

SHEQ POLICIES JULY 2022

Innovation Centre Medway Chatham Kent ME5 9FD







ALLSET SAFETY TRAINING LTD SHEQ POLICIES

Company Organisation:

Managing Director: Louise Settle

Head Tutor: Jamie Settle

POLICIES AND STATEMENTS;

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- 2. Environmental Policy Statement
- 3. Quality Policy Statement
- 4. Equal Opportunities Policy
- 5. Drugs Policy
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ALLSET SAFETY TRAINING LTD HEALTH & SAFETY POLICY STATEMENT

- 1. As the Director of Allset Safety Training Ltd I accept that as an employer I have a moral and legal responsibility for the Health, Safety and Welfare for all employees and others who may be affected by the Company's operations. I recognise that injury, damage and loss can be avoided and that consideration for health, safety and welfare should rank equally with all other commercial considerations. I therefore will ensure the full implementation of this policy and expect all employees to follow my example.
- 2. The policy of the Company is that all work will be carried out in such a manner to safeguard, so far as reasonably practicable, the health, safety and welfare of all employees and others, this will include other contractors, visitors and members of the general public. In particular, employees can be rest assured that the Company will:
 - a. Make the workplace safe and without risk to health, ensuring safe access and egress.
 - b. Ensure plant and machinery are safe and that safe systems of work are establish and followed.
 - c. Give information, instruction, training and supervision necessary for their health and safety.
 - d. Ensure articles and substances are moved, stored, maintained and used safely.
 - e. Provide a safe working environment with adequate welfare facilities.
- 3. As the Director I will consult with employees on health, safety and welfare matters, importantly this to include:
 - a. Any change which may substantially affect their health and safety at work, such as in procedures, equipment or ways of working.
 - b. The health and safety consequences of introducing new technology.
 - c. The information they require on the likely risks and dangers arising from their work, measures to reduce or get rid of these risks and what they should do if they have to deal with a risk or danger.
 - d. The planning of health and safety.
- 4. As the Director I will appoint competent people to assist the Company in meeting our statutory duties including where appropriate, specialists outside of the organisation to provide the necessary proficient advice on health and safety matters.
- 5. Adequate funds, time and other resources will be allocated to meet the objectives of this Policy.
- 6. This policy will be reviewed at least annually or as legislation demands and will be reissued. Where appropriate amendments incorporated into this Policy will be brought to the attention of employees as new changes are implemented.
- 7. The allocations of duties, responsibilities and the arrangements for the implementation of this Policy are within this document. With employee co-operation, I am certain that I can achieve all that is required to meet with this, our Company's health, safety and welfare objectives.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD ENVIRONMENTAL POLICY STATEMENT

Allset Safety Training Ltd undertake to:

- ✓ Comply with all statutory and regulatory requirements.
- ✓ Comply with our clients' environmental policy requirements and standards.
- ✓ Identify and evaluate the environmental consequences of the Company's activities and to ensure pollution prevention measures have been implemented.
- ✓ Promote and support 'best practice' for maximising environmental benefit, to encourage environmental improvement and minimise the potential for environmental damage that may be caused by our operations
- ✓ Educate and train our employees to promote awareness and understanding of environmental issues.
- ✓ Ensure that any sub-contractors demonstrate compliance with our environmental policy and that of our clients.
- ✓ Minimise the total quantity of waste produced by our operations and maximise recycling of any waste produced
- ✓ Where applicable, liaise closely with statutory and local authorities, clients, third party organisations and the general public.
- ✓ Review our environmental performance and that of our sub-contractors by regular auditing of operations, identify and rectify any deficiencies and promote continuous improvement.
- ✓ Establish and maintain an effective Environmental Management System to complement our core business operations, supported by proven Environmental Consultants where necessary.

Allset Safety Training will provide assistance to the Client in developing a culture of sustainability during the design and construction. This will be achieved by heightening awareness of sustainability issues through:

- Setting of appropriate targets (KPIs) which will demonstrate good practice in terms of sustainability;
- Provision of presentation material on sustainable issues, including a presentation for the initial site induction and ongoing tool-box talks;
- Regular meetings to discuss sustainability issues and to report improvements in design, particularly additional sustainability measure;
- Provide instruction to all trade contractors on project sustainability issues;
- Review and assessment of trade contractor sustainability performance;
- Assistance in setting a clear agenda for project sustainability;
- On-going training in current sustainability practices for the Project Team;
- To advise the Client on the on-going consideration of economic and social sustainability issues;







• Workshops and meetings to be held to clarify any issues regarding waste management and allow feedback and decisions on sustainability improvements.

Signed:

Jamie Settle Director



ALLSET SAFETY TRAINING LTD QUALITY POLICY STATEMENT

Allset Safety Training Ltd (the 'Organisation') aims to provide defect free goods and services to its clients on time and within budget.

The Organisation operates a Quality Management System that aspires to, but not yet accredited to BS EN ISO 9001: 2015 certification, including aspects specific to the construction industry.

The management is committed to:

- 1. Developing and improving the Quality Management System.
- 2. Continually improve the effectiveness of the Quality Management System.
- 3. The enhancement of client satisfaction.

The management has a continuing commitment to:

- 1. Ensure that client needs and expectations are determined and fulfilled with the aim of achieving client satisfaction.
- 2. Communicate throughout the Organisation the importance of meeting the client needs and legal requirements.
- 3. Establish the Quality Policy and its objectives.
- 4. Conduct Monitoring and Management Reviews of the effectiveness of the implementation of the Quality Management System
- 5. Ensure the availability of resources.

The structure of the Quality Management System is defined in the Quality Manual.

All personnel understand the requirements of this Quality Policy and abide with the contents of the Quality Manual.

In addition to all English and EU commercial legislation and regulations, the Organisation complies with all legislation and regulations specifically related to its business activities.

The Organisation constantly monitors its quality performance and implements improvements when appropriate.

This Quality Policy is regularly reviewed in order to ensure its continuing suitability.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD EQUAL OPPORTUNITIES POLICY

Allset Safety Training Ltd acknowledges the desirability of equal opportunities for employment and the observance of the Allset Safety Trainings of practice as far as it is reasonably practicable. Also we are fully aware and compliant with the recent changes introduced by The Equality Act 2010 which provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The provisions in the Equality Act will come into force at different times to allow time for the people and organisations affected by the new laws to prepare for them. The Government is considering how the different provisions will be commenced so that the Act is implemented in an effective and proportionate way.

We shall comply by;

- ✓ Providing protection for people discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic, so providing new protection for people like careers.
- ✓ Providing protection for breastfeeding mothers;
- ✓ Applying the detriment model to victimisation protection (aligning with the approach in employment law).
- Extending protection from 3rd party harassment to all protected characteristics.
- ✓ Making it more difficult for disabled people to be unfairly screened out when applying for jobs, by restricting the circumstances in which employers can ask job applicants questions about disability or health.
- Making pay secrecy clauses unenforceable.

The intention of the policy is to see that no job applicant or Employee receives less favourable treatment on the grounds of disability, sex, marital status, race, age, colour, nationality or ethnic or national origins, or is disadvantaged by unreasonable conditions or requirements.

Individuals should be selected, promoted and treated on the grounds of their performance, attitude and abilities. All suitably qualified Employees will be given equal opportunity to progress within the organisation.

All those who come into direct or indirect contact with Employees or applicants for employment should ensure that they understand this policy and recognise the part they have to play in its fulfillment.

It is the policy of the Company to encourage the employment and career development of disabled persons. No unnecessary limitations are placed on the type of work that they can perform.

Full and fair consideration will be given to disabled applicants for employment; existing Employees who become disabled will have the opportunity to re-train and continue in employment wherever possible.

Signed:

Jamie Settle Director





Chatham Kent

ME5 9FD



ALLSET SAFETY TRAINING LTD DRUGS POLICY

Illegal substances come in many forms, but in general all will alter the way in which people consuming them perceive the world around them. Ecstasy, for example, reportedly often freely available within many dance venues, makes people feel 'spaced out' and slightly dizzy, whilst heroin (which can be smoked, sniffed through the nose or injected) slows people down and makes them feel sleepy and detached from reality. Other drugs, such as LSD and magic mushrooms, cause those who take them to hallucinate. This means they either see or hear things that do not exist, or see and hear things that do exist but in a totally different wav.

Because of these effects, it is not hard to appreciate how those under the influence of illegal substances can be a danger both to themselves and to their colleagues. Whilst this danger might not be as great in an office environment as it would be, for instance, on a shop floor, the fact remains that the effect of the substance will alter the work contribution individuals will be able to make, and affect their performance within the work team.

Note: Allset Safety Training Ltd appreciates that many people who consume illegal substances would like to quit the habit yet may not be aware of the organisations to which they can turn for help, support and advice. Likewise, many others may be the family or friends of users who would equally welcome such assistance. It is therefore considered appropriate to give details of these organisations. All will treat your enquiry as confidential, and if they are not able to assist you directly will be able to refer you to someone who can.

> The National Drugs Helpline (operate a 24-hour helpline) 0800-776600 Telephone:

ADFAM National (Monday-Friday, 10,00-17,00) Telephone: 020-7928 8900

Families Anonymous (Monday-Friday, 13.00-17.00) Telephone: 020-7498 4680

From time to time all of us suffer ailments for which legally prescribed or legally available drugs are required, either to rectify the ailment itself or to relieve the symptoms suffered. Whilst in many cases the ailment will be temporary, in others it will be longerterm. Just as with illegal substances, however, the drugs we take legally will have some form of side effect. It is of importance that, where this side effect is likely to affect your performance in any way (for instance you are likely to feel drowsy), you are to notify Allset Safety Training Ltd of this fact and the details.

Note: If the Allset Safety Training Ltd reasonably believes that anyone is under the influence of drugs at work at anytime then they shall be required to carry out a for-cause test to establish if they are under the influence of drugs. Also employees will be randomly tested during their employment with Allset Safety Training Ltd, if found positive then discipline/suspension procedures will be followed.

Signed:

Jamie Settle Director

2nd July 2022 Date:







ALLSET SAFETY TRAINING LTD ALCOHOL POLICY

Guidelines on alcohol consumption compare drinks in terms of the number of units of alcohol they contain. For instance, a half pint of average-strength beer, a small glass of wine and a single spirit measure each contain one unit of alcohol.

When we drink, the units we consume get passed into our circulatory system. Here they mix with our blood and get pumped by our hearts to our brains, where they begin to take effect and alter the way we feel and behave.

The amount of alcohol in our bloodstream is measured in milligrams of alcohol per 100 millilitres of blood.

In an average-sized man, a unit of alcohol converts to approximately 20 milligrams per 100 millilitres, whilst in an average-sized woman, a unit results in a blood alcohol level of approximately 30 milligrams. The difference between men and women arises from the fact that women are generally smaller than men and their bodies, as a consequence, contain less fluid. When a unit of alcohol is consumed by a woman it therefore forms a greater concentration in her bloodstream than it would in the bloodstream of a man.

If you are a man of average build and you drink one and a half pints of average-strength beer, you will be consuming three units of alcohol. As alcohol gets absorbed quickly by your digestive system, the result will be that within a relatively short period you will have a blood alcohol level of some 60 milligrams per 100 millilitres.

Tests have shown that a person with a blood alcohol level of 60 milligrams has impaired judgment, is becoming reckless and should not be making important decisions.

Consume two pints (a mere four units) and your blood alcohol level will be 80 milligrams per 100 millilitres. At 80 milligrams tests have shown that the average person suffers from a marked loss of co-ordination.

If you are a woman of average build, a blood alcohol level of 60 milligrams per 100 millilitres is reached after consuming just a single pint of beer (the equivalent of just two glasses of wine or two shorts), whilst 80 milligrams is reached by consuming just one further single unit.

With your judgment and co-ordination affected in this way, you are, for all intents and purposes, semi-detached from reality. Unfortunately, where plant, equipment and machinery are concerned, being semi-detached from reality could easily lead to serious accidents.

If having read this policy you believe you are consuming too much alcohol and want help in reducing your intake, the following organisations will be able to assist you. All calls will be treated as confidential.

The National Alcohol Helpline 0800-917 8282

Al-Anon Family Groups 020-7403 0888 (for relatives and friends of alcoholics)

Alcoholics Anonymous 01904-644026 (Head Office)

As an employer, it is our duty to promote and retain a safe working environment. After due consideration, we have decided that to permit people to work who have consumed alcohol is to put at risk not only the individual concerned, but his or her colleagues as well. As a consequence, we have determined that anyone found consuming alcohol whilst at work, or considered to be under the influence of alcohol during working hours, will be subject to disciplinary procedure.

Note: If the Allset Safety Training Ltd reasonably believes that anyone is under the influence of alcohol at work at anytime then they shall be required to carry out a for-cause test to establish if they are under the influence of alcohol.

This policy applies to all employees/agency workers and sub-contractors working for Allset Safety Training Ltd.





Everybody will receive instructions and information on compulsory alcohol testing during company induction.

Whilst it may seem unreasonable to apply this policy to employees who do not work in high risk area, the fact remains that from time to time most employees will need to visit these areas in order to carry out their duties. If under the influence of alcohol when they do so, they will be putting themselves and others at risk.

In addition, all employees are engaged on the basis that they will provide the Allset Safety Training Ltd with their best endeavours at all times. As judgment and the ability to make decisions are an essential element of all jobs at all levels, and as alcohol affects judgment and the ability to make decisions, it is important that no category of employee should be excluded from this policy.

Signed:

Jamie Settle Director



ALLSET SAFETY TRAINING LTD STRESS POLICY

Introduction

Allset Safety Training Ltd is committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stress.

This policy will apply to everyone in the company. Managers and supervisors are responsible for implementation and monitoring of staff. The company is responsible for allocating the necessary resources to deal with stress at work issues.

Definition of stress

The Health and Safety Executive define stress as "the adverse reaction people have to excessive pressure or other types of demand placed on them".

This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress that can be detrimental to health.

Our Policy

- The company will identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed;
- The company will consult with Trade Union Safety Representatives (If Nominated) on all proposed action relating to the prevention of workplace stress;
- The company will provide training for all managers and supervisory staff in safe practices;
- The company will provide confidential counselling for staff affected by Stress, caused by either work or external factors;
- The company will provide adequate resources to enable managers to implement the company's agreed stress management strategy;

Responsibilities:

Managers and Supervisors

- Conduct and implement recommendations of risks assessments within their jurisdiction.
- Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
- Ensure staff are fully trained to discharge their duties.
- Ensure staff are provided with meaningful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure that staff are not overworking. Monitor holidays to ensure
 that staff are taking their full entitlement.





- Attend training as requested in good management practice and health and safety.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.
- Be vigilant and offer additional support to a member of staff who is experiencing stress outside work e.g. bereavement or separation.

Stress Manager (To be appointed)

- Provide specialist advice and awareness training on stress.
- Train and support managers in implementing stress risk assessments.
- Support individuals who have been off sick with stress and advise them and their management on a planned return to work date.
- Refer to workplace counsellors or specialist agencies as required.
- Monitor and review the effectiveness of measures to reduce stress.
- Inform the employer and the health and safety committee of any changes and developments in the field of stress at work.

Human Resources

- Give guidance to managers on the stress policy.
- Assist in monitoring the effectiveness of measures to address stress by collating sickness absence statistics.
- Advise managers and individuals on training requirements.
- Provide continuing support to managers and individuals in a changing environment and encourage referral to occupational workplace counsellors where appropriate.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD SMOKE-FREE POLICY

Introduction

This policy has been developed to protect all employees and visitors from exposure to second-hand smoke. The company acknowledges that non-smokers have a right to work in a safe and healthy environment and that exposure to second-hand smoke increases the risk of lung cancer and heart disease and causes or triggers asthma as well as many other illnesses and minor conditions. All employees must refrain from smoking outside the times and circumstances set out in this policy. The policy applies to all staff, visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace.

As from 1st July 2007, smoking was prohibited in all places of public gathering including workplaces. It is the intention of the Company to comply fully with this requirement and therefore the conditions described below will come into effect from that date.

Policy Aims

This policy seeks to:

- ✓ Guarantee a healthy working environment and protect the health of employees and members of the public by ensuring that all company workplaces are smoke-free.
- ✓ Comply with: the Health and Safety at Work etc Act 1974, under which employers have a general duty to protect, so far as is reasonably practicable, the health, safety and welfare of their employees; and the [Health Act 2006 OR Smoking, Health and Social Care (Scotland) Act 2005], which prohibits smoking in enclosed workplaces and public places.
- Raise awareness of the dangers associated with exposure to tobacco smoke.
- ✓ Take account of the needs of those who choose to smoke and to support those who wish to stop.

Restrictions On Smoking

Smoking is prohibited at all times in all enclosed and substantially enclosed public or private areas in the workplace, including lifts, corridors, stairways, lavatories, rest rooms, reception areas or entrances. This applies to all persons, regardless of their status within the company or business with the company.

Staff

Members of staff are only permitted to smoke whilst off duty (in official break times only) and in unenclosed designated areas.

Visitors

All visitors, contractors, consultants, customers, clients and other persons who enter the premises of this workplace are required to abide by this smoke-free policy. All staff members are expected to make visitors aware of this policy and to ask any visitor who breaches this policy to extinguish all smoking materials. Visitors who continue to smoke should be reported to a manager.

Company Vehicles

Smoking is prohibited in vehicles belonging to or leased by the company and in staff private vehicles if ever used to transport members of staff or members of the public whilst carrying out their duties as an employee.





Implementation

Allset Safety Training Management has overall responsibility for the implementation and review of this policy. However, all members of staff are obliged to adhere to and support the implementation of the policy on an ongoing basis. All existing employees and new personnel shall be informed of this policy and of the designated smoking areas.

'No-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke-free vehicles. Appropriate signs will be displayed in the designated areas where smoking is permitted.

Non-Compliance

Any member of staff who does not comply with this policy shall be liable to disciplinary action in accordance with the company's Disciplinary Procedure. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

Help To Stop Smoking

The NHS offers a range of free services to help smokers give up. The NHS Smoking Helpline number is 0800 169 0 169 or visit www.gosmokefree.co.uk.

Review

This policy will be kept under review so as to ensure that it continues to meet its aims.

Signed:

Jamie Settle Director



VIOLENCE AT WORK POLICY

Introduction

Allset Safety Training recognises it's statutory duty to ensure that any aggression and violence as a potential risk to employees whilst at work is prevented. This procedure highlights the Company's systematic approach to ensure that so as far as possible, the procedures are adopted through the organisation.

It recognises that different staff groups might well be subject to different levels of risk which shall reflect additional advice or support such as providing means of communications i.e. mobile telephones.

Those at risk are staffs who regularly deal with members of the public who may be angry, distressed, disturbed, ill, embarrassed or resentful. The resulting feelings can be aggression and violence directed at our employees.

Violence from the public can be defined as "Any incident in which an employee is verbally abused, threatened or assaulted by a member of the public in circumstances arising out of the course of their employment".

Statement of Policy

The Company acknowledges the risk of violence and aggression towards staff while at work and affirms that such violence, threat of violence and aggression or verbal abuse is wholly unacceptable. The Company will ensure that employees are provided with, in so far as reasonably practicable, a safe place and safe systems of work and that where employees are subjected to violence and aggression, they are provided with appropriate support.

It will be the responsibility of the Jamie Settle to ensure that all the procedures are brought to the attention all the employees

The Company will consider as unacceptable:

- i) Severe verbal abuse or threats to its employees.
- ii) Verbal or physical harassment of its employees including racial or sexual harassment.
- iii) Verbal or physical abuse to employees outside working hours, arising from employment with the Company.
- iv) Attacks on or damage to employees property arising from or in connection with employees carrying out their duties.

The key areas that can have a substantial impact to the performance of this policy are:-

- i) The prevention of violence.
- ii) Dealing appropriately with acts of violence and aggression.
- iii) Monitoring and aftercare.

Preventing Violence and Aggression

The Company will implement procedures whereby the possibility of employees being harmed is reduced or removed.

Certain tasks and jobs may leave some employees more susceptible to violence and aggression than others.

The personal safety of such employees will remain a prime management consideration when designing jobs and allocating tasks. Personal alarms, mobile telephones or radios will be issued to those employees where risk assessments identify the need.

Training will be provided for employees who are considered to be in a potential risk situation, specific job





training will include:

- i) An understanding of fear and aggression.
- ii) How to avoid/diffuse potentially violent situations.
- iii) What to do if threatened or attacked.
- iv) What support is available if threatened or attacked and how to obtain it.

Additional elements will be included for managers covering:

- a) An understanding of the impact of fear, violence and aggression on employees and their work performance.
- b) The necessity for managers to adopt a sympathetic and clear response so that employees are encouraged to report such issues.
- c) The need for managers regularly to review operational procedures.

Procedures In The Event Of Violent Or Aggressive Acts

All abuse or violence to our employees must be reported. The necessary first aid will be provided to the employee in the event of an injury. In the case of serious assault the incident shall be reported to the Police and a full investigation to be carried out.

Support shall be given to any employee who is subject to violence or abuse, including any time off work required for interviews or attending court shall be deemed in Company time. Counseling will be provided where it is considered necessary.

Monitoring

The Company shall be responsible for monitoring all incidents of violence and aggression, this will be done via the reporting of all such incidents.

Cash Handling or Carrying

Employees who handle or carry cash as part of their duties should not put themselves or their colleagues at risk in defence of the money. If challenged in a robbery situation they should hand the money over as instructed and make no attempt to obstruct the perpetration of the act in any way.

Abusive Telephone Calls

Be patient, after a few moments the abusive language may abate. If the customer does not calm down, advise them clearly that unless they are able to continue the discussion in a civil manner, the call will be terminated. If it is impossible to supply a satisfactory answer to the query, offer to pass the customer to a supervisor.

Signed:

Jamie Settle Director





ALLSET SAFETY TRAINING LTD ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way Allset Safety Training Ltd should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical policy focuses around nine key areas as follows:

Employees

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

Customers

Everybody must play their part in providing quality and efficiency to customers. Allset Safety Training Ltd believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

Allset Safety Training Ltd believes in supporting UK trade and therefore will only buy from preferred UK based manufacturing companies if possible. Allset Safety Training Ltd will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms. All supplier relationships are assessed against our Quality standards.

Community

Allset Safety Training Ltd seeks to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests. In particular, we will agree a chosen local charity each year and endeavor to raise money outside of business interests for this Charity.

The Environment

Allset Safety Training Ltd is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore: Work with others toward a consensus on environmental quality standards which are desirable and attainable. Aim to improve all aspects of the business in respect of environmental issues. Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology. This is reflected in our emphasis to supply recycled promotional products as an option wherever possible

Health & Safety

Allset Safety Training Ltd provides safe working conditions for all its Employees and will do all that is reasonable and practicable to:





- Protect the health and safety of its employees and minimise any adverse effects on the environment
- Implement working practices to prevent personal injury and damage to property
- Making all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others;

Social Responsibilities

Allset Safety Training Ltd is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production;
- Promotes the use of child labour:

Conflict of Interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

Information

Allset Safety Training Ltd regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected.

This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

Records

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING FRAUD & MALPRACTICE POLICY STATEMENT

Introduction;

Allset Safety Training Ltd has a commitment to high legal, ethical and moral standards. All members of staff are expected to share this commitment.

We already have procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment management. In addition we ensure that a risk (and fraud) awareness culture exists within our organisation.

This document is intended to provide direction and help to those Staff and Managers who find themselves having to deal with suspected cases of theft, fraud or corruption.

Our Policy;

- This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with this organisation.
- Fraud & malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting any aspect of our company activity by one or more individuals among management, staff or third parties.
- All managers and staff have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.
- Allset Safety Training Ltd is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and/or malpractice.
- Allset Safety Training Ltd wishes to encourage anyone having reasonable suspicions of fraud or malpractice
 to report them. Therefore it is also our policy, which will be rigorously enforced, that no employee will suffer
 in any way as a result of reporting reasonably held suspicions.
- All members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud or malpractice. For these purposes reasonably held 'suspicions' shall mean any suspicions other than those, which are raised maliciously and found to be groundless. The organisation will deal with all occurrences in accordance with the Public Interest Disclosure Act.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD TRAINING POLICY

General statement

We are committed to ensuring that all our staff has received adequate training in order to be able to carry out their duties safely and without risk to themselves or others. We aim to achieve this by providing induction training for all new employees and ongoing skills training. The need for training will be determined by the requirements of the individual employee's job role. We also constantly assess and review the development needs of our employees and actively encourage all staff, regardless of employment status, language skills and grade, to take advantage of all training opportunities available and to communicate their individual needs and requirements.

Legal position

Providing adequate training to our staff is a requirement of the Health and Safety at Work Act 1974. It is also required by other more specific legislation which relates to the use of machinery, handling activities, hazardous substances and the wearing of personal protective equipment. The test of adequacy is based on providing sufficient training to ensure that employees can carry out their duties without jeopardising either their health and safety, or that of their colleagues and visitors.

Procedures

The following procedures describe the steps that we will take to comply with our obligations to provide adequate training:

- All new employees will receive induction training. This training includes Health and Safety, Quality and Environmental management and covers key areas such as fire safety, first aid and any workplace hazards. A signature will be required from the employee to confirm that they have understood the contents.
- This training will also be provided to other groups who will be working on our projects. This includes agency temps, work experience students and sub-contractors
- Some training is a statutory requirement, e.g. for manual handling activities. However, where this is not
 the case, a Senior Manager/HR will determine whether any training is necessary in order to carry out the
 job role safely.
- Where an employee's job involves the operation of tools or machinery, on-the-job training will be
 provided by the Site or dedicated training provider. It is the responsibility of the employee's manager to
 ensure that this is carried out with close liaisons with the Health and Safety Manager. This training will
 also be given if an employee changes jobs
- If new machinery or equipment is purchased, further training is likely to become necessary.

Effectiveness

The effectiveness of our training policy is measured by checking: -

- Quality of work
- Customer Feedback
- Contract Retention







Audits

Employee duties

Employees are expected to cooperate with us fully with regard to attending health and safety training courses. We expect that all reasonable effort will be made to attend a course, but if this isn't possible, that we will be notified well in advance. Should an employee fail to attend a course which is a legal requirement without good reason, we retain the right to treat it as a disciplinary matter.

Signed:

Jamie Settle Director

ALLSET SAFETY TRAINING LTD ANTI BRIBERY POLICY

The purpose of this policy is to:

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

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

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential operatives, agencies, end-user companies, suppliers, distributors, business contacts, advisers, HRMC and other government and public bodies, including their advisors, representatives and officials.

Who is covered by the policy?

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

What is bribery?

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

Examples:

Offering a bribe

You offer a third party tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the third party to accept your offer.

Receiving a bribe

A third party gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for that third party to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

What risks do we face?

We have identified that the following are particular risks for our business:

- A worker being induced to authorise and process an expense which he/she knows or believes to be illegitimate
- A worker being induced to record information which he/she knows or believes to be false
- A worker being induced in an unethical way to provide a third party with a commercial or contractual advantage.

You should be aware of these particular risks, and take extra care if you are handling a situation in which you might be exposed to such risks.





Gifts

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

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

We appreciate that the practice of giving business gifts varies. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. If you are at all unclear about the appropriateness of a particular gift, please speak to Jamie Settle in the first instance.

Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, provided it falls within reasonable bounds of value and occurrence.

Although no two situations are ever the same, it is possible to identify suitable indicators which will help us to evaluate what would be considered acceptable:

- What is the intent behind the hospitality is it to build a relationship or is it something else?
- How would it look if details of the hospitality were made public? Would we feel embarrassed?
- What if the situation were reversed would there be a double standard?

Entertainment of third parties may only be undertaken by managers or by others if they have been given express authorisation by Jamie Settle or Alan Butler in writing.

What is not acceptable?

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

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an
 expectation that a business advantage will be provided by us in return;
- offer or accept hospitality involving entertainment of a sexual or similarly inappropriate nature;
- solicit or try to solicit any gift or hospitality from a third party;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

If you are unsure whether your actions would be acceptable or not, please consult with Jamie Settle before proceeding.







Your responsibilities

You must ensure that you read, understand and comply with this policy at all times.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Jamie Settle as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a third party offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with Jamie Settle. Concerns should be reported via the same method.

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

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

Protection

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

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Jamie Settle immediately. If the matter is





not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be provided through contact with the HR department.

Training and communication

Training on this policy can be requested via the HR department at any time.

Our zero-tolerance approach to bribery and corruption must be communicated to all operatives, agencies, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for the policy?

Jamie Settle has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. He has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and review

Jamie Settle will monitor the effectiveness and review the implementation of this policy regularly, considering its suitability, adequacy and effectiveness.

Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

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

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD WORK SAFE POLICY

Allset Safety Training Ltd operates a Work Safe Policy (Or Refusal to Work Policy) for its staff working on all their sites.

Every member of Allset Safety Training and that of any applicable Sub-contractor's team working on behalf of Allset Safety Training Ltd has the absolute right to decline to carry out work if they feel it is not safe to do so.

Any situation arising which leads to an individual refusing to work for health and safety reasons must be reported to management as soon as possible, and no work should be recommenced until the issue(s) causing concern have been addressed.

The company additionally provides full confidential reporting arrangements via a direct line to Jamie Settle (Senior Manager/Proprietor).

The contact number for confidential reporting is 07940 219527. All reports will be fully investigated by Allset Safety Training's Health and Safety consultants to ensure that all personnel are not placed in a position where they are expected to carry out work that is unsafe.

Managers and supervisory staff are also encouraged to report any unsafe acts or conditions, which they have witnessed.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD SECURITY POLICY

Purpose

The purpose of this policy is to protect from all threats, whether internal or external, deliberate or accidental, the information assets of Allset Safety Training Ltd.

Objectives

The implementation of this policy is important to maintain and demonstrate our integrity in our dealing with customers and suppliers.

It is the policy of Allset Safety Training to ensure:

- Information is protected against unauthorised access
- · Confidentiality of information is maintained
- Information is not disclosed to unauthorized persons through deliberate or careless action
- Integrity of information through protection from unauthorised modification
- Availability of information to authorized users when needed
- Regulatory and legislative requirements will be met
- Business continuity plans are produced, maintained and tested as far as practicable
- Information security training is given to all Employees
- All breaches of information security and suspected weaknesses are reported and investigated

Applicability

All Allset Safety Training personnel and suppliers, employed under contract, who have any involvement with information assets covered by the scope of the Information Security Management System, are responsible for implementing this policy and shall have the support of Management who have approved the policy.

Goals

- ✓ To identify through appropriate risk assessment, the value of information assets, to understand their vulnerabilities and the threats that may expose them to risk.
- ✓ To manage the risks to an acceptable level though the design, implementation and maintenance of a formal Information Security Management System.
- ✓ To comply with legislation including;
 - Companies Act 1985
 - Health and Safety Act
 - Interception of Communication Act 1985
 - The Data Protection Act (1998)
 - Copyright, Designs and Patents Act (1988)
 - Computer Misuse Act (1990)
 - Regulation of Investigatory Powers Act (2000)
 - Freedom of Information Act (2000)
 - Human Rights Act (2000)
- ✓ To comply with any customer contract conditions relating to information security.
- ✓ Commitment to comply with ISO 27001-2005
- ✓ Commitment to achieve and maintain certification to ISO27001-2005

Specific Policies

Specific policies exist to support this document including:

- Physical Security
- Site access control policy (key holders, wearing of badges, visitor controls)







- Computer usage policy (email, internet access, access control, software download)
- Password controls (frequency of change, length, complexity)
- Data backup
- Virus control policy (frequency of updates, control of external media)
- Communications policy
- Business Continuity Management
- Security breach and incident management policy

Responsibilities

It is the responsibility of Jamie Settle to continually review this policy, facilitate and implement this policy through the appropriate standards and procedures.

All personnel and contracted suppliers are to follow procedures that maintain the information security policy. All personnel have a responsibility for reporting security incidents and any identified weaknesses. Any deliberate act to jeopardise the security of information that is the property of Allset Safety Training Ltd or their customers or suppliers will be subject to disciplinary and/or legal action as appropriate.

Review

The policy is reviewed bi-annually and in case of influencing changes to ensure it remains appropriate for the business and our ability to serve our customers.

Signed:

Jamie Settle Director





ALLSET SAFETY TRAINING LTD COMPLAINTS POLICY

Allset Safety Training Ltd believes that if a someone (either employee or non employee) wishes to make a complaint or register a concern they should find it easy to do so. It is our policy to welcome complaints and look upon them as an opportunity to learn, adapt, improve and provide better services. This policy is intended to ensure that complaints are dealt with properly and that all complaints or comments are taken seriously.

The policy is not designed to apportion blame, to consider the possibility of negligence or to provide compensation. It is NOT part of each establishment's disciplinary policy.

Allset Safety Training Ltd believes that failure to listen to or acknowledge complaints will lead to an aggravation of problems, client/public dissatisfaction and possible litigation. Allset Safety Training supports the concept that most complaints, if dealt with early, openly and honestly, can be sorted out at a local level between just the complainant and each establishment (whether this is either on site or within the office domain). If this fails due to either the establishment or the complainant being dissatisfied with the result, the complaint will be referred to the Director and legal advice will be taken as per necessary.

Aim

Allset Safety Training's aim is to ensure that its complaints procedure is properly and effectively implemented, and that all personnel feel confident that their complaints and worries are listened to and acted upon promptly and fairly.

Goals

Allset Safety Training's goals are to ensure that:

- clients, employees, general public and others and their representatives are aware of how to complain, and that we provides an easy process to register complaints
- a named person will be responsible for the administration of the procedure
- every written complaint is acknowledged within two working days
- investigations into written complaints are held within 28 days
- all complaints are responded to in writing by each establishment
- complaints are dealt with promptly, fairly and sensitively with due regard to the upset and worry that they can cause.

The named complaints manager with responsibility for following through complaints is Alan Butler (Allset Safety Training Safety Director).

Complaints Procedure:

Oral Complaints

- All oral complaints, no matter how seemingly unimportant, should be taken seriously. There is nothing to be gained by staff adopting a defensive or aggressive attitude.
- Staff who receive an oral complaint should seek to solve the problem immediately if possible.
- If staff cannot solve the problem immediately they should offer to get their line-manager to deal with the problem.
- All contact with the complainant should be polite, courteous and sympathetic.
- At all times staff should remain calm and respectful.
- · Staff should not accept blame, make excuses or blame other staff.
- After talking the problem through, each manager or the member of staff dealing with the complaint should suggest a course of action to resolve the complaint. If this course of action is acceptable then the member of staff should clarify the agreement with the complainant and agree a way in which the results of the complaint will be communicated to the complainant (ie through another meeting or by letter).
- If the suggested plan of action is not acceptable to the complainant then the member of staff, or manager, should ask the complainant to put their complaint in writing to the establishment and give them a copy of the complaints procedure and form for completion.
- In both cases details of the complaints should be recorded on a complaints form and handed to the Manager.







Written Complaints

- When a complaint is received in writing it should be passed on to the named complaints manager who should record it in the complaints book and send an acknowledgment letter within two working days. The complaints manager will be the named person who deals with the complaint through the process.
- If necessary, further details should be obtained from the complainant.
- A leaflet detailing the procedure should be forwarded to the complainant.
- If the complaint raises potentially serious matters, advice should be sought from a legal advisor to the
 establishment.
- Immediately on receipt of the complaint, Allset Safety Training Ltd will launch an investigation and within 28
 days should be in a position to provide a full explanation to the complainant, either in writing or by arranging a
 meeting with the individuals concerned.
- If the issues are too complex to complete the investigation within 28 days, the complainant should be informed of any delays.
- If a meeting is arranged the complainant should be advised that they may, if they wish, bring a friend or relative or a representative such as an advocate.
- At the meeting a detailed explanation of the results of the investigation should be given and also an apology if it is deemed appropriate (apologising for what has happened need not be an admission of liability).
- Such a meeting gives the establishment the opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated.
- After the meeting, or if the complainant does not want a meeting, a written account of the investigation should be sent to the complainant.
- The outcomes of the investigation and the meeting should be recorded on appropriate documentation and any shortcomings in the establishment's procedures should be identified and acted upon.
- Allset Safety Training will discuss complaints and their outcome at a formal business meeting and the establishment's complaints procedure should be audited by the Director every six months.

Training

The Director is responsible for organising and co-coordinating relevant training. All staff should be trained in dealing with, and responding to, complaints. Complaints policy training should be included in the induction training for all new staff and in-house training sessions on handling complaints should be conducted at least annually and all relevant staff should attend.

Review

The policy is reviewed bi-annually and in case of influencing changes to ensure it remains appropriate for the business and our ability to serve our customers.

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING PRIVACY POLICY

In line with the EU General data Protection Regulation (GDPR), Allset Safety Training is required to provide certain details regarding our organisation and the way we collect and use your personal data. Allset Safety Training operates based on legitimate interest to facilitate your interest in our business.

Purpose of the Processing

Allset Safety Training Ltd takes your privacy seriously and will only use your personal information to administer your account, personalise your use of the website, and to provide the products and services you have requested from us.

For 'users' to use our online services and to respond to enquiries we need to collect and process various personal data. Users may be asked to complete an online form(s) which requests, name, address, e-mail and telephone number. The personal data we collect is used to process your request for our services.

All information provided will be treated as confidential and will only be used for the purpose intended. Anyone can contact Allset Safety Training Ltd to correct or update personal information in our records.

What information is being collected?

To facilitate your interest in Allset Safety Training, we will only collect and process personal data that is required to contact you in relation to your enquiry and what has been requested by external Governing Bodies we are in communication with regarding your qualification. Personal data will only be collected when you actively enquire about our products and services these are:

- Name, place of work, position
- Contact telephone number
- Postal address
- Email Address

For registration to courses on behalf of external Governing Bodies; we will provide within the registration form a detail list of information required by the Governing Body. Please see below which shows the full information required and the length of time the information will be held on file for each Governing Body.

How we will use your information

We will use the information held about you for the purposes for which it was provided to us as stated at the point of collection (or as may be obvious in the context of collection). Your personal data will be used by us in the following ways:

- To respond to your enquiries
- To send you information you have requested
- To register for courses/exams for the relevant Governing Body for your chosen qualification

We promise never to share or sell your information to other organisations or businesses for the purposes of marketing and you can opt out of our communications at any time by writing to Allset Safety Training, Innovation Centre Medway, Chatham, Kent ME5 9FD or by sending an email to louise@allsetsafetytraining.co.uk.

The lawful basis

Allset Safety Training Ltd will process data for the specific and lawful purpose for which it is collected and not further process the data in a manner incompatible with this purpose.

Disclosure of your information





We may disclose your personal data to any member of our organisation who needs access to that information to assist you with the purpose of your enquiry.

We will only disclose your personal data to the awarding body relevant to the course that is being undertaken and the information given is only what is needed to gain the qualification.

We promise never to share or sell your information to other organisations or businesses for the purposes of marketing and you can opt out of our communications at any time by writing to Allset Safety Training, Innovation Centre Medway, Chatham, Kent ME5 9FD or by sending an email to louise@allsetsafetytraining.co.uk.

Disclosure to third parties

We do not collect or compile personal data for release or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties.

We must have a legal reason to process your personal information. Your information will be processed to meet our legitimate interest to facilitate your interest in our business. In those few cases where your consent is required, this will be communicated to you at the point of collection.

We will not disclose your personal data to third parties without your prior authorisation except for the eventuality that we are under a duty to disclose or share your personal data to regulatory or law enforcement agencies.

Information storage and retention

We have in place security measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate. We cannot guarantee the security of any third-party application you may use to transmit your data (for example, internet browsers).

We will keep your personal information for as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we will consider our legal, regulatory and professional obligations.

We will not transfer or process your data outside of the UK.

Your rights

You have rights regarding your personal information, including the right to access, correct, delete, restrict or object to our use of it. We would encourage you to inform us if the information we hold about you is no longer accurate. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us at louise@allsetsafetytraining.co.uk. If you do not want us to process your data, then we may not be able to facilitate your interest in our business.

The right to lodge a complaint

Data subjects can complain to Allset Safety Training Ltd about:

- how their personal data has been processed
- how their request for access to data has been handled
- · how their complaint has been handled
- appeal against any decision made following a complaint.

If you have cause for complaint, please contact us and we will endeavour to resolve this immediately. However, if you have a data privacy related complaint, you also have the option to direct your complaint to the Information Commissioner's Office (ICO) www.ico.org.uk/concerns.



Websites and cookies

A cookie is a small file, typically of letters and numbers, downloaded on to your device (e.g. your PC) when you access Allset Safety Training Ltd website. Cookies allow the website to recognise your device and so distinguish between the different users that access the site.

Session cookies will remember your selections as you browse the site. These cookies are for the browsing session and not stored long term. No personal information is collected by these cookies.

Google Analytics cookies help us to make the website better for you by providing us with user statistics, for example: which pages are the most visited; how a user navigates the site. No personal information is collected by these cookies. You may delete or control the use of cookies through your browser settings, but this may limit the functionally of the website. The site and our computer systems have security measures in place with the aim of protecting the loss, misuse or alteration of the information 'users' provide to us.

To find out more about cookies and what cookies might be stored on your device, visit www.aboutcookies.org or www.allaboutcookies.org

How to contact us

Questions, comments and requests regarding our Privacy Policy are welcomed and should be emailed to: louise@allsetsafetytraining.co.uk

Governing Bodies & Retention Periods

We are governed by a number of awarding bodies, who to request certain personal data and the length of time the information needs to be retained. If you would prefer for this information not to be given unfortunately, you will be unable to receive the relevant qualification.

CITB - 1 year by Allset Safety Training Ltd

- Full Name
- Date of Birth
- Full Address
- Email Address
- Contact Telephone Number
- CITB Registration Number
- National Insurance Number
- Signature

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD DATA PROTECTION POLICY

Introduction

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the European Council and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU). It also addresses the export of personal data outside the EU. The primary objectives of the GDPR are to give citizens back control of their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. When the GDPR takes effect it will replace the data protection directive (officially Directive 95/46/EC) from 1995. The regulation was adopted on 27 April 2016 and applies from 25 May 2018 after a two-year transition period.

The 1998 Data Protection Act, which came into force on 1 March 2000, will continue to apply until the new General Data Protection Regulations come into force in May 2018.

The following guidance is not a definitive statement on the Regulations, but seeks to interpret relevant points where they affect Allset Safety Training.

The Regulations cover both written and computerised information and the individual's right to see such records.

It is important to note that the Regulations also cover records relating to staff, customers, contractors and information passed between Allset Safety Training and the Construction Industry Training Board (CITB).

All Allset Safety Training's staff are required to follow this Data Protection Policy at all times.

The Managing Director has overall responsibility for data protection within Allset Safety Training but each individual processing data is acting on the controller's behalf and therefore has a legal obligation to adhere to the Regulations.

Definitions

Processing of information – how information is held and managed.

Information Commissioner – formerly known as the Data Protection Commissioner.

Notification – formerly known as Registration.

Data Subject – used to denote an individual about whom data is held.

Data Controller – used to denote the entity with overall responsibility for data collection and

management. Allset Safety Training is the Data Controller for the

purposes of the Act.

Data Processor – an individual handling or processing data

Personal data – any information which enables a person to be identified

Special categories of personal data – information under the Regulations which requires the individual's

explicit consent for it to be held by the Charity.

Data Protection Principles

As data controller, Allset Safety Training is required to comply with the principles of good information handling.







These principles require the Data Controller to:

- 1. Process personal data fairly, lawfully and in a transparent manner.
- Obtain personal data only for one or more specified and lawful purposes and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
- 3. Ensure that personal data is adequate, relevant and not excessive for the purpose or purposes for which it is held.
- 4. Ensure that personal data is accurate and, where necessary, kept up-to-date.
- 5. Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained.
- 6. Ensure that personal data is kept secure.
- 7. Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

Consent

Allset Safety Training must record explicit consent to storing certain information (known as 'personal information) on file.

For the purposes of the Regulations, personal data recorded by Allset safety Training covers information relating to:

- 1. Online identifiers such as an IP address
- 2. Name and contact details including telephone numbers and email addresses.
- 3. National Insurance (NI) Numbers
- 4. Bank account details
- 5. Genetic and/or biometric data which can be used to identify an individual

As a general rule Allset Safety Training will always seek consent where personal information is to be held.

It should also be noted that where it is not reasonable to obtain consent at the time data is first recorded and the case remains open, retrospective consent should be sought at the earliest appropriate opportunity.

If personal data needs to be recorded for the purpose of service provision and the individual refuses consent, the case should be referred to the Managing Director for advice.

Obtaining Consent

Consent may be obtained in a number of ways depending on the nature of the interview, and consent must be recorded on or maintained with the case records:

- face-to-face
- written
- telephone
- email.

Face-to-face/written: A pro-forma should be used.

Telephone: Verbal consent should be sought and noted on the case record.

E-mail: The initial response should seek consent.







Consent obtained for one purpose cannot automatically be applied to all uses e.g. where consent has been obtained from a delegate for the provision/registration of a course, separate consent would be required if, for example, direct marketing were to be undertaken.

Preliminary verbal consent should be sought at point of initial contact as personal and/or special categories of personal data will need to be recorded either in an email or on a computerised record. The verbal consent is to be recorded in the appropriate fields on the computer record or stated in the email for future reference. Although written consent is the optimum, verbal consent is the minimum requirement.

Specific consent for use of any photographs and/or videos taken should be obtained in writing. Such media could be used for, but not limited to, publicity material, press releases, social media, and website. Consent should also indicate whether agreement has been given to their name being published in any associated publicity. If the subject is less than 18 years of age then parental/guardian consent should be sought. Individuals have a right to withdraw consent at any time.

Ensuring the Security of Personal Information

Unlawful disclosure of personal information:

- 1. It is an offence to disclose personal information 'knowingly and recklessly' to third parties.
- 2. It is a condition of course registration that all delegates for whom we hold personal details sign a consent form allowing us to hold such information.
- 3. Delegates may also consent for us to share personal information with the CITB (where required) on a need to know basis.
- 4. A client's individual consent to share information should always be checked before disclosing personal information to another agency.

Use of Files, Books and Paper Records

In order to prevent unauthorised access or accidental loss or damage to personal information, it is important that care is taken to protect personal data. Paper records should be kept in locked cabinets/drawers (or within the Allset Safety Training administration office location) overnight and care should be taken that personal information is not left unattended and in clear view during the working day. If your work involves you having personal data at home or in your car, the same care needs to be taken.

Disposal of Scrap Paper, Printing or Photocopying Overruns

Be aware that names/addresses/phone numbers and other information written on scrap paper are also considered to be confidential. Do not keep or use any scrap paper that contains personal information but ensure that it is either shredded or incinerated in accordance with company procedures.

If you are transferring papers from an external location, to the office for shredding this should be done as soon as possible and not left in a car for a period of time. When transporting documents they should be carried out of sight in the boot of your car.

Computers

Where computers are networked, access to personal and special categories of personal information is restricted by password to authorised personnel only.





If working in a public area, eg reception, you should lock your computer when leaving it unattended.

Firewalls and virus protection to be employed at all times to reduce the possibility of hackers accessing our system and thereby obtaining access to confidential records. Where computers or other mobile devices are taken for use off the premises the device must be password protected.

Cloud Computing

When commissioning cloud based systems, Allset Safety Training will satisfy themselves as to the compliance of data protection principles and robustness of the cloud based providers.

Direct Marketing

Allset Safety Training will not share or sell its database(s) with outside organisations.

Allset Safety Training holds information on our staff, clients and other delegates to whom we will from time to time send information that may be of interest to them. Specific consent to contact will be sought, including which formats they prefer (e.g. mail, email, phone etc) before making any communications.

We recognise that clients, staff and delegates for whom we hold records have the right to unsubscribe from our mailing lists. This wish will be recorded on their records and will be excluded from future contacts.

The following statement is to be included on any forms used to obtain personal data:

We promise never to share or sell your information to other organisations or businesses for the purposes of marketing and you can opt out of our communications at any time by writing to Allset Safety Training, Innovation Centre Medway, Chatham, Kent ME5 9FD or by sending an email to louise@allsetsafetytraining.co.uk

Privacy Statements

Any documentation which gathers personal and/or special categories of personal data should contain the following Privacy Statement information:

- Explain who we are
- What we will do with their data
- Who we will share it with
- Consent for marketing notice
- How long we will keep it for
- That their data will be treated securely
- How to opt out
- Where they can find a copy of the full notice

A fuller Privacy Statement will also be published on our website.

Personnel Records

The Regulations apply to staff records. Allset Safety Training may at times record special categories of personal data as part of a staff member's contract of employment.

Confidentiality

When working from home, or from some other off-site location, all data protection and confidentiality principles still apply. All computer data, e.g. documents and programmes related to work for Allset Safety Training should





not be stored on a personal computer. If documents need to be worked on at a non-business computer they should be saved onto a USB drive which should be password protected.

Workstations in areas accessible to the public, e.g. reception or trading office, should operate a clear desk practice so that any paperwork, including paper diaries, containing personal and/or special categories of personal data is not left out on the desk where passers-by could see it.

When sending emails to outside organisations, care should be taken to ensure that any identifying data is removed.

Any paperwork kept away from the office should be treated as confidential and kept securely as if it were held in the office. Documents should not be kept in open view (eg on a desktop) but kept in a file in a drawer or filing cabinet as examples, the optimum being a locked cabinet but safely out of sight is a minimum requirement.

Retention of Records

Paper records should be retained for the following periods at the end of which they should be shredded or incinerated:

- Delegate records 1 year from the date of course attended
- Client records 6 years after ceasing to be a client.
- Staff records 6 years after ceasing to be a member of staff.
- Financial/accounting documents 7 years.
- Employer's liability insurance 40 years.
- Archived records should clearly display the destruction date.

What to Do If There Is a Breach

If you discover, or suspect, a data protection breach you should report this to the Managing Director who will review our systems to prevent a reoccurrence and to determine whether it needs to be reported to the Information Commissioner.

Any deliberate or reckless breach of this Data Protection Policy by an employee may result in disciplinary action which may result in dismissal.

The Rights of an Individual

Under the Regulations an individual has the following rights with regard to those who are processing his/her data:

- Personal and special categories of personal data cannot be held without the individual's consent (however, the consequences of not holding it can be explained and a service withheld).
- Data cannot be used for the purposes of direct marketing of any goods or services if the Data Subject has declined their consent to do so.
- Individuals have a right to have their data erased and to prevent processing in specific circumstances:
 - o Where data is no longer necessary in relation to the purpose for which it was originally collected
 - When an individual withdraws consent
 - When an individual objects to the processing and there is no overriding legitimate interest for continuing the processing
 - Personal data was unlawfully processed







- An individual has a right to restrict processing where processing is restricted, Allset Safety Training is permitted to store the personal data but not further process it. Allset Safety Training can retain just enough information about the individual to ensure that the restriction is respected in the future.
- An individual has a 'right to be forgotten'.

Allset Safety Training will not undertake direct telephone marketing activities under any circumstances.

Data Subjects can ask, in writing to the Managing Director, to see all personal data held on them, including e-mails and computer or paper files. The Data Processor (Allset Safety Training) must comply with such requests within 30 days of receipt of the written request.

Powers of the Information Commissioner

The following are criminal offences, which could give rise to a fine and/or prison sentence

- The unlawful obtaining of personal data.
- The unlawful selling of personal data.
- The unlawful disclosure of personal data to unauthorised persons.

Further Information

Further information is available at www.informationcommissioner.gov.uk

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING CONFLICTS OF INTEREST POLICY

As an employer, Allset Safety Training starts from a position of trusting the professionalism of the staff it employs, and this trust underlies any attempt to handle questions which raise potential conflicts of interest. Yet the damage to the reputations of individuals and Allset Safety Training caused by conflicts of interest could be considerable, e.g. where doubt is cast on the validity of an academic's research findings owing to the academic being discovered to have had a financial interest with the sponsor.

Conflicts of interest could arise in many circumstances and it is not possible to provide a single definition to cover them all. A conflict of interest may be defined as including: 'a conflict between the official responsibilities of a person in a position of trust and any other interests the particular individual may have, e.g. where the individual could be seen to be influencing for actual or potential personal benefit or seeking such a gain at the expense of Allset Safety Training'.

A conflict or perceived conflict can be defined as a situation in which a person has a private or personal interest, sufficient to appear to influence the objective exercise of his or her official duties as, for example, a trainer's family member or a company employee.

Trainers who work for more than one training provider must declare this information to any new or existing training provider they work for.

Should anyone feel they are in a position giving rise to an actual or potential conflict of interest, they must contact Jamie or Louise Settle as a matter of urgency. Appropriate steps will then be taken to deal with the conflict of interest situation in line with Allset Safety Training's Conflicts of Interest Policy and that of any Training Body we belong to (such as the CITB, IATP, etc).

In summary, the Conflicts of Interest Policy provides for a three-fold approach:

- Disclose always
- Manage the conflict in most cases
- Prohibit the activity when necessary to protect the public interest or the interests of Allset Safety Training and any relevant Training Body

Details of any conflict of interest must be recorded on within the Allset Safety Training conflict of interest log and be made available to any Training Body official auditor (e.g. the CITB Senior Quality Consultant for audit on the annual visit).

Signed:

Jamie Settle Director





ALLSET SAFETY TRAINING LTD SAFEGUARDING POLICY

1. Policy Statement

Allset Safety Training acknowledges that:

- all children and vulnerable adults have the right to protection from abuse, neglect and exploitation
- safeguarding children and vulnerable adults is everybody's responsibility
- doing nothing is not acceptable
- working in partnership with relevant agencies, in conjunction with local safeguarding procedures, has demonstrable results.

2. Scope, roles and responsibilities

Scope

This policy applies to all children and vulnerable adults in Allset Safety Training staff, delegates and visitors to our company.

Roles and Responsibilities

It is the responsibility of all personnel to support our commitment to the safeguarding of children and vulnerable adults and attend training as required. It is the responsibility of Allset Safety Training's management (Jamie and Louise Settle) to ensure compliance and the effectiveness of the procedure accompanying this policy.

Failure to report suspected harm or abuse in line with the procedure that accompanies this Policy may be regarded as colluding with the harm or abuse and be in breach of the code of conduct. All personnel working with children or vulnerable adults are responsible for familiarising themselves with this policy and its associated procedures.

Definitions

Safeguarding is the right of every child and vulnerable individual accessing our services to be protected from any form of abuse. Abuse occurs when the child's or vulnerable adult's rights are not respected.

Abuse is any behaviour towards a person that deliberately or unknowingly causes them harm, endangers life or violates their rights. It includes not only physical, emotional and psychological ill treatment but also neglect (including self-neglect), financial or sexual abuse, and the impairment of physical, intellectual, emotional, social or behavioural development. It concerns the misuse of power, control and /or authority and can be perpetrated by an individual, a group or an organisation.

A child is anyone who has not yet reached their 18th birthday. An adult is anyone aged 18 or above. A vulnerable adult is someone of 18 years or over 'who is or may be in need of community care services by reason of mental or other disability, age or illness' and 'who is or maybe unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation' No Secrets' Guidance 2000.

The Mental Capacity Act 2005 provides a statutory framework to empower and protect vulnerable people who are not able to make their own decisions. It makes it clear who can take decisions, in which situations, and how they should go about this.

3. Principles

- The welfare of the child or vulnerable adult is the paramount consideration.
- We will not tolerate abuse in any circumstances. Doing nothing is not an option.
- All children and vulnerable adults, regardless of age, disability, gender, racial or ethnic origin, religious





beliefs and sexual identity have a right to protection from abuse.

- Adults have the right to be in control of their life, make decisions, be treated with respect and consideration and have their confidentiality respected.
- All children and vulnerable adults have a right to intervention, support and/or information which could
 make life better and/or safer for them and be involved in decisions that are made about them. We will
 promote the empowerment, wellbeing, security and safety of children and adults at risk of abuse
 consistent with their rights, mental capacity and personal choices
- We aim to minimise the risk of abuse by being sensitive to cultural, gender and individual needs in our service delivery. We will maintain a culture and standards that prevent the development of poor care and support practices.
- All staff will be aware of, and comply with, local guidelines in relation to reporting concerns about children or vulnerable adults at risk. Where no such local procedures exist externally, we will provide our own.
- We will report every instance of disclosed or suspected abuse to the appropriate social services contact
 in line with Local Authority safeguarding procedures alerting the police or other emergency services as
 required. Where appropriate, we will report concerns to the Disclosure Barring Service or the Care
 Quality Commission.
- Allset Safety Training actively encourages and supports reporting of concerns and will protect colleagues
 disclosing malpractice from the risk of victimisation provided the disclosure is made in good faith.
- We comply with relevant legislation and regulation, including:
 - Disclosure Barring Service (DBS) regulations
 - Care Quality Commission (CQC) Registration regulations
 - Protection of Freedoms Act 2012
 - Mental Capacity Act 2005
 - Safeguarding vulnerable groups Act 2006
- We will review new legislation as it arises and continually review our procedures in line with good practice.

4. Application

We deliver the principles of this policy through the application of processes which clearly distinguish between the requirements to safeguard vulnerable adults and the safeguarding of children. Each has a specific, named, lead officer within Allset Safety Training. Both recognise that we have responsibilities as an employer of colleagues who work with children and with vulnerable adults. Both also recognise that any colleague may identify potential abuse in their daily work.

Signed:

Jamie Settle Director





ALLSET SAFETY TRAINING LTD EXAMINATION AND INVIGILATION POLICY AND PROCEDURES

The purpose of this exam policy is:

- To ensure the planning and management of exams is conducted efficiently and in the best interest of candidates.
- To ensure the operation of an efficient exam system with clear guidelines for all relevant staff.

It is the responsibility of everyone involved in Allset Safety Training's exam processes to read, understand and implement this policy. Allset Safety Training is committed to actively promoting equality of opportunity in everything that it does and to ensuring that differences between all of our learners and staff are valued and respected. This exam policy will be reviewed annually.

Examination Responsibilities

The examination invigilator is responsible for setting up the room. The invigilator may ask the delegates to leave the room whilst this is completed.

Examination rooms must meet the following requirements, prior to any examination being administered.

- They must be suitably quiet, in an undisturbed location, with adequate space, lighting and ventilation.
- There must be a minimum of 1.25 m between delegates (so they cannot see each other's work).
- There must be a clean desk environment, with no notes, pads, course materials, etc. visible.
- Posters or display materials, which may assist the delegates, must not be visible (except for emergency signage).
- A clock must be visible to all delegates.
- For CITB examinations (excluding HSA), the final 10 minutes (SSSTS & SSSTS-R) and 15 minutes (SMSTS &SMSTS-R) of the examination is open book examination. Therefore, course publications are allowed to be open for this period of the examination only. Where a delegate has chosen a downloadable or electronic publication, a hardcopy of the publication must be provided for the examination

All telephonic and information technology devices must be switched off prior to the start of the examination..

If a delegate leaves the examination prior to its conclusion, they will not be permitted to re-enter the examination room until the final delegate has finished and the trainer or invigilator invites the delegate back.

Invigilation requirements

All course examinations must be invigilated to prevent collusion between the delegates. Invigilators can be the course trainer and/or another person who is aware of the examination and invigilation process. This person cannot be a delegate of the course.

Prior to commencement of the examination, the invigilator is to ensure delegates are aware of their responsibilities, as follows.

- They must not communicate with anyone other than the invigilator during the examination.
- To communicate with the invigilator they must first raise their hand.
- To change any answers they must cross out their incorrect entry, make a further entry and initial the new answer.
- There must not be any eating, drinking or smoking during the examination.







Once the examination has commenced delegates cannot leave the room until the examination has been completed, except in extenuating circumstances that affect the group.

Examination resits

Where there is an option for an examination to be re-taken (see individual Training Provider course requirements for details) if the delegate fails on the first attempt

A training provider may wish for an examination resit to be held on the last day of the course. The delegate must agree and be given sufficient time to prepare for this. The examination paper for the resit must not be the same as the first paper taken by the delegate. It is therefore a requirement that an alternative examination paper is available in the event of this occurrence.

Special considerations and reasonable adjustments

Delegates with special assessment requirements can request the assistance of the invigilator, if required.

Discussions to accommodate delegates with special requirements should be arranged prior to the course and separate arrangements must be put in place.

Prior to course commencement, Allset Safety Training will identify any special requirements that delegates may have, such as physical disabilities, including sight, hearing or writing, and learning or reading difficulties (for example, dyslexia).

It is important to remember that sensitive information about the delegate has been offered voluntarily and it should be respected as confidential and in accordance with Data Protection legislation.

In circumstances where assistance is required the Allset Safety Training will ensure that under the Equality Act 2010, we are specifically required to make 'reasonable adjustments' or give 'special consideration' to enable everyone to compete equally, however, this must not affect the integrity of the examination.

Allset Safety Training Will check with the delegate to find out what support they need and be prepared to arrange for adaptations (for example, the examination can be held in a separate room and questions can be read to the delegate), which may include additional staff support.

Should this be the case, Allset Safety Training will provide an additional authorised person to facilitate any special considerations and reasonable adjustments.

Exam responsibilities

Having overall responsibility for the centre as an exam centre, the Director:

- Advises on appeals and re-marks.
- Is responsible for reporting all suspicions or actual incidents of malpractice.
- Advises tutors, assessors and other relevant support staff on exam timetables, and procedures of the awarding bodies.
- Oversees the production and distribution to staff and candidates of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events.
- Ensures candidates are informed of and understand those aspects of the exam timetable that will affect them.
- Consults with teaching and assessing staff to ensure that necessary coursework is completed on time.
- Provides and confirms detailed data on estimated entries.
- Receives, checks and stores securely all exam papers and completed scripts.





- Administers access arrangements, and makes applications for special consideration and reasonable adjustments.
- Identifies and manages exam timetable clashes.
- Accounts for income and expenditures relating to all exam costs and charges.
- Oversees internal invigilators.
- Submits candidate's coursework marks and stores returned coursework, and any other material required by the appropriate awarding bodies, correctly and on schedule.
- Arranges for dissemination of exam results and certificates to candidates and forwards any appeals or re-mark requests.
- Maintains systems and processes to support the timely entry of candidates for their exams.

Tutors and Assessors are responsible for:

- Identification and notification of access arrangement requirements (as soon as possible after the start of the course).
- Submission of candidate's names.
- Provision of additional support with spelling, reading, mathematics, dyslexia or essential skills, hearing impairment, English for speakers of other languages, IT equipment to help candidates.

Invigilators are responsible for:

- Collection of exam papers and other material before the start of the exam.
- Collection of all exam papers in the correct order at the end of the exam and their safe return.

Candidates are responsible for:

- Confirmation and signing of entries.
- Understanding coursework regulations and signing a declaration that authenticates coursework as their own (where required).

Signed:

Jamie Settle Director







ALLSET SAFETY TRAINING LTD WHISTLEBLOWING POLICY

1. Introduction

It is important to Allset Safety Training that any fraud, misconduct or wrongdoing is reported and properly dealt with. The Company therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

This policy applies to all employees of the Company, full time and part time employees on fixed term contracts and others performing functions in relation to the organisation, such as agency workers and contractors, are encouraged to use it. It is also available to use by any external third party or counterparty.

This policy and procedure is not contractual and the Company reserves the right to amend it should it, in its sole discretion, elect to do so.

2. Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Individuals should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.
- No individual will be victimised for raising a matter under this policy. This means that the
 continued employment and opportunities for future promotion or training of the individual will not
 be prejudiced because he/she has raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken, he/she should use the organisation's grievance procedure.



3. Policy

The law provides protection for those who raise legitimate concerns about specified matters. These are called "qualifying disclosures".

A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- financial fraud or mismanagement;
- an act causing damage to the environment;
- negligence;
- breaches of our internal policies and procedures:
- breaches of competition law or anti-competitive practices;
- a breach of any other legal obligation;
- conduct likely to damage Allset Safety Training Ltd and/or any associated subsidiary company's reputation;
- concealment of any of the above; is being, has been, or is likely to be, committed.

It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The individual has no responsibility for investigating the matter - it is the Company's responsibility to ensure that an investigation takes place.

4. Procedure

4.1. Step One

In the first instance, and unless you reasonably believe your Line Manager to be involved in the wrongdoing, or if for any other reason you do not wish to approach your Line Manager, any concerns should be raised with your Line Manager. If you believe your Line Manager to be involved, or for any reason do not wish to approach your Line Manager, then you should proceed straight to Step Three.

4.2. Step Two

Your Line Manager will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position). The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained.

Your Line Manager (or the person who carried out the investigation) will then report to the board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.

If disciplinary action is required, your Line Manager (or the person who carried out the investigation) will report the matter to Human Resources Department and instigate the disciplinary procedure. On conclusion of any investigation, you will be told the outcome and what the board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.



4.3. Step Three

If you are concerned that your Line Manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the board, you should inform the General Counsel, Will Bloomer, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make his own report to the board as in Step Two above. Any approach to the General Counsel will be treated in the strictest confidence and your identity will not be disclosed without your prior consent.

4.4. Step Four

Where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should liaise directly with the Allset Safety Training Managing Director, Louise Settle, where you can raise your concerns and be assured they will be fully addressed and if you wish to remain anonymous, she will ensure this is the case..

4.5 Step Five

If on conclusion of all of the above steps, you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority.

The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs:
- Financial Conduct Authority
- Competition and Markets Authority;
- Health and Safety Executive;
- Environment Agency;
- Independent Police Complaints Commission:
- Local Police Constabulary

The policy statement will be reviewed and revised annually.

Signed:

Jamie Settle Director