

# Policy Manual

Values, standards, and workplace policies



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# VISIONS & VALUES

## OUR VISION

Earn the loyalty and trust of our clients by delivering Product, Service and Value which consistently meets client goals, and exceeds expectation.

## OUR VALUES

Outstanding Quality, delivered by highly skilled, competent people diverse in range, with experience and knowledge enhanced through continual development.

### **Talented People**

Outstanding Quality, delivered by highly skilled, competent people diverse in range, with experience and knowledge enhanced through continual development.

### **Excellence**

Service provided by the best people matched with the correct role with exceptional teamwork communication and leadership excellence in everything we do.

### **Safety**

Safety embedded deep within our culture, built into every aspect of our business systems, behaviour, and culture.

### **Communication**

Communicate effectively as a team and respect supply chain and client relationships.

# COMPANY POLICIES – PRINCIPLES

Our employment policies are designed to create a fair and consistent framework for all employees. These policies ensure you understand your responsibilities and what the Company offers in return. Our goals are to align Company needs with employee satisfaction and to motivate everyone towards achieving corporate objectives.

We would encourage our employees to consult with their line manager in the first instance should they require further information. Should this not be possible, please refer to your local Human Resources representative.

Our Company adheres strictly to the Group's Code of Conduct, ensuring that all our operations and interactions are conducted with the highest standards of integrity, transparency, and professionalism. Our Company policies have been designed with this code as a guiding framework for our ethical practices and decision-making processes. Should you need to reference the Code of Conduct for any reason, please feel free to request a copy from Human Resources.

## **General Definitions**

**Employee:** often used as a standard term, this may refer to employees who are full time, part time, fixed term, temporary or permanent. Where the term employee or staff is used, please note that this would be for all types of employee for Global Infrastructure.

**Worker:** definition will cover persons carrying out any work for Global Infrastructure (including employees) however will include contractors, subcontractors, limited companies and agency workers.

**Company:** This references Global Infrastructure as a business entirety and decisions on these policies are made by Global infrastructure. The policies may also refer to Global Infrastructure as the organisation or the business.

**The Group:** is defined as GEG Capital Ltd.

*Please note that it is the intention of the business that this policy manual is treated as a guidance document. Policies and procedures contained herein (and any contracts of employment that refer to them) do not form part of the contract of employment; and the business retains the right to depart from them in such circumstances as it deems appropriate.*

*For the most up to date and current business organogram(s) and contact details, please refer to the Company website: [www.global-infra.co.uk](http://www.global-infra.co.uk) or link in with your HR representative.*

# HEALTH & SAFETY POLICIES

## HSEQ POLICY

It is the policy of Global Infrastructure to eliminate harm, reduce business risk and deliver sustainable, innovative high-quality products and services to our clients, by managing our business systems and procedures proactively.

### **Our strategy:**

To review and evaluate our basic principles amending where necessary to ensure we continually exceed client expectation, consistently deliver exceptional standards, performance and quality with integrity and resilience, while bringing efficiency and value to the business, and to our clients.

In pursuit of this Policy, Global Infrastructure is responsible for and committed to:

- the health, mental well-being, and prevention of injury to all employees and persons under the control of Global infrastructure affected by our work activities. Through effective assessment, direct worker consultation, participation and communication, risks and hazards associated with the activities of the business - including risks associated with a pandemic, are identified, and mitigated effectively.
- developing our workforce by providing appropriate information, instruction, supervision, training, awareness, appropriate tools & equipment, to perform tasks competently and safely in the most efficient, ethical and sustainable manner.
- assessing strengths, weaknesses, opportunities, and threats appropriately across the business evaluating risk using a framework of procedures and safe systems of work which we continually monitor, evaluate, improve, and communicate. Consideration is given to all stakeholders and interested parties in applying the most appropriate, consistent control measures to satisfy legal, regulatory, industry, organisational, contractual and customer expectations.
- communicating the importance of this policy and its' implementation to all staff and site personnel, meeting legal, organisational and customer obligations. This is achieved through continual workforce engagement and open communication.
- sustainable development, transparency, and accountability, recognising our moral, ethical, and legal obligations to the protection of the environment, society, and the economy. We achieve compliance with regulations at local, national, and international levels. We use a systematic approach to establish, implement, and continually assess the most suitable mitigation measures to minimise environmental impact, prevent pollution, conserve natural resources, protect species and habitat, and reduce annually reported greenhouse gas emissions.
- the continual improvement of our Integrated Management Systems to enhance and improve Quality, Environmental Sustainability and Occupational Health & Safety performance across the business. In seeking ways to achieve this, annual specific, measurable, achievable objectives are established which we monitor, measure, analyse and evaluate, focusing on continuous improvement, risk management, leadership commitment, stakeholder engagement and legal compliance to maintain the highest of standards.

Everyone within the Company has a responsibility for HSE&Q and is required to co-operate fully in the implementation of this policy, and all measures put in place by Global Infrastructure.

The Company shall communicate this Policy to all employees, and it will be freely available to customers, shareholders, contractors, the public and online at: [www.global-infra.co.uk](http://www.global-infra.co.uk).

This Policy is reviewed at least annually for its continuing suitability.

### **ARRANGEMENTS**

## **Safe Places of Work**

All sites and departments in the organisation will be visited regularly by management and checked at least daily by Project Manager. Project managers will carry out active monitoring of sites; record any health and safety shortcomings, discuss and agree appropriate action with supervisors, report their significant findings to management, and ensure that appropriate actions are implemented within an appropriate timescale. The HS&E manager will provide advice and assistance as required.

## **Falls from Height**

Adequate arrangements shall be made to prevent anyone falling wherever there is a likelihood of significant injury, by avoiding the need to work at height. Where this is not reasonably practicable, safe working platforms or personal suspension equipment shall be provided. Failing these options, suitable fall arrest equipment shall be provided (nets, air bags, harnesses & lanyards etc.) to arrest falls should they occur.

Project Managers shall ensure scaffolding & scaffold towers are inspected by a competent person:

- before first use
- weekly
- after substantial alteration/addition
- following events likely to affect strength or stability,
- And the results of the inspections recorded.

## **Fragile Material**

Where it is necessary for anyone to work, or pass adjacent to, fragile materials on the firm's premises or one of its construction sites, barriers shall be erected to prevent access or adequate additional support will be provided immediately above or below to prevent anyone falling wherever there is a likelihood of significant injury.

## **Falling Objects**

Suitable and sufficient steps shall be taken to ensure objects are not thrown, dropped, pushed over, or kicked from height wherever there is a danger of injury or damage. Guard rails, toe boards, sheeting, netting, or brick guards will be provided where such hazards exist. Where it is not reasonably practicable to provide adequate protection, the potential drop zone shall be adequately zoned off by barrier to prevent access.

The Company will provide any necessary temporary support to new or existing structures which may become unstable and shall control the loading of structures (including scaffolding) to avoid unintentional collapse. All temporary support shall be erected and dismantled under the supervision of a competent person with a permit system in place.

## **Demolition / Dismantling**

All work involving the demolition or dismantling of any structure by the firm will be planned to prevent danger to any person and shall be under the supervision of a competent person.

## **Excavations**

Adequate steps shall be taken to avoid persons being trapped in any excavation due to collapse of the sides, by the provision of adequate shoring and/or by preventing materials and spoil being stored adjacent to the sides. Project Managers shall ensure excavations are checked by a competent person before the start of each shift, after any accidental fall of rock or earth, and after any event or change in weather which could cause instability, with the results of the inspections recorded.

Adequate barriers shall be provided to prevent falls of materials, persons or vehicles into excavations which would result in injury or significant damage.

Excavation work shall have a permit system in place and be preceded by a CAT scan and check of utilities plans, where available, to minimise the risk of contact with live services. Hand digging, using shovels and spades only, shall be carried out within 500mm of suspected services to establish their location before further machine work proceeds.

All excavations which present a significant risk of injury shall be provided with a rigid cover or adequate security fencing whenever a site is left unattended, even when the site is otherwise enclosed at its perimeter.

## **Preventing Drowning**

Where work takes place adjacent to water the Company will take all reasonably practicable steps to prevent drowning by providing protective barriers, buoyancy aids and rescue equipment appropriate to the risks involved. Transport of employees by water shall only be on suitably constructed, safely loaded, and properly maintained vessels.

## **Traffic Routes**

The Company's premises and all sites will have planned arrangements for the safe movement of all traffic including, where necessary, suitable signs and speed limits. Pedestrians and vehicles will be segregated where reasonably practicable, particularly at entrances and adjacent to welfare accommodation. The need for vehicles to reverse shall be minimised by using a one-way system of traffic control where practical. Reverse parking will apply in car parks unless otherwise indicated.

## **Vehicles**

All vehicles shall be inspected regularly and maintained at least in accordance with the manufacturer's recommendations. The driver of the vehicle is responsible for checking oil, coolant, and tyre pressures. Passengers must not be carried unless purpose-made seating has been installed. Seat belts shall always be worn, where fitted. Operators of dumpers and similar vehicles will dismount during loading to avoid the risk of injury from falling material, unless falling object protection has been fitted. Unattended vehicles shall be immobilised to prevent unauthorised use.

Loads must be properly secured and sheeted where appropriate.

Maximum carrying capacity and towing capacity limits of vehicles must be observed.

The maximum speed for all vehicles is 5 mph in the Company's yards and on all construction sites unless otherwise indicated.

For all crew buses, vehicles towing trailers, and large vans speed limits are 50mph on single carriageways and 60 mph on dual carriageways, except where lower speed limits (e.g. in built-up areas) apply.

For large goods vehicles, speed limits are 40mph on single carriageways and 50 mph on dual carriageways, except where lower speed limits apply.



## **Manual Handling**

All manual handling operations, where there is a significant risk of injury, shall be avoided as far as is reasonably practicable. Where this is not possible, risk assessments will be carried out by supervisors, Project Managers, and Project Managers, aided, where necessary, by the HS&E manager. On-the-spot risk assessments may also need to be made by Project Managers and individual employees, and all employees exposed to significant risk will undergo training in manual handling and kinetic lifting. Suitable and sufficient aids will be provided to minimise the risk of injury. 140mm (or thicker) dense concrete blocks will not be ordered, or used on Global Infrastructure sites, except with the express consent of the construction manager

## **Plant and Equipment**

Competent employees shall make regular checks of all plant and equipment, and any found to be faulty shall be tagged, taken out of use, repaired, and replaced. All plant and equipment shall be stored safely, and periodically thoroughly examined. The results of examinations of larger items shall be recorded. All plant and equipment hired or loaned to the Company shall only be accepted if accompanied by adequate inspection and maintenance details.

## **Lifting Operations and Lifting Equipment**

All lifting operations shall be planned and supervised by competent persons. Project Managers shall ensure lifting equipment (cranes, hoists, gin wheels, HIABs, MEWPs, forklifts, excavators) is inspected by the operator, or other competent person, weekly and after any event likely to have affected its safe use, and the results of inspections recorded. A thorough examination shall be carried out every 12 months. Foreman / Gangers will be issued with a standard lifting accessories pack, and it will be their responsibility to store appropriately, prevent deterioration and return for testing every six months, this will be flagged up by the Training Department responsible for maintaining a schedule of equipment details and test dates.

## **Fire & Emergencies (on Company premises & sites)**

Management shall appoint a competent person to carry out risk assessments and develop management systems to deal with fire and other emergencies for the organisation's premises. Suitable and sufficient emergency escape routes have been provided with appropriate signs placed. Regular inspections will be made by the appointed person to ensure these routes remain clear of obstructions. All new employees will be briefed on these and other emergency arrangements during their induction. A specialist firm will continue to inspect regularly and maintain fire-fighting equipment. The fire alarms in the headquarters building, will be tested regularly and practices & instruction held at sufficient intervals to ensure all staff are aware of evacuation procedures. A review of workplace fire safety shall be made annually by the competent person.

## **Fire & Emergencies (on construction sites)**

Risk assessments based upon all contract documents and pre-tender information will form the basis of an individual fire and emergencies plan and fire safety rules for each construction site. These shall be included in the health and safety plan. The fire and emergencies plan shall be drawn up by the PC/Client/Project Manager and will incorporate arrangements for escape, provision of fire-fighting equipment, designation of assembly points and the method of alerting everyone to the presence of a fire. The proximity of existing buildings will be considered.

For all hot works activities in new builds / refurbishment contracts and or civil contracts that have a risk of causing fire due to the proximity of flammable material, a hot works permit is always required.

## **First Aid**

The Company will assess the first aid requirements of each section of the organisation and ensure enough employees are trained as first aiders and appointed persons, with refresher training provided at least every three years. First aid kits will be provided for each department and site. Project Managers & supervisors will be responsible for ensuring they are maintained. All employees will be informed of the relevant first aid arrangements and the names of first aiders will be prominently displayed on notices.

## **Hazardous substances**

Before any employee is required to use any hazardous substance a COSHH assessment will be carried out, and the risks and controls briefed to users. Project Managers will, with the assistance of the health, safety, and training manager, produce systems of work which reduce the risk of harm to employees from hazardous substances, so far as is reasonably practicable by (in order of preference):

- elimination of the substance altogether
- substitution with a less harmful alternative
- providing physical barriers which limit numbers exposed
- reducing exposure time by, for example, job rotation
- Providing suitable PPE.

## **Asbestos**

The organisation is committed to the complete removal of asbestos-containing materials from all its premises. No employee will be permitted to work on any site where there is a foreseeable risk of exposure to asbestos. Before work starts on any existing structures, a thorough inspection must be made by a competent person and written evidence provided that, either no asbestos is present, or any asbestos has been removed, or encapsulated, by a licenced contractor and the structure rendered safe. All employees who might inadvertently expose asbestos when working on existing buildings will be given appropriate training in asbestos awareness recognition and provided with suitable instructions. If any worker presumes or identifies that asbestos may be present in their work area, they will stop work immediately, make the work area safe to ensure no-one is permitted to enter the location and then phone the Project Manager and H&S Manager. The Project Manager or HSE Manager will contact Asbestos specialist to go to site to carry out testing, results of this tests will be analysed before any further work continues in this area.

## **Flammable liquids and liquefied petroleum gas (LPG)**

All flammable liquids and LPG shall be stored securely and kept away from combustible materials, except when required for immediate use. All construction sites shall have an area designated for storage and refuelling where the risks of fire or explosion can be controlled.

## **Smoking**

The organisation supports the protection of non-smokers from the discomfort and harm which can be caused by cigarette smoke and recognises the safety risks from naked flames and carelessly discarded smokers' materials. For these reasons smoking is prohibited: -

- in designated refuelling areas on sites,
- in, or near, containers used to store flammable liquids and gas,
- In all rest areas and places where food and drinks are consumed.
- In Company vehicles or plant
- Whenever client's rules, permit-to-work systems, or the Project Manager require special restrictions
- On construction sites, Project Managers will designate zones where smoking is permitted.

## **Lighting**

Adequate natural and artificial lighting, including portable lighting on construction sites, will be provided as appropriate to ensure all employees can work safely.

## **Welfare facilities**

All employees, including those on construction sites, will be provided, as far as is reasonably practicable, with:

- toilets (separate for each sex, unless self-contained and lockable)
- adjacent washing facilities with, as far as is reasonably practicable, warm running water, particularly on sites where cement and concrete are being used, and bowls large enough for hand and forearm washing.
- a supply of drinking water (from a water fountain, or with cups provided)
- accommodation for clothing and work clothes drying facilities
- a rest room or rest area
- facilities to ensure meals can be prepared and eaten
- Means to boil water for hot drinks and facilities to heat food.
- While everyone has a duty to keep welfare facilities in a clean and tidy state as far as possible, the Project
- Manager will appoint a person or persons to clean facilities at least daily.

## **Temperature and weather protection**

All employees working indoors on Global Infrastructure premises, site offices and canteens will be provided with sufficient heating to ensure a reasonable working temperature. Employees exposed to adverse weather conditions will be supplied with suitable protective clothing.

## **Display screen equipment**

The HS&E will assist managers in identifying employees who regularly use computers as a significant part of their work enable assessment of workstation risks. Assessment checklists, results of tests and recommendations made for reducing risks shall be kept by the health and safety adviser. Following assessment, management will authorise all reasonable steps to control risks to the health of users. Display screen equipment users may request an eyesight test at the Company's expense. The Company will only provide standard glasses and lenses when required solely for using display screen equipment at work.

## **Housekeeping**

Suitable containers will be provided for segregation and disposal of waste and, on construction sites employees will be assigned by Project Managers or supervisors to ensure waste is transferred regularly to appropriate skips. Rubbish must not be burnt.

Regular checks will be made by department supervisors and Project Managers to ensure work areas are kept tidy and free of slip and trip hazards.

## **Personal protective equipment (PPE)**

The Company will provide, without charge, all necessary PPE to employees whose activities expose them to a particular risk which cannot be controlled adequately by other means.

Project Managers and supervisors will be responsible for ensuring no-one enters a Global Infrastructure site without suitable head protection, safety footwear a high-visibility vest or jacket, gloves, and eye protection. Supervisors will issue additional personal protection equipment as appropriate, which will be kept in site offices and will include: -

- ear defenders (earmuffs or disposable plugs)
- Goggles/visor (high impact and/or chemical resistant).
- standard gloves (ribbed rubber palms and fingers with fabric back)
- Waterproof gauntlets (for use in polluted water etc.)

- full-body harnesses and lanyards (for use whenever a safe working platform cannot be provided and where there is a significant risk of injury through falling)
- disposable dust masks
- special respiratory protection (assessed and face-fit tested for individual employees)
- waterproof jackets & over trousers
- disposable boiler suits
- safety wellingtons

#### **All employees must:**

- Wear PPE. When required and particularly for activities with special risks
- Safeguard their PPE. from unnecessary damage, using protective storage pouches and bags and lockers were provided
- Report any loss or defects immediately
- Accidents, Injuries and Dangerous Occurrences

It is the responsibility of everyone in the Company to report all accidents and incidents promptly in accordance with Company procedure.

Accident books are kept in the main office and all site offices, and details of every accident, no matter how minor, must be entered by the injured person where practicable.

This is required for two main reasons:-

- Only by finding out the causes of these minor incidents and near misses can similar, more serious events be avoided.
- Certain accidents and dangerous occurrences must, by law, be reported to the Health and Safety Executive (HSE).

The HS&E manager will ensure that an appropriate level of investigation is carried out of all significant incidents, and will ensure that reports are submitted where required, to the HSE.

#### **Information, Instruction and Training**

All new employees will receive induction training on site delivered by their line manager supervisor or Project Manager. All those starting work on, or visiting for the first time any, Global Infrastructure sites will be given a site induction by the Project Manager. No employee shall be required to carry out any task, or use any equipment, where training or technical knowledge is necessary, unless he/she has received adequate information, instruction and training, except where under the direct supervision of a competent person.

The HS&E Manager, in conjunction with Project Managers, will assist with individual training appraisals where necessary to assess:-

- what training and instruction has been given
- how appropriate and effective this training has been
- what further training is required

Originals, where possible, of all certificates and other training information will be kept within our main office premises.

Each year certain Company-wide health & safety issues will be selected, and training & instruction will be given on these topics to all affected personnel.

## **Competence**

A competence matrix will ensure that the following basic levels of competence are achieved:

- CSCS card: for all construction site personnel
- CPC card or equivalent: for construction plant operators
- SMSTS certificate: for Project Managers
- First Aider: at least one certificate holder per site

All the above certificates will be subject to a renewal process to ensure they remain current.

In addition, any site or client specific requirements will be checked.

All vehicle drivers must ensure they have a valid current driving licence for the categories of vehicle which they are expected to drive. Driving Licences must be made available for checking on a regular basis and drivers must notify any restrictions on their licence immediately.

## **Communication**

Any information which could affect an employee's health and safety will be communicated in one of the following ways, whichever is most appropriate:-

- direct mailing to each employee
- verbal instructions and hand-outs at training/briefing sessions
- inductions, where the information forms part of a health and safety plan or method statement
- toolbox talks
- individual interviews (e.g. reviews of training needs, new employee inductions)

Opportunities will be provided at all instruction, briefing and interview sessions for employees to ask questions, give feedback and express any health and safety concerns they may have. Day-to-day queries may be made to supervisors who, in turn will seek further clarification from management if required. Alternatively, any employee can contact the Company H&S manager.

Safety Forums will be held on a regular basis to promote employee involvement.

## **Employee Responsibilities**

All employees are required to:-

- Perform their duties in a safe manner which does not place themselves or others at risk
- Co-operate with the Company in matters of health and safety, making full use of any plant, equipment or system of work provided for reducing risks to themselves and others.
- Safeguard and not misuse anything provided for their own or others' health and safety.
- Report any safety concerns and challenge any apparent unsafe practices.

## **Sub-Contractors**

Global Infrastructure shall maintain a list of approved sub-contractors and, initially, each will be required to return a questionnaire, with supporting documents, to demonstrate they are competent and have adequate resources to carry out their work safely and without risk to health. Their competence will be assessed in conjunction with advice from by the H&S manager, and Compliance Department, who will make appropriate recommendations to the director responsible for health and safety. After their satisfactory assessment, and when appointed to carry out works for a particular contract, they must provide adequate risk assessments and method statements before they or their employees can start work on site.

## **Company rules**

Personal protective equipment must be worn when required. Hard hats, safety footwear and high-visibility vests/jackets must always be worn on all Global Infrastructure sites. Eye protection and gloves are also required.

All accidents, injuries and near misses must be reported immediately.

No excavation shall be started unless at least a CAT scan has been carried out.

Scaffolding must not be erected, altered, or dismantled except by scaffolders under the instructions of the Project Manager.

Ladders must be tied securely on both stiles, or footed, before use, and must extend at least 1m (5 rungs) above landings, unless adequate handholds are available.

Plant and equipment must only be operated by competent and authorised employees.

Any defective equipment should be reported immediately to the supervisor, tagged, and taken out of use.

All lifting operations shall be planned and shall be supervised by a competent person with the authority to stop further operations if there is an immediate risk of injury or damage.

Fire and escape routes must be always kept clear.

No dangerous substances, or substances marked 'very toxic,' 'toxic,' harmful,' 'corrosive' or 'irritant' is to be used unless a COSHH assessment has been provided, read and understood by the user.

All waste material should be collected as work proceeds and working areas tidied at the end of each day.

Mobile phones and radios are not permitted in the workplace. These must be left in the canteen or in vehicles during working hours. Exceptionally, a Project Manager may specifically instruct lone workers and small teams to keep mobile phones with them, for business use only, while working.

The last person to leave any section of Company or site premises shall be responsible for ensuring entrances are locked and alarms activated, where appropriate. Before sites are left unattended:

- excavations shall be boarded over or secured with barriers.
- plant and equipment shall be immobilised.
- harmful substances locked away.
- any means of access to scaffolds shall be removed or secured against unauthorised use.
- for roadworks sites, record photos shall be taken on departure from site.
- horseplay or running on Company premises is prohibited.

The consumption of, or reporting for work under the influence of, drink or drugs is a direct breach of the conditions of employment and can result in instant dismissal.

Regular and systematic inspections and risk assessments of all potentially hazardous work activities will be made under the authority of the HSEQ Manager, who will take into account all the relevant regulations and codes of practice. Specialist advice will be obtained if necessary and the risk assessment will be reviewed periodically. The significant findings will be recorded and appropriate preventative and/or protective measures taken as necessary.

# SUBSTANCE MISUSE POLICY

Our employees are our most valuable resource, and their health and safety are of the utmost importance. The purpose of this Policy is to ensure that the possible consequences of alcohol or drug abuse on the individual, other employees, the public, environment, and the success of our business are reduced to a minimum.

This Policy applies to all employees, agents and sub-contractors engaged by Global Infrastructure (Scotland) Ltd and all visitors to Company premises including premises of Group clients and Group's associates and /or affiliates

The aim of this policy is to protect the health and safety of our employees and to help anyone who may be suffering from a drug or alcohol-related problem. The policy sets out the principles within which our business will usually work together with guidance for occasions when a problem arises.

The Company expressly prohibits:

- The use, possession, solicitation for or sale of narcotics or other illegal drugs (including new psychoactive substances, including those formerly known as "legal highs"), alcohol, or prescription medication (without a prescription for the user) on Company or customer premises or while performing an assignment.
- Being impaired or under the influence of illegal drugs or alcohol away from the Company or customer premises, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.
- Possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company or customer premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.

Illegal drugs are those classified as such in the Misuse of Drugs Act 1971.

All employees are personally responsible for their own health and safety and the safety of others who may be affected by their acts and omissions. Consumption of alcohol or drugs may affect an employee's ability to properly perform his or her job and may also endanger the health and safety of others. Employees are therefore required to advise their line manager if they are taking prescribed drugs.

Where appropriate, the Company will provide support internally and/or through external agencies to employees who seek help for a drug or alcohol problem.

The Company reserves the right to conduct drug and alcohol screening as part of the process for pre-employment selection. Any candidate who has a positive screen, or who refuses to provide the appropriate samples, will not be eligible for employment.

The Company reserves the right to conduct or require a random drug or alcohol screen on any employee whilst at work or on Company property. Such screening will only be carried out with the employee's consent. However, refusal to provide appropriate samples will lead the Company to draw its own conclusions and will certainly lead to disciplinary action.

**Post-Accident Testing:-** Any employee involved in an on-the-job accident or injury under circumstances that suggest use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the-job-accident or injury" means not only the one who was injured, but also any employee who potentially contributed to the accident or injury event in any way.

Breach of this policy by an employee will be fully investigated and dealt with under the Company's Disciplinary Procedure (which may lead to disciplinary action up to and including summary dismissal from the Company and possible reporting to the police). Depending on the nature of the conduct, the employee may be dismissed without notice.

All employees, agents or sub-contractors visiting or carrying out business on customers' premises shall comply with any alcohol/drug related rules, regulations and policies enforced by the customer. Failure to do so will result in disciplinary action.

Employees who by the nature of their duties are liable to be 'called-out' to work at short notice should consider this in the context of the overall Policy.

### **Procedures/Prevention and Rehabilitation**

The primary objectives of this policy are the prevention of the adverse effects of drugs and alcohol in the workplace and the early diagnosis, treatment and rehabilitation of employees who have alcohol or drug- related problems.

The Company will ensure that there are confidential means whereby employees can seek assistance and advice for any alcohol or drug related problem, whether by self-referral or at the request of the Company.

Any member of staff who believes that a work colleague has an alcohol or drugs problem must pass on this information in a confidential manner to their immediate Manager.

Employees should recognize that it is their responsibility and in their best interests to seek help at the earliest possible stage when treatment may be easier and before the problem affects work sufficiently to become a disciplinary matter.

The refusal of help or advice, unacceptable behaviour and/or continuous impaired performance of the abuser will result in disciplinary action.

### **Testing for Drugs and Alcohol**

Testing individuals for drugs and alcohol, whether by the Company or external agencies, will take place under the following circumstances: -

- 'With Cause' Conduct/Behaviour: - When it is suspected that a person's behaviour, actions, or omissions may be attributed to drink or drugs.
- 'With Cause' Post Incident/Accident: - As part of a commitment to thoroughly investigate incidents and where there is evidence to suggest those involved may be under the influence of drink or drugs and may have contributed to the incident or accident.
- Self-Identification/Peer Intervention: - As part of an ongoing care programme and medical review of an individual's progress during care and rehabilitation. These take place either because of voluntary direct contact or encouragement to seek assistance via peer intervention or other programmes.
- Random Testing: - As part of normal safety auditing, the Company will periodically ask a random sample of employees at a site/office to undergo urinalysis testing.

Testing will be carried out by Company approved personnel or by an appropriate third party. Test results will be reviewed by an appropriate Medical Review Officer, who is trained in substance misuse testing.

### **Dealing With Results**

The results of all tests will be treated as confidential by Global Infrastructure (Scotland) Limited to the extent permissible by law.

When a positive result is received (and this applies to a Company or customer test) the employee will be immediately suspended.

Disciplinary procedures in accordance with the Company Disciplinary Policy will ensue, leading to action (dependent on the circumstances) up to and including summary dismissal.

The employee will have the opportunity to have a sample to be sent away to be tested by an alternative independent laboratory if they should desire.



## **General (Alcohol Related)**

During normal working hours, Global Infrastructure (Scotland) Ltd will not provide alcoholic drink for entertaining visitors.

Personnel whose drink-related problems have come to the attention of the Company will be given the opportunity to discuss the problem with their line Manager. Dependent on the circumstances, the Company will normally offer help and advice and even counselling.

If an employee is convicted of drink driving, they must inform their manager. If driving is an integral part of their job, then employment may be terminated (after due process) on the grounds of capability.

## **Smoking Policy**

This policy has been developed to protect all employees, customers, and visitors from exposure to second-hand smoke and to assist compliance with the Smoking, Health, and Social Care (Scotland) Act 2005. Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

It is the policy of Global Infrastructure (Scotland) Ltd that all our workplace(s) are smoke-free and that all employees have a right to work in a smoke-free environment. Smoking (including the use of all types of e-cigarettes and Vapes) is prohibited throughout the entire workplace, with no exceptions. This includes Company vehicles. This policy applies to all employees, consultants, contractors, customers, or members of the public and visitors.

Implementation: - Overall responsibility for policy implementation and review rests with Line Managers. All staff are obliged to adhere to, and to facilitate the implementation of the policy. The Line Managers shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also have to give all new personnel a copy of the policy on recruitment/induction.

Appropriate "No Smoking" signs will be clearly displayed at the entrance to and within the premises.

Project Managers will designate zones where smoking is permitted on site.

Non-compliance: - Local disciplinary procedures should be followed if a member of staff does not comply with this policy. Those who do not comply with the smoking law are also liable to a fixed penalty fine and possible criminal prosecution.

# OCCUPATIONAL HEALTH POLICY

The work of Global Infrastructure (Scotland) Ltd involves the exposure of employees to some health and safety hazards. It is the Policy of Global Infrastructure to eliminate harm and reduce risk by proactively managing our business systems and procedures.

Employers are required under the Management of Health and Safety at Work Regulations 1999 to carry out health and safety risk assessments and to introduce control measures to reduce any possible risks. The Directors of Global Infrastructure recognise their responsibility to ensure this, as far as is reasonably practicable.

Under the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health Regulations 2002, health surveillance is required in circumstances where an occupational risk to health remains despite control measures.

The primary purpose of health surveillance is the early detection of adverse health risks associated with work activity. It allows staff at increased risk to be identified and additional precautions to be taken, as necessary. It is also a means of checking the effectiveness of the existing control measures.

## **Definitions:**

A hazard is something with the potential to cause harm. The risk is the likelihood of that harm occurring and health surveillance is the monitoring of health in relation to a specific hazard to identify early health changes.

## **Responsibilities:**

Whoever individual companies delegate responsibility to, occupational health service personnel and employees all have responsibilities when it comes to occupational health.

### **The Directors are responsible for:**

- ensuring Global Infrastructure (Scotland) Ltd carry out risk assessments
- allocating sufficient resources to allow appropriate follow-up action resulting from risk assessments to be taken
- arranging suitable training for Global Infrastructure (Scotland) Ltd and the responsible person to enable them to carry out their duties in respect of health surveillance
- ensuring the organisation has access to a robust occupational health service.

### **The H&S Manager is responsible for:**

- ensuring risk assessments are carried out in their areas of responsibility
- ensuring adequate control measures are put in place to reduce risks as far as possible
- seeking advice on risk reduction from a safety advisor, occupational hygienist, or other relevant person as necessary
- seeking the advice of the relevant people on the need for health surveillance where it is thought that a residual health risk remains following the implementation of control measures
- ensuring employees co-operate with health surveillance procedures provided
- discussing with the relevant people any health concern brought to their attention by an employee.

### **The Appropriate Line Managers are responsible for:**

- assisting with the risk assessment process as requested by team leaders
- carrying out health surveillance of employees in line with agreed procedures
- maintaining health surveillance records and arranging recalls at the appropriate intervals
- Informing Managing Director and the Directors about levels of compliance with health surveillance procedures.

**The occupational health service is responsible for providing appropriately qualified personnel to:**

- help identify the need for health surveillance programs.
- assist with the risk assessment process as requested by Global Infrastructure Ltd
- carry out health surveillance in line with agreed procedures
- maintain health surveillance records and arrange recalls at the appropriate time
- inform Managing Director and the HSEQ Manager about levels of compliance with health surveillance procedures.

**Employees must:**

- co-operate with health surveillance procedures
- report health problems which may be associated with work to their HSEQ Manager
- co-operate with any control measures implemented to protect their health.

**The following points should be considered to help determine if health surveillance is required:**

- Is there an identifiable disease or condition related to the work activity?
- Are valid techniques available to detect indications of the disease or condition?
- Is it possible the disease or condition may occur in this working environment?
- Is surveillance likely to assist in the protection of the health of the employees concerned?
- Does any specific legislation requiring health surveillance apply?

**Identifying the Need for Health Surveillance**

The health surveillance techniques used will depend on the hazard and degree of risk.

**Health Record**

In its simplest form, a written health record detailing the type of exposure must be kept. The health record must include:

- The individual's:
  - surname
  - forenames
  - gender
  - date of birth
  - permanent address
  - National Insurance (NI) number
- the date the employee started his or her present job
- a record of previous exposures to hazards for which health surveillance is required in the present job
- the dates of all health surveillance procedures and the names of the people who carried them out

The conclusions drawn from the surveillance, including whether the individual is fit to work and the decisions of the qualified or responsible people, but not clinical information.

**Health Surveillance**

If a reliable test can be carried out, the format of health surveillance may include the use of questionnaires to determine symptoms and may also involve clinical examination or measurements, such as lung function testing, hearing tests or biological sampling.

**Frequency of Health Surveillance**

The level of risk determines the frequency of health surveillance programmes. Where the risk is thought to be low, only baseline data will be required, and staff should report to the HSEQ Manager if any problems are experienced. Baseline data will usually be gathered at the employment health interview. If the risk is thought to be more significant, periodic health surveillance for all exposed staff should take place. In most cases this will be annual, however in some high-risk areas a more frequent program may be agreed.

The minimum surveillance required for commonly used substances in Global Infrastructure (Scotland) Ltd is summarized in the table below. More frequent surveillance may be required where a person's medical history suggests a particular vulnerability. The responsible person or occupational health nurse will make this decision and manage the recall process.

| Area                          | Substance | Action   | Recall   |
|-------------------------------|-----------|--|--|
| Lung                          |           | Spirometry and Questionnaire Baseline              | 6 weeks,<br>6 months then<br>annual if results<br>normal |
| Lung                          |           |  |  |
| Lung                          |           |  |  |
| Lung                          |           |  |  |
| Lung                          |           |  |  |
| Skin                          |           | Questionnaire and Examination<br>Baseline          | Annual Review  |
| Skin                          |           |  |  |
| Skin                          |           |  |  |
| Skin                          |           |  |  |
| Skin                          |           |  |  |
| Audiogram                     | Noise     | Questionnaire and Audiogram<br>Baseline Category 1 | Annual for first 3<br>years then 3<br>yearly             |
| Audiogram                     | Noise     | Baseline Category 2                                | 6 months then<br>Annual                                  |
| Audiogram                     | Noise     | Baseline Category 3                                | 3 months<br>refer to Doctor<br>then 6 monthly            |
| Forklift Operator             |           | Screening and Baseline                             | 2 yearly   |
| Working at Height             |           | Questionnaire and Examination<br>Baseline          | Annual Review  |
| Working in Confined<br>Spaces |           | Questionnaire and Examination<br>Baseline          | Annual Review  |
| HAVS                          |           | Questionnaire and Examination<br>Baseline          | Annual Review  |

If health problems are identified following health surveillance, control measures should be reviewed and where necessary enhanced.

The occupational health nurse or doctor will advise on any specific actions to take about the affected employee, e.g.:

- reducing the length of exposure
- restricting work activities which cause exposure
- re-deploying the affected employee
- advising on additional personal protective equipment (PPE)

## **Eye Protection**

Should an employee require spectacles for the purpose of his/her work, an amount to the value of £100 may be applied for providing an initial enquiry has been approved through his/her line manager prior to:

- an eye examination taking place
- production of a receipt

The employee's Line Manager shall only give their authorisation following the above process. Once authorisation has been given, a receipt must be provided before a claim can be applied for.

## **Record Keeping**

The responsible person or Occupational Health nurse will, with the support of Human Resources, ensure employees requiring health surveillance are identified and recalled at appropriate intervals. All data collected will be subject to current Data Protection Legislation.

## HAVS POLICY

It is the policy of Global Infrastructure to eliminate harm and reduce business risk by proactively managing our business systems and procedures. To ensure this is carried out the following points must be adhered to:

Hand Arm Vibration Syndrome (HAVS) is a condition caused by the prolonged use of vibrating tools and equipment. It is important that HAVS is managed using specific control measures to minimise the risk. In pursuit of this policy Global Infrastructure shall:

- Risk Assess exposure in the workplace involving vibrating tools and equipment
- Provide training and awareness providing knowledge and skills for employees to determine exposure limits. Training to include sources, health effects, risk levels, recognising symptoms and how to minimise the risk.
- ensure their employees are suitably trained on safe tool use.
- Communicate effectively, regularly, and collaboratively ensuring all employees are clear on their roles and responsibilities
- Incorporate Purchasing consideration when buying to reduce risks from vibration to the lowest possible level and to make sure we receive data on vibration levels from suppliers.
- Compile a list of equipment known to cause vibration relating this information back to the end users regarding vibration levels and time limiting use of equipment. This information will be posted on all site notice boards.
- Carry out plant maintenance at regular intervals.
- Report, investigate and record corrective actions to prevent future recurrence.
- Where possible use alternative methods to reduce or eliminate exposure to vibration as follows:
  - Limit the time that employees are exposed to vibration by regular rotation of workers.
  - Provide suitable gloves to keep the workers hands warm and dry.
  - Provide employees with health surveillance which may determine if they are showing any symptoms of HAVS.
  - Use Reactec watches to control/limit exposure time

By implementing this HAVS Policy our aim is to protect the health and well-being of our employees and minimise the risk of HAVS-related injuries and liabilities.

# FATIGUE MANAGEMENT POLICY

At Global Infrastructure we care about and are committed to the health & safety of all our employees, we actively work to prevent and manage risks associated with fatigue in the workplace.

Fatigue does not have a clear scientific definition but is a feeling of tiredness and being unable to perform work effectively.

Specifically, a fatigued person will be less alert, less able to process information, will have slower reaction times and less interest in working compared to a person who is not fatigued.

Our responsibility is to manage risks from fatigue, irrespective of any individual's willingness to work extra hours or preference for certain shift patterns for social reasons and to reduce error or violations at work. We therefore endeavour to:

Ensure adequate opportunity is available for employees to have sufficient rest before commencing work, through appropriate working time arrangements.

Monitoring and control working hours, including overtime, to provide time arrangements that do not require excessive periods of wakefulness.

Ensure employees take regular quality rest breaks throughout their shift.

Ensure employees can get enough rest between their shifts.

Encourage employees to develop good sleeping habits.

## **Points to be aware of:**

- Individuals are not good at assessing how fatigued they are.
- They can be skilled at coping with fatigue, but this can increase stress or the risk of gastric disorders or other health problems.
- Shorter and more shifts may not solve the problem – errors rise early on, diminish then peak later.

# **VIOLENCE AT WORK POLICY**

As a responsible employer we have formulated this policy to ensure, as far as is reasonably practicable, the health, safety, and welfare at work of all our employees." These include the provision of a safe place and safe systems of work for our staff, sub-contractors, agency personnel and others who may be affected by our business activities.

We recognise that potential violence i.e. any incident in which the person is abused, threatened, or assaulted in circumstances relating to their work, alongside threatening behaviour, are issues of concern to many staff and we resolve to do all that is reasonably practicable to reduce the risk of such events.

## **Management responsibilities**

Managers / Supervisors have a responsibility to ensure this policy is always adhered to including undertaking risk assessments of work which may put staff at risk from violence (when necessary), making

changes to the physical environment, ensuring that there are safe procedures for staff to follow, supervising to ensure procedures are followed, and investigating any incidents

## **Employees' responsibilities**

All employees have a responsibility to take reasonable steps to ensure that they do not place themselves, or others, at risk of harm. Employees are also expected to co-operate fully with us in complying with any procedures that we may introduce as a measure to protect the safety and wellbeing of our staff and visitors.

The safety of our staff is paramount. So, if anyone finds themselves dealing with rude or aggressive visitors, they must never return aggression as this is how anger can escalate into violence. In the unlikely event that a situation escalates, staff should always withdraw from it.

If employees require training or have concerns about existing procedures, they must raise this with their supervisor.



# BUSINESS POLICIES

## WHISTLEBLOWING

Our aim is to develop a culture of openness so that any concerns about suspected wrongdoing within the Company are properly reported.

### We want to ensure that:

- You have the opportunity and are encouraged to raise a concern.
- You can raise a concern without fear of harassment or victimisation.
- Any concern you raise is taken seriously.
- Your concerns will be dealt with promptly and appropriately.

### Focus of the Policy

This Whistleblowing Policy focuses on reporting concerns related to health & safety, fraud, regulation and competition law, financial reporting, and the environment. We do not condone activities that violate the law or unethical business practices. This policy is not a substitute for the established employee grievance procedures.

### Legal Protection

The Public Interest Disclosure Act 1998 (PIDA) protects workers from being subject to a detriment when they raise a concern or make a disclosure to their employer, provided it is a "qualifying disclosure." PIDA encourages workers to raise concerns internally first.

### Qualifying Disclosures

For a disclosure to be a qualifying disclosure, a worker must have a reasonable belief that the information suggests a relevant failure that happened in the past, is happening now, or is likely to happen in the future, such as:

- A criminal offence.
- Breach of a legal obligation (e.g., breach of contract or negligence).
- Miscarriage of justice.
- Danger to health or safety.
- Damage to the environment.
- Deliberate concealment of any of the above.

Workers who raise concerns they know to be untrue or for personal gain are not protected by PIDA.

### Reporting a Concern

If you have a grievance related to your employment, use the established grievance procedures. Discuss the issue with your Line Manager or, in exceptional circumstances, with your Director alternatively contact your local Human Resources representative.

If you have a concern about suspected wrongdoing, confide in your immediate Line Manager. If this is not appropriate, contact Senior Management directly.

You can send an anonymous letter to: Global Infrastructure Ltd, Beaulieu Quarry, Wester Balblair, By Beaulieu IV4 7BG.

*However, anonymous reporting may limit our ability to investigate and provide meaningful feedback.*

Should you wish to raise a concern, or wrongdoing to our Group Risk Steering Committee, you can do so in writing to [confidential@gegroupp.com](mailto:confidential@gegroupp.com) if you are unable to use the avenues listed above in the first instance.

## **Confidentiality**

All steps will be taken to prevent your identity from becoming known. If confidentiality cannot be maintained due to legal requirements, we will discuss the best way to proceed with you.

## **Advice and Support**

For advice on reporting a concern, contact Public Concern at Work, an independent charity providing free, confidential legal advice on whistleblowing matters.

## **Assessment and Investigation**

Allegations will be reviewed by the Directors of Global Infrastructure Ltd. Further enquiries will be carried out as needed, and appropriate action will be taken based on the results. The objective is to ensure concerns are dealt with promptly and appropriately. Findings will be communicated as appropriate.

## **Contact Information**

To report a concern outside the management line structure:

Make contact with your local Human Resources Representative who will guide you through the process.

For free legal advice on whistleblowing matters:

## **Protect**

[www.protect-advice.org.uk](http://www.protect-advice.org.uk)

*Online contact form rather than email address found on their website.*

Address: The Green House, 244-254 Cambridge Heath Road, London, E2 9DA

Telephone: 0203 117 2520

# CORPORATE SOCIAL RESPONSIBILITY

At Global Infrastructure, we are committed to integrating our business values and operations to meet the expectations of our stakeholders, including employees, customers, investors, suppliers, the community, and the environment. Our Corporate Social Responsibility (CSR) Policy reflects our dedication to social, economic, and environmental responsibilities, which are integral for our Company.

Through our CSR Policy, we aim to demonstrate our commitment to these values and our vision, ensuring that we operate responsibly and sustainably for the benefit of all stakeholders.

We actively seek and value feedback from our stakeholders to continuously improve and ensure the fulfilment of our CSR initiatives.

We are committed to being transparent and honest in sharing our strategies, targets, performance, and governance with our stakeholders, reinforcing our dedication to sustainable development.

Our Global Infrastructure Directors are accountable for implementing this policy, ensuring the necessary resources available. Every employee shares the responsibility for upholding our CSR commitments.

We uphold the highest standards of ethics and human rights, championing equality, diversity, biodiversity, and sustainability.

We strictly prohibit unethical practices such as clandestine brokering, collusion, bribery, modern slavery, and discrimination.

## **Our Partnership Focus**

**Business Performance:** We aim to achieve high business performance while effectively managing risks, upholding honesty, partnership, and fairness in all stakeholder relationships.

**Stakeholder Development:** We support the growth of our external stakeholders through training courses and by providing facilities for industry meetings.

**Contract Transparency:** Our contracts clearly outline terms, conditions, and the basis of our relationships, ensuring protection against unfair business practices.

**Responsible Practices:** We encourage suppliers and contractors to adopt responsible business policies and practices.

**Community Engagement:** We foster dialogue with local communities for mutual benefit.

**Customer Service:** We promptly register and resolve customer complaints in line with our service standards.

**Employee Support:** We encourage and support our employees in participating in local community organisations and activities, especially those chosen by our employees.

**Educational Collaboration:** We work with local schools, colleges, and universities to assist young people in career choices, advocating for our industry.

**Equal Opportunities:** We operate an equal opportunities policy for all current and potential employees, offering clear and fair employment terms and resources for continuous development.

**Employee Remuneration:** We maintain a transparent and fair employee remuneration policy and provide forums for consultation and business involvement.

**Respect and Harassment Prevention:** We ensure all employees are treated with respect, free from sexual, physical, or mental harassment, regardless of nationality, colour, race, or religious belief.

**Health and Safety:** We strive to maintain a clean, healthy, and safe working environment in line with our Health and Safety policy.

**Environmental Responsibility:** We actively promote and encourage the use of our Environmental policies and objectives.

# ETHICAL TRADING & HUMAN RIGHTS POLICY

## **Employment is Freely Chosen**

There is no forced, bonded, or involuntary prison labour.

Employees are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after giving contractual notice.

## **Freedom of Association and the right to Collective Bargaining**

All employees have the right to join or form trade unions of their choosing and to bargain collectively.

The employer maintains an open attitude towards the activities of trade unions and their organisational activities.

Employees' representatives are not discriminated against and are allowed to carry out their representative functions in the workplace.

## **Safe and Hygienic Working Conditions**

A safe and hygienic working environment is provided, considering industry knowledge and specific hazards. Adequate steps are taken to prevent accidents and health issues arising from work by minimising hazards as much as reasonably practicable.

Employees receive regular and recorded health and safety training, which is repeated for new or reassigned employees.

Access to clean toilet facilities, potable water, and, if appropriate, sanitary facilities for food storage is provided.

Accommodation, where provided, is clean, safe, and meets the basic needs of employees.

Responsibility for health and safety is assigned to a senior management representative.

## **Prohibition of Child Labour**

No new recruitment of child labour is allowed.

Children and young persons under 18 are not employed at night or in hazardous conditions.

Policies and Procedures conform to relevant UK standards.

## **Payment of Living Wages**

Wages and benefits for a standard working week meet or exceed national legal standards or industry benchmarks, whichever is higher. Wages should always be sufficient to meet basic needs and provide discretionary income.

All employees receive written and understandable information about their employment conditions, wages, and benefits before employment and details of their wages for each pay period.

Deductions from wages as a disciplinary measure are not permitted, nor are any deductions not provided for by national law without the employee's express permission.

## **Reasonable Working Hours**

Working hours comply with national laws, collective agreements, and the provisions below, whichever offers greater protection for employees. Clauses are based on UK statutory provisions.

Working hours, excluding overtime, are defined by contract and normally do not exceed 48 hours per week unless the employee has contractually opted out.

All overtime is voluntary and used responsibly, considering the extent, frequency, and hours worked by individual employees and the workforce. Overtime is not used to replace regular employment and is always compensated at a premium rate.

The Company complies with all provisions of the Working Time Regulations 1998.

Employees are normally provided with at least one day off in every seven-day period or two days off in every 14-day period.

## **Provision of Regular Employment**

To every extent, work performed must be based on recognised employment relationship established through national law and practice.

Obligations to employees under employment or social security laws and regulations are not avoided through the use of zero-hours contracts, home-working arrangements, or apprenticeship schemes without real intent to impart skills or provide regular employment. Excessive use of fixed-term contracts is also avoided.

## **Prohibition of Harsh or Inhumane Treatment**

Physical abuse or discipline, threats of physical abuse, sexual, racial, or other harassment, and verbal abuse or other forms of intimidation are prohibited.

## **Application of the Policy**

This policy sets minimum standards and does not prevent Global Infrastructure from exceeding these standards. Global Infrastructure applies this policy to comply with UK Human Rights Legislation, primarily the Human Rights Act 1998.

## MODERN SLAVERY STATEMENT

Slavery, servitude, forced or compulsory labour, and human trafficking are abhorrent and will not be tolerated within Global Infrastructure or its supply chain. We only work with suppliers who meet the criteria outlined in our supplier/sub-contractor questionnaire. We ensure transparency by regularly auditing our approved suppliers and requesting evidence of their compliance with the Modern Slavery Act 2015.

Should you suspect or identify signs of slavery, forced or compulsory labour, or human trafficking, report it to the Modern Slavery Helpline on 0800 0121 700 for guidance on what to do next.

This statement outlines the actions we take to identify and mitigate modern slavery risks in our business and supply chains. We are committed to ensuring that slavery and human trafficking do not occur in any part of our operations.

### **Countries of Operation and Supply Chain**

Operating solely in the United Kingdom, we are dedicated to preventing modern slavery and human trafficking in our supply chains and business operations. Our Modern Slavery Statement reflects our commitment to ethical and transparent business practices.

### **Supplier/Sub-contractor Adherence**

We enforce a zero-tolerance policy towards slavery, human trafficking, and bonded labour. We communicate our values clearly and expect all suppliers and contractors to comply. All suppliers and sub-contractors must complete a questionnaire to ensure they meet our standards, including Health & Safety and Equal Opportunities, and are free from modern slavery and human trafficking.

### **Risk Mitigation**

Recruiting temporary labour and paying agencies instead of employees can pose risks. Our policy is to recruit and pay staff directly, and we only work with reputable agencies that have undergone due diligence.

This statement is available to interested parties, clients, and other stakeholders upon request. It will be reviewed annually by the Director in collaboration with designated personnel.

# ANTI-BRIBERY CORRUPTION & FRAUD

Global Infrastructure has a zero-tolerance approach to bribery, fraud, and corruption.

## Purpose:

Outline our responsibilities and those of our employees in upholding our stance against bribery and corruption.

Provide guidance on recognising and dealing with these issues.

## Principles:

- Conduct business fairly, honestly, and with integrity.
- Zero tolerance for bribery, corruption, and fraud.
- Severe consequences for policy breaches.
- Avoid business with those not committed to anti-bribery objectives.
- Promote the benefits of rejecting bribery.
- Implement procedures for policy enforcement and confidential reporting.
- Name key individuals responsible for policy implementation.
- Comply with UK laws, including the Bribery Act 2010.

## Understanding This Policy:

### Who is Covered

All individuals working at all levels, including employees, contractors, and agents.

Third party: Any individual or organisation you interact with during work, including clients, suppliers, and government officials.

### What is Bribery

An inducement or reward offered to gain an advantage, such as offering a gift to secure a contract.

### Gifts and Hospitality

- Allowed if not intended to influence, complies with local law, given openly, and not involving cash.

Example: Accepting a small gift during a holiday season if it's customary and not intended to influence business decisions.

### What is Not Acceptable

- Offering or accepting bribes.
- Facilitating payments or kickbacks.
- Retaliating against those who refuse to commit bribery.
- Example: Offering a payment to expedite a government process is not acceptable.

### Facilitation Payments and Kickbacks

- Not accepted. Always request receipts and report suspicions.

Example: If asked to make an unofficial payment to speed up a service, report it immediately.

### Donations

- No political contributions. Charitable donations must be legal and approved by the Managing Director.

### Responsibilities



- Read, understand, and comply with the policy.
- Report any suspicions to the Managing Director.
- Disciplinary action for policy breaches.

Example: If you suspect a colleague is involved in bribery, report it to your manager.

### **Record-Keeping**

- Maintain accurate financial records and declare all gifts and hospitality.

Example: Keep a record of any business-related gifts received and their value.

### **Raising Concerns**

- Report any suspicions of malpractice to your line Manager/Director.

Example: If you're unsure whether a gift is appropriate, seek guidance from your manager.

### **Victims of Bribery**

- Report any offers or suspicions of bribery immediately.

Example: If offered a bribe by a supplier, inform your manager right away.

### **Protection**

- No detrimental treatment for refusing or reporting bribery.

Example: Employees who report concerns in good faith are protected from retaliation.

### **Training and Communication**

- Policy training during induction and regular updates.
- Communicate zero-tolerance to all business partners.

Example: Ensure new employees understand the policy during their onboarding process.

### **Responsibility**

- Board of Directors ensures compliance.
- Management ensures awareness and training.

## BUSINESS CONTINUITY PLAN

Global Infrastructure is committed to implementing effective business continuity measures to ensure the resilience and continuity of our operations, protect the interests of our stakeholders, and maintain the trust and confidence of our customers. We recognise that proactive planning, preparedness, and response are essential for minimising the impact of disruptive incidents and ensuring the timely recovery of critical business functions.

In pursuit of this policy, Global Infrastructure shall:

- develop a business continuity plan (BCP) which examines risk, threats, and critical business functions assessing response, recovery time and the efforts required during disruptive incidents. The BCP outlines roles, responsibilities, process, and resources necessary for mitigating risk and restoring essential business functions.
- establish clear lines of Communication and co-ordination to effect the plan, which may affect internal and external stakeholders including employees, customers and suppliers. To ensure that the BCP operates smoothly.
- create a business continuity team who are responsible for developing, maintaining and updating the BCP, co-ordinating response and recovery efforts during emergency situations and for conducting training, drills or simulations.
- provide suitable training and awareness to all necessary employees to understand their roles and responsibilities during emergencies.
- conduct drills/simulations to test preparedness, and the effectiveness of our BCP. Following drills/simulations carried out we shall review and update our BCP where necessary taking into account changing threats and lessons learned from past experiences to ensure continuous improvement.

Everyone within the organisation has a responsibility for familiarising themselves with this policy and with the Business Continuity Plan in relation to their roles and responsibilities during an emergency situation and are required to co-operate fully in the implementation of this policy, and all measures contained in the Global Infrastructure BCP.

## RISK REDUCTION POLICY

Global Infrastructure is committed to proactively identifying, assessing, and managing risks to prevent incidents, injuries, damage, and losses. We recognize that effective risk reduction is essential for safeguarding the health, safety, and well-being of our employees, protecting the environment, maintaining operational continuity, and ensuring the trust and confidence of our customers and stakeholders. This policy outlines our approach to managing risks effectively and continuously improving our risk management processes.

This document does not replace the Company's Business Continuity Plan but will be executed alongside it. This document will also be supplemented by the latest guidance as supplied by regulatory bodies.

During unprecedented times, we all have a duty of care and a responsibility to act in the best interests of those closest to us this includes family, friends, colleagues, employees, and the wider community.

To protect the health and well-being of the population we must follow Government guidelines set out for this purpose.

It is the Policy of Global Infrastructure to ensure we provide adequate, carefully considered information in line with Scottish Government Guidelines, to protect the health, welfare, and well-being of our employees during unprecedented times.

In pursuit of this policy Global Infrastructure shall ...

- Continually Assess and Review Exposure
- Keep Communication Flowing
- Provide Flexible Working Information
- Deliver Updated Hygiene Advice & Symptoms
- Provide Official Government Guidelines
- Supply Health & Mental Well-being Advice
- Liaise with our Supply Chain
- Distribute Useful Information

Global Infrastructure is committed to proactively identifying, assessing, and managing risks to prevent incidents, injuries, damage, and losses. We recognize that effective risk reduction is essential for safeguarding the health, safety, and well-being of our employees, protecting the environment, maintaining operational continuity, and ensuring the trust and confidence of our customers and stakeholders.

All stakeholders including employees, contractors, suppliers, consultants and agency personnel involved in Global Infrastructure operations and activities are required to co-operate fully in the implementation of this policy, and all risk reduction measures put in place by the organisation. It encompasses all aspects of risk management, including but not limited to health and safety risks, environmental risks, operational risks, financial risks, and reputational risks and shall be reviewed at least annually for its continuing suitability.

In pursuit of this policy Global Infrastructure shall:

- Identify risk methodically conducting risk assessments to evaluate the likelihood and severity of identified risk and prioritise them based on their potential impact on people, the business, business objectives and the environment.
- Implement appropriate risk mitigating measures to control risk to an acceptable level
- Continuously monitor review and evaluate our risk management processes to identify opportunities for improvement, address emerging risk and enhance the effectiveness of our risk reduction efforts.
- Comply with legislation, regulations and industry standards related to risk management and occupational health and safety.
- Create a risk reduction plan ensuring that roles and responsibilities are communicated clearly to employees, suppliers, customers and all stakeholders using positive and collaborative communication methods and understanding of risk reduction efforts.
- Provide our workforce with suitable training to ensure they have the correct knowledge, skills and competency to identify, assess and manage risks effectively.
- Encourage open and transparent communication surrounding risks, hazards and safety concerns amongst employees, departments and management to facilitate positive judgement and decision making.
- Review and investigate incidents, near misses, hazards and safety concerns identifying corrective action, cause analysis, sharing lessons learned to enhance risk awareness and prevent recurrence.
- Undertake regular analysis of statistics (KPIs) identifying and addressing any deficiencies in our efforts to continuously improve the effectiveness of current risk reduction measures for their suitability,
- Establish clear information to our employees and all stakeholders relating to instances/incidents of an unprecedented nature in order to reduce risk to an acceptable level.

All employees are responsible and accountable for adhering to this policy and participating in risk reduction initiatives. Risk reduction efforts, following this policy, established procedures and protocols, reporting hazards and near misses, and contributing to a culture of safety and risk awareness in the workplace.

During challenging times, help and support is always available. Please do not forget there are helplines available if you feel you need to speak to someone at the end of a phone. There are also people in house and mental health first aiders who can offer you support. Mental Health first aiders are posted on all site noticeboards.

*Up to date contact details can be found on our Site Noticeboards and the Company website or alternatively please reach out to your local Human Resources Representative for who our "in-house" contacts and external suggested contacts are.*

## SUSTAINABILITY & BIODIVERSITY

Global Infrastructure believe in procuring sustainably. We build economic, social, and environmental considerations into our procurement of goods, services, and works encouraging innovation where feasible to achieve the most cost effective and sustainable services and products for our client. The social and economic impacts of the product or service are considered throughout their lifetime.

Through robust supply chain management, our suppliers are expected to consider the social and economic impacts of their product or service and mirror our policy of sustainable procurement

Sustainability is broken down into four main areas:

- Environment
- community
- employees
- supply chain

These issues form the framework for managing the aspects of our business that have impacts environmentally and socially and enable us to engage meaningfully with our stakeholders.

Annually we review and prepare a Carbon Analysis Review underpinned by sustainability goals set by the business. The setting of goals objectives and KPIs within this, along with our operational controls and procedures, enables us to effectively manage these impacts.

Sustainability is driven from the very top in our business and embedded throughout every department and engaging our whole workforce. Strong leadership and governance therefore underpin and supports our sustainability endeavours and ensures we are compliant with all environmental legislative and other requirements.

### Environment

We are committed to reducing and managing carbon pollution on and off site with a net zero aim over the next decade. Introducing PHEVs and electric vehicles to the business fleet and by hiring the most up to date plant with lowest emissions from our trusted suppliers enables us to demonstrate our commitment to sustainability.

Our operating systems provide us with an excellent framework for managing and monitoring our carbon output. ISO 14001 (Environmental) forms part of our Integrated Management System that also includes 45001 (Health & Safety) and ISO 9001 (Quality).

### Local Community

We have formed many close relationships with the local community and maintained these through our community investments and sponsorship programme. Supporting community from local football team sponsorship and provision of materials for playgroups, to volunteering for local charities and engaging with young people at schools, colleges and careers events.

### Engaging our Employees

Communication is an important component of our operations. We use our regular leadership meetings, HSEQ Meetings, forums, briefings, newsletters, e-mails, and social media posts to connect with our workforce and others. Encouraging workforce participation, we have an open-door policy, and we will continue to encourage our workforce support in this regard.

### Suppliers/Sub-Contractors

We manage all our supply chain with the expectation they have their own sustainability policy. Should this not be the case they are required to commit to our Company Sustainability policy prior to approval.

## **BIODIVERSITY – HOW WE CAN ALL HELP?**

Global Infrastructure recognises and values the need for a biodiversity policy to help mitigate the major loss of biodiversity and ecosystems, particularly when undertaking operational activities across the business. As far as is reasonably practicable, and in alignment with client expectation, Global Infrastructure shall adhere to the following:

Minimise the impact on habitats and biodiversity from activities and operations which could potentially cause harm and prevent pollution following these simple steps:

- Seek to create, maintain, and enhance habitats to encourage both plants and animals, where possible.
- Minimise the impact on biodiversity from operations and, where possible, install nature-based solutions and seek a net increase in ecological value through project design and delivery.
- Ensure ecological surveys are completed prior to, and post completion of operations, and the results are documented.
- Work with clients/stakeholders to improve habitat and biodiversity management practices.
- Seek opportunities to cultivate an awareness of and connection with nature on site and within the local community
- Provide training for personnel to ensure contractors can meet the requirements of the Biodiversity and Sustainability Policies.
- Ensure all contractors are provided with knowledge of the biodiversity policy and the mitigation measures/constraints on site.

### **Monitoring And Reporting**

Implement mechanisms for monitoring habitats and biodiversity wherever possible.

Seek to identify, monitor, and protect any protected species and national conservation list species with habitats in areas affected by GI operations.

### **Communication, Education, Research & Stakeholder Engagement**

- Raise awareness about the climate and ecological crisis and what measures can take to help mitigate the major loss of biodiversity and ecosystems.
- Encourage workforce to connect with nature.
- Educate to further the understanding of both our place in nature, our reliance on its health, and how we can enhance it.

# WASTE MANAGEMENT POLICY

It is the policy of Global Infrastructure to eliminate harm and reduce business risk by proactively managing our business systems and procedures. Global Infrastructure in their aim towards net zero shall:

- prevent, reduce, reuse, recycle, recover and will send to landfill only when there is no other option.
- adopt the principles of the 'best practicable environmental option' in the delivery of its waste management services.
- apply a 'circular economy waste hierarchical approach,' to prevent, reduce, reuse, recycle and recover waste products.
- account for waste monthly within the business using their carbon management tool.
- provide an annual Carbon Review to include waste and the carbon it represents.

There is a legal requirement for all who produce, keep, or dispose of waste of any type to comply with the various regulations and the Duty of Care under Environmental Protection legislation. Global Infrastructure recognises the importance of meeting these legal requirements and to manage its waste responsibly, reduce dramatically the volume of waste sent to landfill and maximise reuse and recycling.

Global Infrastructure requires all staff, contractors, and anyone else making use of the premises to comply with this Policy to ensure compliance with all waste legislation.

In accordance with the Policy Statement Global Infrastructure will fulfil the following Policy Objectives:

- To ensure that waste is managed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- To minimise waste generation at source and facilitate prevention, reduction, reuse, recycling and recovery options over the disposal of wastes, where it is cost effective.
- To provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- To promote environmental awareness to increase and encourage waste minimisation, reuse, and recycling.
- To secure where possible, revenue for recyclable material to reinvest into the expansion of recycling opportunities on the site
- To ensure the safe handling and storage of wastes on site
- To provide appropriate training for staff, and other stakeholders on waste management issues
- To promote industry waste management "best practice"
- To appoint competent person(s) to provide waste management advice.

## Application

This policy applies to all activities undertaken by (or on behalf of) Global Infrastructure including those of its staff, contractors, suppliers, visitors.

## Organisation and Management

The responsibilities and organisational arrangements for this Waste Management Policy lie with the Managing Director of Global Infrastructure.

## **Project Manager/Site Manager**

Responsible for:

- Coordinating the provision of a central waste and recycling contract service for use by all facilities on the site.
- Ensuring that EWC, SIC codes and all waste values are notified on the waste transfer notification before signing on behalf of Global Infrastructure.
- Ensuring that all contractors are advised that they must comply with the Duty of Care; that they must comply with Global Infrastructure's Waste Management Policy; or satisfy Global Infrastructure that their own procedures will achieve legal compliance.
- Ensuring that all contractors appointed to carry out works are from Global Infrastructures 'Approved List'.

## **ECoW/Environmental Manager/H&S Manager**

Responsible for:

- Provision of advice and guidance to Global Infrastructure on waste management.
- Setting Environmental Performance Indicators for waste management.
- Reporting annually on progress against the Environmental Performance Indicators.
- Monitoring and auditing the management systems for all wastes, to ensure legal compliance.
- Monitoring and auditing all waste contractors working for Global Infrastructure.
- Provision of appropriate training for all personnel who have responsibilities for waste management.
- Registering with appropriate enforcement agencies as a waste producer.
- Coordinating the gathering of, and supplying all relevant information to appropriate enforcement agencies, when information relating to waste management is requested.
- Investigation of any incidents or accidents relating to waste management
- Compiling waste data and statistics to enable annual benchmarking against established Environmental Performance Indicators.

## **Site Supervisor**

Responsible for:

- Overseeing the day-to-day delivery of general waste and recycling services.
- Monitoring the performance of the contractor against Service Level Agreements.
- Liaising with the HSEQ Managers to establish procedures for managing waste
- Operational monitoring of waste management systems across the site.
- Compiling and holding in the office Waste Transfer Notes
- Non-Special/Hazardous Wastes (central waste and recycling contract); ensuring that no Special/Hazardous Waste is disposed of through the general or waste recycling streams. (N.B. There is no requirement to sign any Waste Transfer documentation or keep records for centrally managed waste and recycling services).
- Special/Hazardous Wastes; nominating a 'responsible person' within their School/Directorate to coordinate waste disposal for any hazardous or clinical wastes.
- Informing the Health, Safety and Environment Office of the nominated Staff / Contractors & Suppliers
- Disposing of waste responsibly, through the appropriate waste stream, in accordance with Global Infrastructure's policies and procedures.
- Reporting any problems with waste collection schemes to Global Infrastructure



## **Glossary of Terms**

### **Best Practicable Environmental Option (BPEO)**

The Best Practicable Environmental Option refers to the analysis of different methods of waste disposal. The preferred option is the one which minimises harm to the environment, considering what is affordable and practicable.

### **Clinical Waste**

**Any waste which consists wholly or partly of:**

- human or animal tissue; blood or other body fluids; excretions;
- drugs or other pharmaceutical products other than controlled or cytotoxic drugs swabs or dressings;
- syringes, needles, or other sharp instruments which unless rendered safe may prove hazardous to any person coming into contact with it. It also includes any other waste arising from medical, nursing, dental, veterinary, pharmaceutical, or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it.

### **Environmental Protection Act 1990 (EPA 1990)**

This is the single most important piece of environmental legislation, and it controls many aspects of how the environment is protected and regulated. The EPA 1990 provides the main statutory framework in relation to waste.

Most of the waste leaving Global Infrastructure is controlled waste. This is described in the EPA 1990 as the waste arising from household, commercial or industrial premises. Controlled waste includes waste from offices, food handling, shops, and other domestic activities.

**EPA 1990 Section 34 imposes a "Duty of Care" on producers and handlers of waste, "to take reasonable measures to prevent the unauthorised deposit, treatment or disposal of waste."**

**This means the following:**

- Global Infrastructure must keep records of how much waste it is generating.
- Global Infrastructure must ensure that a registered carrier collects their waste.
- Global Infrastructure must ensure that all transfer notes are completed and filed detailing the type of waste for disposal. Special/Hazardous Waste Notes must be kept for 3 years, waste transfer for 2 years.
- Ensure that all waste is dealt with in accordance with the "Duty of Care".
- Breach of the Duty of Care is a criminal offence and can incur penalties of up to £20,000 or an unlimited fine if convicted on indictment.

## Special/Hazardous Waste

Referred to as Hazardous Waste in England and Special Waste in Scotland, these are the most dangerous wastes as they can cause the greatest environmental damage or are dangerous to human health. Some common Special/Hazardous Wastes are listed below:

|   |   |
|---|---|
| <b>Asbestos</b>   | Asbestos containing materials must be handled by a specialist contractor only   |
| <b>Waste oils / lubricants/<br/>Oil Contaminated<br/>material</b> | Spills or leaks of oil-based substances can contaminate soil, waterways and groundwater leading to ecological damage health hazards   |
| <b>Contaminated Soils</b>   | Hazardous substances such as heavy metals, fuel hydrocarbons, pesticides or industrial chemicals will require remediation to ensure safe land use   |
| <b>Industrial Waste - Heavy<br/>Metals/cyanides/ammo<br/>nia</b>  | May require specialist treatment or disposal methods to minimise the impact on the environment  |
| <b>Chemical Waste /<br/>COSHH</b>                                 | COSHH substances no longer needed or regarded as waste may need to follow special waste   |
| <b>Weee Waste –<br/>TV/Computers/Applianc<br/>es</b>              | Lead, cadmium, mercury and brominated flame retardants must be recycled and disposed of following WEEE regulations to prevent environmental pollution and human exposure  |
| <b>Demolition &amp;<br/>Construction wastes</b>                   | Asbestos, lead based paints, treated timber and chemical residues may be recovered during these activities. Must be managed correctly to protect workers from potential hazards and the environment   |
| <b>Clinical Waste</b>   | Sharps, pharmaceuticals and radioactive waste may be recovered during construction works. These must be segregated handled and disposed of following strict protocol to prevent the spread of infection and protect public health and follow separate legislation |

## How to comply

Producer Registration

All industrial and commercial premises producing more than 500kg of Special/Hazardous Waste must notify their existence to SEPA.

Additionally:

- No Special/Hazardous Waste can be collected from any unregistered site
- Waste producers who do not register their premises will be committing an offence
- Waste contractors who move waste from a non-registered site will be committing an offence
- Waste producers will need to provide proof to waste contractors (via a unique code number) that they are registered
- Registrations must be renewed annually

### **Movement of Special/Hazardous Waste**

Under the Regulations, the movement of wastes is controlled by a documentation system which must be completed whenever waste is removed from premises. From the waste producer's perspective, the most important form is the Consignment Note. This must be completed before waste can be removed and detailed information must be provided including:

- a description of the Waste detailing:
  - the process giving rise to the waste
  - the quantity
  - the chemical (and/or biological) components and their concentrations
  - the waste code
  - and the container type, size, and numberidentify where the waste is going and  
give the Consignment Note a unique Code number

Lastly you must keep a copy of the consignment notes and the quarterly return in a register for a minimum of 3 years and make them available to SEPA on request.

### **Recycling is -**

The diversion of waste away from landfill or incineration and the reprocessing of those wastes either into the same product or a different one. This includes non- Special/Hazardous Wastes such as paper, glass, and cardboard, plastic, and scrap metal.

### **Responsible Person is -**

The person who oversees the waste is to be removed from the premises at which it was produced or is being held.

### **Waste is-**

The legal definition of waste comes from Section 75(2) of the Environmental Protection Act 1990 (EPA 1990). It defines waste as any substance or object which the holder discards, intends to discard, or is required to discard.

The EPA 1990 refers to 'controlled wastes' which are split into four categories: Household, commercial, industrial, and clinical waste. Global Infrastructure produce waste in all four categories. There are some wastes which are exempted as they have their own separate legislation e.g. radioactive wastes.

### **Waste Hierarchy**

Unlike the traditional linear method of buy, make, dispose, Global Infrastructure follow a circular economy framework fostering resilience, sustainability and regeneration through the maximisation of resources and the minimisation of waste, pollution and environmental impact.

The waste hierarchy below lists the different ways of dealing with waste in order of preference.



**1 PREVENT** - The most preferred option. Reduce the waste through product design improvements, collaboration, innovation, process optimisation or alternatives materials.

**2 RE-USE** – through refurb, repair etc consider reusing the waste/item, extend the lifespan, eliminate the use of resources in making new items.

**3 RECYCLE** – Collect, sort and process waste into separate receptacles, conserving resources to make new products or raw materials, decreasing waste sent to landfill.

**4 RECOVER** – collection of waste to energy incineration recovered to generate energy or material recovery through anaerobic digestion or composting.

**5 DISPOSE** – to landfill. This should be considered **only** when Prevention, Re-use, Recycling and Recovery are not feasible.

**Burning and dumping of waste is illegal!**

# PEOPLE POLICIES

## EQUALITY & DIVERSITY

Global Infrastructure is committed to being an equal opportunities employer. We value our employees and ensure they are always treated with respect. We foster a fair, inclusive, and supportive environment to prevent harassment, discrimination, and victimisation in the workplace.

We adhere to the Equality Act 2010 and relevant codes of practice, ensuring non-discrimination in terms of:

- Race or colour
- Nationality or ethnic origins
- Sexual orientation or marital status
- Gender identity
- Age
- Disability
- Pregnancy and maternity/paternity

### **Reasonable Adjustments**

We make reasonable adjustments for employees with long-term physical or mental impairments, ensuring they have the same access to job opportunities as non-disabled persons, as far as reasonably possible.

### **Management Responsibilities**

Management ensures that recruitment, selection, training, development, and promotion procedures do not result in less favourable treatment based on race, colour, nationality, ethnic or national origin, religion or beliefs, age, disability, trade union membership or non-membership, gender identity, sexual orientation, marital status, or part-time status. Our objective is to select and promote individuals based on their aptitudes, skills, and abilities.

### **Raising Concerns**

If employees feel they have been treated less favourably without reasonable justification, they should raise the matter with their manager.

### **Reporting Discrimination**

If you experience discrimination, harassment, or abuse from another employee, client, customer, or visitor, inform your Manager or a Director immediately, or follow the Confidential Reporting Policy outlined in section 5 of this manual.

# ANTI-HARASSMENT & ANTI BULLYING

This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

Our Company is dedicated to fostering a work environment where bullying and harassment are unequivocally unacceptable and not tolerated at any level. We strive to ensure that every individual can work in an atmosphere of comfort and dignity. We are committed to providing appropriate redress for any employee who experiences bullying or harassment and guarantee that complainants will not face any form of reprisal or victimisation as a result of their complaint.

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong. We are committed to providing a safe and respectful workplace and promoting a working environment based on dignity and trust, and one that is free from discrimination, harassment, bullying or victimisation. A toxic workplace culture, where bullying or harassment is tolerated, is harmful to the wellbeing of the workforce as well as the wider organisation. We therefore adopt a zero-tolerance approach to instances of bullying or harassment. This includes all forms of sexual harassment.

Employees can seek confidential and informal advice and support from their Manager or a Director, who will guide them on the policy and procedures for handling such complaints.

## **Who is protected from harassment**

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation; and
- age.

Although pregnancy and maternity and marriage and civil partnership are not specifically protected under the legal provisions on harassment, we consider harassment on any ground to be unacceptable

## **Definitions**

### **Harassment**

Harassment is any unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. It can take many forms, occur on various grounds, and may be directed at individuals or groups. Harassment can occur between people of the same or opposite sex. It is the impact on the recipient, not the intention of the perpetrator, that defines harassment.

## **Sexual Harassment**

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Employers are legally obliged to take reasonable steps to prevent sexual harassment of their workers in the course of their employment and by third parties.

## **Bullying**

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work. If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

## **Responsibilities**

### **Employees**

All employees are responsible for complying with this policy and contributing to a work environment where the dignity of all employees is respected.

### **Managers**

Managers have a duty to ensure that harassment and bullying do not occur in their areas of responsibility. They must explain the Company's policy to their staff and take proactive steps to promote a positive work environment.

### **Managing Director**

The Managing Director is responsible for ensuring the effective implementation and operation of this policy.

# EMPLOYEE LIFECYCLE & BENEFITS POLICIES

## RIGHT TO WORK

We only recruit individuals with a legal right to work in the UK. All offers of employment will be subject to the candidate providing the required original documents or our organisation being able to carry out a check on the Home Office online [right to work checking service](#) confirming their right to do the work in question. To enable us to conduct an online check, the candidate must have shared their right to work details using the Home Office [prove your right to work to an employer](#) online service.

The requirement to provide evidence of the right to work in the UK applies to all new recruits, regardless of their race, nationality or ethnic or national origins.

It is an ongoing condition of employment that employees:

- have and maintain an immigration status enabling them to work in the UK for the organisation and to undertake the type of work for which they are employed by the organisation;
- immediately notify the organisation if they cease to have the right to work in the UK undertaking the type of work for which they are employed by the organisation;
- immediately notify the organisation if their immigration status changes or if there are any change(s) in your personal details or those of your role with the organisation which do or may have an effect on their immigration status;
- provide the organisation with up-to-date contact details including name, address, telephone number and mobile telephone number and immediately notify the organisation of any changes to those contact details; and
- provide to the organisation on demand any documents or information relating to their immigration status that may be requested from the organisation (or the Group) from time to time.



# ONBOARDING

We provide all new employees with a comprehensive onboarding programme.

The purpose of the onboarding programme is to provide you with the best possible start in your role, as well as to ensure that you settle in well. The onboarding process will also give you the opportunity to gain an understanding of our organisation and its values and culture.

We want you to enjoy working for our organisation and are committed to providing an environment where everyone can thrive.

## Scope

This policy applies to employees employed by us. It does not apply to workers, contractors, consultants or any self-employed individuals working for the organisation.

## What your onboarding programme will cover

Your line manager, in conjunction with the HR department, will tailor your onboarding programme to meet your specific needs. This will vary depending on your job role, level of responsibility, previous work experience and your training needs.

For example, your onboarding programme would usually cover:

- our core objectives, values, culture and priorities;
- an introduction to key senior leaders, all team members that you will be working with and individuals from the wider teams with whom you will come into contact;
- the key responsibilities of your role and how your role aligns with our organisation's goals;
- our department structure;
- our social networks and committees;
- arrangements during your probationary period (including training relevant to your role);
- our health and safety procedures, including fire safety and accident reporting rules;
- documentation required by the HR department; and
- our policies and procedures, including those concerning equality, diversity and inclusion; employee wellbeing; hybrid working; and data protection.

This list is not intended to be exhaustive.

## How your onboarding programme will be delivered

Principally, our aim is to ensure that you have time to familiarise yourself with your role, and our people, equipment, systems and processes.

The different elements of your onboarding programme will be delivered by different managers within the organisation, as well as your colleagues. This will give you the opportunity to meet other individuals within the organisation.

You will also have regular catch-ups and connected conversations with your line manager to discuss how the onboarding programme is progressing and how you are settling into the organisation.

There are elements of your onboarding programme that will be conducted face to face but some elements of the programme may be conducted remotely. We will ensure that you have access to the necessary technology for participating fully in the onboarding programme.

You should be aware that some of the tasks that you cover during the onboarding programme may be used to review your performance, capability and suitability for the role as part of the probationary period (see [Probation policy](#)).

**Responsibility for your onboarding**

Your line manager will take the lead role in helping you to settle into the organisation and will ensure that other individuals contribute to the programme as necessary.

## PROBATION

This policy is intended to allow both the employee and the employee's line manager to assess objectively whether or not the employee is suitable for the role. The organisation believes that the use of probationary periods increases the likelihood that new employees will perform effectively in their employment.

The employee's line manager is responsible under this policy for ensuring that all new employees are properly monitored during their probationary period. If any problems arise, the employee's line manager should address these promptly. This will ensure that the employee is aware that some aspect of their performance or conduct is unsatisfactory and prevent the problem from escalating.

### LENGTH OF PROBATION

Your Contract will specify whether your employment is subject to an initial probationary period and any specific terms relevant during that time. If you are required to work for an initial probationary period, your progress and performance will be assessed and monitored.

### EXTENDING PROBATIONARY PERIODS

The organisation reserves the right to extend an employee's period of probation at its discretion. This will be limited to one extension and the total period of probation will be no longer than 12 months.

An extension may be implemented in circumstances where the employee's performance during probation has not been entirely satisfactory, but it is thought likely that an extension to the probationary period may lead to an improvement, or where the employee or the employee's line manager has been absent from the workplace for an extended period during probation.

Before extending an employee's probationary period, the employee's line manager should consult with their Human Resource representative.

If an extension to the probationary period is agreed, the organisation will confirm the terms of the extension in writing to the employee, including:

- the length of the extension and the date on which the extended period of probation will end;
- the reason for the extension and, if the reason is unsatisfactory performance, details of how and why performance has fallen short of the required standards;
- the performance standards or objectives that the employee is required to achieve by the end of the extended period of probation;
- any support, for example further training, that will be provided during the extended period of probation; and
- a statement that, if the employee does not meet fully the required standards by the end of the extended period of probation, their employment will be terminated.

### TERMS OF EMPLOYMENT DURING THE PROBATIONARY PERIOD

During the probationary period, employees will be subject to all the terms and conditions of their contracts of employment.

Once the probationary period has been completed, the notice periods will be as defined in the employee's contract of employment.

In the case of existing employees who have been transferred or promoted into different roles, the amount of notice that the employee must give to the organisation if they wish to resign, and the amount of notice the organisation must give to the employee of dismissal will be as defined in the employee's contract of employment.

## **LINE MANAGER'S RESPONSIBILITIES**

Under this policy, the line manager has responsibility for monitoring a new employee's performance and progress during the probationary period. The line manager must ensure that the employee is properly informed at the start of their employment about what is expected of them during probation, for example the required job outputs or standards of performance.

## **REVIEWS DURING PROBATION**

The line manager should review and assess the employee's performance, capability and suitability for the role on at least a monthly basis during the employee's probation, and again at the end of the probationary period. A clear record should be made of each review meeting. A copy of the record should be passed to Human Resources to retain on the employees personnel file.

During an employee's probation, the line manager should provide regular feedback to the employee about their performance and progress, and should there be any problem areas, raise these with the employee as soon as possible with a view to resolving them. The line manager is also responsible for providing guidance and support and for identifying and arranging any necessary training or coaching.

## **IRREGULARITIES DISCOVERED DURING THE PROBATIONARY PERIOD**

If, during an employee's probation, it is suspected or established that the employee does not have the qualifications, experience or knowledge that they claimed to have at the time of recruitment, the matter will be discussed with the employee to establish the facts. If the evidence suggests that the employee misrepresented their abilities in any way, the organisation will terminate the employment giving one week's pay in lieu of notice. If the employee is an existing employee who has been transferred or promoted into a different role, the organisation's normal capability/dismissal procedure must be followed in full.

## **END OF PROBATION**

At the end of the probationary period, the line manager should conduct a final review of the employee's performance and suitability for the job.

This will involve a meeting with the employee to discuss their performance and progress throughout the period of probation. The review must be conducted on or shortly before the date on which the employee's probationary period comes to an end. If the employee's performance is satisfactory, the line manager should notify their Human Resource Representative to issue a letter of confirmation of appointment to the employee. If the employee's performance has not met the standards required by the organisation, the line manager should discuss the matter with the Human Resources Representative before any decision is made to terminate the employee's employment.

## **TERMINATION OF EMPLOYMENT**

If an employee's performance while on probation has been unsatisfactory (despite support from the line manager), and it is thought unlikely that further training or support would lead to a satisfactory level of improvement, the employment will be terminated at the end of the period of probation. It is the organisation's policy to allow the employee to complete the designated period of probation rather than terminating employment before the probation has come to an end. This is to give the employee a full opportunity to come up to the required standards. If, however, there is clear evidence prior to the end of the period of probation that suggests the employee is wholly unsuitable for the role, the line manager should consult their Human Resources Representative with a view to terminating the employee's contract early.

Where a decision is taken to terminate the employee's employment, the employee must be interviewed and informed of the reason for the termination. The organisation will write to the employee confirming the termination and the reason for it. The employee will be given an opportunity to appeal the decision.

If an employee's employment is terminated after the expiry of the probationary period, or if the employee is an existing employee who has been transferred or promoted into a different role, the organisation's normal capability/dismissal procedure must be followed in full.

## **ABSENCE MANAGEMENT & CAPABILITY**

Global Infrastructure (Scotland) Ltd. recognise that some absence due to sickness is inevitable. Our approach to absence management is based on a starting assumption of trust between managers and employees, and as an organisation, we are committed to supporting employees in a consistent, fair and sympathetic way. The absence policy sets out the principles and methods through which absence is managed but is also just one part of a broader strategy to establish a healthy workplace. Our aim is to tackle the underlying causes of sickness and reduce the adverse impact of sickness absence on employees and on service delivery.

Throughout this policy, we assume that ill health is genuine unless there is evidence to the contrary, the reason for taking action will therefore relate to the capability of an employee and will not be because of their illness.

Capability is defined in Section 98 (3)(a) of the Employment Rights Act 1996 as follows: "capability, in relation to an employee, means his (cap)ability assessed by reference to skill, aptitude, health or any other physical or mental quality."

The policy also makes provision for disability leave which is recognised as a separate absence type from sickness absence.

This policy covers the management of short term and long-term absence in relation to unplanned leave and applies to all employees employed by the Global Infrastructure (Scotland) Ltd. Guidance is also provided in relation to agency workers in terms of sickness absence reporting and incident response, this is in no way intended to create or imply an employment relationship with the agency worker.

Failure on the part of an individual employee to comply with any aspect of the Unplanned Leave Procedure may result in action being taken in accordance with the Company's Disciplinary Procedure.

### **Aims and Objectives**

The aims of this Absence Management Policy are to:

- provide a framework to support employees who are unable to work due to illness and assist them back to work;
- reduce the impact on other work colleagues when covering for colleagues who are absent and;
- secure the attendance of employees in order to minimise the cost and effects of sickness absence and to maximise operational efficiency in all areas.

### **SICKNESS ABSENCE NOTIFICATION**

#### **Reporting Procedure**

Management of absence needs to be based on reliable information. Information is gathered through the sickness reporting procedure, which is as follows:

If an employee is absent from work for any reason and the employee's absence has not previously been authorised by the Company, the employee must inform both their Manager/Supervisor in advance of the beginning of their shift on the first day of absence. If it is clear that the absence is likely to last for more than one day, employees should explain this to their manager and agree the appropriate timeframe for making contact, and what form the contact should take.

Immediately following the employee's return to work after a period of absence which has not previously been authorised by the Company and is less than five full working days, the employee is required to complete a Self-Certification Form. This form is available from your Human Resources Representative and requires the employee to state the dates of, and reason for absence including details of sickness on non-working days. Self-certification forms should be sent to the Human Resources Representative and will be retained in the Company's records.

If an employee is absent from work due to sickness or injury which continues for more than seven calendar days, the employee must provide the Company with a Fit Note from their GP. Further Fit Notes must be provided as appropriate to cover the entire period of absence. If the employee anticipates that their absence will continue beyond the date specified on their Fit Note, they must make their manager or supervisor aware of this in advance of the Fit Note's expiration (a minimum of one day's notice in advance) to allow for any necessary operational arrangements to be implemented

If an employee or agency worker fails to report for work and their absence is unexplained by the start of their shift, their manager or supervisor should make all reasonable efforts to contact them to check that they are okay. If contact cannot be established, the manager or supervisor should immediately inform their Human Resources Representative (and where appropriate the agency representative). If contact cannot be established, the employee or agency worker's next of kin will be contacted and a home visit may be conducted to ensure nothing serious has happened.

If an employee or agency worker attends work and presents to a manager or supervisor as unwell, the manager or supervisor should advise the employee that they are being sent home until their condition improves. In these circumstances the manager or supervisor should also inform their local Human Resources Representative, the agency representative (where appropriate) and their local HSE team. Any subsequent returns to work must have prior approval from senior management, HSE and the local Human Resources Representative.

If an employee or agency worker becomes unwell at work and or the emergency response protocols are initiated, the manager or supervisor should also inform their local Human Resources Representative, the agency representative (where appropriate) and their local HSE team. If the emergency services are called to the scene contact should be made as outlined above immediately. Any subsequent returns to work must have prior approval from senior management, HSE and the local Human Resources Representative.

While mitigating factors will be taken into account, if employees are absent and do not make contact this could be viewed as unauthorised absence, which means they will not get paid whilst absent and this may also lead to disciplinary action being taken. Similarly, if a manager or supervisor fails to attempt to make contact with an employee or agency worker who has not reported for work, this may be considered a breach of their duties and could lead to disciplinary action being taken.

### **Sickness Absence Categories**

Global Infrastructure apply two specific categories to sickness absence, which often determines the way in which it is measured and managed. These are:

- Short-term sickness absence: Absences of less than 4 continuous weeks.
- Long-term sickness absence: Absences of 4 continuous weeks or more.

Care should be taken to ensure that other forms of absence are not recorded as sickness.

## Talking and listening

Managers, with support from their local Human Resources Representative will review employee sickness absence levels on a rolling basis and may need to have a series of more formal meetings. The Company manage sickness absence through a series of informal and formal conversations between employees and their manager, both during and following a period of absence. This is to achieve a better understanding of the nature of the employee's absence and decide how best the Company can provide support. This applies equally to ill-health that hasn't yet resulted in absence. Preventative action can often significantly reduce the impact of emerging ill-health at work, so if employees are experiencing health difficulties they are encouraged to talk openly and honestly with their manager/supervisor and their Human Resources Representative.

## Working in partnership with Occupational Health

In certain circumstances, employees may be asked to attend our Occupational Health providers who are best placed to provide the Company with the specialist advice needed to be able to support employees appropriately.

If a Fit Note or Occupational Health report mentions any reasonable adjustments that could potentially be made to support employees at work, The Company will consider that advice. If employees are asked to attend Occupational Health, their manager and Human Resources Representative will meet with the employee in advance to explain why additional medical advice is being sought. This could be before, during, or after a period of absence.

Additional information can be found in our [Occupational Health Policy](#).

## Medical Redeployment

If the Company cannot make any reasonable adjustments to support an employee's return to work, medical redeployment will also be considered. This process will be facilitated by the manager or supervisor, the local HSE team and a Human Resources Representative. If appropriate, advice will also be sought from Occupational Health to find out what suitable alternative work might be.

## Sickness Absence Thresholds

While the Company are committed to providing support to colleagues who are experiencing health difficulties, where sickness absence reaches certain levels, this needs to be managed through a more formal process. Human Resources Representatives will support managers to determine the most appropriate way of managing absence by referring to a number of sickness absence thresholds, outlined in the table below:

| <b>Short-term absence thresholds</b>                        | <b>Employee should not exceed thresholds again within</b> |
|---|---|
| 3 instances of sickness absence in a 12-month period        | 12 months   |
| <b>Long term absence thresholds</b>                         | <b>Employee should not exceed thresholds again within</b> |
| 4 weeks of continuous sickness absence in a 12-month period | 12 months   |



## **What happens when a threshold is reached?**

Whenever an employee is absent due to sickness, their manager, with support from the local Human Resources Representative, will look at the number of instances and days the employee has been off sick in the past 12 months to check whether they have reached or exceeded any of the absence thresholds.

If their sickness absence reaches any of the threshold levels, their manager will discuss this with the employee at a return-to-work conversation (or by other appropriate means if the employee is still off work) to make the employee aware that they have reached a threshold and to explain what this means.

If an employee exceeds a threshold before their manager has an opportunity to discuss this with them (in a single absence for example), the manager may choose to proceed straight to a formal absence meeting. If an employee exceeds a threshold (i.e. more than 3 instances/8 days of short-term absence, or more than 4 weeks of continuous long-term absence in a 12-month period), in most cases their manager will arrange a formal absence meeting with the employee with support from the local Human Resources Representative.

Progression to a formal absence meeting will typically be automatic, although consideration should be given to the specific circumstances and it may be decided not to proceed to a formal meeting. For example:

- where an absence relates to a 'one off' situation, such as a surgical intervention;
- where an absence is related to a critical illness; or
- where, up to that point, the employee had a consistently exceptional attendance record.

This list is only indicative and does not mean all such situations would be excluded from the formal absence management process. It's vital that individual circumstances are considered so that sensible and contextual decisions can be reached.

There are situations where the formal stages of the absence management process would not be applied, and any medical referrals would only be to assist with employee's wellbeing. These include:

- where the absence relates to a terminal illness;
- where the absence relates to a previously unknown pregnancy; and
- if we find out that the absence relates to a domestic abuse issue.

In these cases, the employee's manager and local Human Resources Representative will still arrange regular conversations with the employee so that everyone can be kept updated.

## **Pattern Absence**

If an employee hasn't reached one of the threshold levels but there is a regular pattern to the absence, their manager, with support from the local Human Resources Representative, will discuss this with the employee and may need to arrange a formal absence meeting if this is becoming problematic. Examples of pattern absences could be where an employee is frequently off after annual leave, after certain events, or on specific days (such as Friday / Monday). The Company recognise that patterns can be coincidental, or may even be indicative of other underlying issues, so these conversations will always be approached from a supportive position.

## **Conversations and Formal Absence Meetings**

### **1. Short-term sickness absence** **a. Regular conversations**

After each instance of short-term absence, an employee's manager, along with the local Human Resources Representative, will have an informal meeting with the employee when they return to work.

The aim of this return to work (RTW) conversation is to support the employee's wellbeing by ensuring they are well enough to be back at work, and to explore any possible underlying health issues or barriers to them achieving sustained levels of attendance. If the absence means the employee has reached one of the short-term thresholds, their manager will also make them aware of this during the conversation.

#### **b. Formal Meetings**

There are normally three formal meetings in the short-term absence management process. Employees will normally be invited to a formal absence meeting once their absence has exceeded any of the short-term thresholds. At each meeting, their manager will discuss the employee's absence record with them, covering anything that might have affected their attendance levels, whether they have reached or exceeded a threshold, and whether there are any underlying health issues. If appropriate, and if advised by Occupational Health, short-term absence meetings may also include discussions around potential medical redeployment.

### **2. Long-term sickness absence**

#### **a. Regular conversations**

If an employee is on long-term sickness absence, their manager, along with the Human Resources Representative, will seek to agree levels of face-to-face and/or telephone contact with them to allow everyone to keep each other informed about the employee's state of health, their progress towards recovery and a possible return to work. The long-term absence should be reviewed and informally discussed with the employee initially within the first four weeks, then at regular intervals.

#### **b. Formal meetings**

There are normally three formal meetings in the long-term absence process. At each meeting, the employee's manager will discuss with them how they are feeling, current medical/specialist advice, when they might be able to return to work, and any adjustments that might be made to assist their return.

If appropriate, and if advised by Occupational Health, the meeting may also include discussions around medical redeployment or ill-health retirement. Depending on the reason for the absence, the manager, with support from the local Human Resources Representative, may make a referral to Occupational Health at any time during the absence to get medical advice in relation to the employee's fitness to return to work. The employee's manager, with support from the local Human Resources Representative, will always discuss the referral with the employee.

### **Returning from long-term sickness absence**

Employees are expected to return to work when their last fit note expires. When an employee returns from a period of long-term sickness absence, their manager, with support from the local Human Resources Representative, will meet with the employee for a Return to Work (RTW) meeting to talk about the absence, find out how they are and discuss any support that might be needed.

### **Phased returns after long-term sickness absence**

An employee's GP or Occupational Health may suggest a phased return to work following long-term absence. If this is agreed, then this will normally take place over a four-week period with support from the Human Resources Representative. During the four weeks, employees must build up the time they are at work in each week. A longer phased return would be considered if medical advice strongly recommended this, and if it is likely to facilitate an earlier return to work.

**Statutory sick pay**

Employees are entitled to Statutory Sick Pay (SSP) during authorised absence as a result of sickness, provided they meet the criteria laid down in government SSP regulations.

The first three qualifying days of sickness are waiting days, for which SSP is not payable. When employees are sick for four or more consecutive days they will be paid SSP by the Company from the fourth day, if they are eligible. This is treated like salary and is subject to Income Tax and National Insurance Contributions.

**Company sick pay**

Entitlement to Company sick pay if applicable is detailed in employees Contract of Employment. Provisions of SSP will still apply and the Company shall effectively cover the difference between SSP and an employee's basic pay for the periods of eligibility.

**Pregnancy Sickness Absence**

Pregnancy related sickness absence will be recorded separately and not be taken into account when considering whether or not the absence triggers have been met. If the absence is not pregnancy related the normal absence procedures will apply.

If the employee is off work because of a pregnancy-related illness within 4 weeks of the due date, maternity leave begins automatically. This is unless the manager and the employee agree together to delay it (for example, for health and safety reasons).

## OTHER TYPES OF UNPLANNED LEAVE

### Disability Related Leave and Sickness Absence

The majority of disabled people do not require any more time away from work than other employees. Although an impairment may impact on a person's day to day activities, it does not necessarily impact on their general health. Accordingly, the absence of a disabled employee will be dealt with under the provisions of this policy and procedure, where appropriate.

Nevertheless, under the Equality Act 2010 there is a need to recognise that employees with a disability may need to take unexpected unplanned leave to either receive treatment for their disability or that they may be absent from work as a result of their disability. In either case accurate recording is essential to ensure that disability related absence can be clearly identified as distinct from other absences. It is important to establish at an early stage whether the unplanned absence is disability related; OH advice will be sought as appropriate.

There will be occasions when a disabled employee needs to take unplanned sickness absence as a result of their disability. Both disability related and non-disability related absence will be counted for the purposes of sick pay and for any action required. However, recording the absences separately will assist managers in taking appropriate action and will enable them to fully consider the application of 'reasonable adjustments'. In such cases this may include extending the absence triggers. Each period of sickness will, to a certain extent, be unique and consideration will need to be given to the amount of disability related absence that is 'reasonable' and the extent to which the absence triggers can be extended.

### Transport Issues

Other situations may include the inability to get to work for one day or more or delayed arrival at work or early departure from work due to car breakdown, bad weather (i.e. heavy snow affecting transport), or delayed or cancelled transport services (i.e. flight delays on returning from holiday, industrial action affecting public transport). Alternative means of transport should always be explored to minimise absence from work. Employees experiencing issues which results in unplanned leave should engage with their Manager/Supervisor at the earliest opportunity.

### Jury Duty

Employees called to serve on a jury or to make a court appearance as a witness should advise their Manager/Supervisor at the earliest opportunity. Unless exemption can be secured, time off with pay to attend will be at the complete discretion of the Company and if payable will be granted subject to the deduction from salary of the allowance paid by the court. Claiming the salary allowance is the employees responsibility entirely Submission of the applicable It is therefore important that you claim the appropriate amount from the courts. You are required to submit a copy of the jury service expense claim form to the Finance Manager on completion of your period of duty.

## ANNUAL LEAVE

This policy sets out our organisation's rules in relation to holiday.

It is important that you take regular holidays for your wellbeing and to take some time away from work.

We encourage you to take your full entitlement and to spread out your holiday throughout the year to prevent building up an excessive period of leave at the end of each holiday year.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

## Scope

This policy applies to employees and workers. It does not apply to contractors, consultants or any self-employed individuals working for the organisation.

## Your entitlement

The holiday year runs from 01 January to 31 December.

Unless your contract provides otherwise, you are entitled to 30 days' paid holiday per holiday year or a pro rata equivalent if you work part-time. This includes bank and public holidays.

If your employment starts or terminates part way through a holiday year, your holiday entitlement during that year will be calculated on a pro rata basis.

Except where set out in this policy and/or otherwise required by law, all holiday must be taken during the holiday year in which it is accrued otherwise it will be lost.

In exceptional circumstances a maximum of five days may be carried over from one holiday year to the next, but only where your line manager has given permission in writing.

## Booking holiday

To book annual leave, you must request permission from your line manager. All holiday must be approved in advance. You must give as much notice as possible when booking leave. In any event, you must give notice that is at least twice the number of working days that you wish to take as leave.

You should not normally take more than two-weeks' consecutive holiday at any one time, although your manager has the discretion to increase this if the circumstances are exceptional.

Every effort will be made to meet a holiday request. However, there may be circumstances where your line manager may turn down your holiday request due to operational needs or where there is insufficient capacity within our organisation to accommodate high levels of leave.

## Taking holiday

We reserve the right to require you take leave on specified dates including periods of shut down and to avoid staff accruing large amounts of untaken holiday. In such circumstances, you will receive notice that is at least twice the number of working days that you are required to take.

You should keep back **ten days** of your annual leave entitlement for when the office closes during the Christmas/New Year period. The dates of this period will be advised by 1st July each year.

## Holiday pay

You will receive normal pay during any day taken as part of your holiday entitlement.

You are not entitled to pay in lieu of holiday not taken, except on termination.

## Sickness during holiday

If you fall sick or are injured while on holiday, you may choose to take your holiday as sick leave subject to the following conditions:

The total period of sickness must be fully certificated by a qualified medical practitioner.

You must follow the [absence procedure](#) if you are sick during your holiday.

If you are overseas when you fall ill or are injured, the total period of sickness absence must still be evidenced by way of a medical certificate.

If you fall sick or are injured before the start of a period of planned holiday, and as a consequence you are unable to take your holiday, you may postpone your holiday dates to another mutually agreed time. To do this, you must submit a written request to your line manager to postpone your planned holiday, accompanied by medical evidence confirming that you are unfit, or are likely to be unfit, to take your planned holiday.

### **Holiday entitlement and sick leave**

You will continue to accrue your holiday entitlement during any period of sick leave.

If you are unable to take your full holiday entitlement due to sickness absence, or if you are still absent at the end of the holiday year, you may carry over any unused holiday to the next holiday year with the agreement of your line manager and subject to statutory legislation.

Any holiday that is carried over under this provision is limited to the four weeks' annual leave that you are entitled to under EU legislation, and must be taken within 18 months starting from the end of the holiday year in which it was accrued.

Alternatively, you may book a period of holiday while on sick leave to receive holiday pay for that period, provided that you give your manager as much notice as possible of your proposed holiday dates.

### **Holiday entitlement and family leave**

You will continue to accrue your holiday entitlement during any period of family leave (i.e. maternity, paternity, adoption and shared parental leave, ordinary parental leave, and parental bereavement leave).

You should make every effort to take any outstanding holiday entitlement before commencing family leave or immediately after your family leave has ended. Any holiday entitlement that has not been taken because of a period of family leave may be carried over into the next holiday year.

### **Holiday pay on termination of employment**

On the termination of your employment, you will receive a payment in lieu of accrued and untaken holiday for that holiday year.

You may be required to take outstanding holiday during your notice period.

If, on the termination date, you have taken more holiday than your accrued entitlement, the corresponding amount will be deducted from your final salary payment.

If you are dismissed for gross misconduct, or if you leave before the contractual notice period has expired, you will not be entitled to payment in lieu of accrued contractual holiday over and above the statutory minimum.

## **BUYING & SELLING OF ANNUAL LEAVE**

This policy sets out the organisation's rules in relation to purchasing and selling holidays.

It is important that you take regular holidays for your wellbeing and to take some time away from work.

### **SCOPE**

The scheme applies to all employees who have successfully completed their probationary period.

### **YOUR ENTITLEMENT**

We encourage you to take your full entitlement and to spread out your holidays throughout the year. However, we recognise that some employees may wish to take longer or shorter periods of holidays and for this reason we operate a policy of allowing all employees to purchase or sell some holiday entitlement, subject to certain conditions.

### **CONDITIONS FOR PURCHASING OR SELLING HOLIDAYS**

The conditions for employees to buy or sell holiday are as follows:

- Only one instance of purchase and one instance of selling is permitted in the holiday year with the holiday year running from 01 January to 31 December.
- The maximum amount of additional annual leave that you may buy in any one holiday year is 5 working days.
- The maximum amount of annual leave that you may sell in any one holiday year is 5 working days.
- You are not entitled to sell holiday if this results in you being entitled to less than the statutory minimum annual holiday provided for in the Working Time Regulations 1998.
- If you wish to buy or sell some of your holiday you must apply in writing to your line manager.
- Applications for purchasing or selling holiday for the next holiday year must be received no later than one month before the end of the current holiday year.
- We reserve the right to refuse an application to buy or sell holiday. This may be necessary for operational or technical reasons related to your job.

Where an application has been received and approved, you will be notified in writing together with details in relation to any adjustments in your pay and confirmation of when the change will take effect. You will then be asked to confirm in writing that you wish to proceed. If we do not hear from you within 5 days, your application will be cancelled by default.

Any additional holiday leave granted under this scheme must be taken within the holiday year in respect of which the application was made. If, having bought additional holiday, you fail to take it before the end of the relevant holiday year, the leave will be lost. In such circumstances, no compensatory payment or salary adjustment will be made.

### **APPLYING TO BUY OR SELL LEAVE**

Employees should email their line manager, or to the most obvious person for their role including the amount of days they wish to buy/sell by no later than one month before the new holiday year begins i.e. applications are to be received no later than 30<sup>th</sup> November each year.

Your application will be reviewed on a case-by-case basis and will be awarded at the discretion of management.

Any approved applications will be forwarded to Human Resources for processing.

## **ADJUSTMENTS TO PAY**

Employees should note that submitting a request to buy or sell annual leave, if accepted, this form will constitute as their consent for their salary being adjusted accordingly.

The cost of buying or selling holiday will be calculated and notified to you after your application has been approved.

If you are paid monthly, the cost for buying holiday will be calculated by:

- dividing your annual salary by 52 to determine your weekly pay;
- multiplying this figure by the number of weeks you wish to buy;
- dividing this figure by the remaining number of months in the holiday year to arrive at the amount that will be deducted from your monthly salary;
- subtracting that figure from your normal monthly salary; and
- applying the new level of monthly pay from the agreed date through to the end of that holiday year.

The calculation for selling holiday is the same except that your monthly pay will be increased rather than reduced.

If you are paid weekly, the total amount to be deducted will be divided by the remaining number of weeks (rather than months) in the holiday year in order to arrive at the amount to be deducted from your weekly pay.



## PERFORMANCE

The Company seeks to create a high performing culture which will support the achievement of its strategic goals and enable future growth. A high performing culture means that underperformance must be addressed and employees who have gaps in their capabilities are provided with the right level of support to try and address such gaps in a structured manner thus improving their performance.

This policy provides a clear framework for the consistent management of underperformance and applies to all employees.

Where poor performance is believed to be the result of deliberate negligence, or where serious errors have been made to the detriment of the organisation, the Company may decide to invoke the disciplinary procedure instead.

### SCOPE

This policy applies to all employees of Global Infrastructure (Scotland) Ltd.

### STAGE 1 – INFORMAL MEETING

Prior to the formal procedure being invoked, it is important that issues of underperformance have been discussed with the employee and that their manager has attempted to resolve these informally. Please note that support should be sought from your Human Resource Representative during this stage as well as any formal stages.

[Appendix A](#) provides guidance on what the Company expects and informal approach to consist of.

If any informal approach does not achieve a satisfactory improvement in performance, then the formal procedure outlined below should be followed. A formal procedure should only be invoked with support from your Human Resource Representative.

### STAGE 2 – PERFORMANCE IMPROVEMENT MEETING

Where stage 1 does not lead to a satisfactory improvement in performance, the employee will be invited to a performance review meeting.

The purpose of this meeting is to discuss the performance and decide what measures should be taken to help to improve performance to an acceptable level.

The meeting should be conducted by the employee's manager, with support from the Human Resource Representative.

At the meeting, the employee should be given an opportunity to ask questions, comment on the issues and put forward any explanation they may have for the matters identified by their line manager as amounting to poor performance.

[Appendix B](#) provides guidance as to what should be referred to at performance meetings.

The outcome of the meeting may be:

- a decision to take no further action;
- a decision to refer the matter for investigation under the disciplinary procedure; or
- the implementation of a performance improvement programme (see below).

## **Performance Improvement Programme**

A performance improvement programme is a series of measures, normally incorporated as part of a performance improvement plan (PIP), designed to help you to improve your performance. Agreement to each measure will normally be sought, however the line manager will reserve the right to insist on any aspect of the performance improvement programme if agreement cannot be reached.

Each programme will be tailored to the particular situation, but will cover the following elements:

### **Targets**

The particular areas in which improved performance is needed and on what criteria performance will be assessed. Where appropriate, specific targets will be set that will need to be achieved either by the end of the programme or at identifiable stages within it.

### **Timescale**

The overall timescale in which the necessary improvement must be achieved, together with the timescale for reaching individual milestones where appropriate. The length of time required to make an improvement to performance whilst in stage 2 of the process would generally be no longer than a period of 12 weeks, unless mitigating circumstances are identified.

### **Measures**

The measures proposed to support the employee in improving their performance. This may include:

- training;
- additional supervision;
- the reallocation of certain duties; and
- the provision of additional support from colleagues.

### **Feedback**

Employees must be given regular feedback from their line manager indicating the extent to which they are on track to deliver the improvements set out in the programme.

If, at any stage during the programme, the manager feels that the performance is not progressing in a satisfactory way, a further meeting may be held with the employee to discuss this, and where appropriate, their programme may be amended and/or extended.

### **Review**

At the end of the programme, the performance will be reviewed. If satisfactory progress has been made, this will be confirmed in writing. If the manager feels that satisfactory progress has not been made, the performance improvement programme may be extended and/or amended. Alternatively, the employee may be asked to attend a formal capability hearing under stage 3 of this procedure (see below).

### **Ongoing Review**

Following the successful completion of a performance improvement programme, the performance will continue to be monitored. If, at any stage during the following 12 months, the performance again starts to fall short of an acceptable standard, the manager may decide to initiate stage 3 of this procedure.

Your Human Resources Representative will be able to provide you with a template for a performance improvement plan (PIP)

### **STAGE 3 – FORMAL CAPABILITY HEARING**

Where stage 2 does not lead to a satisfactory improvement in performance, the employee will be invited to a formal performance management hearing.

The employee will be informed in writing of the grounds on which the hearing is being convened.

The letter will set out sufficient information and examples of why the line manager believes the performance still falls short of an acceptable standard.

The hearing will be conducted by an impartial senior manager and a Human Resource Representative. The employee will be entitled to be accompanied by a fellow employee.

At the hearing, employees will be given an opportunity to ask questions, comment on the issues and to put forward any explanation they may have for the matters identified by their manager as amounting to poor performance.

The outcome of the meeting may be a decision to:

- take no further action;
- refer the matter for investigation under the disciplinary procedure;
- institute another performance improvement programme; or
- issue a formal warning.

A formal warning will be issued if it is concluded that reasonable steps have been taken that should have allowed the employee to perform to an acceptable standard, but that these measures have not worked. The warning will explain the nature of the improvement that is required in performance and state the timescale for making these improvements. It will also explain that, if the necessary improvement does not take place, the employee may be dismissed.

The warning will remain current for a period of 12 months, after which it will cease to have effect.

### **STAGE 4 – DISMISSAL HEARING**

If an employee has been issued with a warning under stage 3 that remains live and their line manager believes that their performance is still not acceptable, the matter may be referred to at a performance dismissal hearing.

The employee will be informed in writing of the grounds on which the hearing is being convened. The letter will set out sufficient information and examples of why their manager believes their performance still falls short of an acceptable standard.

The hearing will be conducted by an impartial senior manager authorised to make dismissal decisions, accompanied by a Human Resource Representative.

The employee will be entitled to be accompanied by a fellow employee; details of the companion must be confirmed in advance of the meeting.

At the meeting, the employee will be given an opportunity to ask questions, comment on the issues and to explain any issues around their performance or mitigating circumstances.

The outcome of the meeting may be:

- a decision to take no further action;
- the issuing of another performance management warning;
- an offer to redeploy the employee to alternative work; or
- a decision to dismiss the employee.

Any offer to redeploy the employee will be entirely at the discretion of the Company. Such an offer will be made only where there is confidence that the employee will be able to perform well in the redeployed role. It will normally be offered as an alternative to dismissal only in circumstances in which the Company is satisfied that the employee should no longer be allowed to continue to work in their current role. Whilst employees are free to refuse any offer of redeployment, the only alternative available will usually be dismissal.

If the Company believe that there is no alternative role available and suitable for the employee and that the employee has not met an acceptable standard of performance, the employee may be dismissed. A decision to dismiss will only be taken by a senior manager who has the authority to do so.

The decision to dismiss together with the reasons for dismissal will be set out in writing and sent to the employee. Any dismissal will be with full notice or a payment in lieu of notice.

## **APPEAL**

Appeals can be made in relation to any of the formal stages outlined above and should be made in writing to the named individual advised in your outcome letter. This will often be a more senior management member or a representative from Human Resources, within five working days of receipt of the disciplinary outcome letter.

The appeal letter should set out the grounds on which the employee believes that the decision was flawed or unfair.

An appeal hearing will be convened to consider the matter. It will be chaired by an impartial senior manager e.g. director / general manager together with a Human Resource Representative. Employees are entitled to be accompanied by a fellow employee; details of the companion must be confirmed with the chair of the meeting in advance.

At the hearing, the decision to impose the sanction will be reviewed and employees will be entitled to make representations about the appropriateness of that decision.

The result of the hearing will be either to confirm the sanction or substitute any outcome that was available to the panel conducting the hearing at which the sanction was imposed.

The outcome of the appeal will be confirmed to the employee in writing, explaining the grounds on which the decision was reached.

The outcome of the appeal will be final.

## *Appendix A – Informal Approach (Performance)*

### **What should an informal approach consist of?**

- Discussions about concerns and support tools should have taken place, normally over a period of at least 6 weeks
- Detailed specific examples of the concerns along with supporting evidence where appropriate should be provided.
- The current role profile will be reviewed to ensure the requirements of the role are fully understood
- Both the gap in performance and the required standard for the role must be made clear to the employee
- Meetings should be documented, and a clear plan set out of realistic performance standards/tasks to be achieved and expectations should be set out, and how you will monitor them
- The employee should be given an opportunity to explain why the required standards of performance are not being met.
- Managers should probe if there are any personal circumstances which may be impacting on performance.
- Consideration should be given to what suitable support and relevant training could reasonably be offered and provided, to help an employee reach and maintain the required standard of performance for their role. This may include further training, guidance, closer supervision, appointing a mentor, coaching, making some adjustments to workload or temporarily reallocating work for an agreed period to provide some further support.
- Explain to the employee that if the performance concerns are not resolved and are ongoing the matter will be progressed and considered under the formal policy.

## *Appendix B – What should be referred to at the meeting (Performance)*

### **What should be referred to at the Performance meeting?**

At a performance meeting, the manager will:

- Outline the performance concerns against the required performance standard.
- Review the support and training provided to date to assist the employee to achieve the required performance standard.
- Ensure the employee is given an opportunity to respond and explain why they have not achieved the standard of performance required.
- Consider the explanation offered by the employee,
- Discuss with the employee what other additional support or training could be provided to help the employee achieve the required standard of performance. This may include further training, guidance, closer supervision, appointing a mentor, coaching, making some adjustments to workload or temporarily reallocating work for an agreed period to provide some further support.
- Explain the impact of the continued underperformance
- Discuss the draft PIP prepared in advance with the employee. The employee can provide suggestions and comment and it is then jointly developed and agreed in the meeting. (The complexity and timing of the tasks should be considered when setting timescales and should include some key milestones or positive progress indicators. The level/areas for improvement in performance, actions required, timescales to be met and the support to be provided should be captured in a Performance Improvement Plan.
- Confirm next steps and explain the potential consequences on their continued employment if they fail to achieve the required performance standard as outlined.

## DISCIPLINARY

We work to ensure that we handle any issues concerning an employee's conduct promptly and fairly.

If we have any concerns about your conduct, we will usually attempt to talk to you about this on an informal basis. An early conversation may be enough to identify the issue and take steps to resolve it. Most minor conduct-related issues can be resolved informally and a "Line in the Sand" may be issued to the employee to draw a line under the referred conduct.

However, where an informal approach is unsuccessful, or the allegations are so serious that an informal approach is inappropriate, we will follow a formal disciplinary procedure.

This policy outlines the disciplinary procedure, the roles of those involved and the support that is available to you.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

This policy applies to employees and workers. It does not apply to contractors, consultants or any self-employed individuals working for the organisation.

We recognise that a disciplinary procedure can be stressful and upsetting. Everyone involved in the process is entitled to be treated calmly and with respect.

We will not tolerate abusive or insulting behaviour from anyone taking part in a disciplinary procedure and treat any such behaviour as further potential misconduct.

### **Gross misconduct**

Gross misconduct is conduct that is so serious that it justifies dismissal without notice or payment in lieu of notice, although we will always consider the circumstances of any case before deciding on the appropriate penalty.

Examples of gross misconduct include (but are not limited to):

- theft and dishonesty;
- physical violence;
- serious instances of bullying or harassment (whether it takes place in person or online);
- acts of discrimination against fellow staff members, clients or customers;
- deliberate damage to Company property;
- any conduct that negatively affects our reputation;
- unauthorised disclosure of confidential information;
- serious breach of our rules, including, but not restricted to, health and safety rules and rules on computer use;
- consuming alcohol or unlawful drugs during working hours or in the workplace;
- smoking (including the use of e-cigarettes) in any unauthorised area;
- unauthorised use of computer equipment;
- misuse of Company passwords or log-in details;
- deliberate breach of procedures on the handling of personal data;
- deliberate refusal to follow reasonable instructions;
- accessing obscene or pornographic material while at work or on equipment that we provide;
- breach of cash-handling procedures;
- falsifying time sheets;
- breach of clock-in procedures;
- breach of requirements relating to safeguarding of children or vulnerable adults;
- deliberate breach of professional standards relevant to your employment; and
- offering or accepting a bribe within the meaning of the Bribery Act 2010.

## **Misconduct**

Examples of misconduct for which disciplinary action is appropriate include (but are not limited to):

- persistent poor timekeeping;
- breach of our absence reporting procedures;
- general disobedience;
- careless work;
- time-wasting;
- disruptive behaviour; and
- insulting or offensive behaviour towards others, not amounting to serious harassment or bullying.

## **Actions outside work**

We may consider your actions outside work (including your use of social media) to be gross misconduct, or misconduct, if they affect your ability to carry out your job or have a negative effect on our reputation.

## **Allegations of misconduct**

Where an allegation of misconduct is made against you that cannot be resolved informally, or it is not appropriate to do so, the allegation will be explained to you by your line manager (or, where appropriate, a different manager). The details of the allegation will also be confirmed to you in writing, together with a copy of this disciplinary procedure.

## **Suspension**

In some cases, it may be appropriate to suspend you from work for a temporary period while the disciplinary matter is dealt with. This is in no way intended to indicate guilt on your part, but is an administrative measure designed to protect the business or ensure the smooth running of the disciplinary procedure. Any period of suspension will be regularly reviewed, kept as short as possible and will be on a fully paid basis.

## **Stage 1 - Investigation**

We will investigate the allegations to decide whether there is sufficient evidence to justify taking the matter further.

The person appointed to conduct the investigation will usually talk to you at an early stage to hear your response to the allegations and will talk to anyone else who may have relevant information.

Where appropriate, the investigation may also include the examination of documents, including emails and other forms of electronic communication. It is important that you cooperate fully with the investigation process as this is the best way to ensure a fair outcome.

Once the investigation is complete, we will decide whether to proceed to a formal disciplinary meeting or whether the matter can, in fact, be resolved informally or without any further action.



## **Stage 2 - Hearing your disciplinary case**

### ***Invitation to a disciplinary meeting***

If we consider that it is necessary to hold a disciplinary meeting, we will confirm this to you in writing. You will usually be provided with reasonable notice of any meeting, depending on the complexity of the case, to allow you to prepare and to arrange for a companion to accompany you.

You will be entitled to be accompanied by a fellow employee or a trade union official. The responsibility for finding a companion rests with you. If your chosen companion is not a fellow employee, we reserve the right to check their credentials as an accredited trade union representative.

We will give you a copy of any evidence collated during the investigation (where appropriate) in advance of the disciplinary meeting, and you will be invited to submit any further evidence that you consider to be relevant.

### ***The disciplinary meeting***

The disciplinary meeting will be conducted by an appropriate representative of management with other panel members appointed as necessary. As far as possible, we will ensure that the disciplinary meeting is conducted by managers who have not previously been involved in the matter.

The evidence gathered during the investigation will be presented and you and your companion will be given an opportunity to confer and to respond. You may also call on witnesses to give evidence on your behalf, if they are willing, and their evidence is relevant to the issues being considered in the meeting.

The chair of the meeting may choose to adjourn the meeting so that further evidence can be obtained. If this happens, the meeting will be reconvened once this is done, and you will be given an opportunity to respond to any new evidence. Before the meeting closes, you (or your companion) will be given an opportunity to make any comments or representations that you think are relevant and which may explain the situation.

### ***The outcome***

The chair of the meeting will usually adjourn for a period to consider the outcome. The outcome will usually be communicated when the meeting is reconvened but will, in any case, be confirmed to you in writing as soon as possible and usually within seven working days after the meeting.

### ***Disciplinary penalties***

If the allegations are upheld to any extent, formal disciplinary action may be taken. This will usually take the form of a first written warning for a first offence. However, we reserve the right to implement this procedure at any stage depending on the circumstances and misconduct.

**A first written warning** is appropriate for instances of misconduct that are sufficiently serious to warrant disciplinary action, but where there is no current warning in place. The warning will set out the nature of the misconduct and explain that any further misconduct (similar or otherwise) will be likely to result in further disciplinary action.

**A final written warning** is given in cases of serious misconduct or where there is a live first written warning in place and the circumstances justify it. It will set out the nature of the misconduct and make it clear that any further misconduct (similar or otherwise) will be likely to result in dismissal.

If you are found to have committed misconduct while subject to a live final written warning, the outcome may be that you are dismissed with notice.

If you are found to have committed gross misconduct, the outcome may result in you being dismissed without notice. In these circumstances, your contract of employment will end immediately, although this will not affect your right of appeal.

In exceptional circumstances (for instances where you are likely to continue to commit misconduct even if subject to warning), you may be dismissed even if no warning of dismissal has been given. Depending on the terms of your contract, this may involve being given a payment in lieu of notice.

If you are dismissed with notice, we reserve the right to instruct you not to work for the duration of your notice period.

Where we find that the misconduct is sufficiently serious to justify dismissal, we may consider alternative disciplinary action such as suspension without pay, demotion, transfer to other work or a loss of seniority, where your terms and conditions of employment allow for this.

### **Stage 3 - Appeal**

#### ***Appealing against the outcome***

If you believe that a disciplinary penalty is unfair, you are entitled to appeal.

You should appeal in writing to the named individual advised in your outcome letter. This will often be a more senior management member or a representative from Human Resources, within five working days of receipt of the disciplinary outcome letter.

You should also set out in writing the grounds on which you believe the outcome of the original meeting to have been unfair.

#### ***Appeal meeting***

Following receipt of your appeal, we will arrange an appeal meeting as soon as practically possible, we would aim for this to be within five working days. However, if this is not possible, you will be informed of the reason for any delay.

You are entitled to be accompanied at the appeal meeting by a fellow employee or a trade union official.

The appeal meeting will be conducted by an appropriate member of the management team, or alternate person as appointed who has not been involved in previous proceedings. They will consider the grounds that you have put forward and review the conclusion reached in the original disciplinary meeting.

At the meeting you will be given the opportunity to explain why you feel the initial meeting reached the wrong conclusion. Depending on the circumstances, the meeting may either solely consider the points that you have raised, or it may reconsider the whole case and reach its own conclusion on the correct outcome. Where appropriate, a member of the HR department may also be present.

#### ***Outcome of appeal***

Following the appeal meeting, the relevant manager will inform you in writing, usually within ten working days, of the outcome.

If the result of the appeal is that a decision to dismiss you is overturned, you will be reinstated with immediate effect.

You will be reimbursed in full for any wages lost since your dismissal.

The outcome of the appeal is final.

### **Duration of warnings**

When you are given a warning, we will tell you how long it will remain live. This will depend on the specific circumstances. However, in general:

- a first written warning remains live for up to six months; and
- a final written warning remains live for 12 months.

Warnings may be live for a longer period depending on the seriousness of the misconduct and the wider circumstances of the case. Once a warning has expired, it will no longer be considered when determining the level of any further disciplinary action.

### **Trade union representatives**

If you are an accredited representative of a recognised trade union, we will endeavour to take no action under this procedure (except for suspending you in a case of alleged gross misconduct) until we have had an opportunity (with your agreement) to discuss the matter with a full-time official of the union.

## GRIEVANCE

We foster a culture in which you can raise any workplace problems, complaints or concerns in a supportive framework and we will ensure that all genuine grievances are dealt with quickly and fairly.

Most grievances can be resolved informally. However, if an informal approach does not resolve matters, or is not appropriate, you may choose to raise a formal grievance. This policy outlines the grievance process, the roles of those involved and support that is available to you.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

We recognise that a grievance procedure can be stressful and upsetting. Everyone involved in the process is entitled to be treated calmly and with respect.

We will not tolerate abusive or insulting behaviour from anyone taking part in a grievance procedure and will treat any such behaviour as misconduct under our disciplinary procedure.

### **Raising an informal grievance**

In the first instance, you should raise any grievance that you may have informally with your line manager. If your grievance is about your line manager, you should raise this with a member of the senior management team or your local Human Resources Representative.

The relevant manager will meet with you to give you the opportunity to explain your grievance and seek to identify whether the issue can be resolved informally. Many concerns can be resolved informally.

However, while we encourage the informal resolution of complaints, we recognise that this is not always possible or appropriate, for example if your grievance relates to a serious issue such as discrimination. Therefore, if the informal process does not resolve matters or is not appropriate, you should raise a formal grievance under this procedure.

### **Raising a formal grievance**

Where your grievance has not been resolved informally, or if your grievance is serious in nature, you should raise the matter formally in writing. It is important that you set out clearly the nature of your grievance and indicate the outcome that you are seeking. If your grievance is unclear, we may ask you to clarify your complaint before we hold a grievance meeting. Your complaint should be headed "Formal grievance" and sent to your line manager (or appropriate person i.e. Senior Management or Human Resources). If your complaint relates to your line manager, you should send your written grievance to a more senior manager or Human Resources instead.

### **Stage 1 - Investigation**

Your grievance will be kept confidential as far as possible. However, before proceeding to a grievance meeting, we may have to carry out an investigation. This will usually be conducted by the same manager who will hear your grievance. The relevant manager will write to you confirming that they are conducting the investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of your grievance.

You will be given a copy of any evidence collated during the investigation in advance of the grievance meeting. However, in some cases, the evidence given by individuals may have to remain confidential. Where confidentiality is necessary, we will provide you with an appropriate summary of the evidence.

## **Stage 2 - Hearing your grievance**

### ***The grievance meeting***

The grievance meeting will be held as soon as reasonably practical following receipt of your written complaint. However, if this is not possible, you will be informed of the reason for any delay. You will be entitled to be accompanied by a fellow employee or a trade union official. The grievance meeting will be conducted by your line manager (or other appointed person), unless your grievance relates to your line manager in which case it will be conducted by an appropriate person from the management team. Where it is considered appropriate, a member of the HR department may also be present.

The purpose of the meeting is for you to explain the nature of your complaint and what action you feel should be taken to resolve the matter. If more information comes to light, it may be necessary to adjourn the grievance meeting to conduct a further investigation and reconvene the meeting when this has been done.

If you are unable to attend the grievance meeting because of circumstances beyond your control, you should inform the manager conducting the meeting as soon as possible. If you fail to attend without explanation, or if it appears that you have not made sufficient attempts to attend, the grievance meeting may take place in your absence, based on your written grievance statement and any other documentation available.

### ***The outcome***

Following the meeting, the relevant manager will inform you in writing, usually within ten working days after the meeting, of the outcome and any action that will be taken as a result of your complaint.

## **Stage 3 - Appeal**

### ***Appealing against the outcome***

If you are not satisfied with the outcome of your grievance, you may submit a formal appeal. You should appeal in writing to the person appointed on your outcome letter or to Human Resources within seven working days of receipt of the grievance outcome letter. Your letter should clearly state the grounds of your appeal, i.e. the basis on which you consider that your grievance has not been satisfactorily resolved.

### ***Appeal meeting***

We will then arrange an appeal meeting within five working days to consider the matter. However, if this is not possible, you will be informed of the reason for any delay. You are entitled to be accompanied by a fellow employee or a trade union official. The appeal meeting will be conducted by an appropriate member of the management team, or alternate person as appointed who has not been involved in previous proceedings. They will consider the grounds that you have put forward and review the conclusion reached in the original grievance meeting. Where appropriate, a member of the HR department may also be present.

If you are unable to attend the appeal meeting because of circumstances beyond your control, you should inform the manager conducting the meeting as soon as possible. If you fail to attend without explanation, or if it appears that you have not made sufficient attempts to attend, the meeting may take place in your absence, based on your written grievance statement and any other supporting documentation available.

### ***Outcome of appeal***

Following the appeal meeting, the relevant manager will inform you in writing, usually within ten working days, of the outcome.

The outcome of the appeal is final.

## MATERNITY, PATERNITY & ADOPTION

The Company aims to recruit and retain high performing and talented employees through supporting them where possible and appropriate to balance the needs of their home and work life. To reflect this commitment this policy will set out the arrangements in place for taking different forms of family leave.

### Purpose

This policy sets out the types of family leave arrangements for employees enabling them to have a clear understanding of the relevant procedures that apply

### Scope

This policy applies to all employees provided they meet any specific eligibility service requirements for taking family leave

### DEFINITIONS

"Expected week of childbirth" means the week, starting on a Sunday, during which the employee's doctor or midwife expects them to give birth.

"Qualifying week" means the 15<sup>th</sup> week before the expected week of childbirth.

All pregnant employees (regardless of length of service) have the right in law to take up to 26 weeks' ordinary maternity leave and up to a further 26 weeks' additional maternity leave and to resume work afterwards. The employee is therefore entitled to a total period of 52 weeks' maternity leave. Additional maternity leave follows on immediately from the end of the period of ordinary maternity leave.

All employees who take maternity leave have the right to return to work at any time during either ordinary maternity leave or additional maternity leave (except during the first two weeks from the day of childbirth or four weeks in the case of factory workers), subject to their following the correct notification procedures as set out below.

### HOW MUCH MATERNITY PAY WILL THE EMPLOYEE RECEIVE?

Employees who have been continuously employed by the Company for at least 26 weeks at the end of their qualifying week and are still employed during that week, will qualify for statutory maternity pay, providing that:

they are still pregnant 11 weeks before the start of the expected week of childbirth (or have already given birth);

they have provided a MAT B1 form stating their expected week of childbirth; and

their average weekly earnings are not less than the lower earnings limit for national insurance contributions.

Statutory maternity pay is payable for up to 39 weeks, with the first six weeks payable at 90% of the employee's average weekly earnings. The remaining 33 weeks is payable at a rate set by the Government for the relevant tax year, or at 90% of the employee's average weekly earnings, if this figure is lower than the Government's set weekly rate. It is treated as earnings and is therefore subject to PAYE and national insurance deductions.

Payment of statutory maternity pay cannot start prior to the 11<sup>th</sup> week before the employee's expected week of childbirth. It can start from any day of the week in accordance with the date the employee starts their maternity leave.

Statutory maternity pay is payable whether or not the employee intends to return to work after their maternity leave.

Employees who are not entitled to statutory maternity pay may be entitled to receive maternity allowance payable directly by the Government. If an employee is not entitled to statutory maternity pay, the organisation will provide the employee with an SMP1 form to allow them to pursue a claim for maternity allowance.

### **TIMING OF MATERNITY LEAVE**

Ordinary maternity leave can start at any time after the beginning of the 11<sup>th</sup> week before the employee's expected week of childbirth (unless their child is born prematurely before that date in which case it will start earlier). Maternity leave will start on whichever date is the earlier of:

- the employee's chosen start date;
- the day after the employee gives birth; or
- the day after any day on which the employee is absent for a pregnancy-related reason in the four weeks before the expected week of childbirth.

If the employee gives birth before their maternity leave was due to start, they must notify the organisation in writing of the date of the birth as soon as reasonably practicable.

The law obliges all employees to take a minimum of two weeks of maternity leave immediately after the birth of the child (four weeks in the case of factory workers).

### **NOTICE REQUIREMENTS**

On becoming pregnant, an employee should notify their line manager as soon as possible. This is important as there are health and safety considerations for the organisation.

By the end of the qualifying week, or as soon as reasonably practicable afterwards, the employee is required to inform the organisation in writing of:

- the fact that they are pregnant;
- her expected week of childbirth; and
- the date on which they intend to start their maternity leave.

The employee must also provide a MAT B1 form, which is a certificate from a doctor or midwife confirming the expected week of childbirth. The form must have either the doctor's name and address or the midwife's name and registration number on it.

The employee is permitted to bring forward their maternity leave start date, provided that they advise the organisation in writing at least 28 days before the new start date or, if that is not possible, as soon as reasonably practicable. The employee may also postpone their maternity leave start date, provided that they advise the organisation in writing at least 28 days before the original proposed start date or, if that is not possible, as soon as reasonably practicable.

The organisation will formally respond in writing to the employee's notification of their leave plans within 28 days, confirming the date on which they are expected to return to work if they take their full 52-week entitlement to maternity leave.

The employee is required to give at least 28 days' notice of the date that they want their statutory maternity pay to begin. If it is not possible for the employee to give 28 days' notice, for example if the baby arrives early, they should tell the organisation as soon as reasonably practicable.

### **TIME OFF FOR ANTENATAL CARE**

Once an employee has advised the organisation that they are pregnant, they will be entitled not to be unreasonably refused paid time off work to attend antenatal appointments as advised by their doctor, registered midwife or registered health visitor.

To be entitled to take time off for antenatal care, the employee is required to produce a certificate from their doctor, registered midwife or registered health visitor, stating that they are pregnant.

Except in the case of the first appointment, the employee should also produce evidence of the appointment, such as a medical certificate or appointment card, if requested to do so.

Antenatal care may include relaxation and parent craft classes that the employee's doctor, midwife or health visitor has advised them to attend, in addition to medical examinations.

The employee should endeavour to give their line manager as much notice as possible of antenatal appointments and, wherever possible, try to arrange them as near to the start or end of the working day as possible.

An individual who has a qualifying relationship with the employee, which includes the employee's husband or civil partner and the father of the expected child, is eligible to take unpaid time off to accompany the employee at up to two antenatal appointments. The individual with the qualifying relationship should ask their employer for more details of the right.

## **HEALTH AND SAFETY**

The organisation has a duty to take care of the health and safety of all employees. We are also required to carry out a risk assessment to assess the workplace risks to women who are pregnant, have recently given birth or are breastfeeding where the work is of a kind that could involve a risk of harm or danger to their health and safety or the health and safety of their baby and the risk arises from either processes, working conditions or physical, chemical or biological agents in the workplace. If applicable, the organisation will provide the employee with information as to any risks identified in the risk assessment.

If the risk assessment reveals that the employee would be exposed to health hazards in carrying out their normal job duties, the organisation will take such steps as are reasonably necessary to avoid those risks, such as altering the employee's working conditions. In some cases, this may mean offering the employee suitable alternative work (if available) on terms and conditions that are not substantially less favourable.

If it is not possible for the organisation to alter the employee's working conditions to remove the risks to their health and there is no suitable alternative work available to offer them on a temporary basis, the organisation may suspend them from work on maternity grounds until such time as there are no longer any risks to their health.

This may be for the remainder of their pregnancy until the commencement of their maternity leave. If an employee is suspended in these circumstances, their employment will continue during the period of the suspension, and it does not in any way affect their statutory or contractual employment and maternity rights. The employee will be entitled to their normal salary and contractual benefits during the period of their suspension, unless they have unreasonably refused an offer of suitable alternative employment.

## **SICKNESS ABSENCE**

If an employee is absent from work during pregnancy owing to sickness, they will receive normal statutory or contractual sick pay in the same manner as they would during any other sickness absence provided that they have not yet begun ordinary maternity leave. If, however, the employee is absent from work due to a pregnancy-related illness after the beginning of the fourth week before their expected week of childbirth, their maternity leave will start automatically.

If the employee is absent from work wholly or partly because of pregnancy during the four weeks before the expected week of childbirth, they must notify the organisation in writing of this as soon as reasonably practicable.



## **RIGHTS DURING MATERNITY LEAVE**

During ordinary maternity leave and additional maternity leave, the terms and conditions of the employee's contract except normal pay will continue. Salary will be replaced by statutory maternity pay if the employee is eligible for it.

This means that, while sums payable by way of salary will cease, other benefits such as holiday entitlement will remain in place.

The organisation's pension contributions will continue based on the employee's normal pay during ordinary maternity leave and paid additional maternity leave. However, the organisation's pension contributions will cease during any periods of unpaid additional maternity leave. The employee will remain in the life assurance and private medical insurance schemes. (If applicable and included in the employees contract and terms and conditions of employment).

Employees are encouraged to take any outstanding holiday due to them before the commencement of maternity leave. Employees are reminded that holiday must be taken in the year that it is earned.

## **CONTACT DURING MATERNITY LEAVE**

The organisation reserves the right to maintain reasonable contact with employees during maternity leave. This may be to discuss employees' plans for return to work, to discuss any special arrangements to be made or training to be given to ease their return to work or to update them on developments at work during their absence.

## **KEEPING-IN-TOUCH DAYS**

Employees can agree to work for the organisation or to attend training for up to 10 days during their maternity or adoption leave without that work bringing their maternity or adoption leave to an end and without loss of a week's statutory maternity or adoption pay. These are known as "keeping-in-touch" days. Any work carried out on a day shall constitute a day's work for these purposes.

The organisation has no right to require employees to carry out any work and employees have no right to undertake any work during their maternity or adoption leave. Any work undertaken, and the amount of salary paid for any work done on keeping-in-touch days, is entirely a matter for agreement between employees and the Company.

## **RETURNING TO WORK**

The employee may return to work at any time during ordinary maternity leave or additional maternity leave, provided that they give the appropriate notification.

Alternatively, the employee may take their full period of maternity leave entitlement and return to work at the end of this period.

If the employee wishes to return before the full period of maternity leave has elapsed, they must give at least eight weeks' notice in writing to the organisation of the date on which they intend to return.

The employee has the right to resume working in the same job if returning to work from ordinary maternity leave. If the employee returns to work after a period of additional maternity leave, they are entitled to return either to the same job or, if this is not reasonably practicable, to another suitable job that is on terms and conditions not less favourable.

Failure to return to work by the end of maternity leave will be treated as an unauthorised absence unless the employee is sick and produces a current medical certificate before the end of the maternity leave period.

If the employee decides during maternity leave that they do not wish to return to work, they should give written notice of resignation to the organisation as soon as possible and in accordance with the terms of their contract of employment.

## **FERTILITY TREATMENT**

Employees may request paid leave if they or their partner are undergoing IVF treatment. The Company offers up to 5 days' paid leave to an employee actually receiving IVF treatment and up to 5 days' paid leave for employees accompanying a partner who is receiving IVF, in any 12-month period. As with other time away from work, the line manager should be given reasonable notice of the appointment, evidence of the appointment may be required.

## **MISCARRIAGE, STILLBIRTH AND NEONATAL DEATH**

The Company recognises that the effects of a miscarriage, stillbirth and neonatal death can be extremely distressing and that to many employees a miscarriage is the loss of a baby, regardless of how early in pregnancy it occurs. These events can have significant physical and emotional consequences which may affect an employee's attendance or performance at work.

For the purposes of maternity leave, there is no distinction between live, stillbirth, and neonatal death (when the baby dies within the first 28 days of life) after 24 weeks of any pregnancy.

Employees who have had a miscarriage (before 24 weeks of pregnancy), may need time off work to recover physically and emotionally and it is appreciated that the amount of time off required will vary from individual to individual. If the employee requires time off after a miscarriage, this will be supported under the Sickness Absence policy. Sickness absence after a miscarriage is protected and formally recorded as a pregnancy-related absence and will therefore not count towards the normal sickness absence triggers. The employee may be asked to provide a medical certificate to cover the sickness absence from work. Details of relevant support organisations are available from your Human Resource Representative.

## **PATERNITY LEAVE**

### **Eligibility**

You can take paternity leave if you:

- have at least 26 weeks' continuous employment ending with the 15<sup>th</sup> week before the expected week of childbirth.
- are the biological non-birthing parent of a child, or the spouse, civil partner or partner of the child's birth parent; and
- have, or expect to have, the main responsibility (apart from any responsibility of the birthing parent) for the child's upbringing.

Paternity leave is also available to the spouse, civil partner or partner of an individual who has adopted a child. Where a couple adopt a child jointly, one may take adoption leave and the other paternity leave. They are entitled to choose for themselves which adoptive parent takes which type of leave.

To be eligible for paternity leave for a child adopted within the UK, you must have you: have at least 26 weeks' continuous employment by the end of the week in which the adoption agency formally notifies the adopter that they have been matched with the child.

### **Length and timing of Paternity Leave**

An eligible employee can take either one week's leave or two consecutive weeks' leave. You cannot take paternity leave in instalments for example as part weeks or individual days.

You can take just one period of paternity leave per pregnancy or adoption, regardless of the number of children born as a result of the pregnancy or the number of children placed under the same adoption arrangement.

You must take paternity leave within 56 days of the child's birth or, if the child is born earlier than the expected week of birth, within 56 days of the first day of the expected week of birth.

For an adopted child, you must take within 56 days of the child's placement for adoption with you (or in the case of a child adopted from overseas, within the period of 56 days beginning with the date the child entered Great Britain).

If you wish to take shared parental leave, you must take your paternity leave first. You cannot take paternity leave if you have already taken a period of shared parental leave in relation to the same child.

### **Notice to take Paternity Leave**

To take paternity leave for a birth child, you need to give your line manager at least 15 weeks' written notice of:

- the date on which your partner's baby is due;
- the length of paternity leave you wish to take; and
- the date on which you wish your paternity leave to start.

To take paternity leave for an adopted child, you need to give your line manager written notice of your intention to take paternity leave no later than seven days after the date on which notification of the match with the child was given by the adoption agency. The notice must specify:

- the date on which the adopter was notified of having been matched with the child;
- the date on which the child is expected to be placed for adoption;
- the length of paternity leave you wish to take; and
- the date on which you wish your paternity leave to start.

### **Changing Paternity Leave plans**

If you wish to change the timing of your paternity leave, you must give your line manager at least 28 days' notice of the revised start date.

### **Rights during Paternity Leave**

During your leave, all the terms and conditions of your contract except normal pay will continue. Salary/wages will be replaced by statutory paternity pay if you are eligible for it.

This means that, while sums payable by way of wages/salary will cease, all benefits will remain in place. For example, holiday entitlement continues to accrue. Pension contributions will continue to be paid.

### **Returning to work after Paternity Leave**

Following your leave, you have the to resume working in the same job as before on terms and conditions that are no less favourable to them than the terms that would have applied had they not been absent.

Your continuity of employment is not affected.

### **Time off for Antenatal care**

In addition to your paternity leave, you have the right to take time off to accompany a pregnant woman with whom you are having a child at up to two antenatal appointments.

Our policy is that this time off will be paid.

This could be if you are the husband or civil partner of the birthing parent, or you could be living with the pregnant person in an enduring family relationship. In addition, you will be eligible for the time off if you are the biological non-birthing partner of the expected child.

To make a request for time off to accompany someone at an antenatal appointment, you should contact your line manager.

The antenatal appointment must be made on the advice of a registered medical practitioner, midwife or nurse.

We expect that normally no more than half a day is needed for an antenatal appointment, but the leave includes the time needed to travel to the appointment and any waiting time needed at the appointment and can be for a maximum of six-and-a-half hours on each occasion.

You should endeavour to give as much notice as possible of when you need the time off for the antenatal appointment and, wherever possible, arrange them as near to the start or end of the working day as possible.

## **ADOPTION LEAVE AND PAY ENTITLEMENTS**

This procedure applies to employees where they are the primary adopter of a child and where they meet the eligibility criteria below. Adoption leave rights also apply to partnerships of the same sex.

### **Ordinary Adoption Leave and Additional Adoption Leave**

Leave must be taken from the date of the child's placement (whether this is earlier or later than expected) or from a fixed date which can be up to 14 days before the expected date of placement. Leave can start on any day of the week.

Ordinary Adoption Leave (OAL) – This is the first period of 26 weeks following the placement of a child;

Additional Adoption Leave (AAL) - This is the second period of 26 weeks leave; it follows OAL.

### **Adoption Matching**

The term "matched" is when the adopting parents are formally notified by an approved adoption agency that they have a child for adoption. The adoption agency will provide a Matching Certificate and will set out a Matching Week which is when the primary adopter will be placed with a child. Employees are also entitled to time off work to attend 5 adoption appointments after they have been matched with a child. As with other time away from work, the line manager should be given reasonable notice of the appointment, evidence of the appointment may also be required.

### **Qualifying for Adoption Leave**

An employee is eligible for adoption leave if:

- they have been newly matched with a child for adoption by an approved adoption agency; and
- they have been continuously employed with the Company for at least 26 weeks in the week they are notified that they have been matched for adoption.

How much Adoption pay will the employee receive?

Statutory adoption pay is payable for up to 39 weeks, with the first six weeks payable at 90% of the employee's average weekly earnings. The remaining 33 weeks is payable at a rate set by the Government for the relevant tax year, or at 90% of the employee's average weekly earnings, if this figure is lower than the Government's set weekly rate.

It is treated as earnings and is therefore subject to PAYE and national insurance deductions.

# MENOPAUSE GUIDANCE

## Purpose

Our Menopause Guidance is designed to outline the support the Company can offer colleagues when experiencing menopausal symptoms.

In this policy, where we refer to the menopause we also mean the perimenopause.

## Background and Commitment

The menopause is a natural event during which a person stops having periods and experiences hormonal changes such as a decrease in oestrogen levels.

The menopause usually occurs between the ages of 45 and 55 and typically lasts between four and eight years. Occasionally, menopausal symptoms can occasionally begin before the age of 40.

Perimenopause, or menopause transition, begins several years before menopause. An individual may start to experience menopausal symptoms during the final two years of perimenopause.

As a conscientious employer, we have a duty to ensure the health, safety and welfare of all of our employees under the Health and Safety at Work Act 1974. In addition to this, the Equality Act 2010 outlines that individuals must not be discriminated against due to any form of disability and we recognise that the symptoms of the menopause may constitute a disability. We are committed to ensuring appropriate support and assistance is provided to any employee who is going through the menopause.

## EMPLOYEE RESPONSIBILITIES

It is important that, as an employee, you prioritise your personal health and wellbeing. If you are experiencing difficulties with any aspect of your role because of symptoms associated with the menopause, you should discuss any concerns you may have with your line manager or your Human Resources Representative, who will treat the matter with complete confidence.

### Physical symptoms of the menopause can include the following:

- hot flushes
- insomnia
- fatigue
- poor concentration
- headaches
- skin irritation
- urinary problems

As a result of the above, or as an extension of the hormone imbalance, individuals going through the menopause can also experience psychological difficulties, including:

- depression
- anxiety
- panic attacks
- mood swings
- irritability
- problems with memory
- loss of confidence.

We understand that each of these symptoms can affect an employee's comfort and performance at work. To ensure that we can provide the best support possible we encourage you to be open and honest in these conversations.

There is an expectation that all colleagues conduct themselves in a helpful and open-minded manner towards fellow colleagues experiencing menopausal symptoms and behave in a way that would demonstrate our Company values.

## **EMPLOYER RESPONSIBILITIES**

### **Approachability**

When responding to an employee experiencing difficulties caused by menopause, we will maintain an open-door policy to ensure you feel comfortable. You should aim to talk openly about your current situation, your line manager or Human Resources representative will not make presumptions about how your symptoms are affecting you.

During any discussions, the line manager or Human Resources representative will consider the individual situation and evaluate if any adjustments can be made. We appreciate any information disclosed to the representative is sensitive and we will maintain confidentiality at all times.

Your line manager or Human Resources representative will also arrange follow up sessions to evaluate the effectiveness of any adjustments put in place.

It may feel uncomfortable discussing personal information with your line manager, if this is the case, we encourage employees discuss the situation with another senior member of the team, or the Human Resources representative. We may consider a referral to Occupational Health, with your consent, to explore opportunities to support you effectively.

### **Consideration of Workplace Adjustments**

To assist in daily duties, we will explore making adjustments to your role or working environment with the aim of reducing the effect that the menopause is having on your health and wellbeing. The Company acknowledges that the menopause affects each individual in different ways so no adjustment will be made without fully discussing the proposed adjustments with you in the first instance.

### **Examples of adjustments include:**

- conducting a risk assessment to identify any particular areas that are a detriment to individuals going through the menopause
- changing the location of an employee so they are closer to toilet facilities or away from hot and cold spots around the office
- implementing further temperature control, such as access to a fan
- assessing how work is allocated and whether the employee is affected at particular points of the day
- allowing additional rest breaks
- consider flexible working hours or allow the employee to work from home
- making allowances for additional needs for sickness absence

Once the adjustments are agreed, the adjustments will be reviewed on an ongoing basis to ensure they are having the required effect.

Access to additional resources can be found below:

- [Menopause Matters](#), which provides information about the menopause, menopausal symptoms and treatment options;
- the [Daisy Network Charity](#), which provides support for people experiencing premature menopause or premature ovarian insufficiency; and
- the [Menopause Café](#), which provides information about events where strangers gather to eat cake, drink tea and discuss the menopause.

## FLEXIBLE WORKING

This policy sets out our approach to flexible working requests under the statutory procedure. We will always aim to consider any requests for a change to working arrangements informally in the first instance. If you would like a change in your current working arrangements, you can consider discussing the request with your line manager informally.

### ELIGIBLE EMPLOYEES

All employees have the statutory right to request flexible working. Under the statutory procedure, you can make two requests in every 12-month period. If you have submitted a flexible working request, you must wait until that one has been considered and any appeal has been dealt with, before submitting another.

However, we recognise the importance of providing flexible working for all employees. Therefore, if you are not eligible to make a formal request for flexible working under the statutory procedure, you may submit an informal request and we will consider this on an informal basis.

It should be understood that an accepted request for flexible working is a permanent change to your terms and conditions of employment and as such your request should be thoroughly considered before applying ensuring that you understand the needs of the business.

### TYPES OF FLEXIBLE WORKING

Examples of permanent flexible working include:

- hybrid working (sometimes referred to as "blended working" or "structured working"), which allows you to split your time between attending the workplace and working remotely;
- reducing the number of hours that you are working;
- changing your start and finish times;
- compressing your working hours into fewer days (for example moving to a nine-day fortnight); and
- working flexitime.

Other forms of flexible working may include temporary measures where a discretionary arrangement may be put in place; for example, to allow an employee to work from home.

### Making a request for flexible working

All requests must be made by filling in our form for submitting a flexible working request, which is available via your Human Resources representative. This should be submitted to your line manager or your Human Resources Representative.

Any request made under this policy must include:

- the date of the application;
- the changes that you are seeking to your terms and conditions of employment;
- the date on which you would like the terms and conditions to come into effect;
- what effect you think the requested change would have on our organisation;
- how, in your opinion, any such effect might be dealt with;
- a statement that this is a statutory request;
- whether or not you have made a previous application for flexible working; and
- if you have made a previous request, when you made that application.

Where a request for flexible working does not contain all the required information, you will be asked to resubmit your request with the necessary additional information. Requests that are incomplete or contain errors will not be automatically rejected.

## **Timescales**

You are able to submit 2 flexible working requests within a 12-month period. Once you submit your flexible working request, it will be dealt with as soon as possible. If you are required to attend a meeting to discuss your request, this will be arranged within 10 days of receiving your request. This may be extended upon agreement. However, all requests will be dealt with within two months, from receipt of the request to notification of any appeal decision.

The timescales within this policy may be extended where this is mutually agreed.

If you fail to attend a meeting to discuss your flexible working request, including an appeal meeting, and then fail to attend a rearranged meeting without good reason, your application will be deemed to have been withdrawn.

### **Meeting to discuss a flexible working request**

Your line manager or your Human Resources Representative will usually arrange a meeting to discuss your request. The aim of the meeting is to find out more about your proposed working arrangements and how they could be of benefit to both you and the organisation.

Your line manager or Human Resources Representative should aim to hold the meeting to discuss your request within 28 days of receiving it. You may, if you wish, ask a work colleague to attend the meeting with you.

Where a request can, without further discussion, be approved in the terms set out in your written application, a meeting will not be necessary.

### **Considering Your Request**

After the meeting, your line manager and Human Resources Representative will consider your proposed flexible working arrangements carefully, weighing up:

- the potential benefits to both you and the organisation; and
- any adverse impact of implementing the changes.

Each request will be considered on a case-by-case basis - agreeing to one request will not set a precedent or create the right for another employee to be granted a similar change to their working patterns.

There will be various roles which do not meet criteria for flexible working and should a request be made from these roles, the employee will be provided the reasons as to why their role is not suited for flexible working i.e. a manual labour role would be unable to work from home, or a different location on a permanent basis as they are a site based role.

### **Notifying you of the decision**

Your line manager or your Human Resource Representative should aim to notify you of the decision as soon as possible and no later than 14 days after the meeting.

Your request may be granted in full or in part. For example:

- we may propose a modified version of your request;
- your request may be granted on a temporary basis; or
- you may be asked to try the flexible working arrangement for a trial period.



## **Reasons for Rejecting a Request**

Your request for flexible working will be rejected only because of:

- the burden of additional costs;
- an inability to reorganise work among existing staff;
- an inability to recruit additional staff;
- a detrimental impact on quality;
- a detrimental impact on performance;
- a detrimental effect on ability to meet customer demand;
- insufficient work for the periods the employee proposes to work; and
- a planned structural change to the business.

Your request will not be rejected for any other reason.

## **Your Right to Appeal**

You have the right to appeal if your request for flexible working is rejected or only agreed in part. Your appeal should be sent in writing to your senior manager within 14 days of receiving our decision. Your letter should set out the grounds on which you are appealing. An appeal meeting will be held within 14 days of you lodging your appeal.

You may, if you wish, ask a work colleague to attend the appeal meeting with you.

You will be informed of the outcome of your appeal as soon as possible and no later than 14 days after the appeal meeting.

## **Flexible working requests that are granted**

If your request is upheld, you and your line manager should discuss how and when the changes will take effect.

Any changes to your terms and conditions of employment, whether permanent or temporary, will be put in writing and sent to you as an amendment to your contract of employment.

## STRUCTURED WORKING

### Applicable to:

Quantity Surveyors (Qs) and Contracts Managers (CMs).

### Objective:

To improve collaboration, communication, and effectiveness by ensuring a structured balance between site presence and office-based teamwork for Quantity Surveyors (Qs) and Contracts Managers (CMs).

### Working Pattern:

- **Office Days:** Monday and Friday (all Qs and CMs to attend the office together, along with the wider team, including Procurement, Bid, and other relevant departments).
- **Site Days:** Tuesday, Wednesday, and Thursday (Qs and CMs to attend sites as required). Senior management will also visit sites and coordinate meetings on-site to foster engagement and alignment.
- **Work from Home (WFH) Flexibility:** Where operationally necessary, one of the site days may include partial or full remote working, subject to approval by line managers. This is not a general hybrid working arrangement but an operational flexibility based on specific role requirements.

### Clarifications:

- This structured working pattern applies **only** to Qs and CMs due to their need for both office collaboration and site engagement.
- This is **not** a hybrid working policy; it is a structured approach to maximise efficiency and communication within the business.
- Any exceptions should be discussed and agreed upon with the relevant line manager.

By following this structure, we aim to enhance teamwork, improve project coordination, and maintain strong links between site and office activities.

## OTHER TYPES OF LEAVE

Our business recognises that there will be times where our employees may require other types of leave and we have provided a non-exhaustive outline below of some examples of the types of leave which may occur from time to time during your employment lifecycle. It should be noted that unless governed by statutory requirements, all leave is provided at the discretion of senior management and should always have the appropriate approval. If there is a type of leave which you do not see listed, please consult with your HR representative who can provide guidance.

### Shared Parental Leave

- **Who is entitled:** Mothers, partners, fathers and adoptive parents.
- **Minimum period of continuous employment:** 26 weeks.
- **Entitlement:** 52 weeks minus the maternity leave or adoption leave already taken, to be shared between the parents.

### Compassionate Leave

We understand that there are times when our employees may face personal challenges that require a bit of extra support. In such instances, we offer discretionary compassionate leave. This leave is designed to provide employees with the necessary time off to manage difficult circumstances, such as bereavement (outwith bereavement leave), serious illness of a close family member, or other significant personal matters. Employees are encouraged to speak with their line manager to discuss their situation and apply for compassionate leave, ensuring they receive the understanding and flexibility needed during these times.

### Bereavement Leave

We acknowledge that every bereavement is different, and grief impacts everyone in different ways. This section is intended to cater for a wide range of circumstances and the differing impacts that a bereavement can have, while also recognising the needs of the business.

If you have suffered a bereavement and cannot attend work, you should inform your line manager of what has happened by telephone as soon as reasonably practicable. This will allow us to support you. You should inform your line manager of what you would like colleagues to know about the situation and of any urgent tasks that other staff can pick up or meetings that need to be cancelled or rearranged.

Following the initial contact, you and your line manager should keep in touch. The level of contact is a matter for agreement between the two of you. You can also approach one of our mental health first-aiders if you have any concerns about a colleague's mental wellbeing.

Paid time off will be at the discretion of senior management.

### Parental Bereavement Leave

- **Who is entitled:** Employees who are bereaved parents of a child under the age of 18, or of a stillborn child after 24 weeks of pregnancy.
- **Minimum period of continuous employment:** None.
- **Entitlement:** Up to two weeks' leave.

### Neonatal Care Leave

- **Who is entitled:** Employees who are parents of a child whose neonatal care starts within a period of 28 days (starting from the day after the child's birth), where the child's neonatal care lasts for a period of at least seven days (starting from the day after the care begins).

- **Minimum period of continuous employment:** None.
- **Entitlement:** One week for every uninterrupted week the child receives neonatal care, up to a maximum of 12 weeks.
- **Payment for Neonatal Care Leave:** Statutory neonatal care pay is payable during your neonatal care leave period, provided you are entitled to it. You should have at least 26 weeks' continuous employment from the end of the relevant week of the child's birth. Full information on statutory Neonatal Care Leave pay can be found at <https://www.gov.uk/neonatal-care-pay-leave>

### Carers Leave

- **Who is entitled:** All employees who have caring responsibility for a dependent.
- **Minimum period of continuous employment:** None.
- **Entitlement:** Up to one week in any 12-month rolling period. A week of carers leave is the same duration as your normal working week i.e. if you are contracted to 5 day week then it would be up to 5 days and if you were contracted to 4 days then it would be up to 4 days for your normal working week. If you are caring for more than one dependent, you do not have a separate entitlement to carers leave for each dependent.
- **Pay during Carers Leave:** You do not have a statutory right to be paid during carers leave. Any leave taken will be unpaid. Whilst your salary will cease, all other benefits will remain in place i.e. pension contribution and holiday accrual.

### Time off for Dependents Leave

- **Who is entitled:** All employees who have dependents who have a long-term care need. **A long-term care need can be defined as:**
  - A disability as defined under the Equality Act 2010
  - An illness or injury that is likely to need care for at least 3 months
  - A care need related to old age
- **Minimum period of continuous employment:** None.
- **Entitlement:** Reasonable, unpaid time to manage unexpected or sudden problems relating to a dependent and make any necessary longer-term arrangements.
- **Pay during Time off for Dependents Leave:** You do not have a statutory right to be paid. Any leave taken will be unpaid. Whilst your salary will cease, all other benefits will remain in place i.e. pension contribution and holiday accrual.
- **Examples:**
  - to provide assistance when a dependant falls ill, gives birth or is injured or assaulted;
  - to make arrangements for the provision of care for an ill or injured dependant;
  - in consequence of the death of a dependant;
  - because of the unexpected disruption or termination of arrangements for the care of a dependant; and
  - to deal with an incident that involves their child and occurs unexpectedly while the child is at school/other educational establishment.

- **A Dependent is:**

- a civil partner;
- a child;
- a parent;
- a person who lives with the you other than as your employee, tenant, lodger or boarder;
- any other person who would reasonably rely on you for assistance if they fell ill or was injured or assaulted, or who would rely on you to make arrangements for the provision of care in the event of illness or injury; or
- in relation to the disruption or termination of care for a dependant, any other person who reasonably relies on you to make arrangements for the provision of care.

### **Domestic Emergencies**

We recognise that a domestic emergency such as a flood, fire or burglary is a traumatic life event. This section applies to all employees and is intended to allow those who have a genuine domestic emergency to take a reasonable amount of time off work to deal with the emergency. This does not apply to planned events such as domestic repairs, refurbishment, building or trades work, installation of appliances, or home deliveries.

Payment arrangements, when absent from work as a direct result of a genuine domestic emergency, is subject to the discretion of the employee's line manager.

### **Time off for Medical and Dental Appointments**

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

However, because the organisation accepts that it is not always possible or practical to arrange medical and other similar appointments outside working hours, the organisation may permit reasonable time off work for such appointments. The decision whether time off is granted will be subject to the discretion of the employee's line manager.

## ENDING EMPLOYMENT

### **Retirement**

If you are planning to retire, please speak with your HR representative or manager to discuss your plans. You will need to provide the required contractual notice, and your leave period will be discussed in further detail to ensure a smooth transition.

### **Resignation**

Should you decide to resign from your position, it is important to notify your HR representative or manager as soon as possible. You must provide the contractual notice as outlined in your employment agreement. Your leave period and any other relevant details will be discussed to facilitate your departure.

# IT & DATA POLICIES

## IT & INTERNET POLICY

Global Infrastructure (Scotland) Ltd are supported by Global Energy Group management who are committed to implementing appropriate strategies and policies that develop, support, and maintain IT services for Global Infrastructure Ltd ensuring an effective and reliable foundation on which Global Infrastructure can compete in the marketplace.

Global Energy IT Department are committed to providing:

- Technical Services - responsible for all IT services, infrastructure, and software related support development for Global Infrastructure Ltd
- Business Solutions - responsible for the Analysis and Development of internal IT Systems and their integration with 3rd party applications
- Global IT Department who are the point of contact for all IT issues for Global Infrastructure Ltd
- Global IT department who will manage 3rd parties who are engaged to supply specialist support and delivery services on behalf of IT
- Global Infrastructure will comply with and adhere to IT policies with regards to the procurement and support of IT services, software, and equipment
- Industry standard IT policies and processes to ensure that Global Infrastructure meets acceptable standards in the deployment, development, maintenance, installation, and support of its technology
- Procedures and practices which aim at protecting the Company's information assets from all threats, deliberate, malicious, or accidental
- Technical Services which will endeavour to operate within the ITIL and ISO27001 framework or any other standards as deemed necessary at the time
- A service which is customer focused, value for money and meets the needs of the businesses

Cyber Essentials is the most recent addition to our accreditations and certifications portfolio. This has provided the business with a competitive edge, in addition to enhancing its resilience against cyber threats by:

- Establishing a strong foundation for protecting their systems and data
- Building trust and credibility with stakeholders, customers and partners
- Demonstrating compliance with various regulatory requirements
- Reducing risk through the implementation of cybersecurity scheme controls

Responsibility for the execution and application of this policy and of detailed policies and procedures, in line with this policy statement, rests with the management of Global Infrastructure Ltd.

The policies attached herein are reviewed annually as a minimum, to ensure their continuing suitability.

# PRIVACY POLICY

Global Infrastructure (Scotland) Ltd ("the Company") is committed to meeting the data protection obligations under the General Data Protection Regulations ("GDPR").

The purpose of this policy is to make you aware of how the Company intends to collect, handle, process, and store personal data in line with the data protection standards, both during and after the working relationship.

To manage the working relationship of the Company it is required to collect and process certain *personal information* ("data") about individuals. *Data Protection Principles*

GDPR have set out the six main responsibilities that the business must comply with. These state that the personal data we hold must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant, and limited to what is necessary.
4. Accurate and where necessary kept up to date.
5. Kept in a form which permits identification to data subjects for no longer than is necessary for the purpose for which those data are processed.
6. Processed in a way that ensures appropriate security of the data.

## The Kind of Information We Hold About You

We will, where applicable, collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Birth Certificate
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension, and benefits information
- Start date and end date
- Location of workplaces
- Copy of driving licence
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training and competency records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage at main office and work sites
- Information about your use of our information and communications systems
- Work related photographs
- Criminal checks and all associated documentation

We may also, where applicable, collect, store, and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health, and sickness records
- Information about driving or criminal offences



## **How We Will Use Information About You**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To fulfil the agreed contract of employment or contract of service.
- Where there is a need to comply with a legal obligation.
- Where necessary for the Company's legitimate business interests providing this does not affect the individuals' rights.

Some examples may include:

- To maintain up to date and accurate records.
- To comply with statutory, regulatory obligations such as eligibility to work in the UK by checking birth certificates and or passports.
- Operate and maintain records of personal development, training, annual leave, absence, and health.
- Administering the contract we have entered with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance, and determining performance requirements.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Education, training, and development requirements.
- Ascertaining your fitness to work
- Complying with health and safety obligations.

## **Change of Purpose**

We will only use personal information for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **How Your Personal Information Will Be Collected**

The Company collects, processes, and stores a range of personal information about individuals through the application and recruitment process, either directly from candidates or sometimes from an employment agency.

We may, where necessary, collect additional personal information during job-related activities throughout the period of you working for us.

## **Responsibilities**

The following personnel within Global Infrastructure have responsibility for Data Protection:

Strategic management to ensure the Company is fulfilling its overall responsibilities

- The Managing Director

Compliance with legal provisions

- The Compliance Director

Day to day processing of information

- The HR Representative & The Office Manager

However, it should be noted that all employees of Global Infrastructure have a responsibility for ensuring data is collected, processed, stored, and handled in accordance with the data protection principles.

## **Data Sharing**

Personal information may be shared within departments in the business.

The business may also share your personal information with third-party service providers including:

- Occupational health providers
- Pension scheme provider
- External auditors
- Training providers
- Disclosure and Barring Service (DBS)

### **Protecting Personal Data and Storage**

The Business has put procedures and strict measures in place to minimise the risk of personal information from been accidentally lost, destroyed, altered, disclosed, or accessed and used in an unauthorised way. Access is granted on an as required basis to data processors, managers and other third parties who have a business and legal requirement to access personal information to perform their role and responsibilities.

Third parties are only granted permission to process individuals' personal information for the specified purpose and not for their own purposes.

In the event of a significant impact data security breach the business will notify the Information Commissioners Office and all affected individuals within 72 hours.

All personal data whether it be stored in paper or electronic format will be always kept secure (under lock and key or password protected) and may only be accessed by authorised persons. All employees should take care in ensuring the following are adhered to when dealing with personal data:

- Data printouts are collected and not left where unauthorised individuals may see them.
- Data printouts are shredded and disposed of securely when no longer required.
- Electronic data should be protected with a strong password which should be changed regularly.
- The business highly discourages it, but in the unlikely event of data been stored on removable media (eg. CV's and Memory Sticks) these must be kept locked away securely when not in use.
- Data must only be stored on designated drives, servers and in Office 365.
- If personal data can be accessed via mobile phones whether these be personal or Company phones (this includes business email) then they must be password protected and anti-virus software installed. (Please contact the IT department if you require any assistance with this).
- Data should never be saved directly to laptops, tablets, and mobile phones.
- Computers and laptops must be left locked if leaving workstations.

### **Retention Period**

The Company will only retain personal information for as long as deemed necessary.

Personal information will normally be retained for up to 7 years following termination of employment or engagement. This excludes any Health Surveillance records, and these will be retained according to statutory provisions.

All personal information held will be securely and effectively destroyed or permanently erased from IT systems when no longer necessary to be held.

To keep personal information accurate and up to date the Company will annually request updates from individuals on their personal information via Employee Update, Health Questionnaire and Driver Declaration forms (where applicable).

Although we ask that individuals, please keep us informed of any changes as they occur, (eg. Home address, contact number, emergency contacts), the business cannot take responsibility of any errors in your personal information in this regard unless you have notified the business of any changes.

Subject to certain conditions and in some circumstances, individuals have a number of statutory rights. The GDPR includes the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to object to processing

For more information on your rights please visit the Information Commissioner Office website at [www.ico.org.uk](http://www.ico.org.uk). Individuals may also contact the Business Support Manger for further information or if you wish to exercise any of these rights. As a security measure the business may request specific information from individuals to verify identity in the event of a request to exercise any of the above rights.

### **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

### **Who to Contact**

If you have any questions relating to this policy, please contact HR by email at [HR@global-infra.co.uk](mailto:HR@global-infra.co.uk)

Information Commissioners Office Registration Reference: ZA3278

# SOCIAL MEDIA POLICY

As the world of social media grows it offers each of us new opportunities to connect with people and find out more about the things that interest us. We believe that the use of certain social media platforms can help to strengthen and develop relationships as well as demonstrating what our business has to offer.

## **Remember! Everything is public**

- Even with privacy settings in place Remember - Everything is public.
- Once you post something, even with privacy settings in place it becomes anyone's information.
- All postings on behalf of, or about the Company must be carried out by key personnel only.
- Stick to what you know and if in doubt ask.

## **Think HSEQ**

- We encourage site photographs to be taken and forwarded to BusinessSupport.
- Uploading of 'on-site' photos must conform to HSEQ protocol.
- Check if the subject is wearing PPE, e.g. High Vis clothing, hard hats, ear defenders, gloves, or safety glasses for example.
- Confidentiality agreements with clients may be in place so if in doubt please check with Directors.

## **Be honest**

- Protect yourselves and the business.
- Always respect copyright laws, so if you are sharing someone else's hard work, give them credit for it and where possible include a link to the source.
- If you are uncertain about something you want to post or see something you feel is inappropriate then, please check with the Directors. You can also contact either your line Manager or HR.