



SAFEGUARDING POLICY

OF

COSYSEAL (DG) LIMITED

**LYNTON HOUSE
304 BENSAM LANE
THORNTON HEATH
SURREY CR7 7EQ**

FOR

EMPLOYEES, CONTRACTORS

&

SUB-CONTRACTORS

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CODE OF PRACTICE

WE ARE COMMITTED TO PROMOTING AND SUPPORTING ENVIRONMENTS WHICH:

- 1) Ensure that all staff, contractors, subcontracts, clients & engineers feel welcomed, respected and safe
- 2) Protect staff, contractors, sub-contractors & clients who may be vulnerable from actual or potential harm
- 3) Enable and encourage concerns to be raised and responded to openly and consistently.

WE RECOGNISE THAT:

- 1) Everyone has different levels of vulnerability, and that each of us may be regarded as vulnerable at some time in our lives
- 2) All adults who may be vulnerable (regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity) have the right to equal protection from all types of harm or abuse
- 3) Working in partnership with staff, contractors and sub-contractors who may be vulnerable, and other agencies is essential in promoting their welfare.

WHEN CONCERNS ARE RAISED, FOLLOWING COMPANY PROCEDURES IN:

- 1) Responding without delay to every concern raised that a client, sub-contractor, engineer or staff who may be vulnerable may have been harmed, or be at risk from harm, through abuse, harassment or bullying; or about the behaviour of an adult or child
- 2) Working with the organisation and the appropriate statutory bodies during an investigation into abuse, including when allegations are made against a member of our staff, sub- contractor or contractor
- 3) Challenging any abuse of power, especially by anyone in a position of trust

IN OUR CARE

- 1). Ensuring that appropriate care is offered to any member of our organisation against whom an allegation is made.

We are committed to reviewing our policy and procedures annually.

1. GENERAL

This code of conduct applies equally to employees of Cosyseal (DG) Ltd., as well as contractors and sub-contractors. Future reference to employees in this document will mean all of the categories referred to above.

All employees must follow this code when working in or near occupied premises. Customer care is very important when dealing with the public, and this code sets out minimum standards for courteous, professional behaviour. The public will have a right to expect to be treated properly under the code. Employees not meeting these basic standards would not be eligible to work for Cosyseal (DG) Ltd.

2. KEEPING AGREEMENTS/APPOINTMENTS

Always notify occupants prior to your visit in writing that you intend to call. Tell occupiers when you wish to enter their premises and give a clear statement of approximately how long the works will continue. Ensure that prior to gaining access to a property, you produce proof of your identity and if you have to change the dates or times, make sure you inform the occupier verbally and/or in writing, then let them know the new schedule.

3. PARKING

Avoid taking up residents' parking spaces and use allocated space where this has been arranged. If necessary, unload tools, equipment and materials and then park elsewhere. Always park in such a manner that your vehicle is not obstructing anything and allows free access to others.

4. IDENTIFICATION

It is essential that you carry with you your identification card at all times. Show the occupier this and tell them your name, and the names of anyone else who you know will be working on the premises. If necessary, produce a letter of authorisation from the main contractor or owner which proves you are entitled to enter the premises to carry out works.

5. PROFESSIONAL CONDUCT

Under no circumstances should racist, sexist or abusive and/or foul language be used to or in front of the occupiers. This will also include circumstances where it could be overheard by neighbours, or passes by. No behaviour should offend or intimidate any person, as all occupiers and members of the public must be treated equally at all times.

6. SAFETY OF VALUABLES AND PREPARATION OF WORK AREA

When making arrangements for access, ensure that the occupants are aware that they should remove all valuables from the premises and move furniture and any other obstacles at least two metres away from the whole of the working area immediately prior to commencing work. Ensure that this has been carried out, thus avoiding unnecessary damage or loss. Do not move any items without getting permission or authorisation.

7. DISPUTES

If you consider that a dispute is developing between yourself and an occupier or neighbour, try to bring the conversation to a polite conclusion by informing the person who they should complain to at a more senior level within the company. Advise them of the address to which they should put their complaint in writing. Ensure that you advise the senior person within your company of the exact details immediately. If threatened with verbal or physical abuse, stop work, leave the area and bring the matter to the attention of your manager immediately.

8. CLEAN AND TIDY

Ensure that you always use clean dust sheets or covers in occupied premises. These should cover not just the immediate working area, but anywhere else where dirt or dust might be left or walked through the building. Clear all debris and clean up generally at the end of each working session, make sure communal passageways and entrances are left clean and tidy. Ensure that any work involving removal of existing building materials is arranged so that these materials are cleared away immediately to the skip, to avoid any possibility of hazard or danger to the general public or other workmen.

9. SMOKE AND NOISE POLLUTION

Never smoke without the occupiers expressed permission and always place smokers debris in agreed receptacles or clear up any communal area used at the end of the day. Under no circumstances must any portable stereo equipment or radios be used.

10. DANGEROUS TOOLS AND MATERIALS

Apart from the usual health & safety requirements, make a special effort to keep sharp implements or materials and potentially dangerous tools close by the immediate area where you are working. When children or pets are in the premises, come to an arrangement with the occupier as to where items can be safely kept out of harms way. Agree with them to keep children or pets under control and away from the immediate vicinity of the works and access areas.

If you are unable to reach an agreement, ensure that no work is carried out and that you inform your supervisor immediately.

11. SERVICES

Always reconnect services and make sure that they work before leaving at the end of each working day or session. If for any reason this cannot be done, make sure that you inform the occupier verbally and in writing what is not working, and when the service can be restored.

12. SATISFACTORY COMPLETION OF THE WORKS

When all the work has been completed, ensure that you have double-checked all areas of your work. On completion of this, produce a satisfactory note for signature by the occupant where applicable.

13. COMPLAINTS

In the event of a complaint brought to your attention in connection with your work, always attempt to resolve the matter amicably on the spot. If this cannot be done, then politely ask the person bringing the complaint to your attention to put it in writing to the company, addressed to the Managing Director.

In the event that you consider a person intends to bring a complaint against the company, ensure that you inform your supervisor immediately giving full details.

If these simple rules are adhered to, they should help to ensure the smooth running of the site and ensure that you comply with the reasonable requirements of all those to whom you have a responsibility. Please ensure that you adhere to the general principles as well as the written word of these guidelines.

PERSONAL HARASSMENT POLICY AND PROCEDURE

A) INTRODUCTION

- 1) Harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable.
- 2) Personal harassment takes many forms but whatever form it takes, personal harassment is always serious and is totally unacceptable.

B) POLICY

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all our employees.

C) COMPLAINING ABOUT PERSONAL HARASSMENT

- 1) Informal complaint

If you are the victim of minor harassment you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser.

- 2) Formal complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of a Director as a formal written complaint.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by a work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation which will normally be within ten working days of the meeting with you, the decision of the investigator detailing the findings will be sent, in writing, to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

D) GENERAL NOTES

- 1) If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal by using our disciplinary appeal procedure.

- 3) If you bring a complaint of harassment you will not be victimised for having brought the complaint. However if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

DISCIPLINARY PROCEDURES

A) INTRODUCTION

- 1) It is necessary to have a minimum number of rules in the interests of the whole organisation.
- 2) The rules set standards of performance and behaviour whilst the procedures are designed to help promote fairness and order in the treatment of individuals. It is our aim that the rules and procedures should emphasise and encourage improvement in the conduct of individuals, where they are failing to meet the required standards, and not be seen merely as a means of punishment. We reserve the right to amend these rules and procedures where appropriate.
- 3) Every effort will be made to ensure that any action taken under this procedure is fair, with you being given the opportunity to state your case and appeal against any decision that you consider to be unjust.
- 4) The following rules and procedures should ensure that:
 - a) the correct procedure is used when requiring you to attend a disciplinary hearing;
 - b) you are fully aware of the standards of performance, action and behaviour required of you;
 - c) disciplinary action, where necessary, is taken speedily and in a fair, uniform and consistent manner;
 - d) you will only be disciplined after careful investigation of the facts and the opportunity to present your side of the case. On some occasions temporary suspension on contractual pay may be necessary in order that an uninterrupted investigation can take place. This must not be regarded as disciplinary action or a penalty of any kind;
 - e) other than for an "off the record" informal reprimand, you have the right to be accompanied by a fellow employee at all stages of the formal disciplinary process;
 - f) you will not normally be dismissed for a first breach of discipline, except in the case of gross misconduct; and
 - g) if you are disciplined, you will receive an explanation of the penalty imposed and you will have the right to appeal against the finding and the penalty.

B) DISCIPLINARY RULES

It is not practicable to specify all disciplinary rules or offences that may result in disciplinary action, as they may vary depending on the nature of the work. In addition to the specific examples of unsatisfactory conduct, misconduct and gross misconduct shown in this handbook, a breach of other specific conditions, procedures, rules etc. that are contained within this handbook or that have otherwise been made known to you, will also result in this procedure being used to deal with such matters.

C) RULES COVERING UNSATISFACTORY CONDUCT AND MISCONDUCT

(these are examples only and not an exhaustive list)

You will be liable to disciplinary action if you are found to have acted in any of the following ways:

- a) failure to abide by the general health and safety rules and procedures;
- b) smoking in designated non-smoking areas;
- c) persistent absenteeism and/or lateness;
- d) unsatisfactory standards or output of work;
- e) rudeness towards clients, residents, members of the public or other employees, objectionable or insulting behaviour, harassment, bullying or bad language;
- f) failure to devote the whole of your time, attention and abilities to our organisation and its affairs during your normal working hours;
- g) failure to carry out all reasonable instructions or follow our rules and procedures;
- h) unauthorised use of e-mail and internet;
- i) unauthorised use or negligent damage or loss of our property;
- j) failure to report immediately any damage to property or premises caused by you;

D) SERIOUS MISCONDUCT

- 1) Where one of the unsatisfactory conduct or misconduct rules has been broken and if, upon investigation, it is shown to be due to your extreme carelessness or has a serious or substantial effect upon our operation or reputation, you may be issued with a final written warning in the first instance.
- 2) You may receive a final written warning as the first course of action, if, in an alleged gross misconduct disciplinary matter, upon investigation, there is shown to be some level of mitigation resulting in it being treated as an offence just short of dismissal.

E) RULES COVERING GROSS MISCONDUCT

Occurrences of gross misconduct are very rare because the penalty is dismissal without notice and without any previous warning being issued. It is not possible to provide an exhaustive list of examples of gross misconduct.

However, any behaviour or negligence resulting in a fundamental breach of contractual terms that irrevocably destroys the trust and confidence necessary to continue the employment relationship will constitute gross misconduct. Examples of offences that will normally be deemed as gross misconduct include serious instances of:

- a) theft or fraud;
- b) physical violence or bullying;
- c) deliberate damage to property;
- d) deliberate acts of unlawful discrimination or harassment;
- e) possession, or being under the influence, of drugs* at work;

*For this purpose, the term 'drugs' is used to describe both illegal drugs and other psychoactive (mind-altering) substances which may or may not be illegal.

- f) breach of health and safety rules that endangers the lives of, or may cause serious injury to, employees or any other person;
- g) failure to report an incident of abuse, or suspected abuse of a client/resident;
- h) abandoning duty without notification or sleeping on duty;

- i) acceptance of gifts & hospitality in contravention of the Bribery Act 2010;
- j) failure to give notice of any pecuniary interest of which you are aware, in a contract which has been, or is proposed to be, entered into by the organisation;
- k) wilful misrepresentation at any time during employment in connection with qualifications held;
- l) deliberate disclosure of privileged confidential information to unauthorised people;
- m) any act or omission constituting serious or gross negligence/or dereliction of duty;
- n) consumption of alcohol on premises prior to and/or during hours of duty;
- o) conviction for a criminal offence which clearly indicates unsuitability for the role employed to undertake.

(The above examples are illustrative and do not form an exhaustive list.)

F) DISCIPLINARY PROCEDURE

- 1) Disciplinary action taken against you will be based on the following procedure:

OFFENCE	1st OCCASION	2nd OCCASION	3rd OCCASION	4th OCCASION
UNSATISFACTORY CONDUCT	Formal verbal warning	Written warning	Final written warning	Dismissal
MISCONDUCT	Written warning	Final written warning	Dismissal	
SERIOUS MISCONDUCT	Final written warning	Dismissal		
GROSS MISCONDUCT	Dismissal			

- 2) We retain discretion in respect of the disciplinary procedures to take account of your length of service and to vary the procedures accordingly. If you have a short amount of service you may not be in receipt of any warnings before dismissal.
- 3) If a disciplinary penalty is imposed it will be in line with the procedure outlined above, which may encompass a formal verbal warning, written warning, final written warning, or dismissal, and full details will be given to you.
- 4) In all cases warnings will be issued for misconduct, irrespective of the precise matters concerned, and any further breach of the rules in relation to similar or entirely independent matters of misconduct will be treated as further disciplinary matters and allow the continuation of the disciplinary process through to dismissal if the warnings are not heeded.

G) DISCIPLINARY AUTHORITY

The operation of the disciplinary procedure contained in the previous section is based on the following authority for the various levels of disciplinary action. However, the list does not prevent a higher level of seniority progressing any action at whatever stage of the disciplinary process.

PERSON AUTHORISED TO TAKE DISCIPLINARY ACTION IN THE CASE OF:

	MANAGEMENT	OTHER EMPLOYEES
Formal verbal warning	Director	Director
Written warning	Director	Director
Final written warning	Director	Director
Dismissal	Director	Director

H) PERIOD OF WARNINGS

- 1) **Formal verbal warning**
A formal verbal warning will normally be disregarded for disciplinary purposes after a three month period.
- 2) **Written warning**
A written warning will normally be disregarded for disciplinary purposes after a six month period.

- 3) Final written warning
A final written warning will normally be disregarded for disciplinary purposes after a twelve month period.

I) GENERAL NOTES

- 1) If you are in a supervisory or Managerial position then demotion to a lower status may be considered as an alternative to dismissal except in cases of gross misconduct.
- 2) In exceptional circumstances, suspension from work without pay for up to five days as an alternative to dismissal (except dismissal for gross misconduct) may be considered by the person authorised to dismiss.
- 3) Gross misconduct offences will result in dismissal without notice.
- 4) You have the right to appeal against any disciplinary action.

SAFEGUARDING

A) RIGHTS OF SEARCH

- 1) Although we do not have the contractual right to carry out searches of employees, engineers, sub-contractors and their property (including vehicles/vans) whilst they are on our premises or business, we would ask all employees, engineers & sub-contractors to assist us in this matter should we feel that such a search is necessary.
- 2) Where practicable, searches will be carried out in the presence of a colleague of your choice who is available on the premises at the time of the search. This will also apply at the time that any further questioning takes place.
- 3) We reserve the right to call in the police at any stage.

B) CONFIDENTIALITY

- 1) All information that:
 - a) is or has been acquired by you during, or in the course of your employment, or has otherwise been acquired by you in confidence,
 - b) relates particularly to our business, or that of other persons or bodies with whom we have dealings of any sort, and
 - c) has not been made public by, or with our authority,shall be confidential, and (save in the course of our business or as required by law) you shall not at any time, whether before or after the termination of your employment, disclose such information to any person without our written consent.
- 2) You are to exercise reasonable care to keep safe all documentary or other material containing confidential information, and shall at the time of termination of your employment with us, or at any other time upon demand, return to us any such material in your possession.
- 3) In particular, you are required to comply with all of the Company's policies and procedures on confidentiality of information and data protection relating to clients.
- 4) You must make yourself aware of our policies on data protection in relation to personal data and ensure compliance with them at all times.

C) COMPANY PROPERTY AND COPYRIGHT

All written material, whether held on paper, electronically or magnetically which was made or acquired by you during the course of your employment with us, is our property and, where appropriate, our copyright. At the time of termination of your employment with us, or at any other time upon demand, you shall return to us any such material in your possession.

E) STATEMENTS TO THE MEDIA

Any statements to reporters from newspapers, radio, television, etc. in relation to our business will be given only by a Director.

F) DATA PROTECTION

The General Data Protection Regulation (GDPR) and the current Data Protection Act regulate our use of your personal data. As an employer it is our responsibility to ensure that the personal data we process in relation to you is done so in accordance with the required principles. Any data held shall be processed fairly and lawfully and in accordance with the rights of data subjects.

We will process data in line with our privacy notices in relation to both job applicants and employees.

You have several rights in relation to your data. More information about these rights is available in our "Policy on your rights in relation to your data". We commit to ensuring that your rights are upheld in accordance with the law and have appropriate mechanisms for dealing with such.

We may ask for your consent for processing certain types of personal data. In these circumstances, you will be fully informed as to the personal data we wish to process and the reason for the processing. You may choose to provide or withhold your consent. Once consent is provided, you are able to withdraw consent at any time.

You are required to comply with all company policies and procedures in relation to processing data. Failure to do so may result in disciplinary action up to and including dismissal.

G) GIFTS

You are not permitted to accept any gift from our clients, residents or their relatives.

I have read and I understand the current Safeguarding Policy. I accept that it forms part of my Contract of Employment except where the contrary is expressly stated and I will keep myself informed of its contents.

SIGNATURE: _____
Employee

SIGNATURE: _____
On behalf of Cosyseal (DG) Ltd

NAME: _____
Print

NAME: _____
Print

DATE: _____

DATE: _____

This is an important document and you should therefore return one signed form to the General Manager by ____/____/____.