Storage of Documents  | 6        |
| <b>EXAMPLE RIGHT TO WORK CHECKLIST FOR EMPLOYEE FILE</b>       | <b>7</b> |

## INTRODUCTION

It is illegal to employ someone who is not allowed to work in the UK. As an employer, you have a duty to check potential employees' documents, before you employ them, to ensure they have the right to work in the UK.

To ensure that you meet your obligations under the Immigration, Asylum and Nationality Act 2006, **Right to Work documentation must be presented before, or on the first day of service.** If documents are not presented before/on the first day of employment then the individual **must** be sent home to collect the documentation. Their employment cannot begin until your company has seen the original documentation which confirms their right to work.

### How to Use this Document

Follow the process outlined below when you meet with a new employee before or on their first day of employment.

Use the checklist at the end of the document to ensure you have covered all the steps correctly. Detach the checklist and store it on the employee's personal file, along with signed and dated copies of documents that have been presented to you.

### Summary: Conducting a Right to Work Check

There are 3 basic steps to conducting a right to work check:

1. Obtain original versions of one or more of the acceptable documents;
2. Check the documents in the presence of the holder of the documents; and
3. Make copies of the documents; retain the copies and a record of the date on which the check is made.

Each step in the right to work check process is addressed in detail below.

When completed correctly, this can provide a 'statutory excuse' against a civil penalty.



## RIGHT TO WORK PROCESS

### 1. Obtaining Acceptable Documents Showing Right To Work

- You must be provided with one of the documents or combinations of documents in List A or List B below as proof that someone is allowed to work in the UK.
- You must only accept original documents.

#### LIST A

| Documents to Establish a Continuous Statutory Excuse |  |
|--|--|
| 1.   | A passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and colonies having the right of abode in the UK  |
| 2.   | A passport or national identity card showing that the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland   |
| 3.   | A Registration Certificate or Document Certifying Permanent Residence issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency <sup>1</sup> to a national of a European Economic Area country or Switzerland  |
| 4.   | A Permanent Residence card or document issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to the family member of a national of a European Economic Area country or Switzerland   |
| 5.   | A <b>current</b> Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the person named in it is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK   |
| 6.   | A <b>current</b> passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK   |
| 7.   | A <b>current</b> Immigration Status Document issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to the holder with an endorsement indicating that the person named in it is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, <b>together with</b> an official document giving the person's National Insurance number and their name by a Government agency or a previous employer (a P45, P46, National Insurance card, or letter from a Government agency) |
| 8.   | A <b>full</b> birth or adoption certificate issued in the UK which includes the name(s) of at least one of the holder's parents <b>together with</b> an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)  |
| 9.   | A birth <b>or</b> adoption certificate issued in the Channel Islands, the Isle of Man or Ireland <b>together with</b> an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)   |
| 10.  | A certificate of registration or naturalisation as a British citizen <b>together with</b> an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)   |

<sup>1</sup> The UK Border Agency (UKBA) has been replaced by UK Visas and Immigration (UKVI) and the Border Force

**List B**

Seek further advice if List B documents are supplied.

A current passport must be provided, in addition to one of the documents listed below.

| <b>GROUP 1: Documents where a time-limited statutory excuse lasts until the expiry date of leave.</b> |  |
|---|--|
| 1.  | A <b>current</b> passport endorsed to show that the holder is allowed to stay in the UK and is allowed to do the type of work in question (this must be supplied in addition to one of the documents below)  |
| 2.  | A <b>current</b> Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the person named in it can stay in the UK and is allowed to do the type of work in question  |
| 3.  | A <b>current</b> Residence Card (including an Accession Residence Card or a Derivative Residence Card) issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to a non-European Economic Area national who is a family member of a national of a European Economic Area country or Switzerland or who has a derivative right of residence   |
| 4.  | A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK, and is allowed to do the type of work in question, <b>together with</b> an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency) |
| <b>GROUP 2: Documents where a time-limited statutory excuse lasts for 6 months.</b>                   |  |
| 1.  | A Certificate of Application issued by the Home Office under regulation 17(3) or 18(2) of the Immigration (European Economic Area) Regulations 2006 to a family member of a national of a European Economic Area country or Switzerland stating the holder is permitted to take employment which is <b>less than 6 months old together with a Positive Verification Letter</b> from the Home Office Employer Checking Service                                      |
| 2.  | An Application Registration Card (ARC) issued by the Home Office, the Border and Immigration Agency stating that the holder is 'ALLOWED TO WORK' or 'EMPLOYMENT PERMITTED' <b>together with a Positive Verification Letter</b> from the Home Office Employer Checking Service  |
| 3.  | A <b>Positive Verification Notice</b> issued by the Home Office Employer Checking Service to the employer or prospective employer which indicates that the named person may stay in the UK and is permitted to do the work in question   |

**2. Check the Validity of the Documents**

- You must satisfy yourself that the documents are genuine and that the person presenting the documents is the prospective employee, the rightful holder and allowed to do the type of work you are offering.
  1. Are photographs consistent with the appearance of the person and consistent across documents (where applicable)?
  2. Are the dates of birth listed consistent both across documents and with the appearance of the person?
  3. Are expiry dates for limited leave to enter or remain in the UK in the future i.e. they have not passed?

4. Do the endorsements (stamps, visas etc.) show the person is able to do the type of work you are offering (e.g. there are no restrictions – see below)?
5. Are you satisfied that the documents are genuine, have not been tampered with and belong to the holder?
6. Have you asked for further documents to explain why you have been given documents with different names (e.g. marriage certificate/divorce decree/deed poll)?

**NOTE: Restrictions**

If documents show a restriction on the type of work they can do and/or the hours they can work, make sure the job you give them does not break those conditions.

International students who have a limited right to work are required to provide an employer with evidence of their academic term and vacation times for the duration of their studies in the UK while they work.

If there are any queries or concerns relating to the documents provided, use the Home Office Employer Checking Service: <https://www.gov.uk/legal-right-work-uk> or ECS Checking Form.

**3. Seek Further Advice If:**

The individual is non-EU/EEA or Swiss.

The individual has supplied List B documents (indicating that they have limited right to work in the UK).

The Individual is a Croatian national.

The individual has an outstanding application or appeal to vary or extend their leave in the UK.

Advice can be obtained from:

<https://www.gov.uk/check-job-applicant-right-to-work>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/426972/frequently\\_asked\\_Qs\\_illegal\\_working\\_civil\\_penalty\\_May\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426972/frequently_asked_Qs_illegal_working_civil_penalty_May_final.pdf)

**4. Take a Copy of the Documents Sign and Date Each Page Copied**

Copies should be taken in full, and in a format that cannot be altered. Sign and date each page copied.

If a passport has been provided ensure the following are copied:

- Pages providing the holder's personal details; nationality; photo; date of birth; signature; date of expiry and biometric details or other documents as appropriate.
- Any pages containing UK Government endorsements' showing the person is allowed to work in the UK and carry out the work you are offering (if applicable).

Ensure both sides of a Biometric Residence Permit are copied (if applicable).

Ensure letters from the Home Office/ UK Border Agency/ UK Visas & Immigration regarding right to work in the UK are copied (if applicable).

Supporting documents (e.g. marriage certificate/divorce decree/deed poll) to prove a change of name or personal details should also be copied (if applicable).

## 5. Unsuccessful Candidates

Where documents are copied at interview stage, documents for unsuccessful candidates must be securely shredded once the candidate has been notified that their application was not successful. Notification should be given to the candidate that this documentation has been destroyed.

## 6. Storage of Documents

Copies of documents for the successful candidate/new employee must be stored on a personal file. **A right to work document checklist has been included on page 6.**

These must be kept for two years after the employee has left your employment.

### General Notes:

**EEA Nationals Who Can Live and Work Without Restriction EEA Countries** are: Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.

You should require any person who claims to be an EEA national to produce an official document showing their nationality. This will usually be either a national passport or national identity card which indicates that the holder is a national of an EEA state.

**Registration Certificates:** some EEA nationals may also have been issued with a registration certificate to confirm that they are living in the UK in compliance with the EEA Regulations, either by fulfilling the requirements for residence (also known as 'exercising Treaty rights') or by residing in the UK as the family member of another EEA national who is exercising Treaty rights.

**Document Certifying Permanent Residence:** some EEA nationals may be able to produce a document certifying that they have a right of permanent residence in the UK. Under EU law, an EEA national can acquire permanent residence after five years' lawful and continuous residence in the UK.

All of these documents (passport establishing EEA nationality, identity card establishing EEA nationality, registration certificate and document certifying permanent residence) are included in List A of acceptable documents, and production of any one of them will provide you with a continuous statutory excuse if checked and copied correctly before the person starts working for you.

### Croatian Nationals:

Since 1 July 2013, as EU nationals, Croatians are able to move and reside freely in any EEA Member State. However, a Croatian national who wishes to work in the UK and who is subject to the worker authorisation requirement will need to obtain an accession worker authorisation document (permission to work) before starting any employment.

**EXAMPLE RIGHT TO WORK CHECKLIST FOR EMPLOYEE FILE**

|                             |  |
|-----------------------------|--|
| <b>Name:</b>                |  |
| <b>Role and Department:</b> |  |
| <b>Date:</b>                |  |

**Right to Work in UK Confirmed:**

Yes

No

Restricted

|  |  |
|--|--|
| <b>STEP 1</b>  |  |
| Original document seen (e.g. Passport)   |  |
| Document listed on List A or List B?   |  |
| Date leave/right to work expires (if applicable).  |  |
| <b>STEP 2</b>  |  |
| Checked validity of documents (in the presence of the holder) using criteria in Step 2.                        |  |
| <b>STEP 3</b>  |  |
| Copy of relevant pages taken.<br>Each page has been signed and dated by the individual checking the documents. |  |
| <b>STEP 4</b> <span style="float: right;">Where List B Documents Provided</span>                               |  |
| Further advice sought where List B documents provided.   |  |
| Re-check List B documents on 1 April each year and on the expiry date of leave.                                |  |
| <b>STEP 5</b> <span style="float: right;">If applicable</span>   |  |
| Any copies of documentation from unsuccessful candidates destroyed.  |  |
| <b>STEP 6</b>  |  |
| Signed and dated copies of documents stored on employee personal file.   |  |
| Signed by Manager Responsible for check:   |  |

Reviewed: 1<sup>st</sup> August 2024Next Review By: 31<sup>st</sup> August 2025



## SOCIAL MEDIA POLICY

### 1. Introduction

- 1.1 This Social Media Policy applies to all employees, contractors and agents of KpH Group (“the Company”) who use computers, mobile devices, networks and other communications equipment and systems provided by the Company (“Users”).
- 1.2 This Social Media Policy exists to address the use by Users of all types of social network and social media platforms including, but not limited to, Facebook, X, Instagram, LinkedIn, etc. (collectively, “Social Media”).
- 1.3 The purpose of this Social Media Policy is to minimise the various risks to the Company presented by Social Media usage.
- 1.4 No part of this Social Media Policy shall be deemed to form a part of any employee’s contract of employment. It may be amended by the Company at any time and for any reason.

### 2. General Principles

There are certain general principles that all Users should keep in mind when using Social Media whether for personal use or for authorised work-related purposes. The Company expects all Users to:

- 2.1 Use Social Media responsibly and professionally, and at all times in accordance with their duties.
- 2.2 Be mindful of what constitutes confidential, restricted or other proprietary information and ensure that such information is never disseminated over Social Media without the expressed consent of a Division Manager at KpH Group.
- 2.3 Ensure that their use of Social Media does not breach any other of the Company’s policies including, but not limited to, its Information Security Policy; Equal Opportunities and Diversity Policy; Disciplinary Policy and Procedure and Data Protection Policy.
- 2.4 Ensure that their use of Social Media does not breach any other laws, regulatory requirements, or other applicable rules set out by regulatory bodies and other organisations.
- 2.5 Ensure that they do not breach any copyright or other intellectual property rights when using Social Media.
- 2.6 Be mindful of the fact that any communication may be relied upon in court, to the advantage or detriment of the individual or the Company and conduct their use of Social Media accordingly.

### 3. Personal Social Media Use

Users may use Social Media for personal purposes occasionally during work hours [for example, during breaks] provided that such usage complies with the provisions of this Social Media Policy and provided that it does not interfere with their work responsibilities or productivity.

## Business Social Media Use

- 3.1 Certain Users may from time to time be required to use Social Media on behalf of the Company. A User should only use Social Media on behalf of the Company with the authorisation of the Division Manager.
- 3.2 Use of Social Media for business purposes must comply with the provisions of this Social Media Policy at all times.
- 3.3 Users using Social Media on behalf of the Company may from time to time be required to interact with other internet users via Social Media, for example, in response to posts or enquiries regarding the Company. Unless the instructions issued to that User (see paragraph 4.1) specifically authorise the User to respond without further approval, the User may not respond to any such communications without the prior approval of their Division Manager. In any event, no User using Social Media on behalf of the Company should respond to such communications, with or without prior approval, without first consulting the relevant individual and/or department unless they are fully knowledgeable of the relevant topic and suitably qualified to respond.
- 3.4 Before using Social Media on behalf of the Company, Users may require training in order to do so, or may be required to demonstrate that they have already received suitable training, either from the Company or from a previous employer or other organisation.

## 4. Acceptable Use of Social Media

- 4.1 Unless specifically instructed to do so by their Division Manager, Users should make it clear that they are posting on Social Media as themselves, not as the Company, and that all views expressed on Social Media by that User are the author's own and do not necessarily reflect the views of the Company.
- 4.2 Unless using Social Media on behalf of the Company, Users should not use any Social Media accounts belonging to, or otherwise associated with, the Company.
- 4.3 Company email addresses may only be used to sign up to Social Media websites for work-related purposes. Users should be aware that their Company email address will cease to function should they cease to work for or with the Company and may result in the Social Media account(s) in question being inaccessible.
- 4.4 Users should always be respectful to others when using Social Media and should always be mindful of the fact that their association with the Company may be known to anyone at any time. The conduct of all Users on Social Media may reflect on the Company, whether positive or negative. This applies whether a User is using Social Media for business purposes or for personal purposes, whether during work hours or otherwise.
- 4.5 If a User is unsure as to the appropriateness of a post or any other Social Media activity with respect to this Social Media Policy, they should consult their Division Manager before continuing.

## 5. Unacceptable and Prohibited Use of Social Media

- 5.1 Users must not use Social Media to defame or otherwise disparage the Company or any of its employees, contractors, agents, or other affiliated third parties and organisations.
- 5.2 Users must ensure that their use of Social Media does not damage the Company, its interests, or its reputation, whether directly or indirectly, in any way.
- 5.3 As under paragraph 5.1, unless specifically instructed to do so, Users must not represent themselves on Social Media as the Company or as posting on behalf of the Company.



- 5.4 Users may not share confidential, commercially sensitive or other proprietary business information belonging to the Company or any of its employees, contractors, agents, or other affiliated third parties and organisations on Social Media unless specifically authorised to do so by their Division Manager.
- 5.5 Users may not use any intellectual property belonging to the Company on Social Media (including, but not limited to, trademarks and logos) unless specifically authorised to do so by their Division Manager.
- 5.6 Users may not add contacts made during the course of their duties to their personal Social Media accounts without the authorisation of their Division Manager.

## 6. Monitoring

- 6.1 The Company may monitor Users' communications and internet usage (including, but not limited to Social Media) for the following reasons:
  - 6.1.1 To ensure that Company policies and guidelines are followed, and that standards of service are maintained.
  - 6.1.2 To provide evidence of transactions and communications.
  - 6.1.3 To help combat unauthorised use of the Company's computers, mobile devices, networks and other communications equipment and systems and to maintain security.
  - 6.1.4 If the Company has reason to believe that a User has been viewing or sending offensive or illegal material (including, but not limited to that which breaches another party's intellectual property rights).
  - 6.1.5 If the company has reason to believe that a User has been spending an unreasonable amount of time viewing non-work-related sites (including, but not limited to, Social Media) and/or sending and receiving an unreasonable number of personal communications.
  - 6.1.6 In order to better understand the requirements of the Company in terms of the provision of computers, mobile devices, networks and other communications equipment and systems.
- 6.2 Users should be aware that all internet and email traffic data sent and received using the Company's communication systems is logged, including websites visited, times of visits, and duration of visits. Any personal use of the internet, including but not limited to Social Media, will therefore be logged also, irrespective of whether or not it is in compliance with this Social Media Policy and other Company policies. Users who wish to avoid the possibility of the Company becoming aware of any political or religious beliefs or affiliations that they would prefer to keep private should avoid visiting websites that might reveal such information. By using the Company's computers, mobile devices, networks and other communications equipment and systems, Users are taken to consent to their personal internet use and communications being logged and monitored by the Company. The Company shall ensure that any monitoring under this Social Media Policy complies fully with all applicable laws including, but not limited to, the Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000, and the Human Rights Act 1998.
- 6.3 When monitoring emails, the Company will normally restrict itself to looking at the address and email headers. If, however, it is considered necessary, the Company may open and read emails. Users should be aware that sensitive and confidential communications should not be sent by email because it cannot be guaranteed to be private.

## 7. Recruitment


The Company may use internet searches to carry out due diligence as part of its recruitment process. In these circumstances, the Company will act in accordance with its equal opportunities and data protection obligations.

## 8. Misuse and Compliance

- 8.1 Any User found to be in breach of this Social Media Policy will be treated in line with the KpH disciplinary procedure.
- 8.2 The viewing, transmission, downloading, uploading or accessing in any way, whether through Social Media or otherwise, of any of the following material using the Company's computers, mobile devices, networks or other communications equipment and systems will amount to gross misconduct with the possibility of summary dismissal:
- 8.2.1 Material which is pornographic, sexist, racist, homophobic, paedophilic, or any other discriminatory or otherwise obscene or offensive material.
  - 8.2.2 Illegal or criminal material, including material which breaches copyright or any other intellectual property right.
  - 8.2.3 Any material which has the object or effect of causing harassment to the recipient.
  - 8.2.4 Material which the User knows, or ought to know, is confidential, restricted or otherwise proprietary information and which they are not authorised to deal with.
  - 8.2.5 Any website (Social Media or otherwise) which the Company has blocked access to.
- 8.3 Any questions regarding this Social Media Policy should be referred to a Division Manager.
- 8.4 If any User becomes aware of any content on Social Media that reflects poorly on the Company or otherwise defames or disparages the Company, they should contact the Division Manager.

This policy has been approved and authorised by:

**On behalf of KpH Group:**

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31/08/2025   |



# STAFF WELL-BEING POLICY

## CONTENTS

|    |   |   |
|----|---|---|
| 1. | Introduction  | 2 |
| 2. | Statement of Intent   | 2 |
| 3. | Responsibilities for Implementing the Staff Well-Being Policy | 2 |
| 4. | Arrangements for Well-Being and Stress Prevention             | 3 |
| 5. | Communicating the Well-Being Policy                           | 3 |

## 1. Introduction

KpH Group as an employer has a duty to ensure the health, safety and welfare of its employees as far as reasonably practicable. It is also required to have in place measures to mitigate as far as practicable factors that could harm employees' physical and mental well-being, which includes work related stress. This duty extends only to those factors which are work-related and within the Company's control.

The Health and Safety Executive's definition of work-related stress is "the adverse reaction a person has to excessive pressure or other types of demand placed on them" We recognise that there is an important distinction between "reasonable pressures" which stimulate and motivate and "stress" where an individual feels they are unable to cope with excessive pressures or demands placed upon them.

The Health and Safety Executive have produced a number of Management Standards which cover the primary sources of stress at work that, if not properly managed, are associated with poor health and well-being, lower productivity and increased sickness absence. These are:

|                      |  |
|----------------------|--|
| <b>Demands</b>       | i.e. workload, work patterns and the work environment  |
| <b>Control</b>       | i.e. how much say the person has in the way they do their work   |
| <b>Support</b>       | i.e. the encouragement, sponsorship and resources provided by the organisation, line management and colleagues                                     |
| <b>Relationships</b> | i.e. promoting positive working to avoid conflict and dealing with unacceptable behaviour  |
| <b>Role</b>          | Such as whether people understand their role within the organisation and whether the organisation ensures that they do not have conflicting roles. |
| <b>Change</b>        | Such as how organisational change (large or small) is managed and communicated within the organisation.  |

## 2. Statement of Intent

The Managing Director acknowledges the potential impact that work has on an individual's physical and mental health and that there is a moral and legal duty to take steps to promote employee well-being as far as reasonably practicable.

The organisation is committed to fostering a culture of co-operation, trust and mutual respect, where all individuals are treated with dignity and can work at their optimum level.

It recognises that work related stress has a negative impact on employees well-being and that it can take many forms so therefore needs to be carefully analysed and addressed at an organisational level.

## 3. Responsibilities for Implementing the Staff Well-Being Policy

The Director and Senior Managers will:

- support steps taken to develop a culture of co-operation, trust and mutual respect;
- champion good management practices;
- encourage initiatives and events that promote health and well-being.

**Managers and Supervisors will:**

- Treat individuals reporting to them with consideration and dignity and promote a culture of mutual respect in the teams they manage.
- Ensure that there is good communication within their team and there are opportunities for individuals to raise concerns about their work.
- Encourage their staff to participate in events and initiatives which promote well-being and more effective working.
- Take action in the interests of all their colleagues where performance by a member of staff may cause stress to their colleagues.

**Employees will:**

- Treat colleagues and all other persons with whom they interact during the course of their work with consideration, respect and dignity.
- Raise concerns with their line manager if they feel there are work issues that are causing them stress and having a negative impact on their well-being.
- Take responsibility for their own health and well-being by adopting healthy lifestyles.
- Take responsibility for their own development skills as one of the means to enable them to work effectively in their team and so reduce the risk of stress.
- Take responsibility for working effectively in their assigned roles, thus helping to avoid causing stress to their colleagues.

**4. Arrangements for Well-Being and Stress Prevention**

These include the following:

- recruitment and selection procedures;
- clear job descriptions and person specifications to ensure that the 'right' person is recruited for the job.
- training and Development procedures to ensure that individuals have the necessary skills and competencies to undertake the tasks/duties required of them;
- promotion and reward procedures;
- suitable adaptations for disability;
- harassment and anti-bullying procedures.
- Mental Health trained staff contact details displayed on all PC projects

**5. Communicating the Well-Being Policy**

The Well-Being Policy will be brought to all new employees' attention at Company Induction and will be available for reference at the Company Head Office at all times.

The contents of the policy will be covered during site inductions and specific tool box talks.



## Sustainable Timber Procurement Policy Statement

We, KpH Group, recognise that:


- Forests are essential for human survival and well-being. They are among the most biodiverse and valuable terrestrial ecosystems on the planet. They provide us with food, oxygen, shelter, recreation, and spiritual sustenance; and they contribute to the livelihoods of 1.6 billion people worldwide. The biodiversity of forests, the variety of genes, species, and forest ecosystems underpins these goods and services, and is the basis for long-term forest health and stability.
- Promoting ways to use forest biodiversity in a sustainable way, and with clear social and economic benefits for the poor, is important.
- Forest certification provides evidence of sustainable forest management, yet at present, less than 10% of the world’s forests are certified. Mainstreaming forest certification systems (such as PEFC and FSC) will assist in promoting sustainable forest management.

As a user of timber and wood-based products, KpH Group, recognizes that it has a responsibility to current and future generations and will therefore strive to promote sustainable forest management. By demanding products from sustainably managed forests, we aim to stimulate the improvement of forest management and discourage unsustainable management practices.

We, KpH Group, will give preference to suppliers who can demonstrate that their products originate from sustainably managed forests. We consider it important that the origin of our wood-based products can be demonstrated through credible, independent Chain of Custody certification based on international standards and norms.

In this context, we recognize credible third-party certification systems accepted by government procurement policies and guidelines, such as the UK Central Point of Expertise of Timber or the EU Green Public Procurement criteria, as evidence of responsible and sustainable sourcing. This includes the Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC), the two largest forest certification systems globally.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31-08-2025   |



## Tight Fitting RPE User Facial Hair Policy

### Compatibility and Suitability of RPE

As an employee using any PPE / RPE you will have received training and instruction in how to use your RPE device(s) correctly. You may also have received this information as a contractor.

You will have been Fit Tested with your device(s) which will have been chosen in consultation with you to define the most comfortable and compatible device for you. This will ensure you are able to wear it correctly.

As part of this process you have been given information and instruction in:

- How it works.
- How it should be worn.
- How it should be used, maintained, cleaned and stored.
- You will have been trained how to complete a robust pre-use fit check.
- You are provided with storage and a means of cleaning the device.
- For re-usable devices you are required to maintain your RPE and complete a monthly maintenance sheet and change filters.

As part of the training it will have been explained to you why it is vital that you remain clean shaven in the seal area of your tight-fitting respirator where it contacts and seals on your skin.

You will understand that the organisation requires that you are clean shaven within the previous 8 hour period prior to the work shift (for those working up to 8 hours) Or for those working more than 8 hours you should ensure a clean shaven state in the seal area within the 16 hours prior to you completing the shift.

### Compliance

As you are aware compliance in this regard is a matter of Health and Safety and you have a duty to comply with these reasonable requests as part of this duty under the Health and Safety at work Act 1974 Section 7b ... to co-operate with him (the employer) so far as is necessary to enable that duty or requirement to be performed or complied with.

It is therefore our expectation that you as a competent trained and conscientious employee will help us to meet our duties under the Act and consistently adhere to this requirement.

### Consultation

As part of our duty to consult with you we require you to work with us in this respect and raise any concerns or difficulties for you in this regard in the first instance through your line manager.



## Disciplinary Procedure

As part of our duty to ensure we do not expose you to substances hazardous to health we will need to audit compliance in this area.

This may be on a formal or informal basis. If it is suspected by any supervisor, manager or a representative of the relevant competent authority that you may have breached this requirement we will reserve the right to implement sanctions or disciplinary measures to protect your health and our compliance with best practice.

Due to the serious nature of the consequences of exposure to respirable hazards we will not be able to allow you to work for/with us if you are not willing or able to comply in this area.

## Alternatives to tight fitting RPE

It will have been explained to you the alternatives available to you if you are required to keep facial hair for these reasons.

- Health condition(s) that determine your inability to remain clean shaven in the seal area of the respirator.
- Religious practice that according to your faith and your particular standing/branch/movement/sect you are required to wear facial hair that may interfere with the seal of your respirator.

It is therefore your duty to inform us and work with us to help you to remain protected from airborne hazards not otherwise controlled, by consulting with us if this includes you.

The reasons above will not be automatically accepted without further clarification of the legitimacy of these reasons on an individual basis.

If you claim to meet the criteria for consideration for alternatives to tight fitting RPE we reserve the right to seek advice, confirmation / clarification from your medical advisors or specific religious institution you are part of.

The alternatives may include:

- Non-tight fitting RPE (Powered Air Purifying Respirators): These can be relatively expensive, and we will make decisions regarding this alternative based on reasonably practicable criteria.
- Where reasonably practicable being restricted from entering areas when there could be exposure to airborne hazards.

Facial hair fashion or cultural non-religious practice in this respect will not be accepted as a reason for non-compliance. Operatives are required to be clean shaven at the start of each shift. Those who fail to comply with the company policy may be subject to being sent home, attending re-induction or removed from site.

Please remember this is to protect you from acute or chronic health effects of exposure to airborne hazards. For which we have a legal and moral duty to control.

Signed for KpH Group:

|  |                     |
|--|---------------------|
| <b>Jordan Wells</b><br>Health and Safety Manager | <i>Jordan Wells</i> |
| <b>Review Date:</b>                              | 31/08/2025          |

## Whistle-Blowing Policy

### 1. ADVICE AND INSTRUCTIONS FOR STAFF

The term "whistle-blowing" has no legal definition within UK law; however, it has been used to describe incidents where an employee publicly discloses some alleged wrongdoing within an organisation.

The Public Interest Disclosure Act 1998 aims to promote greater openness in the workplace and, by amending the Employment Protection Act 1996, protects "whistle-blowers" from detrimental treatment, i.e. victimisation or dismissal, for raising concerns about matters in the public interest. In providing this protection, the Act also reinforces the obligations of all persons employed by the Company not to disclose to external sources any trade secrets or confidential information acquired during the course of their employment unless they fall within the qualifying for protection disclosures.

This statement sets out the Company's Policy and provides in some detail advice and guidance to staff on the scope of the Policy. It explains that any member of staff who has a reasonable belief that there is serious malpractice relating to any of the protected matters specified in the Policy may raise a concern under the procedure agreed by the Board and which is described in this statement. There is also information about the rights of staff to raise the matter externally if they are not satisfied with the Company's response and the protection afforded to them if they choose to do this after the internal procedures have been exhausted.

### 2. WHISTLE-BLOWING POLICY

- Introduction
- Scope of the Policy
- Who Can Raise a Concern?
- Procedure
- Process
- Investigation
- Records
- Reporting of Outcomes
- Advice for Staff Raising a Concern
- Complaints of Retaliation as a Result of Disclosure
- External Disclosure

#### 1.1. Introduction

All persons employed by the Company are under an obligation implied in their contract of employment to give honest and faithful service to their employer. This includes an obligation not to disclose to external sources any trade secrets or confidential information acquired during the course of employment or act in a manner that will undermine the mutual trust and confidence on which the employment relationship is based. The Public Interest Disclosure Act 1998 complements those obligations by providing protection to

employees for disclosure made without malice and in good faith of certain specific confidential information to a third party in defined circumstances. These are outlined below in paragraph 3. The purpose of this policy is to provide a means by which employees are enabled to raise concerns with the appropriate authorities if they have reasonable grounds for believing there is serious malpractice within the Company. The Company encourages staff to raise matters of concern responsibly through the procedures laid down in this policy statement.

## 1.2. Scope of the Policy

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

The policy may deal with specific concerns which are in the public interest and may include:

- a criminal offence;
- failure to comply with legal obligations or with the Statutes, Ordinances and Regulations of the Company;
- financial or non-financial misadministration or malpractice or impropriety or fraud;
- professional malpractice;
- a risk to the health or safety of any individual;
- environmental damage;
- a miscarriage of justice;
- improper conduct or unethical behaviour;
- attempts to suppress or conceal any information relating to any of the above.

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

## 1.3. Who Can Raise a Concern?

Any member of staff who has a reasonable belief that there is serious malpractice relating to any of the protected matters specified in paragraph 3 above may raise a concern under the procedure detailed in paragraph 6 below. The issues raised under the protected list may relate to another member of staff, a group of staff, the individual's own branch/ department or another part of the Company. Concerns must be raised without malice and in good faith, and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true. The disclosure must not be made for purposes of personal gain, and in all the circumstances it must be reasonable to make the disclosure. The Company will ensure that any member of staff who makes a disclosure in such circumstances will not be penalised or suffer any adverse treatment for doing so. However, a member of staff who does not act in good faith or makes an allegation without having reasonable grounds for believing it to be substantially true, or makes it for the purposes of personal gain, or makes it maliciously or vexatiously may be subject to disciplinary proceedings.

In view of the protection afforded to a member of staff raising a bona fide concern, it is preferable if that individual puts his/her name to any disclosure. The identity of the person raising the matter will be kept confidential, if so requested, for as long as possible, provided that this is compatible with a proper investigation. Anonymous complaints are not covered by this procedure, but may be reported, investigated or acted upon as the person receiving the complaint sees fit (including the use of this procedure), having regard to the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint.

#### 1.4. Procedure

##### Initial Step

Normally any disclosure about a protected matter should be made in the first instance to:

- Kevin Potter (Managing Director)

If the disclosure is about the Managing Director, the member of staff may raise the concern directly with Lyndsey West (Division Manager).

The person to whom the disclosure is made will decide whether the matter should be dealt with under this procedure. If he or she considers that the matter should be dealt with under a different Company procedure, s/he will advise the person making the disclosure as to the appropriate steps which should be taken.

#### 1.5. Process

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

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

Some matters following investigation, will need to be referred to the relevant outside body, e.g. the Police. If the person to whom the disclosure is made decides not to proceed with an investigation, the decision will be explained as fully as possible to the individual who raised the concern. It is then open to the individual to make the disclosure again either to another of the persons specified in the paragraph above or to the Chair of the Audit Committee.

#### 1.6. Investigation

Any investigation will be conducted as sensitively and speedily as possible. The employee will be notified of the intended timetable for the investigation. The person to whom the disclosure is made may authorise an initial investigation to establish the relevant facts. The investigation may be conducted by the internal auditor in the case of a financial irregularity, or by another person. The investigator will report his or her findings to the person to whom the disclosure was made, who will then decide if there is a case to answer and what procedure to follow. This may include taking steps with the competent authority to set up a

special internal independent investigation or reference to some external authority, such as the police, for further investigation. The decision may be that the matter would be more appropriately handled under existing procedures for grievance, bullying and harassment, or discipline.

Where disclosure is made the person or persons against whom it is made will be informed at an early stage of it and of the evidence supporting it, and they will be allowed to respond.

The individual making the disclosure will be informed of what action is to be taken.

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

### 1.7. Records

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

### 1.8. Reporting of Outcomes

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

### 1.9. Advice for Staff Raising a Concern

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

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

Members of staff may also wish to seek independent legal advice or contact 'Protect' which is a confidential advice line, see details below:



Free, confidential whistleblowing advice  
Call us on **020 3117 2520** or [email us](#)

Click on the QR code to  
view the Environmental  
Whistleblowing Toolkit



### What we can help with:

- ✓ As a legal advice service we offer free expert and confidential advice on how best to raise your concern and your protection as a whistleblower
- ✓ We are experts in the specific legal rights that whistleblowers have at work, and are also able to advise on some other connected rights
- ✓ Depending on our resources and policy priorities, we can act as a respected and trusted legal 'third party' e.g. writing to a regulator or Government

### What we can't help with:

- ✗ We do not advocate at the Employment Tribunal, so we cannot represent you in legal proceedings
- ✗ We are not able to advise on all workplace legal rights but can signpost you to other services who will be able to help (for instance, if you are looking for advice on discrimination law)
- ✗ We are not a regulatory body, so cannot investigate your whistleblowing concerns
- ✗ As we have limited resources, we can only give advice as far as our resources allow

#### 1.10. Complaints of Retaliation as a Result of Disclosure

The Company accepts that it has an obligation to ensure that staff who make a disclosure without malice and in good faith are protected, regardless of whether or not the concern raised is upheld. A member of staff who has made a disclosure and who feels that, as a result, he or she has suffered adverse treatment should submit a formal complaint under the grievance procedure as set out in the relevant staff handbook and in the statutes and ordinances detailing what has been done to him or her. If it appears that there are reasonable grounds for making the complaint, the onus will be on the person against whom the complaint of adverse treatment has been made to show that the actions complained of were not taken in retaliation for the disclosure.

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

#### 1.11. External Disclosure

If, having exhausted this procedure, a member of staff is not satisfied with the Company's response and reasonably believes that the information disclosed, and any allegation contained in it, are substantially true, he or she is at liberty to take the matter further by raising it with certain bodies or persons such as:


- a Member of Parliament;
- a Legal Adviser;



- other bodies or persons (if any) prescribed by the Secretary of State under Section 43F of the Employment Protection Act 1996, as amended by Section 1 of the Public Interest Disclosure Act 1998.

A member of staff who makes an external complaint in good faith to any prescribed body or person after exhausting the Company's procedure will be protected against victimisation or unfavourable treatment.

Signed for KpH Group:

|  |  |
|--|--|
| <b>Lyndsey West</b><br>Managing Director |  |
| <b>Review Date:</b>                      | 31-08-2025   |



## Work Safe Policy Statement

KpH Group acknowledge our responsibility under the Health and Safety at Work Act and associated regulations and recognise our duty of care and undertake to maintain safe systems affecting the health, safety and welfare of our employees. We will ensure that no one under our control is exposed to unacceptable levels of health or safety risks at work.

KpH Group operates a Work Safe Policy (or Right to Refuse to Work Policy) to protect our employees and ensure others not in our employment are not placed at risk.


Every member of KpH Group and every member of any Sub-Contractors team working on any KpH Group managed project(s), has the absolute right to decline to carry out work if they feel it is not safe to do so.

Where the operation of a machine, a site condition or a method of working constitutes a danger to the employee or another person the employee may refuse to work.

Any situation arising which leads to an individual refusing to work for Health and Safety reasons must be reported to the senior person on site as soon as possible, and no employee should continue to work until the working environment is made safe. The Health and Safety Manager should be informed. Escalation for resolving a Refusal to Work is through the Operations Manager or the Managing Director and their decision will be final.

Managers and staff are also encouraged to report any unsafe acts or conditions, which they have witnessed through the Near Miss Reporting procedure.

KpH Group will not discipline, discharge, suspend, lay off or demote an employee or impose any financial or other penalty on an employee who invokes the Refusal to Work Procedure.

|                |   |                     |                   |
|----------------|---|---------------------|-------------------|
| <b>Signed:</b> |  | <b>Position:</b>    | Managing Director |
| <b>Name:</b>   | Lyndsey West  | <b>Review Date:</b> | 31/08/2025        |