

Peoples



# Peoples Handbook



People make us **Peoples**



Family. Business. Community.

## Our Mantra and our Values

Peoples are a family business and we are proud of this. Everyone is welcome. Our culture is driven by our values and by living and breathing these, we are able to provide a first-class customer and colleague experience which allows us to be at the leading edge of providing people focussed vehicle solutions for everyone.

Our Values	Our Values	What they mean in reality	Self-Test
<p>We put people first</p>	<p>People are what makes People – they are at the heart of everything we do! We treat everyone the way we would want to be treated and aspire to deliver the best for our customers and colleagues without exception</p>	<p>We are all human.</p> <p>We know the absolute power our people play in making Peoples a success. We can't do this on our own and we need everyone to bring their A game and work together to get things done. How we make people feel needs to be at the forefront of every decision we make and every interaction we have. We need to continue to promote a culture of treating everyone the way we want to be treated, whether that's customers or each other – sounds simple but it's true!</p>	<ul style="list-style-type: none"> <li>• Did I make my customer/colleagues feel important and valued?</li> <li>• Would I be happy with how I was treated if I was my customer?</li> <li>• Would my customer score me 10/10?</li> <li>• Did I treat everyone with dignity and respect?</li> <li>• Did I support my team?</li> <li>• Could I do better tomorrow?</li> </ul>
<p>We deliver on our promises</p>	<p>It's pretty simple – we do what we say we are going to do, whether that be for our customers or for each other. We stick to our commitments. We take ownership for everything we do and we hold ourselves accountable</p>	<p>It's not complicated – if you say you are going to do something then please do it. Take ownership for everything and hold yourself accountable. If you say you are calling a customer back at 12pm, please do it. If you say you will send a report to you manager, please do it. Following through on our commitments is one of the foundations of our success.</p>	<ul style="list-style-type: none"> <li>• Did I do everything I said I would for my customer and my team?</li> <li>• Did I own the customer experience?</li> <li>• Did I do what I committed to doing?</li> <li>• Am I happy with my performance today?</li> <li>• Could I do better tomorrow?</li> </ul>
<p>We're all over it</p>	<p>We don't wait around. If we see a problem, we own it and we solve it. We are honest and committed to doing what is right for our customers, our colleagues and our Company</p>	<p>Don't wait to be told. If you see a problem, raise it and fix it. Yes, it might take a bit longer but doing the right thing is what we are all about. Please don't sit around and think it's someone else's problem. We are one team and by working for Peoples, we need to work together. We want your suggestions on how we can be better and we want you to flag problems, no matter how small. Continually striving to be better will keep us at the forefront of our industry.</p>	<ul style="list-style-type: none"> <li>• Did I go above and beyond today?</li> <li>• Did I own any issues and resolve them, whether the issue started in my team or not?</li> <li>• Could I do better tomorrow?</li> </ul>
<p>We are results driven</p>	<p>Getting results is important to us and we won't apologise for it. We want to challenge ourselves to be better, to exceed customer expectations and to have more impact. We know that delivering exceptional results takes hard work, commitment, determination, loyalty and team work</p>	<p>Results drive the success of our business. We need to challenge ourselves to exceed the expectations of those around us, including our customers. Exceptional results are hard work, but they are what keep our business profitable. So go that extra mile, sell that extra add on, deliver a first-class experience, put yourself forward for development and training.....and in doing these, the results will follow. We want to be the best and we need you to have the same passion and commitment to be the best in your role.</p>	<ul style="list-style-type: none"> <li>• Did I contribute to positive solutions for the business, customers and colleagues?</li> <li>• Did I deliver first class CVP?</li> <li>• Did I promote the features and benefits of our products and services in the best way possible?</li> <li>• Did I care about my performance today and consider its impact for Peoples?</li> <li>• Could I do better tomorrow?</li> </ul>

## **Introduction**

This handbook is prepared for the purposes of ensuring that all employees and managers understand how the Company wishes to operate and manage its employees. The handbook is divided into two sections;

- 1. Company Rules which are contractual and incorporated into every employee's terms and conditions of employment; and**
- 2. Policies and procedures which are non-contractual and are included for guidance purposes only. The policies and procedures set out in this handbook apply to all employees.**

The handbook is not intended as an exhaustive compilation of the Company's expectations, but rather provides information on key policies which are currently in effect. The Company reserves the right to make changes to any of the detailed policies if required.

Having been issued with this Handbook, it is your responsibility to review the content, and unless you notify the People and Development Department in writing, within 5 days of issue, you herewith agree to comply with all terms and conditions as expressed in this Employee Handbook and acknowledge that failure to adhere to the provisions as set out in this document may be viewed as a breach of your terms and conditions of employment with Peoples.

If you have any questions, you can contact your manager or the People and Development Department.

Peoples reserve the right to revise, add or delete any policies, procedures or benefits at our discretion.

## **Part 1 Company Rules**

### **1. Definitions**

In this handbook the following words and expressions have the following meanings: -

- "Group" means the Company, its holding company (if any) and any subsidiaries of it or of its holding company (all within the meaning of Section 1159 of the Companies Act 2006 (as subsequently amended, varied or re-enacted)) for the time being; and any company or companies associated with the Company by virtue of one or more common directors or shareholders;
- "Group Company" means any company within the Group;
- "personal data" is any information that relates to another during his or her lifetime and from which (or from which together with other information in or likely to come into the possession or control of the Company or any data processor instructed by the Company) that person can be identified and includes any expression of opinion about and any indication of the intentions of the Company or anyone else towards that person;
- "processing" data includes obtaining, recording, organising, adapting, altering, retrieving, combining, disclosing, transmitting, erasing and otherwise using data and holding data in hard copy and computer readable form;
- "sensitive personal data" is personal data relating to racial or ethnic origin, political, religious or similar beliefs, membership or non-membership of any trade union, physical or mental health condition, sexuality and sexual practices, the commission of and involvement in and the outcome of any proceedings relating to an alleged criminal offence;

### **2. Commission/bonus**

2.1. We want all of our employees to be successful and to contribute to the performance of the business. For employees who have the opportunity to earn a bonus, your manager will explain exactly how this is calculated as well as the payment process and frequency. Whilst the Company will always endeavour to ensure all accounts are accurate, employees should be aware that the final calculation of profit shares/bonuses can only be determined at the end of the financial year. Therefore, if earlier bonus amounts are made on a monthly/quarterly basis then there may be a risk of an overpayment being made if subsequent months/quarters record losses. The payment of all bonuses is subject to the annual audit of the Company's accounts confirming the result shown in the management accounts. Where an overpayment of bonuses/profit shares has occurred, the Company reserve the right to require repayment of the amount from the employee. This also applies to employees who leave the Company for any reason prior to the audited results being available and where an overpayment of bonuses/profitshare has occurred.

2.2. This clause applies to Sales employees only. Company policy requires you to appraise a customer's car thoroughly both digitally and on paper, this should include an accurate description of Bodywork, Tyres, Alloy wheels, interior condition and mechanical condition as determined by driving the vehicle. The valuation of the vehicle is based on your description and if the Company sustain a financial loss at the point of disposal, we reserve the right to withhold commission if the loss is due to your failure to complete the appraisal process as required.

### 3. OneCX - CEPA

The OneCX Programme is a fundamental part of your contract of employment with the Company. Accordingly, the Company reserves the right to view the OneCX performance and NPS performance of the Dealership on a monthly basis and re-determine your objectives and bonus earnings in the light of the recorded results. This review will be carried out by a Peoples Director.

### 4. Notification of Sickness or other Absence

4.1. If any absence has not previously been authorised by the Company employees must inform the Company of the fact of their absence and the full reasons for it at least one hour before their expected start time on each working day of absence until a medical certificate is provided to the Company. It is not acceptable to send a text message.

4.2. If an employee is absent from work due to sickness or injury which continues for more than seven days (including weekends) they must provide the Company with a medical certificate by the eighth day of sickness or injury. Thereafter doctors' medical certificates must be provided to the Company to cover any continued absence.

4.3. Immediately following their return to work after a period of absence which has not previously been authorised by the Company, employees must complete a Sickness Self Certification form.

### 5. Driving Licenses and Company Vehicles

5.1. To assist in the performance of employee duties, employees may be provided with a motor vehicle, the type, make, value and periodic removal and replacement of which will be entirely within the discretion of the Company.

5.2. If provided with a motor vehicle by the Company, then for so long as this is entrusted to the employee's care they must:-

- 5.2.1. comply with any reasonable directions of the Company with regard to its use, care and maintenance;
  - 5.2.2. at all times take good care of the vehicle and ensure that the provisions and conditions of any policy of insurance relating to its use are observed and that such insurance is adequate for the use to which it is put;
- (a) ensure your vehicle is taxed in line with Company process as detailed in the Company Car policy;
  - (b) ensure that at all times the vehicle meets all legal requirements relating to its condition and that the employee observes all legal requirements governing its use;
  - (c) ensure that the employee holds a full and valid driving licence for such vehicle;
  - (d) not permit the vehicle to be taken out of the United Kingdom without the written permission of the Company;
  - (e) at all times maintain a written record of mileage undertaken in such vehicle and the reasons for such mileage;
  - (f) on reasonable notice from the Company and without notice immediately upon the termination of the employee's employment, return the vehicle, its keys and related documents to or at the Company's direction and the employee hereby grants the Company and its servants and agents an irrevocable licence to enter the employee's property to collect the same.



- 5.3. Company vehicles may be driven only with the prior permission of the Company. Insurance rules for the driving of any Company vehicle require that the Company must have sight of the employee's driving licence before the vehicle is driven. Any disqualifications relating to drink or drugs automatically preclude the driving of Company vehicles. Failure to comply with these provisions will constitute an act of gross misconduct and may lead to summary dismissal.
- 5.4. Any defect identified by you in relation to a Company vehicle must be reported to the appropriate manager immediately and details of accidents, however slight and whether or not involving damage to another vehicle or injury to any person, must be reported immediately to your manager, and an accident report form completed.
- 5.5. Any insurance excess charged to the Company as a result of an accident involving a Company vehicle driven by you will automatically be charged to you and deducted from your salary unless it can be clearly shown that responsibility for the accident has been accepted and paid for by another party. The excess amount payable will be banded based on the age of the employee and/or based on any current driving penalties and is conditional on the Accident Reporting Procedure being fully adhered to.
- 5.6. For those individuals who do not have a Company car but whose job role entails driving company and/or customers vehicles, multiple cases of accidental damage may result in disciplinary action being taken. Furthermore, where the cost of the damages are not recovered from a third party, the Company reserve the right to charge the relevant costs to the employee. Where an incident occurs, the Accident Reporting Procedure must be fully adhered to. Failure to do so may be considered a breach of discipline.
- 5.7. When driving a Company vehicle you must ensure that you do not use a mobile telephone whilst driving, unless the vehicle is fitted with a Bluetooth device. Earpieces are not acceptable. You should therefore ensure that if your vehicle/phone does not have a Bluetooth function, your mobile telephone is switched off when entering the Company vehicle. This applies to both Company mobiles and your own personal mobile. This also applies to a vehicle being driven by a partner. Failure to comply with these provisions will constitute a serious breach of discipline and may lead to disciplinary action which could result in your dismissal.

## 6. Training

- 6.1. Employees may be required to attend scheduled internal/external training courses and you will be given due notice of any courses that you are required to attend by your manager. Failure to attend any training courses without good reason and prior authorisation from your manager will constitute a serious breach of discipline and may require you to reimburse the Company with any costs associated with non-attendance. It should also be noted that employees may be required to fly to certain external courses or events, therefore it is imperative that all employees have the relevant valid documentation in order to do this. Where training is approved by the Company, the Company will cover the training course fees in full. The Company will not pay any salary/overtime for any travel to/from a training venue.
- 6.2. The cost to the Company of training personnel to dealer/manufacture operational calibre is substantial. Training is a financial investment made by the Company to enhance the development and net worth of its employees, with an expected return on investment back to the Company. Therefore, should any employee terminate their employment with the Company prior to the

completion of one year's service or in circumstances where significant financial investment has been made in an employee during the calendar year, the Company reserves the right to recover in full (or such a proportion thereof as may be determined by the Company), the costs associated with the continuous professional development of the employee. Where applicable, such monies will be deducted from your next available or final salary as appropriate.

6.3. The Company will not under any circumstances pay any parking or fines incurred by employees.

6.4. All expenses incurred with training attended will be reimbursed in accordance with the Company's Training, Development and Expense Policy as detailed in the Employee Handbook.

## 7. Other Employment

7.1. Employees must devote the whole of their time, attention and abilities during their hours of work to the Company and to their duties for the Company. Employees may not under any circumstances whether directly or indirectly undertake any other duties of whatever kind during their hours of work for the Company.

7.2. Employees may not without the prior written consent of a Peoples Director (which will not be unreasonably withheld) engage whether directly or indirectly in any business or employment outside their hours of work for the Company.

## 8. Health and Safety

8.1. You are required while at work to take reasonable care for the health and safety of yourself and other persons who may be affected by your acts or omissions.

8.2. You must co-operate with any fellow employees of the Company as far as necessary to enable them to perform or comply with any duty or requirement imposed upon them regarding safety at work. A copy of the Company's Health and Safety Policy, which should be complied with at all times, is detailed in the Employee Handbook.

8.3. The Company will take all reasonably practicable steps to ensure the health and safety and welfare of employees while at work. Employees must familiarise themselves with the Company's Health and Safety Policy and its Safety and Fire rules. It is also their legal duty to take care of their own health and safety and that of their colleagues.

## 9. Confidentiality

9.1. Employees are aware that in the course of their employment with the Company they will have access to and be entrusted with information in respect of the business and financing of the Company or any Group Company and their dealings, transactions and affairs, all of which information is or may be confidential.

9.2. Employees will not (except in the proper course of their duties) without the previous consent of the Company in writing, or after the period of their employment with the Company, divulge to any person whatever or otherwise make use of (and shall use their best endeavours to prevent the publication and disclosure of) any confidential information concerning the business or finances of the Company or any such confidential information concerning any of the Group Companies or any of its suppliers or customers.

9.3. Employees must not remove any documents or tangible items which belong to the Company or which contain any confidential information from the Company's premises at any time without prior authorisation.

9.4. All notes and memoranda of any confidential information concerning the business of the Company or any of its suppliers or customers which shall be acquired received or made by employees during the course of their employment shall be the property of the Company and shall be surrendered by them to someone duly authorised in that regard at the termination of their employment or at the request of the Company at any time during the course of their employment as must all other property of the Company which may include keys, security cards and computer equipment.

9.5. Employees must if requested by the Company delete all confidential information from any re-usable material and destroy all other documents and tangible items which contain or refer to any confidential information and which are in their possession or under their control.

#### 10. Positive Work Environment

10.1. In order that the Company may maintain a positive work environment for all employees, they are required not to engage in or permit any fellow employee to engage in any unlawful discrimination against any person (whether or not a Company employee) in the course of the employee's employment by the Company.

10.2. All employees are required to familiarise themselves with the Company's Diversity, Equity and Inclusion Policy as detailed in this Employee Handbook.

#### 11. Incapacity

11.1. Without limitation of the foregoing provisions, if you shall:-

11.1.1. become apparently insolvent or compound with or grant a trust deed for or/on behalf of your creditors; or

11.1.2. be guilty of:-

11.1.2.1. Wilful neglect or gross incompetence in the discharge of your duties hereunder; or

11.1.2.2. Any dishonesty or personal misconduct likely materially to affect adversely the Company's reputation or business; or

11.1.2.3. be convicted of any criminal offence which in the reasonable opinion of the Managing Director materially affects your position as an employee of the Company;

The Company shall be entitled to terminate your employment hereunder without further notice and without payment in lieu of notice. Any delay or forbearance by the Company in exercising such rights or termination shall not constitute a waiver of it or them nor shall it limit or restrict the Company's rights in the event of a repetition or recurrence of such events.

#### 12. Mystery Shop Programme

Mystery shopping exercises will be undertaken within the Company for the purposes of continuous professional development, to identify training needs, to improve service quality and customer satisfaction and to ensure adherence to process and policy. Mystery shopping exercises will result in



employees, from time to time, being recorded interacting with customers using audio, photographic or video equipment. The results of such exercises will be communicated to managers and discussed with employees on an individual basis, ensuring compliance to the GDPR and Human Rights Act. In accordance with the Ford Motor Company Mystery Shopping Programme, should the dealership incur a failed mystery shop, any financial penalty incurred will be deducted from the employee's salary. In instances where it is deemed the employee has wilfully failed to carry out their duties in accordance with process and policy, disciplinary action may be taken.

### 13. Ford Pass Activation

The Ford Pass Programme is an important part of your contract of employment with the Company. Accordingly, the Company reserves the right to review the Ford Pass Activation Objective of the Dealership on a quarterly basis and re-determine your objectives and bonus earnings in the light of the recorded results. This review will be carried out by a Peoples Director.

### 14. Incentives Received

All incentives received must, before receipt, be cleared by the Managing Director of the Company. Full details of all incentives must then be passed through the Company via the Edinburgh Dealership (1 Cultins Road, Edinburgh, EH11 4DF).

### 15. Company Facilities and Other Matters

15.1. The company will not accept responsibility for any personal property of employees which is kept or brought onto its premises.

15.2. Employees are not permitted to bring personal/portable electronic appliances onto company premises unless this has been pre authorised by your Manager/ the Managing Director and the appliance has been subject to the relevant Portable Appliance Testing (PAT) in line with Health & Safety Regulations. Employees are only entitled to play portable radios in accordance with the Company's performing rights licence.

15.3. You are not permitted to park non-Company vehicles on Company premises. You are reminded that the Company accepts no responsibility for damage from any cause to any vehicle on Company premises.

### 16. Changes to your Terms of Employment

The Company reserves the right to make reasonable changes to any of an employee's terms and conditions of employment and will notify them in writing of such changes at the earliest opportunity and in any event within one month after such changes have taken effect. Such changes will be deemed to be accepted unless an employee notifies the Company of any objection in writing before the expiry of the notice period.

## **Part 2 Policies and Procedures**

### **Looking After You:**

Health and Safety Policy	Page 11
Drug, Alcohol and Substance Misuse Policy	Page 15
Diversity, Equity and Inclusion Policy	Page 18
Corporate Social Responsibility Policy	Page 21
Absence Management Policy	Page 23
Bullying and Harassment Policy	Page 27
Grievance Policy	Page 29
Whistleblowing Policy	Page 30
Retention Policy	Page 32

### **Workplace Policies:**

IT Policy	Page 33
Social Media Policy	Page 37
GDPR Policy	Page 39
Employee Privacy Policy	Page 45
Dress Code Policy	Page 49
Company Car Policy	Page 50
Training, Development and Expenses Policy	Page 54
Disciplinary and Performance Policy	Page 56
Anti-corruption and Bribery Policy	Page 59
Corporate Criminal Offence Policy	Page 63

### **Family Friendly Policies:**

Maternity Policy	Page 65
Paternity Policy	Page 67
Adoption Leave Policy	Page 68
Flexible Working Policy	Page 69
Time off for Dependents Policy	Page 71
Bereavement Leave Policy	Page 72
Adverse Weather Policy	Page 73

## Health and Safety Policy

### Health and Safety Management Statement

Peoples is a family-owned group of six franchised dealerships that have been operating since 1983. The business represents the Ford brand in the North West and Scotland. We have a Board of Directors who are responsible for Health and Safety.

Each location operates as a business with a management team. The locations predominantly engage in low risk, office-based sales and administration activities. Each location also has technicians and valet staff engaged in service and maintenance activities. Two locations have a bodywork repair and paint facility. We have a non-commercial fuel facility at one location that is routinely inspected by the Fire authority for compliance.

The health, safety, and wellbeing, of employees and others that may be affected by the business activities, is considered a key management responsibility. Commercially, the business utilises the services of employees to add value in the products and services it offers. Legally, the Directors recognise their duties under the Health and Safety at Work Act 1974 and the associated regulations. Morally, the business is a family business, all our colleagues are important. Management of Health and Safety is therefore intrinsic to our management and operations.

We have a Health and Safety organisational structure document which identifies our roles and responsibilities. We have a Health and Safety process map for; recruitment, induction and training. We have a comprehensive management policy document. We have a Health and Safety management system for planning, maintaining, recording and visibility of our status. The management system provides all employees with access to key information and official guidance provided by HSE. The system also provides access to HSE guidance on Risk Assessment (INDG163). Our adopted risk assessments are provided on the system.

We operate our service repair and accident repair facilities in accordance with the guidance provided in HSG261 and associated HSE INDG series publications. Our Brokers and Insurers are Marsh Ltd.

Our employees are made aware of our requirements in their induction and training. Independent training assessment of Health and Safety is carried out at every level. We engage with our employees, specifically to review risk assessment and consider improvements to the work environment. We engage contractors, importing their expertise where internal resources are not appropriate. We have a process of approval of contractors and a permit to work document for processes incurring significant risk.

Our employees routinely attend manufacturers training courses for specific work instruction and training. Most of our technicians are time served apprentices/mechanics and have a wealth of experience. We have health monitoring in place and monitor the issue and use of personal protective equipment.

Our operations are routinely vetted by Ford to ensure we maintain the highest level of brand standards. Our insurers provide an annual commercial audit. Our system gives; current status, exception reports, planning, records, risk assessments and auto email reminders of tasks requiring action. We have had visits from HSE over a number of years, we have had no improvement notices and have no outstanding actions.

### Purpose

Peoples is committed to ensuring that every possible effort is made, so far as is reasonably practicable, to ensure the health and safety and general welfare of all employees. We welcome and encourage all suggestions from our employees in relation to health and safety. It is the responsibility of management at all levels, to promote health and safety throughout the working day. Managers are responsible for ensuring that all employees, under their control, are made fully aware of hazards in their departments, and are adequately trained in prevention and protection. We are committed to providing information, instruction, training and supervision, on health and safety matters for all employees as well as consulting with them regarding arrangements for health and safety management. Equally, all employees have a duty to exercise personal responsibility to take reasonable care for the health and safety of themselves. Employees will work in a safe manner and will not, by act or omission, knowingly endanger themselves, their colleagues or the general public.

### What is covered by this policy?

In accordance with our health and safety duties, we are responsible for:

- Assessing risks to health and safety and identifying ways to overcome them.
- Providing and maintaining a healthy and safe place to work and a safe means of entering and leaving our premises, including emergency procedures for use when needed.
- Providing information, instruction, training and supervision in safe working methods and procedures as well as working areas and equipment that are safe and without risk to health.
- Ensuring that equipment has all necessary safety devices installed, that equipment is properly maintained and that appropriate personal protective equipment is provided.
- Promoting co-operation between employees to ensure safe and healthy conditions and systems of work are in place.
- Regularly monitoring and reviewing the management of health and safety at work, making any necessary changes and bringing those to the attention of all employees.

As an employee, you should recognise that everyone shares responsibility for achieving healthy and safe working conditions. You must consider the health and safety implications of your acts and/or omissions and take reasonable care for your health and safety and that of others. Any health and safety concerns should be reported to your manager or a Peoples Director immediately. Your legal responsibilities as an employee are simply put: to look after your own health and safety, cause no harm to others, and do as instructed with regards to health and safety. One of the key requirements to help all of us stay safe, is for you to report anything that you are aware of that may cause an accident. Your contribution is needed.

### Standards of workplace behaviour

- You must co-operate with supervisors and managers on health and safety matters and comply with any health and safety instructions.
- You must take reasonable care of your own health and safety and that of others by observing safety rules applicable to you and following instructions for the use of equipment (including safety equipment and personal protective equipment).
- Any health and safety concern, however trivial it might seem, including any potential risk, hazard or malfunction of equipment, must be reported to your Line Manager.
- You must co-operate in the investigation of any accident or incident that has led, or which we consider might have led, to injury.

Failure to comply with health and safety rules and instructions or with the requirements of this policy may be treated as misconduct and dealt with under our Disciplinary Procedure.

### Equipment

- You must use equipment in accordance with operating instructions, instructions given by a Manager/Supervisor and/or any relevant training. Any fault with, damage to or concern about any equipment or its use must immediately be reported to your manager.
- You must ensure that health and safety equipment is not interfered with and that any damage is immediately reported.
- You should not attempt to repair equipment unless trained and designated to do so. Failure to report damage to or a fault with equipment or failure to use it as directed may result in disciplinary action.

### Accidents and first aid

Any accident at work involving personal injury should be reported to your manager and the details will be recorded in the Accident Book. You must cooperate with any resulting investigation. Details of first aid facilities and trained first aiders are displayed on the notice boards and are available from your manager. If you suffer an accident at work you (or someone on your behalf) must report this to your manager as soon as possible. All accidents should be reported, however trivial.

### National health alerts

In the event of an epidemic or pandemic alert we will organise our business operations and provide advice on steps to be taken by employees, in accordance with official guidance, to reduce the risk of infection at work as far as possible. Any questions should be referred to the People and Development Department. It is important for the health and safety of all employees that you comply with any instructions that are issued in these circumstances.

### Emergency evacuation and fire precautions

You should familiarise yourself with the instructions about what to do in the event of fire which are available from your manager. You should also know where the fire extinguishers are located, ensure that you are aware of your nearest fire exit and alternative ways of leaving the building in an emergency. Fire drills will be held to ensure that our fire procedures are effective and to ensure you are familiar with them. These drills are important and must be taken seriously. You should notify your Manager or the People and Development Department as soon as possible if there is anything (for example, impaired mobility) that might impede your evacuation in the event of a fire.

If you discover a fire you should not attempt to tackle it unless you have been trained or feel competent to do so. You should operate the nearest fire alarm, if you have sufficient time, call 999 and report the location of the fire. On hearing the fire alarm you should remain calm and walking quickly, not running, evacuate the building immediately following the instructions of the fire wardens. Do not stop to collect personal possessions, do not use the lifts, and do not re-enter the building until you are told that it is safe to do so.

Smoking (including e-cigarettes) is prohibited in the following areas:

- In and around the workshop, Body shop or customer facing areas of the Dealership;
- In the parts stores;
- In the Valet Bays;
- In any other area marked with a ' No Smoking' sign.
- In any Company or Customer vehicle

#### Risk assessments, DSE and manual handling

General workplace risk assessments are carried out as required, or, as reasonably requested by employees or management. Managers are responsible for ensuring that any necessary risk assessments are undertaken and that recommended changes to the workplace and working practices are implemented.

#### Vehicles Including Fork Lift Trucks

Only authorised persons are permitted to drive company vehicles. Drivers must be in possession of a valid driving license and will be aware of and comply with all legal obligations involving the driving and control of vehicles. Mechanical defects must be reported immediately to your Line Manager. Details of any accident involving vehicles must be given to your manager and an accident report form of all accidents must be completed as soon as possible after any accident. Any accident involving injury must be reported to the Police at the time of the accident.



## **Drug, Alcohol and Substance Misuse Policy**

### **Purpose**

This policy covers all employees, consultants, job applicants, contractors and visitors to any of our sites. For the purposes of this policy the term drug includes:

- Substances covered by the Misuse of Drugs Act 1971 (referred to as “controlled drugs”);
- Prescribed and over-the-counter drugs;
- Solvents and any other substances

This policy is designed to help protect our employees from the dangers of alcohol, drugs and other substance misuse. It aims to encourage those with misuse problems to seek help and to ensure individuals are treated consistently. The Company recognises that it has a responsibility to its employees and customers to ensure that this risk is minimised and that any employee with such problems is able to obtain help and support.

### **Policy**

We take matters relating to the misuse of alcohol, drugs and/or substances very seriously. Every employee has a responsibility for Health and Safety and a responsibility for the implementation of this policy. Employees could be liable to criminal charge if their alcohol consumption or drug-taking puts the safety of themselves or others at risk. Company policy involves two approaches:

- Providing reasonable assistance to the employee who is willing to co-operate in treatment for an alcohol, drug or substance abuse problem.
- Adhering to disciplinary rules, enforced through disciplinary procedures, where the use of alcohol, drugs or substances affects performance or behaviour at work or has the potential to bring the Company into disrepute.

Any breaches of this policy will be handled under the Company’s Disciplinary and Performance Management Policy and employees may be liable to dismissal on the grounds of gross misconduct. As with all disciplinary matters, the circumstances of each case will be fully investigated. In this policy a person will be deemed unfit due to drugs or alcohol if they have drugs or alcohol in their body at a level that would cause them to test positive in either Company’s drugs or alcohol test.

### **Policy Rules**

- It is strictly against Company policy for any employee to bring alcohol, drugs or substances to work or to be unfit to work due to drugs or alcohol. This includes:
  - During working time
  - Whilst on company premises
  - When driving on company business, either in a company or non-company vehicle
  - During a period prior to work where the effects may carry over to the workplace, taking into consideration the fact that some alcohol and drugs can remain in the system for longer than twelve hours.
- Anyone suspected of being unfit to work due to alcohol, drugs or substances will be escorted from the premises immediately. The Company reserves the right to request a drug/alcohol test.
- Company arranged social events are to be considered as an extension of working time during which employees are expected to conduct themselves appropriately. Excessive alcohol

consumption that results in poor behaviour and/or the use of drugs or substances is strictly prohibited. Where conduct fails to be of an acceptable standard disciplinary action may be taken.

- Any employee, who is required to take a substance for a legitimate medical reason, must notify their manager in advance. This includes prescription medications which have a known impact on driving abilities or can cause drowsiness. The onus is on the employee to notify their manager immediately.
- Dispensing, distributing, possessing, using, selling or offering to buy controlled drugs or substances at work is prohibited. Any such activity carried out in circumstances where you are liable to bring the Company into disrepute is also prohibited and may be reported to the police (this includes reasonable suspicion of any such activity).
- Possession of alcohol, drugs or substances during working hours will be treated in the same way as consumption. The Company has the right to request to search an employee, their vehicle or belongings where alcohol or drug use/misuse/supply is suspected. These rules apply equally to illegal drugs, substances and prescription drug misuse. The Company reserves the right to conduct such searches on Company premises at any time if management believe that the prohibition of substances is being or has been infringed. If an employee refuses to comply with the search procedure, such refusal will normally be treated as amounting to gross misconduct and will entitle the Company to take disciplinary action.
- Anyone convicted of a crime relating to substance abuse, sale or supply out with work may be subject to disciplinary action.
- It is wholly against Company policy for anyone who has the use of a company vehicle or who drives any vehicle for company business to drive this while under the influence of alcohol or drugs. Employees who are suspected or found guilty of driving while under the influence will be subject to disciplinary action. Loss of licence due to a drug or alcohol conviction (regardless of this occurring outside of working hours) may result in disciplinary action. Where driving is part of an employees' job role, the possibility of alternative employment will be considered by the Company, however should there prove to be no viable alternatives then the employee will be dismissed with notice from the company. The loss of a licence will result in the removal of a company vehicle or cash option with immediate effect and will remain while the driving ban is in place.

#### Alcohol, Drug and Substance Testing

To assist in the effective implementation of this policy, the Company reserves the right to conduct alcohol, drug and substance tests. Such testing may be carried out in the following circumstances:

#### For cause testing:

- Testing for alcohol, drug or substance misuse may be carried out if an accident or incident occurs and there are reasonable grounds to suspect that an action or omission by an employee led to the accident and was as a result of drug, alcohol or substance misuse.
- When there is reasonable suspicion that an employee has been misusing or is under the influence of alcohol or drugs. By way of example, a complaint received in good faith internally or externally may give reasonable grounds to suspect alcohol or drug misuse.

Random testing:

- At the Company's sole discretion, unannounced random testing may be carried out. This involves the random selection of 5% of employee and/or contractors at the relevant location to be randomly tested. This means that everyone has an equal chance of being randomly selected for testing;

Follow-up testing:

- An employee who is being supported while they undergo dependency counselling and rehabilitation may be subjected to further periodic testing to ensure that the employee is complying with any course of rehabilitation that has been prescribed.
- Where testing takes place, the individual will be expected to sign a written consent form to be tested. Failure to give consent, or refusal to supply the required sample, will be considered as a breach of these rules and may lead to disciplinary action being taken.
- Where the results of a drug or alcohol test are positive, the employee will be suspended and disciplinary action will be taken. The employee may be liable to dismissal on the grounds of gross misconduct.

Help and support

The Company will endeavour to ensure that advice and help are made available to any employee who feels they have a problem with alcohol or drug misuse. The company offers all employees support via the Employee Assistance Programme provided by Health Assured. Additional external services are provided by GPs, hospitals and other agencies. In the first instance, individuals will be encouraged to seek help from their GP or via EAP. Through this policy the Company will seek to assist employees in obtaining appropriate specialist help and to ensure that everyone is treated in a fair and consistent manner.

Some useful links to websites are provided below:

- EAP VIA Health Assured - [www.healthassuredeap.com](http://www.healthassuredeap.com) or contact 0800 030 5182. To gain access to the Health and Well-being Portal you will require the below login credentials:  
**Username: Peoples Password: Ford**
- Alcoholics Anonymous Tel 0800 9177 650  
[www.alcoholics-anonymous.org.uk](http://www.alcoholics-anonymous.org.uk)
- ACAD (Advice and Counselling on Alcohol and Drugs) [www.acad.org.uk](http://www.acad.org.uk)
- FRANK Tel 0800 776 600 (24 hours) [www.talktofrank.com](http://www.talktofrank.com)

## **Diversity, Equity and Inclusion Policy**

### **Purpose**

Peoples are committed to encouraging equality, diversity and inclusion amongst our workforce, and eliminating unlawful discrimination. Our aim is for our employees to be truly representative of all sections of society and our customers and for everyone to feel respected and able to give their best.

It is the responsibility of every employee to ensure that their own conduct conforms to the expected standards and reflects the commitments made in this policy. The aim is to encourage and promote respect amongst colleagues and customers, promote good working practices and ensure that the workplace is free from unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic or national origin, sex, sexual orientation, gender reassignment, age, marital status or disability. We are committed to creating a culture where our differences are truly valued and everyone's individuality can be included.

We aim to ensure that all our employees achieve their full potential and are treated with dignity and respect at work. All employment decisions are taken without reference to irrelevant or discriminatory criteria and we are absolutely committed to living and breathing this.

These principles of equality of opportunity and non-discrimination also apply to the manner in which our employees treat customers, our business partners and visitors. Employees are expected to work with the Company towards these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

### **Policy**

All Peoples employees and all applicants for employment will be given equal opportunity, irrespective of their colour, race, nationality, ethnic or national origin, sex, sexual orientation, gender reassignment, age, marital status or disability in all aspects of employment and training. The operation of recruitment, training and promotion policies to all individuals will be in accordance with equal opportunities. We acknowledge, and will honour, our statutory obligations to part-time and fixed terms workers.

All employees have a right to equality of opportunity and a duty to implement this policy. Any suspected breach of the Equal Opportunities Policy will be taken seriously, fully investigated and may result in disciplinary action. Anyone who believes that they may have been disadvantaged on discriminatory grounds may raise the matter through the Company's grievance procedure.

### **Our commitments**

- We will encourage equality, diversity and inclusion in the workplace.
- We will create a working environment free of bullying, harassment, victimisation and unlawful discrimination. We will promote dignity and respect for everyone and will recognise and value the individual differences and contributions of all our colleagues.
- We will treat all of our colleagues and customers as individuals;
- We will support any colleagues in relation to their gender identity, including transitioning at work and will respect the confidentiality of all colleagues and will not reveal information without the prior agreement of the individual
- We will treat any issues of bullying and harassment in relation to an employee's personal characteristics seriously
- We will make opportunities for training and development available to all colleagues. We want you to be the best you can be.

### Recruitment and Selection Practices

We do not discriminate directly or indirectly, on the grounds of colour, race, nationality, ethnic or national origin, sex, sexual orientation, sexuality, gender reassignment, age, marital status or disability, when undertaking recruitment or considering promotion. We periodically review our selection criteria and procedures to ensure that it does not offend the principles of this Policy. We pride ourselves on showing the local and wider communities that we are open, welcoming and encouraging to all talent. Where we recognise a particular group or groups of people are unrepresented in our business, we will seek to engage in proactive initiatives across our company to support and encourage people from this group to apply for a role. We are committed to the highest standards of equality and inclusion. To support this via our Recruitment and selection processes we:

- Do not discriminate or disadvantage any applicant on any unlawful ground or protected characteristic;
- Ensure the confidentiality and data provided by applicants will be respected at all times and only used for the purposes agreed;
- Will ensure all recruiting managers and People and Development colleagues make decisions based exclusively on the identified skills and behaviours required for the role; and
- Will make all reasonable adjustments an applicant may require, including those with a disability, to be able to participate in the selection process in a fair and equitable way.

### Sources of Recruitment

All roles are typically advertised in several different places to attract a wide and diverse group of applicants. All roles are advertised on our website as well as additional job sites. All our adverts use inclusive language and images which show the diversity within our business.

### Applications and Interviewing

All applications are processed in exactly the same way. All interviews are conducted on an objective basis. Where it is necessary to assess whether personal circumstances will affect performance of the job, this will be discussed openly and objectively, without detailed questions based on assumptions about marital status, children and domestic obligations, race, sexual orientation, sexuality, gender reassignment, age or disability.

### Internal management

Peoples will support all our employees to progress within the organisation free from discrimination. Where a disability arises for an existing employee, we will make every effort to retain them within the workforce whenever reasonable or practicable.

Wherever practicable Peoples will install in existing premises, facilities for people with disabilities and with any future capital development in terms of new or refurbished premises make every practical effort to provide for employees and customers with disabilities.

### Telling us

For anyone who is planning to transition or is already in the process of transitioning it can be a difficult step to tell people. However, we encourage employees to talk to their manager openly about the situation as early as they can, so we can ensure the correct support is given. If one of our employees feels like they can't talk to their manager or that they need additional support, then they should speak to the People and Development Team who will provide any relevant help and/or guidance. If an employee tells us about their Trans status, we'll never disclose this to anyone unless you say it's okay to do so or you ask us to. If anyone outs a colleague as transgender without their permission or spreads rumours or gossip about someone's

gender, we'll deal with this matter under the Bullying and Harassment Policy.

#### Personal data

If you want to change your name or remove or change your title (Mr/Mrs/Miss/Ms) from our records, you don't need a Gender Recognition Certificate to do this. If you want to amend your record, you can notify the People and Development Department who will be on hand to help. Although we know it might not be easy for you to legally change your gender, if you don't, we'll need to keep some of your records – such as National Insurance and pensions – as your gender identity at birth. However, we will keep this information as confidential as possible. If you do change your legal gender identity, we'll update all the personal data we have about you and make sure this is kept strictly confidential. As well as your personnel record, this includes payroll, National Insurance and pension data. So we can make these changes, you'll need to give your Manager a copy of your amended birth certificate or Gender Recognition Certificate. Your manager will provide a copy of this to HR accordingly.

Further guidance is available via the ACAS website [www.acas.org.uk](http://www.acas.org.uk)

These principles of equality of opportunity and non-discrimination also apply to the manner in which our employees treat customers, our business partners and visitors. Employees are expected to work with the Company towards these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.



## **Corporate Social Responsibility Policy**

### **Overview**

The running of our business has an effect on society and as a result we have a responsibility to our customers, our employees and our contractors as well as the broader community in which we operate. We are committed to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and employees, minimising our impact on the environment, and improving the quality of the local community.

By putting CSR into practice, we are committed, wherever possible, to:

- Conducting ourselves responsibly and in an ethical manner
- Creating a positive and supportive working environment
- Supporting local communities
- Improving service levels to customers
- Acting fairly in our dealings with suppliers and other third parties
- Minimising the impact on our environment.

### **Communication, Responsibility and review**

By having this policy, we seek to raise awareness of any negative impacts of our business and methods to reduce them. Our Board of Directors have overall responsibility for our CSR strategy and for implementing this policy. They have a key role in ensuring the systems and controls we have in place are effective.

All employees have a role to play in complying with our CSR objectives and are encouraged to make further suggestions in relation to initiatives we could undertake. If anyone has a suggestion, they should contact their local Director.

We are fully committed to the highest possible standards of openness, honesty, and accountability. In line with that commitment, in accordance with our Whistleblowing Policy, we actively encourage all employees who have serious concerns about any real or perceived departure from the high ethical standard that we set to voice those concerns openly. Our Whistleblowing Policy can be found in our Employee Handbook.

We are committed to ensuring our policy remains effective. As part of our ongoing commitment, this policy is reviewed at least annually to verify its effective operation. Records of the reviews are maintained and any necessary amendments are made to the policy, as appropriate.

### **Our CSR Principles**

#### **Our conduct**

We aim to adopt the highest professional standards and not to act in such a way as to compromise our firm's integrity. We actively promote respect between our staff members in their dealings with each other and with clients and other third parties.

#### **Our working environment**

We recognise that our employees are our most important resource. We actively seek to offer our employees a positive and healthy working environment and ensure that they have rewarding careers and job satisfaction. We maintain an Employee Handbook, which sets out the rights and expectations of all employees and we seek to ensure that all employees have access to the training they need both for their own development and to enable them to deliver a high-quality service. Our procedures in relation to training and development can be found within our Employee Handbook.

We consider all employees to be equal and we aim to create a working environment which is free of unlawful discrimination. In this regard, we maintain an Equality, Diversity and Inclusion Policy.

#### **Our community**

In considering our impact on the community we support and work with local charities. We encourage dialogue with local communities and groups for mutual benefit.

#### **Our customers**

We are committed to delivering a high level of service to all our customers. We understand that our business exists in a very competitive market and in order to retain our customers we need to deliver a professional and courteous service. Wherever possible, we take steps to promote equal opportunity in relation to access to the legal services that we provide. We take account of the diversity of the communities we serve in order to ensure that, subject to funding constraints, our services are accessible to all customers.

#### **Suppliers**

We are committed to eliminating unlawful discrimination and to promoting equality and diversity in our professional dealings with suppliers and other third parties. Our Equal Opportunities Policy can be found in our Employee Handbook. We endeavour to enter into clear and fair contracts with our suppliers. We commit to the timely settlement of suppliers' invoices. Where possible, we aim to support the local economy by contracting with local suppliers.

#### **Environment**

We are committed to behaving responsibly and to minimising our impact on the environment. We aim to minimise our impact on the environment by:

- Minimising waste and adopting sensible recycling policies in respect of our paper and food consumption
- Providing safe and comfortable working conditions
- Encouraging employees to walk, cycle or use public transport to get to work
- Ensuring that electrical equipment and lights are off when not in use and through the use of energy saving lighting
- Ensuring that heating is turned off or down outside office hours

## **Absence Management Policy**

### **Purpose**

We are committed to improving the health, wellbeing and attendance of all our employees. Our people come first. We value the contribution you make to support our success, so if you are unable to be on time or attend work for any reason, we miss that contribution. We recognise that some absences in the workplace are unavoidable and therefore we have this Policy to promote, encourage and enable the highest practicable attendance standards from all our employees. This policy aims to provide a fair and consistent process for handling absence and sets out our procedure for reporting sickness absence.

We reserve the right to make changes to this policy and to waive any stage of the policy if it deems appropriate. We may vary the procedures set out in this policy as appropriate in any case.

### **Policy Guiding Principles:**

You have an obligation to attend work unless prevented to do so by ill health or injury;

- When absent from work due to sickness or injury, you must comply with the notification procedures outlined below. Failure to do so could impact your entitlement to sick pay, where applicable;
- You are expected to keep in reasonable contact with the Company throughout any period of absence;
- Personal information relating to sickness absences will be treated in a sensitive and confidential manner

### **Absence Procedure**

If you are unable to attend work for any reason you must personally notify your manager by phone at least one hour before you are due to start work. It is not acceptable to send a text message. The reason for your absence together with the likely duration should be given. You will need to contact your manager at the start of each day that you are absent, unless you have provided a medical certificate for your absence.

For sickness absence of up to seven calendar days you need to complete a self-certification form which is available from your manager, the People and Development Team or via Workplace. For absence of more than 7 days you need to obtain a medical certificate from your doctor stating that you are not fit for work along with the reason(s) why. This should be forwarded to your manager within 3 days of issue. If your absence continues, further medical certificates need to be provided to cover the whole period of absence. If you don't provide a medical certificate within this timescale it may result in your absence being regarded as unauthorised and Statutory Sick Pay or Company Sick Pay may be withheld.

If a medical certificate states that you "may be fit for work" you should let your manager know straight away. Where necessary we will hold a return to work interview to discuss any additional measures that may be needed to facilitate your return to work, taking account of your doctor's advice. If such measures are not possible, you will remain on sick leave and we will set a date to review the situation. Failure to follow the provisions detailed above may result in disciplinary action.

### **Return to Work Interviews**

Every employee who has been absent from work will have a Return-to-Work Interview on the day they return. This is irrespective of whether the absence was for 1 day or 1 month. This is to ensure you are fit for work and to discuss your most recent absence. A Return-to-Work form will be completed for each occasion of absence and this will be signed by you and your manager before being sent to the People and Development Team.

### Sickness absence and Annual Leave

It is your responsibility to cancel holidays that cannot be taken because of sickness absence. Where you are ill at the start of a holiday, you should telephone your manager and inform them of the circumstances and that you wish to cancel your holiday request. A medical certificate will be required to support any holidays cancelled due to sickness. Holidays should not be taken during or substituted for, periods of sickness absence.

### Unauthorised Absence / AWOL (Absence without leave)

If you do not attend work and/or fail to notify your manager within the timescales stipulated in this policy, your absence will be classified as unauthorised or absent without leave (AWOL). Cases of unauthorised absence / AWOL will be dealt with under the Company's Disciplinary and Performance Management Policy.

If you are AWOL we will try to contact you by telephone and in writing if necessary. This should not be treated as a substitute for reporting sickness absence. If you make contact and / or return to work following unauthorised leave/AWOL, you may still be subject to action under the Disciplinary and Performance Management Policy and the company deems AWOL as potential Gross Misconduct.

### Sick Pay

You should refer to your contractual terms for details of the sick pay to which you are entitled. Unless otherwise stated, you shall not be entitled to a Company Sick Pay scheme and therefore Statutory Sick Pay (SSP) will be paid to you during your absence. SSP will be paid in line with current legislation. SSP is payable to you from the 4th consecutive day of absence on the provision of either a self-certificate or medical certificate covering your full period of absence. No payment will be made for absences of 3 days or less.

### Medical Reports

In line with your contract of employment, we may require you to give us consent to obtain a medical report. This can be for long term absence or short-term frequent absences. The purpose of this is to enable Peoples to gain further clarity and information in relation to your absence.

Obtaining this information, allows us to abide by our duty of care. Should you not consent to us obtaining a medical report or at our request undergo a medical examination, any decisions made by Peoples will be based on the available information, which may be more limited in the circumstances.

### Long Term Absence

In cases where employees have been or are expected to be absent from work for 4 weeks or more, we classify this as long-term absence. For cases of long-term absence, your manager may, in conjunction with the People and Development Team, arrange an absence review meeting / home visit to discuss your absence. You will be informed of any meetings / visits in writing along with the date, time and who will be present. Notes will be taken at any review meetings.

The Company reserves the right to dismiss an employee who is incapable of work for a prolonged period, or for persistent intermittent periods. The grounds for dismissal will be Capability. This decision may be taken if;

- Having obtained information regarding long term or frequent short-term absences there are no appropriate adjustments that can be made; and/or
- The impact of ongoing absence levels is likely to cause a significant impact on the business and/or your health.

The decision to dismiss is not taken lightly and in all cases a formal process will be followed as detailed below:

- You will be given written notice of any Capability meeting.
- You are entitled to bring a representative to any meeting or appeal meeting under this procedure – this can be either a trade union representative or a fellow employee.
- You may appeal against the outcome of this procedure and all appeals should be made in writing stating the full grounds of appeal. Unless it is not practicable, you will be given written notice of an appeal meeting within one week of the appeal being received. Any new matters raised in an appeal may delay an appeal meeting if further investigation is required. If the decision is taken to dismiss on the grounds of capability, you will be entitled to payment in lieu of notice in line with your contract of employment.

#### Levels of Absence

The Company is committed to supporting employees throughout any periods of absence, however where absence reaches or exceeds the below triggers, action may be taken in line with the Company's Disciplinary and Performance Management Policy:

- 4 periods of absence in a rolling 12-month period; or
- 10 absence days or more within the same period

Each case will be investigated on an individual basis prior to disciplinary action being taken. Factors which will be considered include:

- Whether the absences relate to sickness arising from a disability or underlying health condition;
- Whether there is a likelihood of a reoccurrence;
- Whether the absence record indicates a trend/pattern of absence e.g. following weekends or non-working days;
- Where there has been a failure to follow the absence reporting procedure;
- Absences linked to a recently completed probationary period

The above is not an exhaustive list and any other relevant information may be used as part of the individual case. If appropriate you may be invited to a formal meeting in line with the Disciplinary and Performance Management Policy. You will be given written notice of a meeting and you will have the right to be accompanied by a fellow employee or Trade Union Representative. At the meeting you will have the opportunity to put forward your side of the case.

As a result of the meeting, you may be issued with a Disciplinary sanction. You will be informed of the sanction and of your right to appeal. Each case will be assessed on its own merits. The sanction options are set out below:

- First Written Warning (which will remain on your file for 12 months)
- Final Written Warning (which will remain on your file for 12 months)
- Dismissal

### Disabilities

We are aware that sickness absence may result from a disability. At each stage of the absence procedure, particular consideration will be given to whether there are reasonable adjustments that could be made to the requirements of a job or other aspects of working arrangements that could provide support at work and/or assist a return to work. If you consider yourself to be affected by a disability or any medical condition which affects your ability to undertake your work, you should inform your manager.



## **Bullying and Harassment Policy**

### **Purpose**

We put people first and all our employees and visitors are entitled to a working environment which respects their personal dignity and which is free from harassment. Harassment is unacceptable and will be regarded as gross misconduct under our Disciplinary and Performance Management Policy. Harassment of whatever type and/or bullying will be viewed seriously. This Policy is designed to raise general awareness of the circumstances which may amount to unlawful harassment and any complaint will be dealt with seriously, promptly and in the strictest of confidence.

Harassment can take many forms, but may include inappropriate comments (whether written or verbal), behaviour, action, inaction, exclusion, comment or physical contact that the recipient finds objectionable, or offensive. A single incident can amount to harassment if sufficiently serious and will result in disciplinary action.

Examples of harassment or bullying include but are not limited to:

- derogatory remarks about sexuality, gender related personal remarks or jokes, unwanted sexual advances, the display of sexually explicit material, and requests for sexual favours as a condition of an employee's continued employment;
- open expression of racist views and intimidating comments, and/or jokes relating to race and the display of racially insulting material in the workplace;
- derogatory remarks about a person's disability and/or appearance including physical or mental attributes.
- ridicule or exclusion of an individual for cultural or religious differences, on the grounds of sex or sexual orientation or on the grounds of disability

### **Policy and Procedure**

If you think you are being harassed or bullied we are here to support you and to enable us to do this the following procedure should be followed: -

- Please report the harassment or bullying, which will be held in the strictest confidence, to your manager or the People and Development Department. The matter will be explored with you and where appropriate we will try and resolve the matter informally first if possible.
- If an informal meeting with the alleged harasser or bully is considered appropriate, and takes place, your manager will review the position with you shortly after speaking to the harasser or bully, to find out if the harassment/bullying has stopped. If it has not, disciplinary action will be considered.
- In more serious cases, or where an informal approach has been unsuccessful, the matter will be investigated and the perpetrator of the harassment or bullying will be dealt with under our Disciplinary and Performance Management Policy. Investigations will be carried out discreetly, and we will be mindful of the sensitive nature of the issues and subject matter. If complaints are upheld appropriate disciplinary action, including the potential dismissal of the harasser or bully, will be taken.

- If you make a complaint, you can be accompanied, at any stage in the procedure, by a colleague. In the event of any person involved in an investigation into a complaint of harassment failing to take the allegation seriously, or treat it confidentially, they may themselves be subject to disciplinary action.
- It may be necessary to interview witnesses to any of the incidents raised in your complaint and if so the importance of confidentiality will be emphasised to those involved.
- Whether or not your complaint is upheld, we will consider how best to manage and support the ongoing working relationship between you and the alleged harasser or bully.
- False allegations may exceptionally be made. If a complainant was found to have made such an allegation it would be viewed as a serious disciplinary matter and appropriate disciplinary action would be taken against the complainant.

As a general principle, the decision whether to progress a complaint is up to the individual employee. However, we have a duty of care to protect all our employees and therefore may pursue a matter independently if, in all the circumstances, we consider it appropriate to do so.

## **Grievance Policy**

### **Purpose**

We encourage employees to resolve any problems informally and to use the formal grievance procedure only if informal methods have failed or are inappropriate. If you have a grievance concerning your employment please speak to your manager in the first instance. If you are not happy with the way in which your complaint is dealt with then you should take the complaint to the People and Development Department and follow the procedure set out below. You can contact the People and Development Department via telephone or email and they will advise of how to begin the Grievance process. This grievance procedure does not form part of your terms and conditions of employment.

### **Formal Grievance Procedure**

#### **Statement of grievance**

As an employee, you must set out full details of your grievance in writing and send it to the People and Development Department via letter or email. They will then arrange for the matter to be investigated accordingly.

#### **The grievance meeting and notification of the decision**

As soon as is reasonably practicable, you will be invited to attend a Grievance meeting to discuss your grievance. The meeting will be conducted by an impartial Manager or Director who has had no prior involvement with the nature of the Grievance. You will have the right to bring a colleague or trade union representative to the meeting. You will have an opportunity to put forward your side of the case and ask specific questions. The meeting will be minuted and the minutes retained on your Personnel File. Either at the end of or after the meeting you will be informed of the decision by the person who heard the grievance and of your right to appeal against the decision if you are not satisfied with it. Any appeal must be submitted in writing to the People and Development Department and you must set out the reason for the appeal.

#### **Appeal procedure**

You have 5 working days to submit a Grievance Appeal. Upon submitting an appeal, you will be invited to attend an appeal meeting as soon as is reasonably practicable. If required, a more senior person than the one who dealt with the original grievance will deal with the appeal meeting. Either at the end of or after the appeal meeting, you will be informed of the decision made and this decision will be final.

## Whistleblowing Policy

### Purpose

Peoples is committed to managing the organisation in the best way possible and to putting our people first. This policy is in place to reassure employees that it is safe and acceptable to speak up and enable concerns to be raised at an early stage and in the right way. If you, as an employee, have reasonable belief that illegal or inappropriate behaviour, as described below, is occurring within the workplace and you feel that, for any reason, you are unable to take about the issues with your Manager, the Whistleblowing Line is there to help.

Areas where the Whistleblowing Line may be of assistance are:

- A criminal offence has occurred or you believe it may have occurred
- The Company has failed to comply with its legal obligations
- Financial fraud or abuse
- Physical theft or fraud
- Law or Company rule breaking
- Health and safety issues in the workplace
- Environmental issues or damage
- Improper conduct
- Professional malpractice
- Waste of Company resources
- Dangers to public health and safety
- Attempts to conceal information relating to the above

The issues raised may relate to another employee, a group of employees, the individuals own department or another department of the Company.

### Policy

The official name for Whistleblowing is “making a disclosure in the public interest”. It means that if you believe there is wrong-doing in your workplace, you can report this by following the correct processes and your employment rights are protected.

### How It Works

The Whistleblowing Line is a confidential telephone line. The calls are not recorded and you may remain anonymous if you wish. The line is a direct line to the Group Director of People and Development. There is also a confidential email address should you prefer this option.

The content of your concern will be investigated appropriately, but as discreetly as possible. In the course of investigation, if any concern raised in relation to the above matters appears to relate more to grievance, bullying or harassment, or discipline, those procedures will be invoked.

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.

The more information that can be provided, the more successful the investigation is likely to be. If you feel confident enough to leave your name, this will be treated in confidence and this may help the investigation if the investigator can talk to you, however, do not feel that you have to do this. It is better to call and not

leave your name than not call at all.

#### Complaints about the Group Director of People and Development

In the event that the concern is about the Group Director of People and Development, this concern should be made to the Chairman who will decide on how the investigation will proceed.

#### Raising Concerns with outside bodies:

The purpose of this policy is to ensure that employees are aware of the way to raise their concerns in-house and for employees to see that action is taken promptly to remedy a particular situation. It is hoped that this procedure will give employees the confidence to raise concerns internally. However, it is recognised that there may be circumstances where employees may feel they wish to report matters to outside bodies. A full list of persons/bodies can be found on the gov.uk website.

#### Our Commitment

We are committed to treating all information supplied through the Whistleblowing Line seriously and undertakes that employees who call the Line will not be treated unfairly as a result of making that call. The Company will endorse this policy and periodically consider the need for review.

#### Group Director of People and Development:

- The Group Director of People and Development is the nominated board sponsor for the Whistleblowing Policy and Procedure across the Group.
- The Group Director of People and Development will ensure that all concerns raised are dealt with fairly, thoroughly, and in accordance with policy.

#### **Whistleblowing Contacts:**

**Telephone Number: 0131 453 0207**

**Email: [whistleblowing@peoples-ford.co.uk](mailto:whistleblowing@peoples-ford.co.uk)**

## Retention Policy

### Purpose

This policy details the principles, values and processes which underpin our approach to the retention of our employees. We are committed to valuing and supporting our people. As part of our commitment, we will:

- Ensure everyone is treated fairly;
- Ensure all our employees feel valued, appreciated and listened to;
- Create a sense of belonging and promote our ethos of Family.Business.Community;
- Proactively improve the experience of our employees;
- Recognise and reward our employees;
- Have clear communication channels which promote transparency and opportunities to feedback and listen;
- Support the wellbeing of our employees, whether that be via our EAP, internal support or any appropriate external support;
- Actively promote and encourage the training and development opportunities across our business;

### Listening to you

We put people first and in doing so we want everyone to feel seen, valued, listened to and appreciated. We want everyone to feel a sense of belonging and to be part of the Peoples family. This means we will ensure we have policies and processes in place to support this. We also encourage everyone to share their views, experiences and concerns and we want everyone to feel listened to. We have a range of platforms and ways to give us feedback, whether that be via your manager, the People and Development Department, through email, confidentially via our Whistleblowing line, or via our Workplace app.

### Wellbeing

We provide all our employees direct access to our Employee Assistance Programme which is available 24/7, 365 days a year. The programme is in place to support the health and wellbeing of everyone at Peoples. We also have dedicated Mental Health First Aiders across the Group and provide support and coaching to those who need help.

### Training and Development

The ongoing development of our teams is a huge focus at Peoples. We want people to feel valued and invested in. We actively encourage you to seek out development opportunities and we will support you in providing these opportunities, whether that be in career development, self-development or coaching and mentoring. We will ensure every employee is provided with the skills, knowledge and support to excel in their role.

### Reviews

If you choose to leave our business we will talk to you to find out the reasons and to gain feedback on your time with Peoples. We will also analyse our turnover stats and if we identify any trends then we will look to take positive action to reduce our attrition rate.



## IT Policy

### Purpose

Our business depends fundamentally upon information that is stored and transmitted in electronic form. Much of this information is valuable or difficult to re-create. There is often an essential requirement for accuracy and instant availability of both the information and the systems that deliver it. Some types of data may also be sensitive for the Company, employees, customers or business partners and the Company may be subject to contractual restrictions. The failure to adequately protect these information assets can have an impact on business and it is therefore imperative that you take adequate steps to safeguard the Company's own and client systems, networks and information. If you have any queries about use of the Company's I.T. facilities, you can seek advice from the People and Development or IT Department.

### Policy

As an employee you must agree to this I.T. Policy before being granted access to the Company's I.T. facilities. Use of the I.T. facilities including the Internet and e-mail will be monitored by the Company. The Company may retrieve the contents of messages for the purpose of monitoring whether the use of the e-mail system is legitimate, to assist in the investigations of wrongful acts, or to comply with any legal obligation. The company's email domain peoples-ford.co.uk should not be used for personal use, e-commerce, or other personal correspondence.

### Security

- Where access to the system is controlled by a password or authentication device, it is forbidden to disclose the password to anyone else. Passwords must not be written down or sent via e-mail. Your password must be complex and must be changed regularly.
- You are not permitted to access any system or stored information unless you have been expressly authorised and enabled to do so whether on a Company, client or other third-party system.
- You must not attempt to 'probe' the security of any system or network or to engage in any type of computer hacking activity.
- The use of VPN's is strictly forbidden on the Peoples network.
- In cases where sensitive or business-critical information is held on a P.C., laptop, tablet or other device, adequate controls must be applied to prevent unauthorised access, corruption or accidental loss of the information.
- On-line communications, such as e-mail, are not guaranteed to be 100% secure. Where connection to Internet or other third-party network is provided, no sensitive or confidential information may be sent via the public network unless it is first authorised by a Director of the Company and is sent only to a trusted party. Privileged legal advice should not be circulated over the Internet.
- You must not masquerade as another person in initiating or responding to communications. The only exception to this rule may be where a Director has given express permission to you to send information on their behalf.
- You must not establish a system to masquerade as, or conflict with, any other system on the network.
- You are not permitted to establish any connection between internal networks and any third party or public network such as Internet, Hotmail, or other third party unless expressly permitted.
- Everyone has a duty to report all known or suspected breaches of I.T. security to their manager and the I.T. Department. Any identified or suspected weaknesses in security must also be reported so appropriate action may be taken to rectify the problem.
- The Company's I.T. systems are not to be used by employees' friends, family or associates, unless prior authorisation has been obtained from the employee's manager.

- You must only log onto a Company system using your own identity username and password. The sharing of this information with anyone else is strictly prohibited.
- Data which is stored electronically must be protected from unauthorised access, accidental deletion and/or malicious hacking attempts.
- Under no circumstances can data be transferred or stored onto a removable media without the express permission of a Director.
- Personal data should never be transferred outside of the European Economic Area.
- Where data is being electronically transferred to a third party, this data must be encrypted and password protected

Further information can be found in the Information Security Policy which is available from your manager or the People and Development Department.

#### Data Storage

- Data must be retained on Company system and servers only. This should not be transferred or stored on any non-company system or device.
- Data should never be saved directly to laptops or other mobile or tablet devices.
- Data should only be stored on designated drives and servers and should only be unloaded to an approved cloud computing service.
- You are responsible for reviewing the electronic data you hold via email or on your system. This data should be reviewed regularly and sensibly cleansed in line with the GDPR policy. The Company Retention policy sets out clear guidance on data retention timescales, for both customer and internal data. This must be adhered to by all employees.
- Where data has been sent via email, you must evaluate if retaining the email serves any legitimate purpose. If not this data must be securely deleted.

#### Offensive Material

- In using Internet facilities, under no circumstances should you download, use, or view any offensive or obscene material or information, or any material or information likely to harass, abuse or defame. Examples of this include nudity, or racist content. If you receive any such material it must be immediately deleted and on no account, should it be distributed within the Group or printed or displayed.
- Views can differ between individuals with regard to what is offensive, if you are in any doubt with regard to whether another individual would find the material or information offensive you must not download, use or view it. You should notify your manager for clarification.
- Downloading and/or forwarding of non-business material, programs, files, chain letters or material likely to cause offence is strictly forbidden. Any employee found to be acting in this manner will be subject to disciplinary action.

#### Software

- Any software on any operational system or network device must only be installed by a member of the IT Department.
- Unauthorised copying of software is not permitted and will result in disciplinary action.
- No software purchases should be entered into without prior approval from the I.T. Department
- Games and other software not essential for the business of the Company are prohibited and must not be brought into the business or used on any system.
- The use of software on any of the Company's P.Cs or workstations requires a licence for each

application. Periodic audits will be carried out to ensure that all software is properly licensed in accordance with the Company's policies. Any employee who finds they are using copied unlicensed software must report this to their manager and the I.T. Department immediately and cease using the software.

#### Viruses

- You must take adequate and appropriate steps to prevent computer viruses or malicious code infecting the Company's network. You must also ensure you do not, through negligence, allow computer viruses to infect client sites or other third parties.
- It is strictly forbidden for you to knowingly create, introduce, or proliferate within the Company, any malicious computer virus, 'Trojan horse' or other disruptive software element, regardless of the intent in so doing.

#### Data Backups

As each user's \My Documents folder & sub folders are backed up on a daily basis, all users should ensure any files they have should be located within \My Documents and not on their Desktop. A user may choose to create a backup copy of a file in another folder as an additional security. No user who has the ability to login to work from home may keep any work-related files or emails on their home computer/laptop unless it's necessary for them to complete their work.

#### Data Protection

All employees must comply with the principles of the GDPR by taking adequate precautions to protect any personal data relating to suppliers, employees, customers or clients, against accidental or unauthorised disclosure, loss or modification and by only using personal data in line with GDPR Principles. The I.T. Department will conduct an annual data audit however employees must take onus for regularly assessing the data in which they hold electronically in line with the principles of GDPR.

#### General Rules Regarding E-mail and Internet Use

- The Company may be held liable for the damage caused by internal and external e-mails and other on-line communications. Such communications can be regarded as defamatory material and they may be used as evidence in court proceedings. The law does not distinguish between such communications and paper memoranda when evaluating whether material is potentially defamatory. You must ensure when circulating information on competitors, clients or individuals that the information is accurate and not defamatory.
- You are not permitted to use the Internet facilities for any purpose that may be detrimental to the Company's interests.
- You must not send or pass-on any material, whether by e-mail, from the Internet or otherwise, which contravenes any Company policy.
- You should consider carefully who the appropriate recipients of any e-mail are.
- Material on the Internet is often protected by intellectual property laws and invariably it may not be copied. Illegal copying of information from the Internet will be regarded as a disciplinary offence.
- You should note that contracts entered into on the Internet may be binding. You should not enter into any contracts without prior permission from a Director.
- E-mail messages are more permanent and accessible than most people realise. E-mails should be treated in the same way as other written material in that they may be accessible even when apparently deleted. The way in which the information in the Company's computer systems is archived or backed up means that even after a message has been deleted it can still be accessed. All e-mail messages should be regarded as permanent documents. You should ensure your "deleted

folder” is cleared on a regular basis.

- Users are not permitted to enable automatic forwarding of e-mail messages to another location outside of the Company, e.g. via Internet, Hotmail, etc.
- You must log off your systems at the end of each shift without exception. You must ensure all computers, terminals and monitors are switched off at the end of each shift.
- If you are out of the business, you must ensure you comply with the Company “out of office” template.

#### Prohibited E-mail and Internet Use

For the avoidance of doubt, you must not use the Company’s e-mail system or internet facility for:-

- Visiting pornographic, defamatory, racist, sexist or abusive sites;
- Receiving or sending pornographic, defamatory, racist, sexist or abusive material or information;
- Sending offensive, obscene, untrue, malicious or potentially libellous statements or attachments;
- Engaging in private or freelance business;
- Gambling;
- Breaches of copyright or confidentiality;
- Conducting political activities;
- Participating in Internet discussion groups or other discussion groups or bulletin boards (except where expressly authorised to do so as part of their job);
- Offering, providing, purchasing or otherwise obtaining goods or services (except where expressly authorised to do so as part of their job);
- Anything that may damage the business interests of the Peoples Group;
- Downloading programs/files from outside the Company or distributing, copying or using programs/files that others have downloaded from outside the Company, unless permitted by a licence and as part of their job. (With these activities there is a risk of importing computer viruses and the software/files may be unauthorised and so give rise to liability, including criminal liability.)

The above list is non-exhaustive. You should consult your manager or the I.T. Department if you are in doubt as to what is a prohibited activity. Failure to comply with the I.T. Policy is viewed extremely seriously and as such any breaches will be dealt with under the Company’s Disciplinary and Performance Management Policy, whereby serious breaches of the I.T. Policy may result in summary dismissal.

## Social Media Policy

We recognise that the use of social media is part of everyday life and therefore allow the use of such media for both business and personal use subject to restrictions set out in this policy. Restrictions are necessary because communication through social media networks can be viewed from a wider audience including the company's customers and competitors. The restrictions therefore are intended to ensure compliance with legal and regulatory restrictions as well as privacy and confidentiality agreements.

### Purpose

The purpose of this policy is to provide Peoples employees with requirements for participation in social media, whether it is social media supported by Peoples or use of personal social media where the employee's affiliation with Peoples can be identified or presumed. For the purposes of this policy social media includes social networking websites including Facebook, Twitter, Instagram, Snap Chat, TikTok, Linked In, YouTube and our internal app Workplace as well as blogs, podcasts and discussion forums. This list is not exclusive.

### Scope and Use

We operate a number of Peoples social media accounts on each of our channels (Facebook, Twitter, Instagram, Snap Chat, TikTok, Linked In, YouTube). Employees are actively encouraged to follow and interact with the content and postings on any of the Peoples social channels and accounts. If any employee is found to be using derogatory comments against the company or its employees or customers, which could bring the company name and reputation into disrepute and/or is found to constitute bullying and/or harassment, then the company reserves the right to enforce its disciplinary procedure against any such employee found to be behaving in breach of this policy and to rely on such evidence as part of any disciplinary procedure.

The company does permit limited personal use of any social media site, provided that use is carried out in the employee's own time i.e., before and after the working day and during any lunchtime periods.

The company reserves the right to monitor such use and, where excessive use is detracting from an employee's work throughput or efficiency, it may lead to disciplinary action being taken. The company further reserves the right to take any necessary action to prevent abuse of this facility.

### Policy Guidance for employees

- You should not post any material or make comments that are obscene, discriminatory, defamatory, profane, libellous, threatening, harassing, abusive, hateful or embarrassing to another person or entity when posting to the company's social media channels/platforms (and any other appropriate social media).
- It is important to be inclusive, friendly and respectful.
- You should not post content or conduct any activity that fails to respect data protection and copyright laws.
- You should not say or suggest that the views and opinions you express relate to the company, and you are encouraged to add a disclaimer to each page where talking about work related issues, making clear that any views expressed are that of you only. For example, "the postings on this site are my own and do not necessary represent the position or opinion of my employer."
- You should respect people's right to privacy at all times when using social media.
- You should observe the company's IT rules and must not download or install software found through social networking sites onto work computers (including laptops).

- We want you to have your own opinion but you must be respectful, friendly and clear about what you want to say.
- Always think before you post. Does your post add value and think about who will read it.

Sometimes things go wrong on social media. This may be where you think the reputation of the business is being challenged by a member of the public or someone else. Should you be involved in or become aware of such a situation you should raise this to the Marketing Team immediately. Please never communicate directly with the complainer/instigator. Email [marketing@peoples-ford.co.uk](mailto:marketing@peoples-ford.co.uk) and then call Aisha Doyle or John Johannesen who will take the details and investigate the matter.

The company reserves the right to view any breaches of this policy as gross misconduct under the company's disciplinary procedure. If employees have any concerns regarding this policy they should speak to either their manager or contact the People and Development Department.

The company reserves the right to amend this policy from time to time as reasonably required.

## GDPR Policy

### Purpose

Everyday our business will receive, use and store personal information about people who we have a business/commercial/employment relationship with. These may include members of the public, both current and historical, together with current and prospective employees, clients, customers, and commercial business partners. Peoples may also be required by law to collect and use information in order to comply with the requirements of central government. It is important that this information is handled lawfully and appropriately in line with the requirements of the General Data Protection Regulation (GDPR).

We are fully committed to a policy of protecting the rights and privacy of individuals, employees, and others, in accordance with the GDPR and Data Protection Requirements. We will follow procedures that aim to ensure that all employees, contractors, agents, consultants and partners of Peoples who have access to any personal data held by or on behalf of Peoples, are fully aware of and abide by their duties and responsibilities under the GDPR. This Policy is subject to regular review and all employees are expected to apply the policy without exception.

### General Data Protection Regulation (GDPR)

GDPR regulates the processing of personal data, and protects the rights and privacy of all living individuals. Any data that Peoples hold where an individual can be directly or indirectly identified must be processed in accordance with the requirements of the GDPR. GDPR gives all individuals the general right of access to the personal data which relates to them. Personal data is any information about an identifiable living person and may be in hard or soft copy and may include facts or opinions about a person.

Peoples regards the lawful and correct treatment of personal information as very important to the achievement of its business objectives and to the success of our operations, and to maintaining confidence between the Company and those with whom the Company has a business/employment relationship. Peoples will ensure that the organisation treats personal information lawfully and correctly. To this end, Peoples fully endorses and adheres to the Principles of GDPR.

### What is Personal Data?

Personal data is data (whether stored electronically or paper based) which relates to a living individual who can be identified directly or indirectly from that data (or from that data and other information in our possession).

Processing is an activity that involves the use of personal data. It includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Sensitive personal data includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including the consent of the individual.



### Responsibilities under the GDPR

Peoples will be the “data controller” under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of personal data. Compliance with the legislation is the personal responsibility of all members of Peoples who process personal information. Individuals who provide personal data to Peoples are responsible for ensuring that the information is accurate and up-to-date.

### The Principles of Data Protection

The legislation places a responsibility on anyone processing personal data to comply with a number of principles. These Principles are legally enforceable. More detailed guidance on how to comply with these principles can be found on the ICO’s website ([www.ico.gov.uk](http://www.ico.gov.uk))

Anyone processing personal data must ensure that they comply with the below principles:

Lawfulness, fairness and transparency	Personal data shall be processed fairly, lawfully and in a transparent manner.
Purpose limitation	Personal data shall be collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary for the intended purposes.
Accuracy	Personal data shall be Accurate and where necessary, kept up to date.
Storage limitation	Personal data will be 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.
Integrity and confidentiality	Personal data must be processed in line with the individual’s rights and in a manner that ensures appropriate security of the personal data.
Accountability	The controller shall be responsible for, and be able to demonstrate compliance with the GDPR.

### Fair and Lawful processing

We will only process personal data where it is required for a lawful purpose. The lawful purposes include (amongst others): whether the individual has given their consent, the processing is necessary for performing a contract with the individual, for compliance with a legal obligation, or for the legitimate interest of the business. When sensitive personal data is being processed, additional conditions must be met.

### Notifying Individuals

If we collect personal data directly from an individual, we will inform them about:

- The purpose or purposes for which we intend to process that personal data, as well as the legal basis for the processing.
- Where we rely upon the legitimate interests of the business to process personal data, the legitimate interests pursued.
- The types of third parties, if any, with which we will share or disclose that personal data.
- The fact that the business intends to transfer personal data to a non-EEA country or international organisation and the appropriate and suitable safeguards in place.

- How individuals can limit our use and disclosure of their personal data.
- Information about the period that their information will be stored or the criteria used to determine that period.
- Their right to request from us as the controller access to and rectification or erasure of personal data or restriction of processing.
- Their right to object to processing and their right to data portability.
- Their right to withdraw their consent at any time (if consent was given) without affecting the lawfulness of the processing before the consent was withdrawn.
- The right to lodge a complaint with the Information Commissioners Office.
- Other sources where personal data regarding the individual originated from and whether it came from publicly accessible sources.
- Whether the provision of the personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal data and any consequences of failure to provide the data.
- The existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the individual.

#### Data Rights

We will process all personal data in line with data subjects' rights. Under the GDPR you have a number of rights with regard to your personal data. You have the right to:

- be informed of the data we hold on you;
- request from us access to the information Peoples holds on you and for what purposes;
- make corrections to the information if necessary;
- request the erasure of your personal data;
- restrict processing of your personal data;
- object to the processing of your personal data; and
- in certain circumstances the right to data portability;
- rights in relation to automated decision making and profiling.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR with regard to your personal data. In addition, individuals can exercise the right to gain access to their information by means of a "subject access request". You can do this by emailing [data.protection@peoples-ford.co.uk](mailto:data.protection@peoples-ford.co.uk)

If you have any questions about the personal information that we hold about you then please speak to your manager or the People and Development Department in the first instance. We encourage you to contact us to update or correct your personal information if it changes or if the personal information we hold about you is inaccurate.

### Responsibilities:

Everyone who works for Peoples has a responsibility for ensuring data is collected, stored and handled appropriately and that it is processed in line with this policy and Data Protection Principles. The Company will ensure that:

1. Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice.
2. Everyone managing and handling personal information is appropriately trained to do so.
3. Queries about handling personal information are promptly and courteously dealt with.
4. Methods of handling personal information are regularly assessed and evaluated.
5. Data sharing is carried out under a written agreement, setting out the scope and limits of the sharing. Any disclosure of personal data will be in compliance with approved procedures.
6. Data must not be shared informally. When access to confidential information is required, employees can request this from their manager.
7. Data must not be disclosed to unauthorised people, either within the Company or externally.
8. Data will not be transferred to people or organisations situated in countries without adequate protection and without firstly having advised the individual.
9. If you decide to leave the Company, you shall deliver up to the Company all customer or Company data or other documents, papers belonging to the Company or any other Group Company or client thereof which may have been prepared by you or may have come into your possession in the course of your employment hereunder, and you shall not make or retain any copies thereof.

### Data Storage:

Everyone in Peoples has a responsibility to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. This applies to paper and electronic data and the below guidelines should be followed without exception:

#### Paper Data:

- Paper data must be kept in a secure environment where unauthorised people cannot see it.
- Paper and files should be kept in a locked drawer or filing cabinet.
- Employees should ensure paper and printouts are not left where unauthorised people can see them.
- Data print outs should be shredded and disposed of securely when no longer required.
- The Company operates a clear desk policy and data should not be left unattended. At close of business this information must be securely locked.
- Data must be retained in Company documents only. This should not be transferred or stored on any non-Company materials.

#### Electronic Data:

- Data which is stored electronically must be protected from unauthorised access, accidental deletion and/or malicious hacking attempts.
- Data stored electronically must be protected by strong complex passwords that are changed regularly and never shared between employees.
- Under no circumstances can data be transferred or stored onto a removable media (e.g. DVD or USB stick), without the express permission of a Director.
- Data should only be stored on designated drives and servers and should only be unloaded to an approved cloud computing service.
- Data should never be saved directly to laptops or other mobile or tablet devices.
- Personal data should never be transferred outside of the European Economic Area.

- Data must be retained on Company system and servers only. This should not be transferred or stored on any non-Company system or device.

All employees, consultants, partners or other servants or agents of the Company who are users of personal information supplied by the Company will be required to confirm that they will abide by the requirements of the GDPR with regard to information supplied by the Company.

#### Data Accuracy

Peoples will take reasonable steps to ensure data is kept accurate and up to date and expects this same responsibility from all employees. Employees should ensure the below are adhered to:

- Data should be held in as few places as necessary. Employees must not create any unnecessary additional data sets.
- Employees should take every opportunity to ensure data is updated. For example by confirming a customer's details when they call.
- Where an employee captures customer data, it is their responsibility to ensure this is accurately captured and recorded.
- Data should be updated if inaccuracies are discovered.

#### GDPR Employee Checklist

- ✓ As an employee, you must be aware that Information protected by the GDPR includes not only personal data held on computer, but also manual files containing personal data (for example, personnel files). The purpose of these rules is to ensure that you do not breach the GDPR.
- ✓ Anybody who knowingly or recklessly discloses personal data in breach of the GDPR could be criminally liable. A serious breach of data protection is also a disciplinary offence and will be addressed in accordance with the Company's Disciplinary and Performance Management Policy. Unauthorised access to personnel records and the unauthorised disclosure of customer information will be deemed as a serious breach of discipline.
- ✓ Compliance with the GDPR is both the responsibility of the Company and its employees. Below are actions all personnel should adhere to in the course of their daily duties:-
  - Computer systems must not be left unlocked whilst unattended.
  - The Company operates a clear desk policy and data should not be left unattended. At close of business this information must be securely stored in a lockable location.
  - Passwords must be protected and changed in accordance with the Company's IT Policy.
  - Personal information should not be left unattended and securely stored when not in use.
  - Personal information must be communicated in a secure form of media that does not enable unauthorised persons to read it.
  - Employees must not retain or disclose personal information about other employees or customers to a third party, without the express permission of the person who is the subject of the information, together with the authorisation from their Director.
  - Employees should be aware that those seeking information may from time to time, use deception in order to gain access to it. The identity of the data subject and the legitimacy of the request must be verified at all times.
  - Requests for personal information about another employee should be referred to the HR Department, who will deal with such requests.

- All employees should ensure that any personal data held is kept securely, either in a locked filing cabinet, or, if computerised, it is password protected.
- ✓ If you want to raise a complaint that the above rules are not being followed with respect to personal data held about them, should contact the People and Development Department. If the matter is not resolved to the employee's satisfaction, this can be raised as a formal grievance under the Company's Grievance Procedure.
- ✓ Please contact the People and Development Department if you have any queries or questions relating to this policy.

## **Employee Privacy Notice**

### **Purpose**

We are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Peoples collects from or about you, how we will use this information and to whom we disclose that information.

### **How your information will be used?**

As your employer, we need to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to:

- comply with the employment contract
- comply with any legal requirements
- pursue the legitimate interests of the Company; and
- protect our legal position in the event of legal proceedings.

If you do not provide this data, we may be unable, in some circumstances, to comply with our obligations and we will tell you about the implications of this decision. GDPR requires us to manage personal information in accordance with GDPR Principles and in particular requires us to process your personal information fairly and lawfully. This means you are entitled to know how we intend to use any information you provide.

### **What personal information is held by Peoples?**

A large amount of the information we hold about you will have been provided by you. However some of it may come from other sources, for example your manager or external sources like references. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations, to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sickpay, and where applicable health insurance or life assurance policies.

We also monitor computer and telephone/mobile telephone use, as detailed in our IT policy within the Employee Handbook.

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us. This includes:

### Type of information Examples

Please note that the examples are illustrative and non-exhaustive.

Information about you:	name, address, date of birth, marital status, nationality, race, gender, religion, details of any disabilities or work restrictions
Information to contact you at work or home:	name, address, telephone number, and e-mail addresses
Information about who to contact in a case of emergency (yours or ours):	name, address, telephone number and their relationship to you
Information to identify you:	Photographs, CCTV images, passport and/or driving license details
Information about your suitability to work for us and/or a relevant third party	References, interview notes, work visa, ID information such as passport details or driving licence information
Information about your skills and experience:	CVs and/or application forms, references, records of Qualifications, skills, training and other compliance requirements.
Information about your terms of employment with Peoples:	Letters of offer and acceptance of employment, your employment contract and any amendments to it, mandatory policy acknowledgement sign-off sheets, job title
Information that we need to pay you:	Bank account details, national insurance number, salary details
Information that we need to provide you with benefits and other entitlements:	Length of service information, health information, annual leave requests, sickness and other absence information.
Information relating to discipline, grievance and other employment related processes:	Interview/meeting notes, outcome letters and evidence, correspondence.
Information relating to your work travel and expenses:	Bank account details, passport, driving licence, vehicle registration and insurance details.
Information made at your request:	Letters at your request, for example a letter to your mortgage company confirming salary information or a salary advance request
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks, CCTV and access control systems, communication systems, remote access systems, email, internet facilities, telephones, voicemails and mobile phone records.



### CCTV Usage

CCTV is in operation across the Peoples Group. The primary use of CCTV is to protect the property and people within Peoples. Cameras are installed for the purpose of detecting and preventing crime. Signs are displayed to inform employees, customers and other individuals that CCTV is in use. No images or information will be stored beyond those which are strictly required for the stated purpose of a surveillance camera system. Surveillance images and information will be subject to appropriate security measures to safeguard against unauthorised access and use. Camera surveillance will be maintained at all times and footage will be continually recorded and held on the system memory for a period of up to 31 days (each site will vary).

As CCTV is installed in a workplace, it is likely to capture pictures of employees and workers, even if they are not the main subject of surveillance. CCTV evidence may be used as part of an employee investigation where there is a reasonable belief by the company that there may have been serious or gross misconduct committed. Where footage is used in disciplinary proceedings, the footage will be retained and the employee will be allowed to see and respond to the images.

Complaints about the use of CCTV should be made to the Board of Directors.

### How we store and process your data:

All the personal data we have is stored on our UK database and UK Premises. Your personal data will be stored for as long as is reasonably necessary to fulfil the purposes for which it is collected and as required to comply with applicable legal and regulatory obligations. This generally means holding your personal information for as long as one of the following applies:

- Your personal information is reasonably required in order to provide the services you have requested;
- Your personal information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant legal limitation period); or
- Applicable laws or regulations otherwise require the retention of your personal information.

We will process your information for the below purposes:

- If it is necessary to comply with your employment contract;
- If it is necessary to comply with mandatory legal or statutory obligations;
- If it is necessary for Public Interest;
- Workforce planning, recruitment and staffing, workforce administration, payroll, pension, and benefit programs, or workplace management such as travel and expense programs;
- Performance management, training, career promotion information and Succession planning;
- Legal compliance;
- Internal reporting and record keeping;
- Other legal and customary business-related purposes;
- Consent, whereby you have given us permission to use the personal data.

### Who your personal information will be shared with?

Your personal information may be disclosed to:

- Any law enforcement agency, court, regulator, government authority, or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues;
- Companies or other organisations where you have asked us or agreed that we may share your personal information with them;
- Companies or other organisations that we have engaged to provide services on our behalf such as our Pension provider, payroll operator, Ford Motor Company and Professional advisors;
- Any recipient, with your consent, such as for employment verification or bank loans.

Other than as mentioned above, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes.

### Your rights

In relation to your personal data and under GDPR you have the right to:

- Request from us access to the information Peoples holds on you and for what purposes;
- Make corrections to the information if necessary;
- Request the erasure of your personal data;
- Restrict processing of your personal data;
- Object to processing of your personal data; and
- In certain circumstances the right to data portability.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. If you have any questions about the personal information that we hold about you, speak to your manager or the People and Development Department. We encourage you to contact us to update or correct your personal information if it changes or if the personal information we hold about you is inaccurate.

### How do we protect your personal data?

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information. You are required to help with this by ensuring that your own personal information and that of your colleagues and third parties are kept secure. You should not share your (or anyone else's) personal information unless there is a genuine business reason for doing so. If you have any questions about the personal information that we hold about you we suggest that you speak to your manager or the People and Development Department in the first instance.

## Dress Code Policy

### Purpose

We want you to be yourself and to be comfortable at work. Our dress code policy provides an overview of what attire is permitted. Please remember that as an employee you act as a representative of Peoples and the way in which you dress and present yourself plays an essential part in the image that we portray to customers, external partners and the general public. Please be aware of your personal presentation and hygiene at all times when representing Peoples.

### Dress Code Requirements

1. Peoples operates a business casual dress code and we trust that you will dress appropriately in line with this. You should wear clothing which is comfortable and practical for work and which is not distracting or offensive to others.
2. If you are in a customer facing role please see the below business casual attire:
  - a. Your name badge should be worn at all times
  - b. Where provided (ie in customer facing roles), the appropriate company branded items such as polo shirts, jackets, pullovers, etc. need to be worn
  - c. Trousers, chinos or jeans which should be black or navy. Shorts or ripped/frayed jeans are not permitted
  - d. Black or navy skirt (knee length or below).
  - e. Smart shoes, loafers, smart boots, smart black or navy trainers are all permitted
3. We all have access to customer and public areas of the Dealerships and therefore non-customer facing employees should also be dressed in suitable business casual attire at all times. Business casual attire includes but is not limited to the below:
  - a. Your name badge should be worn at all times
  - b. Trousers, chinos or jeans which should be black or navy. Shorts or ripped/frayed jeans are not permitted
  - c. Collared shirt or casual button-down shirt
  - d. Jumper/knitwear
  - e. Collared or non-collared blouse
  - f. Dress or skirt which should be knee length or below (beach dresses or spaghetti strap dresses are not permitted)
  - g. Shoes, loafers or smart boots, smart trainers/converse are all permitted
4. Technicians are required to wear Company issued overalls/uniform and personal protective equipment. Safety boots must be worn at all times.
5. Please wear footwear which conform to your job and ensure due diligence towards your health and safety.

We trust that you will dress appropriately when representing Peoples. Failure to comply with any of the above may result in you being sent home to change, with disciplinary action taken against repeat offenders.

## Company Car Policy

### Purpose

This policy details the conditions of use for Company vehicles within the Peoples Group. Failure to comply with any part of this will be a breach of an employee's Contract of Employment. The Company reserves the right to withdraw the employee's allocated vehicle at any time for any reason.

### General Conditions of Use

- The make and model of vehicles allocated may be agreed by the Managing Director.
- Vehicles may be used only by the designated employee and a spouse or partner residing at the same address. This address must be the address on the employee/spouse/partner driving licence.
- You must ensure the vehicle is taxed prior to driving it. You require email confirmation from your Sales Administrator confirming this prior to driving.
- You must comply with all relevant traffic laws and rules. Failure to do so may result in disciplinary action.
- Any driver of a Company vehicle must be in possession of a valid UK Driving Licence, and the photo card version must be presented to your manager prior to any vehicle belonging to the Company or a customer being driven. The Company will check the licence via the DVLA to ascertain whether or not there are any convictions on the licence which must be notified to the Insurers.
- Company Car drivers must immediately report any changes to their licence and/or to their partner's licence. This, together with the monthly reporting of the vehicle's mileage to Sales Admin, is an insurance requirement.
- All traffic law violations (including parking fines, speeding) must be reported directly to your manager. All fines and costs attached to these violations must be met directly by the employee. This includes fines and other costs incurred while in the pursuit of Company business. Failure to notify your manager of a parking ticket allocated to your vehicle which results in the fine to the Company increasing may result in disciplinary action and the deduction of the fine taken in full from your monthly salary.
- Yearly licence checks and health declaration forms are required for both the driver and their spouse/partner.
- Yearly onsite eye sight distance checking will be carried out. If you fail the test then you will not be allowed to drive Company vehicles until you have had your eyes tested and it has been confirmed by the optician that you are able to drive.
- You are reminded that if you have issues regarding your eyesight or are aware of any health issues or situations whereby it could have an impact on your ability to drive the onus is on you to advise the Company and/or receive positive confirmation from your GP that you are able to drive.
- A Company Car is provided to support employees in their job role. In instances of long-term absence the Company reserves the right to withdraw this benefit temporarily. All individual circumstances will be considered prior to any decision being made.

- All 'live' and current disqualifications from driving prohibit the use of Company vehicles.
- Company vehicles may not be taken out with mainland UK (Scotland, England & Wales) without prior permission from the Chairman. Any additional insurance costs attached to overseas travel (if granted) must be met by the employee.
- Employees are responsible for informing the Inland Revenue of their Company car use. Company cars attract additional taxation as a Benefit in Kind. Due to the nature of the Company's business, the Company has a specific agreement with the Inland Revenue regarding the taxation of these vehicles.
- In the event of a Company vehicle being stolen, you must inform the police immediately and inform your Manager and our Insurers as soon as practically possible.
- Fuel - Company car drivers are responsible for the cost of all fuel. Business travel mileage will be reimbursed at the appropriate rate.
- All vehicles must be kept in demonstration condition. Smoking (including vaping) is not permitted in Company vehicles at any time. Failure to adhere to this will result in disciplinary action.
- When onsite the vehicle must be parked at the designated Demo area and a price board displayed (this does not apply to leased demonstrators).
- All vehicles will be inspected when de-fleeted and any costs to rectify damage out with normal wear and tear of the vehicle will be met by the employee.
- Mobile Phones are only permitted when paired to the vehicle via Bluetooth and the vehicle is equipped with hands free voice activated technology.
- Increases in penalty points on your licence may be notified to our insurance company which may result in a review of your current excess amount. This may result in your excess being increased.
- It is illegal to drive a vehicle whilst under the influence of alcohol or drugs, including some prescription drugs. It is wholly against company policy for anyone who has the use of a Company vehicle to drive this while under the influence of alcohol or drugs.
- Employees who lose their driving license will also lose their rights to a Company vehicle or cash option while the driving ban is in place with immediate effect.

- If you are involved in an accident in a company vehicle you must follow the Accident Reporting Procedure. Any insurance excess charged to the Company as a result of an accident involving an assigned company vehicle will be recharged to the employee (up to a current maximum of £700) and deducted from their salary. If the cost of the repair is less than the excess and not reclaimed from a third party, then this cost will be recharged to the employee and deducted from their salary. Failure to comply with the Accident Reporting Procedure will result in the employee being liable for the full excess amount which will be £500 greater than the current excess will be the sole responsibility of the employee. The additional £500 will not be covered by any employee Group Scheme or Bump Club arrangement.
- All allocated vehicles remain under the control of the Company and may be withdrawn if employees do not adhere to the conditions of this policy.

#### Accident Reporting Policy/Procedure

(Applicable to any vehicle covered by Company insurance).

This procedure applies to all employees and spouse/partners who drive either company vehicles, customer vehicles or any other vehicle which is covered by Peoples Insurance Policy.

- The Accident reporting procedure must be followed if you are involved in an Accident and/or suffer damage to a company vehicle.
- If you are involved in an accident, immediately after the accident (within 1 hour where possible), and when it is safe to do so, you must telephone Allianz (our current Company insurers).
- Allianz will ask you for your details, the purpose of the journey, your vehicle details, the detailed location and a description of the incident.
- If a third-party vehicle is involved you must provide the vehicle registration, the name and address of the third party and a contact telephone number.
- If there is damage to your vehicle then you should advise Allianz that an estimate from Peoples will follow in due course.
- You must take photographs of each vehicle showing the number plates, number of occupants and any areas of damage. Where possible these should be taken at the accident location.
- If the vehicle has been moved you should take photographs of the accident location showing the view of the driver and the road layout.
- After the accident has been reported you must notify your Manager and then complete an accident claim form. A detailed diagram showing each vehicle, including their direction of travel and relevant lane markings should be included.
- A repair estimate for the Peoples vehicle should be provided as soon as available.

# Allianz Contact Details:

0344 412 9996	Lines are open Monday to Friday 8am to 6pm. After this the call will be handled by Insurers Claims Manager using the same number.
0344 412 9996	24 hour recovery assistance
+44 (0)1483 218 200	For accidents outside the UK. Lines are open Monday to Friday 9am to 5pm
<a href="mailto:motortradeclaims@allianz.co.uk">motortradeclaims@allianz.co.uk</a>	
<p>When you call Allianz you will be required to provide the below information</p> <p>Policy Number <b>SM22857798/08</b></p> <p>Policyholder Name <b>PEOPLES LIMITED AND/OR SUBSIDIARY COMPANIES</b></p> <p>Driver Name Vehicle Reg</p> <p>Date of Accident</p>	



## **Training, Development and Expenses Policy**

### **Purpose**

We are committed to supporting the training and development needs of our employees and to ensuring that all our employees have the skills, knowledge and competencies to be able to be the best in their roles. If you are required to attend external training and/or events, please remember that you are representing Peoples. Please treat the company's money as if it were your own. We trust you to be reasonable in any expense amounts made and reserve the right to review any where we feel excessive spending has taken place.

### **Policy**

We pride ourselves on having a culture of continuous professional development in our company. There are some roles in the business which will have mandatory training for specific job roles, such as technical or knowledge updates and we will make sure any training requirements are communicated to our teams. We actively encourage our employees to seek new learning opportunities, and these will be supported by our managers and the People and Development Team.

### **Overnight Accommodation**

Training which requires overnight accommodation will be booked by the People and Development Team in advance and, where possible, we will settle the cost in advance.

### **Travel**

You may be required to fly to training venues or events so it is important that you have the relevant valid documentation in order to be able to do this. If you are required to fly, please apply common sense when arranging travel out with normal travel using Company vehicles (for example utilising public transport - taxis, trains and buses). If overnight parking is required, please liaise with your manager to have this cost paid by the company in advance. The People and Development Team will arrange pre-paid taxis to transport employees to and from the Airport to training venues.

If you need to travel to training in Daventry by car, where possible, a Company vehicle will be provided for such travelling and any fuel costs associated will be reimbursed on presentation of the relevant VAT receipt in accordance the Business Mileage terms below.

### **Business Mileage**

To satisfy HMRC requirements the Company must be able to demonstrate that it has not paid for any fuel which is placed into an employee's vehicle which the employee then utilises for private purposes. Driving home from work is considered private mileage. HMRC requires that the employee personally pays for all fuel which goes into their company vehicle. To be reimbursed for business mileage, please submit a Business Mileage Expense Claim (available from your Manager or via Workplace). Please complete the form in full including, the odometer reading at the start and end of the month, the business mileage carried out and dates of places visited. The form will then calculate the implied private mileage as well as the business mileage for which reimbursement is due.

### Meals

For courses held at Ford College, lunch is provided by the venue. Peoples will only reimburse expenses for an evening meal where overnight accommodation is required or where the level of travel incurred in attending any training within a day is time consuming. Expenses of up to £15 can be claimed for an evening meal. If you think staying within this limit will be an issue then you need to speak to your manager in advance. If the training course being attended includes an evening meal then expenses will not be reimbursed. The consumption of alcohol is not promoted by Peoples whilst attending training and all employees are reminded that courses which incorporate the driving of vehicles will require all attendees to undergo a breathalyser test, whereupon failure of this test will result in Peoples being notified and potential disciplinary action being taken. Please ensure all expenses are supported by a VAT receipt prior to reimbursement.

### Claiming Expenses

An Expense Claim form needs to be completed for the reimbursement of additional expenses incurred whilst attending external training courses. All requested information must be presented on the claim form and all supporting documentation attached for VAT purposes. Expense claims will then be reviewed by your manager and passed to Accounts for authorisation for reimbursement in accordance with this policy. Expenses due will be reimbursed directly into your bank account. Expense claim forms will not be authorised or paid if it is found that a) the supporting documentation does not match the amount being claimed in the expense claim form and/or b) the amounts claimed exceed the levels deemed to be reasonable. Peoples reserves the right to reject an expense claim form if it believes that you have been careless with regard to the level of expenditure generated.

All expense claims should be submitted for authorisation as soon as is practicable after the expenditure has been incurred and no later than 2 months after which time Peoples reserves the right to refuse any claim.

Failure to attend any training courses without good reason and prior authorisation from your manager may result in a training charge being incurred and we reserve the right to recoup any such charge in relation to non-attendance from your next salary.

## **Disciplinary and Performance Management Policy**

### **Purpose**

Peoples reserves the right not to follow this policy in relation to short service employees (i.e. employees with less than 2 years' continuous service) and to instead follow the Probationary route. We reserve the right to waive any stage of the Disciplinary Procedure and to substitute any Manager, People and Development Representative or independent third party for the purpose of this procedure as it deems appropriate.

At all times Peoples aims to ensure that there is a fair and consistent approach to the maintenance of standards of discipline of our employees. This Policy is designed to support and encourage a genuine and permanent improvement in the conduct of our employees. The Policy is as comprehensive as possible but cannot be exhaustive since every case must be treated on its own merit.

### **Policy and Procedure**

The purpose of using disciplinary procedures is primarily to deal with situations where employees allegedly fail to comply with disciplinary rules. They may also be used in circumstances where the employee fails to meet the expectations of their job role and duties. The following procedures will be used when an employee fails to meet the Company's standards of performance or conduct. The procedures may also be applied if the employee is in breach of their contract of employment.

### **Investigations**

Where there is a potential incident of misconduct or performance concern, an investigation will take place to establish the facts of the case. Notice of an investigation is not required. On conclusion of the investigation, an adjournment will be taken to determine the outcome. The decision will then be taken as to whether formal action is required.

### **Formal Action**

If at the end of the investigation there is an allegation to answer then the matter will be put forward to a Disciplinary meeting. To initiate a formal process you will be invited to a Disciplinary meeting. You will be given written notice of the meeting which will include:

- The date, time, location and who will be present at the meeting
- The allegations or complaint made against you (the employee)
- Any relevant evidence that will be used during the meeting
- Advice of the potential outcome of the hearing
- Advice of the right to be accompanied at the meeting

### Breaches of Discipline (Misconduct)

Conduct constituting a breach of discipline includes (but is not confined to):-

- Poor attendance or bad time-keeping;
- Failure to observe procedures concerning sickness or accident absence;
- Use of abusive language to other employees, Management or Directors at Peoples
- Failure to meet Company standards in respect of quality of work;
- Irregularities in the care and custody of Company property;
- Abuse of the Statutory Sick Pay Scheme;
- Failure to perform duties in a satisfactory manner;
- Failure to follow Company procedures;
- Failure to adhere to the Company's GDPR policy and guidelines;
- Unsatisfactory attitude towards employees, Management or Directors of the Company;
- Inefficiency;
- Commercial indiscretion.

### Serious Breaches of Discipline (Gross Misconduct)

Conduct constituting a serious breach of discipline includes (but is not confined to):-

- Willful disobedience of instructions given by Management or Directors of Peoples;
- Serious and persistent abuse of the Statutory Sick Pay Scheme;
- Drunkenness, drug taking, bribery, corruption or tax evasion facilitation or gambling on Company premises;
- Serious commercial indiscretion or breach of confidentiality;
- Taking without consent property of the Company, an employee or of a customer of the Company;
- Causing malicious damage to Company, employee or customer property
- Assault, act of violence or the threat of violence or aggression;
- Theft, dishonesty or fraud;
- Use of foul, abusive and/or threatening language;
- Any act of discrimination;
- Harassment or bullying;
- AWOL;
- Any breach of Company Health and Safety Rules or Procedures;
- Failure to comply with the Company's rules relating to the use of Company or customer vehicles;
- Serious negligence which causes or might cause unacceptable loss, damage or injury;
- Any action likely to bring the Company into disrepute;
- Inappropriate comments or postings on social media in relation to / or linked to the Company;
- Serious breach of the terms and conditions of employment and/or Company rules and policies;
- Breach of trust and confidence
- Conviction of a criminal offence (except for minor road traffic offences) that impacts on your suitability to do your job or your relationship with the Company, your work colleagues or the Company's customers, suppliers or business partners.

The above lists constitute examples only and are not exhaustive of the categories of breaches or serious breaches of discipline.

### Suspension

In some circumstances, it may be appropriate to suspend you, on normal pay, while a matter is investigated. Any suspension will be for the minimum period possible. The reasons for suspension will be provided in writing to you and suspension terms and rules will be agreed with you at the time of suspension.

### Disciplinary Meeting and Outcome

At the Disciplinary meeting the hearing Manager will explain the complaint or concern against you based on the evidence gathered and the implications of your actions. You will have an opportunity to put forward your side of the case and ask specific questions. The interview will be minuted and the minutes retained on your Personnel File. Following a Disciplinary meeting, an adjournment will be taken to allow the hearing Manager to consider all of the information. A decision will then be taken as to what outcome is deemed satisfactory. In cases relating to conduct or performance, the below actions may be taken:

- No further action
- A first written warning for unsatisfactory performance (which will be live for 12 months)
- A first written warning for misconduct (which will be live for 12 months)
- A Final Written Warning (which will be live for 12 months)
- Dismissal
- Demotion

If you are found to be guilty of a serious breach of discipline, gross negligence, gross incompetence or abuse of authority, you may be dismissed summarily. If you are found to be underperforming in your duties, corrective action may be taken in many forms such as training, development and/or a review of objectives and departmental infrastructure. However if it is deemed that your performance will not improve to the levels required in spite of the corrective measures introduced, Peoples reserves the right to terminate your employment. In all outcomes, the decision will be confirmed to you in writing.

### Appeal Process

If you wish to appeal the decision made at a Disciplinary Meeting then an appeal must be submitted in writing within 5 working days. Peoples will then arrange a meeting to hear the appeal within a reasonable timeframe. You will have the right to be accompanied by a colleague or Trade Union representative at the appeal meeting. The appeal decision lies with the hearing Manager of Peoples who may confirm, modify or cancel the action in question. Where possible, the Manager hearing the appeal will be of a higher level than the Manager who made the original decision. The Manager hearing an appeal against dismissal shall have the power to substitute a warning or other disciplinary action for the original decision to dismiss. The appeal outcome will be confirmed in writing and the decision of the appeal is final.

## **Anti-corruption and Bribery Policy**

### **Purpose**

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption and we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

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

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

### **Who is covered by this policy?**

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

### **What is bribery?**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### **Gifts and hospitality**

This policy does not prohibit normal and appropriate hospitality given and received to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It complies with local law;
- It is given in our name, not in your name;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;

- It is given openly, not secretly; and
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your manager.

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

#### What is not acceptable?

It is not acceptable for you or someone on your behalf to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

#### Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

#### Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your manager or using the procedure set out in the Whistleblowing policy:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee



- agreement, or to provide an invoice or receipt for a payment made;
- a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
  - a third party requests an unexpected additional fee or commission to "facilitate" a service;
  - a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
  - a third-party requests that a payment is made to "overlook" potential legal violations;
  - a third-party requests that you provide employment or some other advantage to a friend or relative;
  - you receive an invoice from a third party that appears to be non-standard or customised;
  - a third party insists on the use of side letters or refuses to put terms agreed in writing;
  - you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
  - a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
  - you are offered an unusually generous gift or offered lavish hospitality by a third party;

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

#### Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

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

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

### Protection

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

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People and Development Department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## Corporate Criminal Offence Policy

### Purpose

Peoples conduct all of our business dealings in an honest and ethical manner. Peoples has a zero-tolerance approach to all forms of tax evasion and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We are committed to enforcing effective systems to counter tax evasion facilitation.

The Corporate Criminal Offences was introduced by the 2017 Finance Act and is intended to address the issue of Tax Evasion by making organisations accountable for the actions of those acting for them or on their behalf. Corporate Criminal Offences is comprised of offences for the failure of an organisation to prevent the facilitation of UK tax evasion and the failure to prevent the facilitation of foreign tax evasion.

At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented. Employees must not undertake any transactions which:

- cause the Company to commit a tax evasion offence; or
- facilitate a tax evasion offence by a third party who is not an associate of the Company.

**Tax Evasion** is an offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

**Foreign Tax Evasion** means evading tax in a foreign country, provided that the conduct is an offence in that country and would be a criminal offence if committed in the UK.

**Tax Evasion Facilitation** means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country by another person, or aiding, abetting, counselling or procuring the commission of that offence). Tax evasion is a criminal offence, where it is done deliberately and dishonestly.

Employees must at all times adhere to and comply with this policy. It is not acceptable for employees to:

- engage in any form of facilitating Tax Evasion
- Aid, abet, counsel or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent Evasion of Tax by another person in accordance with this policy
- Engage in any other activity that might lead to a breach of this policy
- Threaten to retaliate against another individual who has refused to commit a Tax Evasion offence or a Foreign Tax Evasion offence or who has raised who has raised concerns under this policy
- An offence under the law of any part of the UK consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax.

There is not an exhaustive list of Tax Evasion opportunities, however it is important for all employees to be vigilant and adopt a common-sense approach for any concerns. Employees are reminded of the Whistleblowing policy which can be utilised at any time. By applying common sense, employees should be aware of the following:

- Is there anything unusual about the manner in which an employee is conducting their relationship with the company or a third party (usually a customer)?
- Is there anything unusual about the customer's or the employee's conduct or behaviour in your dealings with them?
- Are there any unusual payment methods?

How to raise a concern:

Every employee has a responsibility to take reasonable action to prevent harm to Peoples. Any actions that breach tax laws of wherever we operate and brings harm to Peoples will not be tolerated. If you have any concerns you should raise these to your Manager, the People and Development Department or via the Whistleblowing policy without delay.

If you are ever asked by anyone either inside or outside of Peoples to go outside our standard procedures then you must report this without delay as someone may be attempting to evade tax. Examples and further guidance are available at any stage from your manager or the People and Development Department.

We will review and monitor this policy regularly to ensure best practice is adopted. If you require any further training in relation to this topic please speak to your manager in the first instance.

## Maternity Policy

### Purpose

This policy outlines the statutory rights and responsibilities of employees who are pregnant or have recently given birth, and sets out the arrangements for ante-natal care, pregnancy-related sickness, health and safety, and maternity leave. It does not apply to agency workers or the self-employed. Our Maternity Guide for Employees offers further detail and FAQs which you may find helpful.

### Definitions which apply in this policy:

**Expected Week of Childbirth:** the week, starting on a Sunday, in which your doctor or midwife expects you to give birth.

**Qualifying Week:** the 15<sup>th</sup> week before the Expected Week of Childbirth

If you are pregnant, we ask that you inform us as soon as possible. In addition to this we will need to know the below before the end of the Qualifying Week, or as soon as reasonably practical afterwards:

- That you are pregnant;
- The Expected Week of Childbirth; and
- The date on which you would like to start your maternity leave

To allow us to process your maternity leave, you will need to provide us with a MAT B1 form from your doctor or midwife which will confirm your Expected Week of Childbirth.

### Entitlement to maternity leave:

All employees are entitled to up to 52 weeks' maternity leave which is divided into:

- Ordinary maternity leave of 26 weeks (OML).
- Additional maternity leave of a further 26 weeks immediately following OML (AML).

### Time off for ante-natal care

If you are pregnant, you can take reasonable paid time off during working hours for ante-natal care. We ask that you give as much notice as possible of any future appointments.

### Sickness during pregnancy

Periods of pregnancy-related sickness absence shall be paid in accordance with the statutory sick pay scheme in the same manner as any other sickness absence. Periods of pregnancy-related sickness absence from the start of your pregnancy until the end of your maternity leave will be recorded separately from other sickness records and will be disregarded in any future employment-related discussions. If you are absent for a pregnancy-related reason during the four weeks before your Expected Week of Childbirth, your maternity leave will usually start automatically.

### Starting Maternity Leave:

The earliest date you can start your maternity leave is 11 weeks before the Expected Week of Childbirth (unless your child is born prematurely before that date). You need to notify us in writing of your intended start date for maternity leave. We will then write to you within 28 days to inform you of the date we will expect you to return to work if you were to take your full entitlement. You can postpone or bring forward your intended start date by informing us at least 28 days before the new start, or if that is not possible, as soon as reasonably practicable.

Maternity leave shall start on the earlier of:

- Your intended start date (as notified to us); or
- The day after any day on which you are absent for a pregnancy-related reason during the four weeks before the Expected Week of Childbirth; or
- The day after you give birth.

If you are absent for a pregnancy-related reason during the four weeks before Expected Week of Childbirth you must let us know as soon as possible in writing. Maternity leave will then be triggered, unless we agree to delay it. If you give birth before your maternity leave was due to start, you must let us know the date of the birth in writing as soon as possible.

The law prohibits you from working during the first two weeks following childbirth.

#### Statutory Maternity Pay

Statutory maternity pay (SMP) is payable for up to 39 weeks. SMP will stop being payable if you return to work (with the exception of keeping in touch days). You are entitled to SMP if:

- You have been continuously employed for at least 26 weeks at the end of the Qualifying Week and are still employed by us during that week;
- Your average weekly earnings during the eight weeks ending with the Qualifying Week are not less than the lower earnings limit set by the Government;
- You provide us with a doctor's or midwife's MAT B1 form stating your Expected Week of Childbirth;
- You give at least 28 days' notice (or, if that is not possible, as much notice as you can) of your intention to take maternity leave; and
- You are still pregnant 11 weeks before the start of the Expected Week of Childbirth or have already given birth.

SMP is calculated as follows:

- **First six weeks:** SMP is paid at the Earnings-Related Rate of 90% of your average weekly earnings calculated over the Relevant Period;
- **Remaining 33 weeks:** SMP is paid at the Prescribed Rate which is set by the Government for the relevant tax year, or the Earnings-Related Rate if this is lower.

SMP accrues from the day in which you commence OML and thereafter at the end of each complete week of absence. SMP payments are made on the next normal payroll date and income tax, National Insurance and pension contributions shall be deducted as appropriate.

#### Expected Return to Work Date:

We will expect you back at work on your Expected Return Date, unless you tell us otherwise. It helps us if, during your maternity leave, you are able to confirm that you will be returning to work as expected. If you wish to return to work earlier than your Expected Return Date, we ask that you give us eight weeks' prior notice. If not enough notice is given, we may postpone your return date.

#### Deciding not to return

If you do not intend to return to work, we ask you to notify us as early as possible and to give notice of your resignation in accordance with your contract. The amount of maternity leave left to run when you give notice must be at least equal to your contractual notice period, otherwise we may require you to return to work for the remainder of your notice period. This does not affect your right to receive SMP.

## Paternity Policy

### Purpose

This policy outlines when an employee may be entitled to paternity leave and paternity pay, and sets out the arrangements for taking it.

Paternity leave is available on the birth of a child if you have been continuously employed by us for at least 26 weeks ending with the 15<sup>th</sup> week before the Expected Week of Childbirth and either:

- a) You are the biological father and will have some responsibility for the child's upbringing; or
- b) You are the spouse, civil partner or cohabiting partner of the biological mother and will have the main responsibility (with the mother) for the child's upbringing.

Paternity leave is available where a child is placed with you for adoption by an adoption agency (if you have been continuously employed by us for at least 26 weeks ending with the week in which the agency notifies you that you have been matched with a child). In such cases you may be entitled to adoption leave instead (see our Adoption policy). Adoption leave may only be taken by one adoptive parent. Paternity leave is available to the other adoptive parent (of either sex).

### Taking Paternity Leave

Paternity leave is a period of one or two weeks' consecutive leave taken when a child is born or placed with you for adoption. You can start your leave on the date of birth or placement, or later, provided it is taken within eight weeks of the birth or placement. If the baby is premature the period ends eight weeks after the start of the Expected Week of Childbirth.

To take paternity leave you will need to give us written notice by the end of the 15<sup>th</sup> week before the Expected Week of Childbirth or no more than seven days after the adoption agency notified you of being matched with a child. You need to tell us:

- a) The Expected Week of Childbirth;
- b) Whether you intend to take one week or two weeks' leave; and
- c) When you would like your leave to start.

You can change your intended start date by giving 28 days' notice or, if this is not possible, as much notice as you can.

### Paternity Pay

Statutory paternity pay (SPP) is payable during paternity leave provided you have at least 26 weeks' continuous employment ending with the Qualifying Week or the week in which the adoption agency notified you of a match, and your average earnings are not less than the lower earnings limit set by the government each tax year. The rate of SPP is set by the government each tax year.

All usual terms and conditions of your employment remain in force during paternity leave, except for the terms relating to pay.



## Adoption Leave Policy

This policy sets out the arrangements for adoption leave and pay for employees who are adopting a child through a UK adoption agency.

### Entitlement to Adoption Leave:

You are entitled to adoption leave if you meet all of the following conditions:

- a) You are adopting a child through a UK or overseas adoption agency.
- b) The adoption agency has given you written notice that it has matched you with a child for adoption and tells you the date the child is expected to be placed into your care with a view to adoption (Expected Placement Date).
- c) You have notified the agency that you agree to the child being placed with you on the Expected Placement Date.
- d) Your spouse or partner will not be taking adoption leave with their employer (although they may be entitled to take paternity leave).

The maximum adoption leave entitlement is 52 weeks, consisting of 26 weeks' Ordinary Adoption Leave (OAL) and 26 weeks' Additional Adoption Leave (AAL).

### Letting us know

You will need to notify us within 7 days of the agency notifying you in writing that it has matched you with a child (or where that is not reasonably practicable, as soon as reasonably possible). You need to give us notice in writing of the Expected Placement Date, and your intended start date for adoption leave. Once you receive the matching certificate issued by the adoption agency, you will need to provide us with a copy.

### Starting Adoption Leave

Ordinary Adoption Leave may start on a predetermined date no more than 14 days before the Expected Placement Date, or on the date of the placement itself, but no later.

You can change your intended start date by giving 28 days' notice or, if this is not possible, as much notice as you can.

### Adoption Pay

Statutory adoption pay is payable for up to 39 weeks provided you have at least 26 weeks' continuous employment with us at the end of the Qualifying Week and your average earnings are not less than the lower earnings limit set by the government each tax year.

- **First six weeks:** SAP is paid at 90% of your average weekly earnings
- **Remaining 33 weeks:** SAP is paid at the Prescribed Rate which is set by the Government for the relevant tax year, or the Earnings-Related Rate if this is lower.

### Returning to Work

Unless you tell us otherwise, then you will return to work on the expected return date. If you would like to return to work on an earlier date then we ask you to give us at least eight weeks' notice of the date.

## **Flexible Working Policy**

### **Purpose and policy statement**

We are committed to providing equality of opportunity in employment and to developing working practices and policies that support work-life balance. We recognise that work-life balance can improve employee motivation, performance, productivity and can reduce stress. This Flexible Working Policy gives eligible employees an opportunity to formally request a change to their working pattern.

As part of this process we commit to:

- Agreeing to any flexible working arrangements, provided that the needs of both the business and the employee can be met;
- Encouraging open discussions between managers and employees in relation to flexible working;
- Identifying and considering agile ways of working to allow flexibility for employees whilst still meeting the needs of the business;
- Having a fair and transparent process for applying for, agreeing and implementing flexible working arrangements; and
- Ensuring no one who makes a request for flexible working will be subjected to any detriment or lose any career development opportunities as a result.

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

### **Eligibility:**

To be eligible to make a request under the formal flexible working procedure you must:

- a) Be an employee;
- b) Have worked for us continuously for at least 26 weeks at the date your request is made; and
- c) Not have made a formal request to work flexibly during the last 12 months (each 12-month period runs from the date when the most recent application was made).

### **Making a Formal Flexible Working Request**

- You need to submit a request for flexible working in writing to your manager.
- Your request should state the reason for your request and as much information about your desired working pattern.
- Your request should ideally be submitted at least two months before you wish the changes you are requesting to take effect.

### **Formal Meeting:**

- Your manager will arrange to meet with you within 28 days of your request for flexible working being submitted.
- You will be entitled to bring a colleague or trade union representative to the meeting.
- The purpose of the meeting will be to consider the working arrangements you have requested and to discuss the impact that your proposed working arrangements will have on your work and that of your colleagues/department.
- If the proposed working arrangements cannot be accommodated, discussion at the meeting will provide an opportunity to explore possible alternative working arrangements.
- Following the meeting, you will be notified of the outcome in writing within 14 days. If your manager needs more time to make a decision, they will ask for your agreement to delay the decision for up to a further 14 days.

- If your request is accepted, or where we propose an alternative to the arrangements you requested, your manager will write to you with details of the new working arrangements, details of any trial period, an explanation of changes to your contract of employment, and the date on which they will commence. You will be asked to sign and return a copy of the letter.

There will be circumstances where, due to business and operational requirements, we are unable to agree to a flexible working request. In these circumstances, your manager will write to you:

- Giving the business reason(s) for rejecting your request;
- Explaining why the business reasons apply in your case; and
- Setting out the appeal procedures

#### Appeal Process

If you wish to appeal the decision made at a Flexible Working Meeting then an appeal must be submitted in writing within 5 working days. We will then arrange a meeting to hear the appeal within a reasonable timeframe. You will have the right to be accompanied by a colleague or Trade Union representative at the appeal meeting. The appeal decision lies with the hearing Manager of the Company.

If your appeal is upheld, you will be advised of your new working arrangements, details of any trial period, and an explanation of the changes to your contract and the date on which they will commence. You will be asked to sign and return a copy of the letter. You will not be able to make another formal request until 12 months after the date of your original application.

If your appeal is rejected the written decision will give the business reason(s) for the decision and explain why the reason(s) apply in your case. You will not be able to make another formal request until 12 months after the date of your original application. The appeal outcome will be confirmed in writing and the decision of appeal is final.

#### Breaches of the formal procedure:

If you withdraw a formal request for flexible working, you will not be eligible to make another formal request for 12 months from the date of your original request. In certain circumstances, a request made under the formal procedure will be treated as withdrawn. This will occur if:

- a) You fail to attend two meetings under the formal procedure without reasonable cause; or
- b) You unreasonably refuse to provide information we require to consider your request.

In such circumstances your manager will write to you confirming that the request has been treated as withdrawn.

## **Time Off for Dependants Policy**

We respect that there will be occasions when you will need to take time off work to deal with unexpected events involving one of your dependants or someone close to you. This policy gives all employees the right to take a reasonable amount of unpaid time off work to deal with certain situations affecting their dependants.

We appreciate that life can often be unpredictable and therefore all of our employees have the right to take a reasonable amount of unpaid time off work when it is necessary to:

- provide assistance when a dependant falls ill, gives birth, is injured or assaulted;
- make longer-term care arrangements for a dependant who is ill or injured;
- take action required in consequence of the death of a dependant;
- deal with the unexpected disruption, termination or breakdown of arrangements for the care of a dependant; and/or
- deal with an unexpected incident involving their child during school hours (or those of another educational establishment).

A dependant for the purposes of this policy is:

- An employee's spouse, civil partner, parent or child;
- A person who lives in the same household as the employee but who is not their tenant, lodger, boarder or employee; or
- Anyone else who reasonably relies on the employee to provide assistance, make arrangements, or take action of the kind referred to above.

You are only entitled to take time off under this policy to provide personal care for a dependant where there is an immediate crisis. If you know well in advance that you wish to take time off to care for a dependant yourself, rather than arrange for someone else to do so, this policy will not apply. You should take advice from manager if you need to take time off work in these circumstances.

For the right to time off under this policy to arise, it must be necessary for you to take action in relation to a dependant. Whether action is necessary will depend on the nature of the problem, the closeness of the relationship between you, and whether someone else is available to assist. Action is unlikely to be considered necessary if you knew in advance that a problem might arise but didn't make alternative arrangements for a dependant's care. Reasonable time off in relation to a particular problem will not normally be more than one or two days. However, we will always consider each set of circumstances on their facts.

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

You will only be entitled to time off under this policy if, as soon as is reasonably practicable, you let your manager know the reason for your absence and how long you expect to be away from work. Failure to notify us may result in unauthorised time off being recorded. Where it is possible to do so in advance or when you return to work after taking time off under this policy, we might ask you to provide evidence for your reasons for taking the time off.

## **Bereavement Leave**

Bereavement leave is designed to help you as an employee cope with the death of a close relative, to deal with necessary arrangements and attend their funeral.

### **Entitlement**

As an employee you are entitled to take paid bereavement leave of up to 5 days in the event of the death of a spouse, partner, child, stepchild, grandchild, parent, step-parent, parent-in-law, grandparent, brother or sister, stepbrother or stepsister, or brother or sister-in-law. We may exercise our discretion to grant bereavement leave in the event of the death of any other relative or close friend, depending on the circumstances of each case. We are here to support you and if you are unable to return to work following a period of bereavement leave then please contact your manager to discuss your circumstances in more detail. We are here to support you, so in certain cases it may be appropriate for you to take a period of sickness absence, annual leave or unpaid leave. If are struggling it is important that you speak to your manager or the P&D Department.

### **Requesting bereavement leave**

We recognise that it may not always be possible to request bereavement leave in advance. However, where it is possible, please make a request to your manager. You should tell them the reasons for your request and the number of days leave you would like to take. Where it is not possible to request leave in advance then please contact your manager as soon as possible to tell them the reason for your absence and the number of days you will be absent. In exceptional circumstances we may have to refuse a request for bereavement leave. If so, your manager will give you a written explanation for the refusal. If you are dissatisfied with this decision you may appeal to the People and Development Department in writing or make a complaint under our Grievance Procedure within 3 days of receipt of the written reasons for the refusal.

## **Adverse Weather Policy**

This policy applies where it becomes impossible or dangerous for employees to travel in to work because of:

- Extreme adverse weather such as heavy snow;
- Industrial action affecting transport networks; or
- Major incidents affecting travel or public safety.

On these occasions we recognise that a flexible approach to working arrangements may be necessary to accommodate the difficulties employees face and to protect health and safety, while still keeping the business running as effectively as possible.

### **Travelling to work**

- You should make a genuine effort to report for work at your normal time. This may include leaving extra time for the journey and/or taking an alternative route. Travel on foot or by bicycle should be considered where appropriate and safe.
- If you are unable to attend work on time or at all, you must telephone your manager at least 1 hour before your scheduled start time on each affected day.
- If you are unable to attend work, you should check the situation throughout the day in case it improves. If conditions improve sufficiently, you should report this to your manager and attend work unless told otherwise.
- If you do not make reasonable efforts to attend work or fail to contact your manager without good reason, you may be subject to disciplinary action. We will always review the individual circumstances for each case before making any decision.

### **Alternative working arrangements**

- You may be required to work from home, where possible, or from an alternative place of work, if available. Your Manager will advise you of any such requirements. You will receive normal pay in these circumstances.
- If you are able to work, you may sometimes be expected to carry out additional or varied duties during such periods. You will not be required to do anything you cannot do competently or safely.

### **Absence and pay**

- If you are absent from work due to extreme weather or other disruptions to travel, you are not generally entitled to be paid for the time lost.
- If you are absent due to extreme weather or other disruptions to travel, this absence can be treated in a variety of ways. You should discuss your options with your manager who will retain overall discretion in the matter. The options are detailed below:
  - Treating the absence as annual leave
  - Making up the lost hours within a reasonable time
  - Treating the absence as special unpaid leave
- If, in exceptional circumstances, we decide to close the workplace, you will be paid as if you had worked your normal hours.