

**POLICIES**  
**QUALITY POLICY**  
**HEALTH AND SAFETY POLICY**  
**COMMUNICATION POLICY**  
**CONFLICT MANAGEMENT POLICY**  
**DATA PROTECTION POLICY**  
**ENVIRONMENTAL POLICY**  
**EQUAL OPPORTUNITIES & DIVERSITY POLICY**  
**TRAINING AND PERSONAL DEVELOPMENT POLICY**  
**PROCUREMENT POLICY**  
**SOCIAL POLICY**  
**DISASTER RECOVERY POLICY**  
**VIOLENCE POLICY**  
**WHISTLE BLOWING POLICY**  
**DISMISSAL POLICY**  
**ANTI CORRUPTION POLICY**  
**ANTI SLAVERY AND HUMAN TRAFFICKING POLICY**  
**PUBLIC PROTECTION POLICY**  
**CCTV POLICY**  
**COUNTER TERRORISM POLICY**  
**COMPUTING POLICY**  
**COVID 19 POLICY**

**QUALITY POLICY**

Contract Security (UK) Ltd. business objectives are to provide a quality and economic range of security services that meet the full contract requirements of the clients. A cost effective quality management system is the means adopted to ensure that the quality and service standards are met and that evidence is available to substantiate the business objective.

The Company is committed to the principles of quality assurance and recognises the necessity for the involvement and co-operation of all its employees in achieving the quality in its services, for preventing non-conformances and in striving for continual improvement.

The Quality Management System (QMS) is designed to meet the requirements of the current editions of ISO9001 (Quality management), BS7499 (Static site guarding and mobile patrol service. Code of practice) and BS7858 (Security screening of individuals employed in a security environment. Code of practice) (current issues), legal, statutory and regulatory instruments and the British Security Industry Association (BSIA) Guidelines for Manned Security Services. It includes the design of the services provided to clients. However no products are provided so there is no design of products.

It is mandatory that the policies, processes and procedures described in the QMS are understood and adhered to by all personnel of Contract Security (UK) Ltd. The Company Directors ensure that all personnel are made aware of their roles, responsibilities, authority and the relevant procedures through training, appraisal and instruction.

The Company Directors, with the process owners, agree management objectives, including quality objectives, expressed as Key Performance Indices (KPIs) with achievable targets and timescales. The company commits to continually improve the effectiveness of the QMS. They regularly monitor progress to ensure achievement and review and set new targets in line with the fiscal business plan.

This policy is reviewed at least annually as is the effectiveness of the QMS.

**HEIDI MORRIS**  
**Managing Director**

## HEALTH AND SAFETY POLICY

### Introduction

This document sets out the Health & Safety arrangements we have established in conjunction with SAFE *contractor*. We have adopted this standard policy and tailored it to represent our organisation.

The following is a description of the type of work that our Company undertakes:

Description of Work: Provision of security services through manned guarding, mobile patrols, key-holding and alarm response to the current versions of BS:7499 and BS:7984

Industry Sectors: Warehouses, factories, retail outlets, construction sites, vehicle parks, governmental facilities, private and public houses, offices, hotels, buildings, sites.

This document sets a base level of health & safety awareness, and through membership of SAFE *contractor* our organisation will develop and improve health and safety knowledge, standards and performance.

### PART 1 - General Statement of Policy

- 1.1 The Company acknowledges and accepts its legal responsibilities for securing the health, safety and welfare of all its employees, of sub-contractors working on its behalf and all others affected by their activities.
- 1.2 The Company recognises and accepts the general duties imposed upon the company as an employer under the Health and Safety at Work Act and subsequent health and safety regulations appertaining to its operation
- 1.3 The Company will do all that is reasonably practicable to provide and maintain: Safe places of work Safe methods and systems of work Safe plant and equipment Personal protective equipment relevant to working tasks A safe and healthy working environment
- 1.4 The Company will carry out a regular review of this policy to ensure that these standards of health and safety are maintained.

Signed: 

Date: 24/01/2023

Name: Heidi Morris Mills

Position: Company Owner, Managing Director

---

### PART 2 - Organisation and Responsibilities

#### 2.1 Head of Company

The Company Owner has overall responsibility for health and safety in the Company, and will:

- Ensure suitable financial provision is made for health & safety obligations
- Provide appropriate information and instruction to employees
- Ensure work is planned to take into account health & safety issues
- Ensure that staff at all levels receive appropriate training
- Monitor and assess risk to health and safety
- Understand the company policy for health and safety and ensure it is readily available for employees
- Set a personal example when visiting site by wearing appropriate protective equipment
- Actively promote at all levels the company's commitment to effective health and safety management

#### 2.2 Health and Safety Co-ordinator / Representative

Named person responsible for H&S: John Mills, Operations Director

Experience /qualifications of above person: NEBOSH certificate, over 20 years experience in the Security Industry

**Procedure P1**

The Health and Safety Co-ordinator / Representative will undertake and be responsible for:

- Monitoring the implementation of the health and safety policy throughout the company and reviewing its appropriateness by regular safety audits/inspections carried out in various workplaces
- Investigating accidents and implementing corrective action
- Reviewing health and safety legislation and implementing any new requirements pertaining to the company's undertaking
- Liaising with managers, employees, sub-contractors and specialists as and when appropriate
- Collating and reporting any accidents reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.)

**2.3. Employees**

Section 7 of the Health and Safety at Work Act 1974 states the following:

It shall be the duty of every employee while at work-

(A) to take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and

(B) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with.

In order for all employees to comply with their legal duties, they will undertake and be responsible for:

- Reading and understanding the Company's health and safety policy and carry out their work safely and in accordance with its requirements
- Ensuring that all protective equipment provided under a legal requirement is properly used in relation to any instruction / training given and in accordance with this health and safety policy
- Reporting any defects to work equipment immediately to the Site Supervisor
- Reporting to the management any incidents, which have led or might lead to injury or damage
- Reporting any accidents or near misses however minor to the Site Supervisor
- Using the correct tools and equipment for the job in hand and in accordance with training and instructions
- Co-operating with any investigation, which may be undertaken with the objective of preventing reoccurrence of incidents.

**PART 3 - Arrangements****3.1 Communication**

In order to meet the legal requirements of the Safety Representatives and Safety Committees Regulations and the Health and Safety (Consultation with Employees) Regulations, the company will communicate and consult with all employees on the following issues:

- The content of this policy
- Any rules specific to a site or job
- Changes in legislation or working best practice
- The planning of Health and Safety training
- The introduction or alteration of new work equipment or technology

This communication and consultation will take place directly with the employees via regular safety meeting, tool-box talks, e-mails and memo's posted on the staff notice board and circulated with payslips.

**3.2 Training**

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations and the regulations of the Security Industry Authority. Training will be provided for the following situations:

- Induction training for new employees (Health and safety awareness, company procedures etc)
- The introduction or modification of new/existing machinery or technology
- A change in employee position/work activity or responsibility

Training is also specifically provided for work with hazardous substances, use of **PPE** and manual handling. Any training provided by the company will be formally recorded with a hard copy kept on file.

**3.3 Risk Assessments**

The Health and Safety Co-ordinator / Representative will carry out and record formal risk assessments. In addition risk assessments are carried out continuously by employees throughout their work. Hazards are considered and work methods established to minimize the risk of injury to themselves and others affected by the work. Where the employee does not have sufficient knowledge about a specific hazard, such as work in confined spaces, they will take further advice from the H&S Co-ordinator / Representative if required. The head of the Company ensures operators are provided with appropriate instruction and training on risk assessments.

Procedure P1

---

### 3.4 Method Statements

Formal method statements (safe working procedures) will be prepared in writing where the risk is particularly high. The method statements will provide site specific information on the task to be undertaken including site set up, chain of responsibility and will detail a clear sequence of work that would be followed in order to undertake the given task safely. These statements shall be incorporated in to Assignment Instructions (AI) provided to every site.

### 3.5 Co-operation with Clients

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Clients site procedures and specific instructions will be followed at all times.

### 3.6 Welfare Facilities

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of Welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site

### 3.7 Work Equipment

All work equipment (including Electrical equipment) used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations (P.U.W.E.R.).

Before new equipment is introduced into the working environment, an assessment will be made by the Operations Director in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturers guidance and industry best practice. Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file.

If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your Site Supervisor.

### 3.8 Personal Protective Equipment (P.P.E.)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunction of PPE must be reported to the Supervisor within one hour.

### 3.9 Hazardous Substances

The risks associated with hazardous substances are considered for all work activities. Alternative less harmful substances are used wherever possible. In case of risks to health, PPE is provided and used by employees, and health surveillance undertaken where necessary.

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance undertaken by the Health and Safety Co-ordinator / Representative, in line with the Control of Substances Hazardous to Health Regulations (COSHH).

An inventory of all substances and materials hazardous to health is held at head office.

**Procedure P1**

---

**3.10 First Aid & Accident Reporting**

Adequate first aid provision will be made at every place of work occupied by the Company.

Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.

Head Office: the first aid box is located at reception

Qualified First Aider / Appointed Person: John Mills

On Project Sites - wherever possible arrangements are made with clients/principle contractors to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site.

The location of the first aid box and the name of the qualified first-aider(s) shall be documented in the Assignment Instructions provided to the personnel at that site.

All accidents MUST be reported to your Site Supervisor and to Control as soon as practicable and within one hour, the details recorded in the accident book (held at head office).

Serious accidents where hospital treatment is required must be reported to the Health and Safety Advisor as soon as possible after the incident.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.):

Certain accidents are reportable to the HSE's Incident Contact Centre. The Health and Safety Co-ordinator must be notified as soon as practicable after incidents causing the following injuries:

- any work related injury that leads to an employee being absent from work for more than 7 working days
- fracture other than to fingers, thumbs or toes;
- amputation;
- dislocation of the shoulder, hip, knee or spine;
- loss of sight (temporary or permanent);
- chemical or hot metal burn to the eye or any penetrating injury to the eye;
- injury resulting from an electric shock or electrical burn leading to
- unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;

any other injury: leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours.

**3.10 Asbestos**

Before any work commences on a client's site, all employees are to make a request to view the site-specific asbestos register.

The position and condition of any asbestos that may be in the area where you will be working should be noted within the asbestos register. If asbestos is noted within your potential work area, contact the Health and Safety Co-ordinator for further instruction.

Due to the nature of our works on older buildings, there could be a risk of exposure to asbestos

If, during your works, you see a fibrous material that you think may be asbestos, you should:

- stop work immediately
- prevent any dust/fibres being released e.g. turn off power tools, minimise air movement etc
- evacuate the immediate area and prevent access by others e.g. the public
- inform those responsible for the premises and the Health and Safety Co-ordinator, so that the necessary sampling can be arranged
- do not return to that area until informed that it is safe to do so

Remember, if you are uncertain as to the content of the material, stop work and seek advice.

**3.11 Manual Handling**

Manual handling risks are considered prior to each work activity. The method of work is adapted to minimise manual handling risks wherever possible, including use of alternative lifting and carrying methods. Our employees are advised not to manually handle loads which they feel incapable of moving safely and have received training in accordance with the Security Industry Authority regulations.

**Procedure P1**

---

**3.12 Fire Safety & Emergency Procedures**

It is the Company's policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with the Company's and the Client's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Site Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

The person with responsibility for the maintenance and testing of fire alarms and fire fighting equipment is:

- at Headquarters: John Mills, Operations Director
- on Site: the client, however regular site inspections by the Company's staff shall verify that inspections are carried out in a timely manner

In the event of the fire alarm being activated, or in any other emergency situation (e.g. bomb scare), all employees must leave the building by the nearest available exit and assemble at the designated assembly point.

**3.13 Sub-Contractors**

Sub-contractors are instructed primarily on the basis of their technical capability, though due regard is also taken of health and safety. Serious breaches of health and safety and the contractors' capability for specific risks will be taken into account during the selection process.

Activities that we sub-contract include:

- Provision of security officers trained and licensed in accordance with the Security Industry Authority requirements.

Sub-contractors health & safety arrangements are assessed by requesting the following documents:

- The sub-contractor's Health and Safety Policy and Risk Assessment procedures

We manage / supervise / monitor sub-contractors activities by the following means:

- Supervisor visits, site induction training and regular check-calls to Control

**3.14 Public safety**

The safety of members of the public and other contractors is considered at all times whilst on site.

Any work area that could place others at risk due to the Company's activities will be closed off by appropriate means (e.g. safety signage, bollards, tape, hoarding) in order to restrict access.

**3.15 Other Important Health & Safety information**

All security officers receive training in accordance with the Security Industry Authority requirements including:

**1. Role and Responsibilities:**

- Introduction
- Behavioural standards
- Civil and Criminal Law
- Searching
- Arrest
- Drugs Awareness
- Recording Incidents and Crime Scene Preservation
- Equal Opportunities
- Health and Safety at Work
- Emergency procedure

**2. Communication Skills and Conflict Management:**

- Introduction to communications skills and conflict management
- Application of communication skills and conflict management

**Procedure P1**

---

3. Company Induction:

- Company overview
- Health and Safety at Work pertaining to the Company

4. Site Induction

- Site procedures
- Health and Safety at Work pertaining to the site

All sites are surveyed before the contract is started to identify and correct or minimise:

- Security risks
- Health and Safety risks

All sites are visited regularly and audited at least monthly to ensure that:

- Security procedures are unchanged
- Health and Safety risks are unchanged, or, if changed, action is taken to update the risk analysis and take any corrective or minimising actions
- Employee performance is adequate

Lone worker safety is verified through a regular check-call procedure and corrective action is taken where a check-call is missed.

**General**

Businesses that are successful in achieving high standards have Health and Safety Policies which contribute to their business performance whilst meeting their responsibilities to people and the working environment in a way which fulfils the spirit and letter of the law.

**What the Law Requires**

Unless we are exempt from certain provisions, our business has to comply with the requirements to have a written statement of General Policy on Health and Safety for the protection of our employees and others who may be affected by our work or activities.

Our statement is important because it is our basic action plan on health and safety. To achieve this Health and Safety General Policy, along with the outlined procedures, a full appraisal of needs and requirements was undertaken in the form of inspections and assessments.

This Health and Safety Policy reflects our commitment to a planned and systematic approach to Policy implementation.

A full review is undertaken from time to time to ensure high standards and commitment is maintained.

**Health and Safety Policy Statement**

Contract Security (UK) Ltd. is committed to the provision of a high quality service by well trained and capable staff, utilising safe working procedures to protect the health, safety and welfare of all employees, customers and members of the public who could be affected by our systems and work practices. Our commitment extends to working with our clients in partnership to assist and co-operate with them to ensure that our safety practices are compatible and effective. Commitment to this policy is an important management objective contributing to business performance and development.

We recognise our duties under the Health and Safety at Work Act 1974 and accompanying protective legislation. We will endeavour to meet the requirements of this legislation so as to ensure that we maintain a safe and healthy working environment. Our managers and supervisory staff are informed of their responsibilities to ensure they take all reasonable precautions, to ensure the safety, health and welfare of those that are likely to be affected by our undertaking.

We recognise so far as is reasonably practicable the duty to ensure the following:

- To provide and maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment.
- To ensure that hazards are identified and regular assessments of risks are undertaken.
- To provide information, instruction and training as is necessary to ensure employees and others are assured of a safe and healthy working environment.
- Promoting the awareness of health and safety and encouraging health and safety best practice throughout our organisation.
- To ensure we are taking the appropriate protective and preventative measures.
- To ensure that we have access to competent advice and are able to secure compliance with our statutory duties.

In order that we can achieve our objectives, and ensure our employees recognise their duties under health and safety legislation whilst at work, we must ensure that we inform them of their duty to take reasonable care of themselves and others that may be affected by their activities. We ensure that our employees are informed of their obligations to ensure they co-operate with management and adhere with our safety rules which are provided upon joining.

## Procedure P1

**Organisation Structure**

Those involved in the management of Contract Security (UK) Ltd. have their duties and responsibilities clearly defined. This is to ensure the Health and Safety Policy is properly taken into account when designing and implementing systems and procedures.

The organisational structure (see Organisation Chart document) outlines the chain of command in respect of health and safety management. It also shows who has responsibility for the implementation of the Health and Safety Policy and are accountable for their areas of responsibility.

**Management Responsibilities**

Alongside each of the positions given in the organisational structure for the implementation of the Health and Safety Policy, individual management responsibilities are allocated. These are deemed the most important responsibilities to be undertaken by Managers, for which they are held accountable.

**Director and Company Secretary**

Maintain an organisation that meets all the statutory requirements contained in the various pieces of health and safety legislation. Ensure that the organisation Health and Safety Policy is developed and brought to the attention of all the employees.	<i>Achieved by regular meetings and discussions with relevant Managers as required. The Health and Safety Policy will be communicated to all employees either individually or on a group basis.</i>
Ensure the organisation has effective arrangements to deal with health and safety issues and emergencies that may arise as a result of the tasks involved. Ensure regular monitoring of the health and safety performance of the organisation is also carried out.	<i>Achieved by regular meetings and discussions with the relevant Managers as required.</i>
Encourage a positive health and safety culture within the organisation, so as to reduce the risk of injury or ill health to employees.	<i>Achieved by regular meetings and discussions with the relevant Managers as required.</i>
Ensure that the organisation has sufficient Employer's Liability Insurance cover and Public Liability Insurance cover for the extent of the business undertaking.	<i>A copy of the Employer's Liability Insurance Certificate will be suitably displayed.</i>
Ensure that adequate funding is available to deal with health and safety issues that affect the organisation, its employees and others who might be affected.	<i>Achieved by providing, as far as is reasonably practicable, sufficient financial resources to meet our statutory obligations.</i>
Ensure that there is an effective method of delivering the requirement to complete risk assessments, for the various work activities. Ensure that the actions arising from such assessments are being delivered and all the necessary documentation is being completed.	<i>Achieved by ensuring there are regular documentation checks to ensure that any delegated health and safety tasks are being delivered in an effective manner. This will be carried out at least annually.</i>

**Operations Director**

Ensure that the Health and Safety Policy is continually developed and the findings brought to the attention of the employees.	<i>Achieved through effective participation with fellow Managers and communicating any findings to employees under my control either individually or on a group basis.</i>
Ensure that all administration staff are made aware of the fire and emergency procedures for the facilities.	<i>Achieved by ensuring an effective staff induction procedure and to continually review the procedures and ensure the relevant records are completed and kept up to date.</i>
Ensure that adequate training, <b>including refresher training</b> , information and supervision is provided to all employees.	<i>Achieved by meetings, discussions, toolbox talks and contact with professional bodies for advice as required. Such meetings will be minuted as necessary.</i>
Be actively involved in communicating safety information to all employees.	<i>Safety information will be delivered by a combination of formal group training, group meetings, individual training or other suitable means.</i>
<b>Ensure all accidents and incidents are thoroughly investigated</b> and the necessary documentation completed. This may include reporting to the appropriate authorities ( <b>RIDDOR</b> ).	<i>Report as required any necessary notifications under the statutory reporting legislation.</i>
Ensure that any personal protective equipment provided affords necessary, suitable and sufficient protection, is correctly CE marked and is issued with the necessary information, instruction and training for its correct use and storage.	<i>Achieved by selecting suitable suppliers.</i>
Ensure that the health and safety arrangements, procedures and systems are developed and used, in all areas of the business.	<i>Achieved by the carrying out of workplace inspections. Ensure that any necessary actions arising from these inspections are completed or programmed for future action.</i>
Ensure that all work equipment in use by employees is statutorily inspected / tested as required.	<i>Achieved by ensuring that all statutory inspections are undertaken and the necessary documentation kept for reference.</i>



## Procedure P1

Managers

Be actively involved in communicating safety information to all employees.	<i>Safety information will be delivered by a combination of formal group training, group meetings, individual training or other suitable means.</i>
Ensure adequate information, instruction and training is provided to all employees.	<i>Achieved by meetings, discussions, toolbox talks and contact with professional bodies for advice as required. Such meetings will be minuted as necessary.</i>
Ensure regular supervision of all employees is undertaken.	<i>Achieved by continual monitoring of supervisors activities.</i>
Ensure Risk Assessments for all areas under his control are undertaken, in date and any actions arising from them carried out.	<i>Achieved by carrying out Risk Assessments as required and acting upon the findings.</i>
Ensure that safe systems of work established as a result of the findings of a Risk Assessment are adhered to and communicated to all staff under my control.	<i>Achieved by continual monitoring employees to ensure that the safe systems of work are in use and understood by those affected.</i>
Ensure all accidents and incidents are thoroughly investigated and the necessary documentation completed.	<i>Report to Operations Director.</i>

Scheduling Manager

Ensure only trained employees are deployed on operational duties.	<i>Achieved through regular discussions with Managers.</i>
Monitor Lone Worker (Check Call) performance of operational employees.	<i>Achieved through regular inspection of Control System records.</i>
Be actively involved in communicating safety information to all employees.	<i>Safety information will be delivered by a combination of formal group training, group meetings, individual training or other suitable means.</i>

Mobile Inspector/Supervisor

Supervise operational employees so that work is conducted safely and without risk to health and safety.	<i>Achieved through continual monitoring of employees.</i>
Ensure adequate information, instruction and training is provided to all employees.	<i>Achieved through monitoring of employees to ensure they are competent to undertake duties.</i>
Ensure all accidents and incidents are thoroughly investigated and the necessary documentation completed.	<i>Report to Operations Director.</i>
Identify hazards or potential hazards in the workplace and ensure any issues identified or reported are addressed promptly.	<i>Report to Business Development Manager.</i>
Be actively involved in communicating safety information to all employees	<i>Safety information will be delivered by a combination of formal group training, group meetings, individual training or other suitable means.</i>

All Employees

Be responsible for undertaking work safely and without risk to their health and safety and that of others.	<i>Achieved through information, instruction, training and safe methods of work.</i>
At all times, undertake work in accordance with laid down procedures, Safe Methods of Work and Risk Assessments.	<i>Achieved through information, instruction, training and safe methods of work.</i>
Report Injuries, Diseases, Dangerous Occurrences and Near Misses.	<i>Report to Line Manager.</i>
Report failure of provision of any Personal Protective Equipment/Clothing, which should be provided for the work.	<i>Report to Line Manager.</i>
Report any hazards arising from their work or changes to working conditions.	<i>Report to Line Manager.</i>

## COMMUNICATION POLICY

Contract Security's policy across the board is complete and clear communication to staff, customers and all stakeholders

### STAFF COMMUNICATION

We send out newsletters to all of Contract Security's staff, this ensures we inform them of any important news, updates and to commend specific employees that have gone above and beyond the call of duty. This important means of communication keeps all of Contract Security's staff aware of all news that affects the company.

Office staff and management receive regular updates again via newsletters and email, all memos and agendas affecting head office staff is communicated through regular meetings and through daily contact via email. Meetings are held daily for operations and weekly for all other office departments.

Security Officers are provided with work schedules and are visited at least monthly and audited, there is always opportunity for telephoning HQ. These provides for communication to and from the officer.

### CLIENT COMMUNICATION

Clients are regularly visited and updated and information relating to the service.

### OTHER STAKEHOLDERS

Local Police are informed when a site is started and assured of assistance when requested. Local libraries are also informed and notice boards erected on sites so the general public have access to telephone numbers, etc. and can contact the company.

## CONFLICT MANAGEMENT POLICY

All security officers shall be trained in accordance with the Security Industry Authority requirements including training in Conflict Management.

All security officers must report all incidents to control as soon as practicable and within 15 minutes.

All incidents shall be documented as soon as possible and within 12 hours, and submitted to Operations for review within 12 hours.

All personnel have regular appraisals to identify training and re-training needs, including Conflict Management.

Additionally, where the incident response or a site audit response warrants training or re-training

Training and re-training is carried out either formally in-classroom or on-site as appropriate to the need.

## DATA PROTECTION POLICY

Contract Security conforms to and is registered under the Data Protection Act and requires all employees to observe this policy, having regard to guidance published by the Information Commissioner including Good Practice Notes.

The Act states that anyone who processes personal information must comply with eight principles, which make sure that personal information is:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with your rights
- Secure
- Not transferred to other countries without adequate protection

The Act provides individuals with important rights, including the right to find out what personal information is held on computer and most paper records.

The Data Protection GDPR compliance has been actioned and reviewed with RBS Mentor. A document "Data Protection and GDPR Compliance" has been created and published.

**Procedure P1**

---

**Data Protection Principles**

The principles of the act are summarised as:

1. Personal data should be obtained and processed fairly and lawfully
2. Personal data can be held only for specified and lawful purposes
3. Personal data should be adequate, relevant and not excessive for the required purpose
4. Personal data should be accurate and kept up-to-date
5. Personal data should not be kept for longer than is necessary
6. Data must be processed in accordance with the rights of the data subject
7. Appropriate security measures must be taken against unauthorised access
8. Personal data cannot be transferred to countries outside the E. U. unless the country has similar legislation to the D.P.A.

**Confidentiality**

All Contract Security personnel shall sign a confidentiality form.

Personnel shall maintain as confidential all information gained in the course of business from whatever source. This includes but is not restricted to all client information, all Contract Security information and all personal information about Contract Security and client personnel and visitors.

Personnel are reminded of their duties at frequent intervals.

Personnel suspecting that a breach of confidentiality has occurred or is suspected shall immediately inform a Director who shall investigate.

Breaches shall be investigated and managed having regard to Guidance On Data Security Breach Management published by the Information Commissioner.

**Data Security**

The Director, Payroll and Accounting shall be responsible for the security of all Company data and shall ensure that the following requirements are met.

All IT equipment shall be provided with automatically updated firewalls.

Access to data stored on the Company's computers and servers shall be limited to named individuals and be password controlled.

Only the Director, Payroll and Accounting may install software onto IT equipment.

All passwords must contain alpha, numeric and non-alphanumeric characters and be at least 8 characters long.

Personnel and Directors permitted access to Company's data from home or outside the offices shall be different from those used to access their personal computers.

Data on the Company's server shall be backed up at least weekly and the most recent backup copy taken off site. Data held by the Company shall not be copied to a personal computer.

Disposal of IT equipment shall include the removal of all data on the equipment and the media reformatted to ensure obliteration before disposal.

Data stored on the Company's computers shall be in defined folders according to the nature of the data. Access to specified folders requiring heightened security, e.g. management accounts, shall be limited to named persons.

Data held as hard copy in files shall be held in cabinets that are locked when not in use.

The offices shall be secured, alarmed and have CCTV to prevent and detect unauthorised access. The alarm shall alert a named Director and CCTV shall be available for remote viewing by Directors or authorised Managers.

The subcontractor used to operate a Control Room or any other service shall have policies implemented to prevent unauthorised access to Company data provided to and held by the subcontractor.

**Auditing**

This Data Protection Policy shall be audited at least once annually and also subjected to scrutiny by the ISO 9001 assessing body.

## ENVIRONMENTAL POLICY

Contract Security (UK) Ltd. is committed to environmentally friendly operations so far as they can be achieved within the overall business objectives.

Resource use - To minimise the use of materials and energy, especially with respect to offices, vehicles and paper.

Waste management - To reduce the production of waste, and dispose of unavoidable waste with regard to Duty of Care and in a manner which minimises its environmental impact.

Transport - To reduce transport by motor vehicles. Where practical, promote the use of public transport, cycling or walking and minimise the use of private or company vehicles for travelling to work and for business purposes. Where practicable to use energy efficient vehicles minimising both fuel and original manufacture energy costs. To utilise route planning to minimise vehicle journeys and use of fuel.

Procurement - To consider the environmental performance of companies in our supply chain, and wherever financially viable give preference to products and suppliers with least environmental impact.

To monitor and continuously improve our use of resources.

Employees and customers: - To ensure all employees and customers are made aware of this policy and to promote similar policies in our customer base.

The company commits to transparency in its operations through communication of its environmental performance to stakeholders.

## EQUAL OPPORTUNITIES & DIVERSITY POLICY

The Company is committed to providing a working environment in which employees are able to realise their full potential and to contribute to its business success irrespective of their gender, race, disability, sexual orientation, religion or belief. This is a key employment value to which all employees are expected to give their support.

In order to create conditions in which this goal can be realised, the Company is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the Company. The Company expects employees to support this commitment and to assist in its realisation in all possible ways.

Specifically, the Company aims to ensure that no employee or candidate is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, race (including colour, nationality or ethnic origin), sexual orientation, religion or belief or disability. This commitment applies to all the aspects of employment outlined below:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career development opportunities.
- Terms and conditions of employment, and access to employment related benefits and facilities.
- Grievance handling and the application of disciplinary procedures.
- Selection for redundancy.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. The Company will keep its policies under review and will implement changes where these could improve equality of opportunity. This commitment applies to all the Company's employment policies and procedures, not just those specifically connected with equal opportunity.

### Sexual Harassment

The Company believes that all employees are entitled to be treated with dignity and respect while at work and when representing the business in any capacity outside of work.

This policy statement has been prepared to make clear to employees that the Company will not tolerate the sexual harassment of one employee by another.

Sexual harassment is unwanted conduct directed towards an employee by a fellow employee (or group of employees) which is of a sexual nature, or which is based on a person's sex, and which is regarded as unwelcome and offensive by the recipient. This could include:

- Unwanted physical contact.
- Unwelcome sexual advances, propositions, suggestions or pressure to participate in social activity outside work, where it has been made clear that this is not welcome.
- Conduct which is intimidatory, physically or verbally abusive, including the display of explicit material, the use of sexually explicit humour, and comments of a sexual nature whether directed specifically at any particular individual or not.
- Suggestions that sexual favours may further an employee's career, or that refusal may hinder it.

The Company regards sexual harassment as a form of intimidation which has the effect of insulting and demeaning the employee against whom it is directed. It is therefore unacceptable in the working environment and the Company will take positive action to prevent its occurrence.

### How complaints of Discrimination and Harassment will be dealt with

Discrimination and harassment are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases employees may be able to deal satisfactorily with an issue by raising it with his or her immediate manager.

A more formal means of complaint is to utilise the Company's Grievance Procedure set out in the Employee Handbook. Irrespective of how an issue of harassment arises, the Company commits itself to making a thorough attempt to resolve all matters of harassment.

If you are accused of Discrimination or Harassment

If you are accused of acting in a discriminatory manner towards a fellow employee, or a job applicant, or if you are accused of harassment, the complaint will be fully investigated.

In the course of the investigation you will be given a proper opportunity to rebut the allegation, and provide an explanation of your actions.

If it is concluded that there was no discrimination or harassment this will be the end of the matter. If it is concluded that a false claim has been maliciously made against you, the person or persons responsible may be subject to disciplinary action.

If it is concluded that you have acted in a discriminatory manner, or have harassed another employee your manager will consider what action to take. This may range from counselling to formal disciplinary action, including dismissal in serious cases.

**Procedure P1**

---

**Management Responsibilities**

Managers are the guardians of equality of opportunity within their areas of responsibility. Equal opportunities are part of the larger management responsibility of ensuring that the employment environment provides employees with motivation to do a good job. This will be impossible to achieve if individuals feel that they are being treated unfairly.

Where problems or complaints arise managers must take these seriously and make sure they are fully investigated and that any necessary follow-up action is taken. This may include initiating disciplinary action against employees who have committed acts of discrimination or harassment.

**Employees' Responsibilities**

Employees have a personal responsibility for the practical application of equal opportunities initiatives. The co-operation of all employees will be needed for the Company to make real progress in this area. In everyday ways we can all contribute to an improved working environment, for example by not making assumptions about people based on their sex or their ethnic background, by challenging those who express prejudice, and by making suggestions to managers about how the working environment can be improved to enhance equal opportunities.

Finally, remember that equality of opportunity is about good and effective employment practice, and about creating an environment in which everybody can be assured that their contribution is valued.

## **TRAINING AND PERSONAL DEVELOPMENT POLICY**

Contract Security (UK) Ltd. has a positive policy towards Training and Personal Development.

All personnel are experienced and trained in their field of work. Their competence is assessed at least annually and during employment probation period before permanent employment is offered. Training needs are identified in these assessments and as needs arise, and timely action is taken.

For our security operations all personnel are trained in accordance with the requirements of the Security Industry Authority and the applicable British Standards for the Security Industry and our operations.

Our internal trainers are qualified to train in certain areas of expertise and external training is arranged for other areas.

Personnel are encouraged to fulfil their career objectives and potential through external training and by guidance from Contract Security (UK) Ltd. Management.

Promotion from within is preferred and employees are encouraged to apply for vacancies.

## **PROCUREMENT POLICY**

Contract Security's policy is, whenever cost effective and where costs are marginally extra, to utilise environmentally beneficial and "Fair Trade" products and services.

We use only suppliers who have been approved by our Directors and Quality Manager.

Suppliers who fail our standards and requirements may be specifically excluded from our Approved Suppliers List.

## **SOCIAL POLICY**

We engage in customer and employee review and consultations on this policy to ensure that it is continuously improved. Our policy aims are:

**1. Society**

To contribute within the scope of our capabilities to improving economic, environmental and social conditions through open dialogue with stakeholders and through participation in common efforts.

**2. Human rights**

To support and respect the protection of internationally proclaimed human rights. Employees and contractors engaged as security personnel shall observe international human rights norms in their work.

### 3. Equality of opportunity

To offer equality of opportunity to all employees and not to engage in or support discrimination in hiring, compensation, access to training, promotion, termination or retirement based on ethnic and national origin, caste, religion, disability, sex, age, sexual orientation, union membership, or political affiliation.

### 4. Minors

To ensure that minors are properly protected; and as a fundamental principle to employ young workers only as part of government-approved youth training schemes (such as work-experience programs).

To support local schools careers events to highlight career prospects in the security industry.

### 5. Freedom of engagement

To require that all employees enter into employment with the company of their own free will; and not to apply any coercion when engaging employees or support any form of forced or compulsory labour.

### 6. Health and safety

To provide a safe and healthy working environment at all sites and facilities and to take adequate steps to prevent accidents and injury to health arising out of the course of work by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

### 7. Employee consultation and communication

To facilitate regular consultation with all employees to address areas of concern. To respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. To ensure that representatives of personnel are not the subject of discrimination and that such representatives have access to their members in the workplace. To make sure, in any case of major layoffs, that a social benefits and guidance plan is in place, and already known to employees or their official representatives.

### 8. Harassment and disciplinary practices

To counteract the use of mental or physical coercion, verbal abuse or corporal/hard-labour punishment; and not to allow behaviour, including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative. To develop and maintain equitable procedures to deal with employee grievances and disciplinary practices.

### 9. Working hours

To comply with applicable laws and industry standards on working hours, including over-time.

### 10. Compensation

To ensure that wages paid meet or exceed the legal or industry minimum standards and are always sufficient to meet basic needs of personnel and to provide some discretionary income. To ensure that wage and benefits composition are detailed clearly and regularly for workers, and that compensation is rendered in full compliance with all applicable laws and in a manner convenient to workers. To ensure that labour-only contracting arrangements and false young persons schemes are not used to avoid fulfilling the company's obligations under applicable laws pertaining to labour and social security legislation and regulations.

### 11. Community involvement

To support local schools careers events to highlight career prospects in the security industry.

To promote and participate in community engagement activities such as charitable fund raising.

To support a local junior football team.

### 13. Business ethics

To uphold the highest standards in business ethics and integrity and to support efforts of national and international authorities to establish and enforce high ethical standards for all businesses.

## TRAINING AND PERSONAL DEVELOPMENT POLICY

Contract Security (UK) Ltd. has a positive policy towards Training and Personal Development.

All personnel are experienced and trained in their field of work. Their competence is assessed at least annually and during employment probation period before permanent employment is offered. Training needs are identified in these assessments and as needs arise, and timely action is taken.

For our security operations all personnel are trained in accordance with the requirements of the Security Industry Authority and the applicable British Standards for the Security Industry and our operations.

Our internal trainers are qualified to train in certain areas of expertise and external training is arranged for other areas.

Personnel are encouraged to fulfil their career objectives and potential through external training and by guidance from Contract Security (UK) Ltd. Management.

Promotion from within is preferred and employees are encouraged to apply for vacancies.

## TUPE

### TUPE Into Contract Security (UK) Ltd.

TUPE applies to all contracts won from other security enterprises or from in-house security services.

General details are requested from the current supplier in order to produce quotations.

On the award of the contract, detailed information is requested for each person offered for TUPE. Where this is not provided in a timely manner by the out-going supplier, Contract Security reserve the right to inform the relevant authorities of the non-conformance with laws and policies.

The TUPE form provides for the person to be transferred to sign giving permission for the release of full information including copies of all screening, holiday, wages, benefits, training and relevant personnel documentation.

However, acceptance of the individual is subject to compliance with British law, especially The Private Security Industry Act 2001, and is also subject to a period of probation and security screening.

All TUPE joiners undergo induction training and site revision training to the newly agreed assignment instructions issued by Contract Security.

Where the previous service to the customer had been criticised adversely, specific instruction and/or retraining may be offered to the individuals to ensure quality of service.

### TUPE From Contract Security (UK) Ltd.

Prior to receiving documented evidence of contract loss and after receiving a documented request from the customer, general details are provided to the competing company.

On receipt of documented evidence of loss of contract from the customer, full TUPE disclosure is made for all personnel to be transferred.

Where requested and agreed with the subject person, vetting information is shared with the competing company.

## DISASTER RECOVERY POLICY

### 1. Introduction

This document describes the procedures, responsibilities and authorities for disaster recovery from:

- Internal Computer Failure
- Control System Computer Failure
- Loss Of The Operational Offices
- Human Resource Limitations
- Cash Flow Limitations
- Resource Limitations (Non Human Resources)



Procedure P1

---

**2. Internal Computer Failure**

Responsibility: Operations Director  
Authority: Operations Director

**2.1 Back-Up**

An automated back-up system of the server at least weekly. The back-up media to be removed from site immediately after back-up

**2.2 Recovery**

Enlist the services of the IT sub-contractor  
IT sub-contractor to recover network failures  
Attempt recovery to the server from the back-up  
If recovery on the server fails recover to a different computer

**2.3 Access to the Control Computer System**

Access to the Control Computer System can be made from any computer operating Windows 2000 or later versions and having internet access, preferably 1Mbit broadband or greater.

First try access from the offices, then from home base(s).

**3. Control Computer System Failure**

Responsibility: Operations Director  
Authority: Operations Director

The control computer system provider shall demonstrate that they have a proven disaster recovery plan, including plans for recovery from telecommunications failures.

NB: The provider, Gallinet, has extensive disaster recovery routines which are tested and have been invoked and are proven.

**4. Loss of the operational offices**

Responsibility: Operations Director  
Authority: Operations Director

Inform all operational personnel of the problem and new telephone numbers, address, etc.

Temporarily set up operations from home base(s) and in the landlord's conference room whilst searching for appropriate premises or awaiting return of the offices.

Redirect the telephone system.

Obtain at least two computers operating Windows 2000 or later versions, at least one with having internet access, preferably 10Mbit broadband or greater.

Obtain the back-up copy of the server and load to one computer.

Log onto the Control Computer System with the second computer.

Obtain the services of the IT sub-contractor to set up further computers and a local area network.

Obtain additional telephone facilities (land-line and mobile).

Create a plan for returning to the offices or to new offices as appropriate.

**Procedure P1****5. Human Resource Limitations**

Responsibility: Operations Director  
 Authority: Operations Director

Planned recruitment to maintain resources.

Use of floating security officers and supervisors to cover gaps.

Utilisation Sub-Contract Individuals as self-employed or supplied by a company acting as an agency.

**6. Cash Flow Limitations**

Responsibility: Company Secretary  
 Authority: Company Secretary

Monitoring of cash flow.

Expediting payments from debtors.

Supplier payment control within agreed payment terms.

On time employee payment.

Negotiation of adequate overdraft facilities and factoring arrangements.

Negotiation of adequate financial resources from all sources including director's loans and other companies owned by the directors.

**7. Resource Limitations**

Non human resources.

Responsibility: Operations Director  
 Authority: Operations Director

Planning and monitoring the requirements for resources including:

- uniforms and security officers' equipment,
- office facilities and equipment,
- computer hardware and software,
- documents (e.g. British Standards) and stationery
- all other resource requirements.

**VIOLENCE POLICY**

Violence and aggression by any Director, employee or sub-contractor is prohibited and all instances shall be deemed as gross misconduct.

Violence towards a Director, employee, sub-contractor, client staff, client visitor or any person shall be dealt with as follows:

1. employees are reminded of the training received (Conflict Management and Violence as applicable),
2. ensure your own safety, back off and, if necessary, flee from the aggressor,
3. observe the aggressor from a safe distance,
  - if practicable, record the event on video or voice,
4. where violence persists, call the police:
  - note that the Assignment Instructions may include apprehending the aggressor,
  - call 999,
  - for telephone systems with outside line access codes dial 9,
  - report the violence, the address and time,
  - assist the police when they arrive,
  - report the violence to Control.
5. in all cases prepare an incident report,
6. liaise with Client and Company supervisors, managers and Directors as appropriate.

**Procedure P1**

---

Aggression towards a Director, employee, sub-contractor, client staff, client visitor or any person shall be dealt with as follows:

1. employees are reminded of the training received (Conflict Management),
2. ensure your own safety, back off and, if necessary, flee from the aggressor,
3. try to defuse the aggression by placating the aggressor,
  - if practicable, record the event on video or voice,
4. where aggression persists, call the police:
  - call 999,
  - for telephone systems with outside line access codes dial 9,
  - report the aggression, the address and time,
  - assist the police when they arrive,
  - report the violence to Control.
5. in all cases prepare an incident report,
6. liaise with Client and Company supervisors, managers and Directors as appropriate.

**Arrest and Ejection from Premises**

Security Officers are not normally required to arrest offenders or eject them from the premises unless this is specifically stated in the Assignment Instructions (e.g. for retail assignments).

When arresting or ejecting offenders:

1. employees are reminded of the training received (Conflict Management and Violence as applicable),
2. use of minimum force
3. ensure that the offender suffers no injury (e.g. suffocation)

**Intervention Guidance**

Firstly ensure your own safety.

If there is danger of injury to any person you should intervene very carefully.

If not on CCTV if possible photograph the incident.

A warning shout should be given. E.g. Stop Fighting. You will be reported.

If on CCTV shout "CCTV in operation, you are being recorded". You can shout this even if there is no CCTV as it may stop the violence.

If you are able to photograph or record shout "You are being recorded"

If two or more people are fighting get help, call police on 999

If one person is assaulting another try to intervene to stop the aggressor

If more than one person is assaulting another get help before intervening, call police on 999

**WHISTLE BLOWING POLICY**

Reports of significant problems should be reported by the complainant to the CEO except where the problem affects the CEO when they should be reported to the independent consultant Derrick Willer, tel 01926 490 456, email [dwiller@theiet.org](mailto:dwiller@theiet.org).

Whistle blowing reports shall be treated in confidence without disclosing the name of the complainant.

Whistle blowing reports shall be treated as Complaints with the **complainants name withheld** and the Complaints process shall be followed.

It may not be possible to reply to the complainant with the corrective action, planned and taken, such action shall be made clear to all (e.g. procedural changes, reports in the newsletter).

## DISMISSAL POLICY

All dismissals, for whatever reason, are and must be verified with RBS Mentor to ensure that they comply to employment law and will result in a favourable result should ACAS become involved.

### Misconduct

Dismissals for misconduct follow the appropriate verbal, written warning before dismissal process according to the nature of the offence and the employee's record of offending. The process is described in the Employee Handbook. Gross misconduct, as defined in the Employee Handbook, can warrant instant dismissal. The Company may also invoke suspension of the employee, with or without pay, whilst the offence is investigated fully.

### Redundancy

Dismissals for redundancy will, if they occur, comply with employee law. It is, however, Company policy to redeploy employees wherever practicable and subject to the employee's agreement. The Company will honour untaken accrued leave with payment in lieu. The Company may offer a gratuity, which may be taxable, in excess of the minimum legal severance pay but in accordance with the employee's record and standards of service.

## ANTI CORRUPTION POLICY

Our Company's long-standing commitment to doing business with integrity means avoiding corruption in any form and complying with the anticorruption laws and anti bribery laws.

Bribery and corruption are defined as gross misconduct in the employee handbook which is provided to all employees and is made available on all sites. Gross misconduct is subject to instant dismissal.

Contract Security uses RBS Mentor to ensure our policies and employee handbook meet legislative requirements. The Company does not give or receive gifts of any kind to or from customers or suppliers.

The Company may make gifts of money or in-kind, e.g. security services, to charities subject to the charity not being involved in any way with the Company.

The Company may make gifts to employees for excellent service, e.g. above and beyond the call of duty.

## ANTI SLAVERY AND HUMAN TRAFFICKING

Contract Security complies fully with UK law with respect to slavery and human trafficking. Should instances of slavery or human trafficking be discovered in the course of our operations we shall inform the police and the appropriate authorities and provide support for the actions of the police and authorities.

The company Secretary is responsible for ensuring this policy is implemented

## PUBLIC PROTECTION POLICY

Contract Security's policy is to ensure that all stakeholders, be they customers, their staff, our employees or the general public are protected against:

- criminal activities so far as is possible within the law and the safety of those present.
- health and safety risks

We encourage our staff to report actual and suspect criminal activity or undocumented health and safety risk whether it be on a client's site or in a public place, whether they are on duty or off duty.

Any member of the general public may also contact us to report actual and suspect criminal activity or health and safety risk related to our clients sites or our staff.

**Procedure P1**

---

**CCTV POLICY**

The CCTV system operated by Contract Security itself for the Contract Security and on behalf of clients, and by its employees at Clients' Sites, for public security, safety, and criminal deterrence, detection and conviction purposes.

Any person may request and be given details of these objectives and policy and of the mechanism for complaint.

Contract Security is located at Thremhall Park, Start Hill, Bishop's Stortford, Hertfordshire CM22 7WE.

The Client's address, where the system is at a Client's site, is stated in the relevant Assignment Instructions.

These systems use cameras (e.g. pan, tilt and zoom), displays and recordings, of appropriate areas:

- for the Company, these monitor the internal offices only, and the Nominated Manager is Lee Mills,
- for Clients, these details and the name of the Nominated Manager are further defined in the specific client's documents and/or Assignment Instructions.

The system may also provide for public information broadcasting related to this policy, to the activities of the Client and for public entertainment ("piped music" etc.).

It is the policy of the Company to ensure that the systems and their operation conform to the requirements of the Data Protection Act and government guidelines and statutory legislation and, where relevant, CCTV standards.

Close liaison is maintained with the Client and personnel on security duty and, where relevant, with the police and law enforcement agencies, and with appropriate organisations (e.g. shops in shopping malls). This liaison could include telephone links, mobile telephones and radios, and other methods of communication.

All areas in the public domain which are monitored are identified with signs clearly visible to the public, stating that a CCTV system is in operation, the purpose of the system (e.g. for public safety and security and for the prevention, detection and prosecution of crime) and providing contact information. Additionally, systems in the public domain and those with private boundaries must be operated by appropriately licenced security officers.

Recording media is maintained in good condition and held secure. Note that in order for recording tapes to be used as evidence in court they should not be used more than 13 times and be de-gaussed before re-use.

There is provision for the release of information to the police, other statutory prosecuting bodies, to defendants or a defendants' solicitors and to members of the public in accordance with the Data Protection Act.

Media may only be released under controlled conditions and then only by authorisation of the Nominated Manager. Note that if the purpose includes "for the prevention, detection and prosecution of crime" media may not be released to a private person but only to their solicitor when the police should be informed of the request.

Media released to a private person must ensure that the Data Protection rights of all persons on the media are observed, this normally means that identities of persons other than the requester are masked on each and every frame.

All complaints shall be recorded and the nominated Manager informed of the complaint and of all corrective and preventive action, and may require specific actions to be carried out. Relevant complaints records shall be made available for inspection to complainants and, for Clients systems, to the Client's Management.

The system shall not be used by any person for private purposes or any purpose which is not connected with the stated purpose of the CCTV system. The system shall not be used to pry into private properties and shall be appropriately set up (e.g. private properties blanked out to prevent viewing) or be audited to ensure misuse does not occur.

All personnel involved in the system are fully trained in the operation of the system so far as it forms part of their specific tasks.

The system shall be registered with the Data Protection authorities by Contract Security for systems administered by Contract Security and by the Client for systems at clients' sites. The provisions of the Data Protection Act require the release of information related to an applicant to that applicant and these provisions are adhered to.

Where appropriate, forms and signs in foreign languages commonly in use in the area, shall be used.

Mobile CCTV equipment is not used.

This policy and the effectiveness of Contract Security's CCTV systems shall be reviewed annually, these may be as part of the QMS review. Also the effectiveness of the Client's systems should be reviewed annually by the client and the Company shall be ready and available to contribute to these client reviews. Such reviews must be made available to the Information Commissioner and any law enforcement agency on demand.

---

## COUNTER TERRORISM POLICY

All personnel are required to cooperate with this policy.

Personnel discovering or suspecting terrorist activities must immediately report these to a Director or Manager.

Possible activities include:

- actual threats
- suspect packages
- conversations overheard
- threats against citizens of UK or other country (e.g. racial threats)
- hearsay

The Director or Manager shall take all necessary steps to evaluate the threat and, if significant, report it to the police.

## COMPUTING POLICY

All Directors, employees and sub-contract security personnel are required to observe and comply with this policy.

The Operations Director shall ensure that this policy is understood and carried out by all Directors, employees and sub-contractors.

Personnel discovering or suspecting contraventions of this policy must immediately report these to the Operations Director and within 24 hours.

The Operations Director shall take all necessary steps to evaluate the threat and, if significant, take mitigation and corrective action and, if a criminal offence, report it to the police.

All Directors, employees and sub-contractors shall receive training in this policy to include cyber security.

### Computers and Servers

All company computers, servers and computing devices shall:

- only be used by authorised persons,
- be protected by automatically updated firewalls,
- have password access control,
- only be linked to the server by authorised personnel,
- only be linked to PeopleHours by authorised personnel.
- have all passwords changed at the discretion of the Operations Director,
- have different access names and passwords for each company application.

All personal computers and computing devices shall not be used for any company business without the documented authorisation of the Operations Director. If so approved they shall:

- be protected by automatically updated firewalls,
- have password access control
- have all passwords changed at the discretion of the Operations Director.

### TelMe

Mobile telephones used solely for TelMe activity provided by GalliNet are excluded because TelMe provides adequate security.

## Training

All personnel shall be trained in computer security and this training recorded.

All personnel shall receive computer training relevant to their job.

Whilst in training all personnel shall be supervised by a trained person.

## COVID 19 POLICY

### Government Instructions and Guidance

All employees, subcontractors and Directors shall conform to government instructions and guidance.

### Covid 19 Rules

Any person suffering or suspecting Covid 19 symptoms shall:

- self-isolate until confirmed well again,
- take a test to confirm the infection and to confirm that the infection has ceased,
- inform their supervisor immediately,
- their supervisor shall inform all personnel who came into contact with the sufferer (e.g. on site) to be aware of the report,
- inform their supervisor when confirmed well after taking a test,
- not attend for work or any other reason without the documented permission of a supervisor, manager or Director,
- where a test is required the Company shall reimburse the person concerned with the costs of Covid 19 testing.

Contract Security (UK) Ltd.

Change Control

Document Ref: P1

Document Title: **Company Policies****CHANGE CONTROL****APPROVAL AUTHORITY**

Managing Director

**DISTRIBUTION**

Controlled: Quality File

Uncontrolled: None (Users of uncontrolled copies must ensure that they are using the up-to-date version for the purpose of use)

**CHANGE HISTORY**

Date	Description of Change	Change Approver(s)
28/05/06	First Issue	HMM
01/04/13	TUPE, Disaster Recovery, Violence, Anti Corruption, Dismissal and Whistleblowing added	HMM
20/02/14	Public Protection Policy added	HMM
24/04/16	Violence Policy amended for intervention guidance, CCTV and Public Protection added, Data Protection and Counter Terrorism policies added.	HMM
1/6/16	Quality Policy added	HMM
24/11/16	Updated Health and Safety Policy	HMM
22/08/17	Quality Policy updated	HMM
01/06/18	Data Protection GDPR compliance added	HMM
13/5/19	Updated Quality Policy for removal of SIA ACS	HMM
28/09/19	Updated for data security	HMM
15/02/22	Computing Policy Covid 19 Policy	HMM
01/02/23	Reviewed no changes	HMM
24/07/23	Design added to Quality Policy	HMM

**Changes Noted & Understood**  
(Assignment Instructions Only)

<b>By (Sig/Init):</b>						

End of Change History

Form No.CSUK063

Approved: JM