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Bribery Prevention Policy

Policy Statement

Heating and Pipework Installations (Leeds) Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Heating and Pipework Installations (Leeds) Ltd has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealing and relationships, wherever in the country we operate.

Heating and Pipework Installations (Leeds) Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

Heating and Pipework (Leeds) Ltd recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to your reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

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Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality:
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

Heating and Pipework Installations (Leeds) Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is made with the suggestion that a return favour is expected.
- It is compliant with the local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).

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- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting an individual of certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

Heating and Pipework Installations (Leeds) recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

Facilitation Payments and Kickbacks

Heating and Pipework (Leeds) Limited does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Heating and Pipework Installations (Leeds) Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

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Heating and Pipework Installations (Leeds) Ltd recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your lane manager.

Heating and Pipework Installations (Leeds) Ltd will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

Heating and Pipework Installations (Leeds) Ltd accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

Employee Responsibilities

As an employee of Heating and Pipework Installations (Leeds) Ltd, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

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If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross conduct. Heating & Pipework Installations Ltd has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Heating & Pipework Installations (Leeds) Ltd, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director, or the Head of Governance and Legal.

Heating & Pipework Installations (Leeds) Ltd will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

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

You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Heating & Pipework Installations (Leeds) Ltd understands that you may feel worried about potential repercussions. Heating & Pipework Installations (Leeds) Ltd will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Heating & Pipework Installations (Leeds) Ltd will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

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Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

Training and communication

Heating & Pipework Installations (Leeds) Ltd will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

Heating & Pipework Installations (Leeds) Ltd.'s anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

Heating & Pipework Installations (Leeds) Ltd will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act need to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

Record keeping

Heating & Pipework Installations (Leeds) Ltd will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

Heating & Pipework Installations (Leeds) Ltd compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions

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for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and Heating & Pipework Installations (Leeds) Ltd may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Signed	
	Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Modern Slavery Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps that HPI Building Services has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. HPI Building Services has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

HPI Building Services is a Mechanical Building Services provider operating throughout the UK, predominately within Yorkshire. Our suppliers are a mixture of local and national suppliers operating within the UK. We also use a small selection of carefully selected sub-contractors who we vet internally prior to entering any agreement with them or providing them with any orders.

Our High-Risk Areas

We aim to reduce the risk across our own company by limiting our suppliers and subcontractors, ensuring that each can be vetted on an individual basis. Our high-risk areas are sub-contractors and suppliers who deal with third part manufacturers. We limit the risk by only using suppliers who have a clear supply chain and by vetting each sub-contractor on an individual basis and monitoring them on an ongoing basis.

Our Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without

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fear of reprisals. This is outlined to all employees within the Employee Handbook.

- Our Code of business conduct explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

HPI Building Services operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public or Law enforcement agencies to indicate that modern slavery practices have been identified.

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Anti-Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

HPI Building Services have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our own business or in any of our supply chains.

We are committed to ensuring that there is transparency in our own business and in our approach to modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting process, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standard.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

Processes to Combat Trafficking and Slavery

We are committed to providing our staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. The former is audited monthly through the payroll process and procedures and the latter by independent review of the employment contract and related documentation coupled with the payroll audit. Furthermore, we ensure all our staff have provided their National Insurance Number, and Working Visa if applicable, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

The construction industry attracts a workforce from all backgrounds. In the UK, we are able to utilise the skills of employees from across the world, particularly Europe. Whilst the benefit of this influx of workers allows for a competitive market, it also has the risk of potential exploitation. By checking our employees' NI Numbers or Working Visa's we know that they are legally eligible to work in the UK and that their salary will be monitored by HMRC.

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Ensuring Standards in Our Supply Chain

HPI Building Services requires of all our suppliers and sub-contractors' compliance with our online prequalification system. This is being adapted to incorporate sufficient information to ensure that we are confident that our supply chain upholds the same standards, principals and business ethics that we do. Any new contracts entered into for suppliers outside of this system will be similarly vetted and scrutinised. Contracts will not be entered into or renewed if we feel the supplier does not reach our standards or has progressively allowed their standards to lower.

Signed	
	Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Equality Policy

Heating & Pipework Installations Ltd is committed to encouraging equality and diversity among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation - in providing goods and/or services and/or facilities - is also committed against unlawful discrimination of customers or the public

The policy's purpose is to:

- Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation
- Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities

The organisation commits to:

- Encourage equality and diversity in the workplace as they are good practice and make business sense
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued

This commitment includes training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination

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Associated Company:

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All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public

Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 - which is not limited to circumstances where harassment relates to a protected characteristic - is a criminal offence

Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation

Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act)

Review employment practices and procedures when necessary to ensure fairness, and update them and the policy to take account of changes in the law

Monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy

Monitoring will also include assessing how the equality policy, and any sporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues

The equality policy is fully supported by senior management and has been agreed with trade unions and/or employee representatives.

Details of the organisation's grievance and disciplinary policies and procedures can be found in the main drawings office. This includes with whom an employee should raise a grievance - usually their line manager.

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Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Signed	
	Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Corporate Responsibility Policy Statement

Statement

HPI Building Services (Leeds) Ltd recognises that its activities and services have a significant impact on the wider social, environmental and economic wellbeing of the north of England and further afield. By addressing these impacts we can also improve the quality and performance of our core organisational processes and responsibilities.

Our published vision is “to improve people’s quality of life by ensuring that waste is considered as a valuable resource and is managed to deliver the best combination of environmental, social and economic benefits”. By embracing corporate social responsibility (CSR) we will broaden our vision by actively looking for opportunities to improve our environment and contribute to the wellbeing of the communities in which we operate.

Tackling the challenge of addressing our wider impacts and reflecting our vision will require a corporate and systematic approach towards identifying these impacts, demonstrating continuous improvement and delivering wider benefits to our core business, stakeholders and environment.

For the purpose of the policy, CSR is defined as the integration of social and environmental concerns into the business of the HPI Building Services (Leeds) Ltd and the HPI Building Services (Leeds) Ltd interaction with its stakeholders.

- The HPI Building Services (Leeds) Ltd is committed to establishing a CSR system which is guided by the following principles:
- Shared responsibility – CSR involves everyone in our organisation which means sharing the responsibilities of ownership as well as its rewards.
- Openness and accountability – We will communicate our CSR policies, objectives and performance openly and honestly to our people, partners and other stakeholders. We will also seek their views and encourage them to communicate with us
- Continuous improvement – In line with our Best Value Approach, we are committed to measuring and improving our CSR Performance. We will develop and implement specific environmental and social policies and procedures, monitor our performance, set targets for improvement and report our progress.
- Demonstrate compliance – as a minimum we will meet or exceed all relevant legislation. Where no legislation exists we will seek to develop and implement our own appropriate standards.

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Policies and programmes will be developed in the following thematic areas of CSR, which reflect the nature of our day to day business activities and wider involvement with society:

Environment

To recognise the need to deliver services in an environmentally sustainable way and to include concern for the environment in all our activities. To address impacts arising from the energy, water and resource use, transport needs and waste generation, of our services and activities.

Relationships

To deliver our vision through developing strong relationships with our partners, other external organisations and individuals, which are conducted with integrity and courtesy, and by ensuring that we honour our commitments. To work with our contractors and suppliers to implement 'green' procurement and to develop a partnership approach for the delivery of our strategies and services.

Communities

To build relationships with our service users, and the local communities which we serve, and to support local social businesses who share our aims. To encourage our people, and those acting on our behalf, to consider the needs of others in our day to day business. To encourage feedback from the local community on our CSR policies and programmes.

People

To Respect our staff and encourage their development and training. To promote and maintain equality and to have constant regard to the happiness of our people as a whole, including their welfare, health and safety, empowerment and communication. To encourage and promote team working and the sharing of skills and knowledge, whilst recognising outstanding individual contribution and rewarding our people fairly.

Organisation

In line with this policy, CSR processes will be incorporated into the HPI Building Services Service Planning process. This will include provision for monitoring and reviewing the effectiveness of CSR measures and will identify the resources required for implementation.

The Director of Waste disposal will have ultimate responsibility for CSR management within HPI Building Services

Senior management will be responsible for identifying and analysing CSR aspects arising from their service activities and will champion CSR in these areas. In conjunction with an identified CSR Co-ordinator, managers will also identify

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and implement an ongoing programme for embedding CSR into HPI Building Services mainstream activities.

The CSR Co-ordinator will be responsible for the provision of advice and guidance on all CSR matters


The internal auditor will be responsible for monitoring the compliance and effectiveness of CSR measures, as part of their ongoing audit programme.

Arrangements

The CSR co-ordinator will provide an annual report to HPI Building Services and summarise progress towards CSR targets and objectives in the previous year and propose action plan for the following year. On approval, the report will be published and made widely available to staff and stakeholders.

CSR training will be provided to the management team and all staff via a number of facilitated sessions, with the aim of ensuring that they have the skills necessary to identify, evaluate and manage the CSR aspects associated with the services they provide.

This policy will be clearly communicated to staff and subject to periodically reviews in accordance with relevant statutory provisions.

Signed	 Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Alcohol and Drugs Policy

We are committed to providing a safe, healthy, and productive working environment for all employees, contractors, customers and visitors involved in its operation.

This policy sets out our aims in reducing and managing alcohol and drug problems in the workplace.

Alcohol and drug problems are associated with a wide variety of costs for employers and employees. These costs include ill-health sickness absence, reduced work performance, and accidents.

Consumption of drugs and alcohol (including prescription and over the counter drugs) or intoxication during working hours implicates the health and safety of the individual and others, since these substances impair coordination, judgement, and decision making. Irresponsible behaviour resulting from the misuse of drugs and/or alcohol may damage our reputation and/or business, and as such, is a policy matter.

Policy Objectives

- To state our position on alcohol and drugs within the workplace.
- To ensure we comply with appropriate legislation.
- To minimise the creation of risks caused by or associated with alcohol and drugs at work.
- To have clear rules regarding substance misuse in the workplace.
- To provide employees with training on the adverse health effects of alcohol and drugs.
- To encourage the early identification of substance misuse.
- To support employees experiencing alcohol and drug problems.
- To provide sufficient training and support to line managers to make sure they feel able to support employees experiencing problems.

Definitions

Alcohol abuse

We define alcohol abuse as any drinking, either intermittent or continual, which interferes with health and/or social functioning and/or work capacity or conduct.

Drug

We define drugs as illegal, prescribed and over the counter medicines and solvents. In the case of prescribed and over the counter drugs, we recognise that their possession and use by the employee is legitimate.

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Drug abuse

We define drug abuse as the use of illegal drugs, the deliberate misuse of prescribed or over the counter drugs, and the use of solvents, either intermittent or continuous, which interfere with health and/or social functioning and/or work capability or conduct.

Legal

Under the Health and Safety at Work Act 1974, we recognise the duty to protect the health, safety, and welfare of employees and others who are (or may be) affected by their activities, as far as is reasonably practicable, and we are committed to taking measures to ensuring this safety.

Under the Management of Health and Safety at Work Regulations 1999, we will carry out a risk assessment to identify workplace hazards and put measures in place to minimise these risks.

Under the Misuse of Drugs Act (1971), it is illegal for anyone, to produce, supply or be in possession of illegal drugs.

Employers may be liable if they knowingly allow an employee, customer, or service user to dispense, manufacture, possess, use or sell drugs on their premises.

Policy Rules

We require all employees to come to work free from the effects of alcohol and drugs. Working under the influence of alcohol and drugs, or consuming alcohol or drugs during hours of work, including paid and unpaid breaks, is unacceptable behaviour.

Employees found in possession of illegal drugs or using illegal drugs while at work will normally be reported to the police.

If the legitimate use of prescribed drugs is likely to affect job performance and safety, employees should inform their line manager immediately.

Education

We are committed to promoting health and welfare at work. We will provide employees with information on safe and sensible drinking and the risks associated with drug use.

We will disseminate this information via written materials and email communications.

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We are committed to providing suitable and sufficient training to help managers enforce this substance misuse policy and support any employees with a problem. Additional support can also be sought from Human Resources.

New managers will be made aware of their responsibilities in relation to this policy via the company induction programme. New staff will be made aware of this policy during the induction and will be sent a copy with their contract of employment.

This policy will be sent to all staff during induction and will thereafter be available on local drives.

Identifying a problem

Substance misuse may become apparent through a number of signs. The following list of signals (particularly in combination) could indicate an issue. This list is not exhaustive.

- Persistent short-term absence.
- Frequent unauthorised absence.
- Recurrent small accidents.
- Poor time keeping.
- Inconsistency in work performance.
- A breakdown in working relations.
- Paranoia/aggression.
- Deterioration in physical appearances, such as dental problems/weight loss.

These factors can have a number of other causes, and we encourage managerial staff to use all the information at their disposal in intellectual discretion to identify a potential problem.

Colleagues may be the first to notice when an employee is misusing substances. If a member of staff suspects an alcohol or drug problem in a colleague, they should either:

- Encourage the person to seek help from support agencies.
- Report the matter to a manager (particularly if the person is involved in a safety critical job).

Misconduct

Our policy is principally concerned with ongoing issues of substance misuse. We class these as 'capability issues' as the problem will primarily impact how the individual performs their job.

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In circumstances where an employee breaches the policy on an individual case, such as reporting for work drunk or being under the influence of drugs at work, we will class this behaviour as a conduct issue and handle it via the normal procedures.

If an employee, for example, is violent at work while under the influence of any substance or deals illicit substances at work or any other very serious incident, we will consider this serious misconduct and are justified in summary dismissal.

If an employee admits to having a substance misuse problem, the disciplinary process may be held in abeyance. This will be subject to the successful outcome of treatment and improvement of performance/job capability.

If the employee subsequently admits to a substance misuse problem following an instance of serious misconduct, we may carry out the support route and the disciplinary route in tandem.

Voluntary Referral

Employees who suspect or know they have a drug or alcohol problem are encouraged to seek support at an early stage.

In such instances, we recognise that it is up to the discretion of individuals regarding informing their line managers.

Referral by Management

Managers will offer support to employees who are suspected of having an alcohol or drug problem.

If the problem has become apparent because of a decline in work performance, management will place the employee on a performance improvement plan where the employee will be required to demonstrate improvement and satisfactory completion of the support programme. If performance does not improve, disciplinary action will be taken.

We will give employees the opportunity to attend treatment within work time. If an employee is absent, normal sick pay arrangements will apply.

Confidentiality

All appropriate staff, such as occupational health and human resources, must maintain confidentiality for any employee who is experiencing problems with drugs and alcohol.

Appropriate staff must not divulge information regarding individual cases to third parties. Information can only be divulged in cases where safety would be compromised by not doing so.

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Relapse

We acknowledge that relapse is common with alcohol and drug problems and, in normal circumstances, we will support employees through two relapses after treatment.

We will treat subsequent relapses on a case-by-case basis. During any review, we will take into account the needs of the department and the business needs of the organisation.

Managers should make sure that employees are aware that disciplinary procedures may begin following subsequent relapses.

Return to Work

After the successful completion of treatment, the company will try to make sure that the employee returns to their existing role. However, if the employee is unable to fulfil their required duties, we will consider alternative duties.

The completion of treatment will not affect promotional prospects.

Managers should make sure that employees are aware that disciplinary procedures may begin following subsequent relapses.


Equal Opportunities

This policy applies equally to all staff regardless of grade, experience, or role within the company.

Monitoring and Review

This policy will be subject to monitoring to review how the policy works in practice. We will review this policy in twelve months.

In compliance with the Employment Protection (Consolidation) Act (1998), we will give all staff twelve weeks' notice of any changes to this policy.

Signed	
	Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Equal Opportunities Policy

Statement of policy and purpose of policy

Heating & Pipework Installations Ltd (the Employer) is committed to equal opportunities for all staff and applicants.

It is our policy that all employment decisions are based on merit and the legitimate business needs of the organisation. The Employer does not discriminate on the basis of race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, marital or civil partner status, pregnancy or maternity, disability, religion or belief, age or any other ground on which it is or becomes unlawful to discriminate under the laws of England and Wales (referred to as Protected Characteristics).

Our intention is to enable all our staff to work in an environment which allows them to fulfil their potential without fear of discrimination, harassment or victimisation. The Employer's commitment to equal opportunities extends to all aspects of the working relationship including:

- recruitment and selection procedures.
- terms of employment, including pay, conditions and benefits.
- training, appraisals, career development and promotion.
- work practices, conduct issues, allocation of tasks, discipline and grievances.
- work-related social events.
- termination of employment and matters after termination, including references.

This policy is intended to help the Employer achieve its diversity and anti-discrimination aims by clarifying the responsibilities and duties of all staff in respect of equal opportunities and discrimination. The Employer will promote effective communication and consultation between the Employer and staff concerning equal opportunities by means it considers appropriate.

The principles of non-discrimination and equal opportunities also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

This is a statement of policy only and does not form part of your contract of employment. This policy may be amended at any time by the Employer, in its absolute discretion.

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Who Is Responsible For Equal Opportunities?

Achieving an equal opportunities workplace is a collective task shared between the Employer and all its staff. This policy and the rules contained in it therefore apply to all staff of the Employer irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed-term staff and any volunteers or interns (referred to as Staff).

The board of directors of the Employer has overall responsibility for this policy and for equal opportunities and discrimination law compliance in the workplace and the Director has been appointed as the person with day-to-day operational responsibility for these matters.

All Staff have personal responsibility to ensure compliance with this policy, to treat colleagues with dignity at all times and not to discriminate against or harass other members of Staff, visitors, clients, customers, suppliers and former staff members. In addition, Staff who take part in management, recruitment, selection, promotion, training and other aspects of career development (referred to as Managers) have special responsibility for leading by example and ensuring compliance.

Managers must take all necessary steps to:

- promote the objective of equal opportunities and the values set out in this policy.
- ensure that their own behaviour and those of the Staff they manage complies in full with this policy:
- ensure that any complaints of discrimination, victimisation or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded.

What is discrimination?

Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any of the Protected Characteristics is prohibited by law, even if unintentional, unless a particular exception applies.

Direct discrimination

Direct Discrimination is less favourable treatment because of one of the Protected Characteristics. Examples would include refusing a woman a job as a chauffeur because you believe that women are not good drivers or restricting recruitment to persons under 40 because you want to have a young and dynamic workforce.

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Direct discrimination can arise in some cases even though the person complaining does not actually possess the Protected Characteristic but is perceived to have it or associates with other people who do. For example, when a person is less favourably treated because they are (wrongly) believed to be homosexual or because they have a spouse who is Muslim.

Indirect discrimination

Indirect discrimination arises when an employer applies an apparently neutral provision, criterion or practice which in fact puts individuals with a particular Protected Characteristic at a disadvantage, statistically and this is unjustified. To show discrimination the individual complaining also has to be personally disadvantaged. An example would be a requirement for job candidates to have ten years' experience in a particular role, since this will be harder for young people to satisfy. This kind of discrimination is unlawful unless it is a proportionate means of achieving a legitimate aim.

Victimization

Victimisation means treating a person less favourably because they have made a complaint of discrimination or have provided information in connection with a complaint or because they might do one of these things.

Harassment

Harassment is:

- unwanted conduct which is related to a Protected Characteristic and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them: or
- unwanted conduct which is of a sexual nature and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them (Sexual Harassment); or
- less favourable treatment because of the rejection of or the submission to Sexual Harassment.
- Harassment can arise in some cases even though the person complaining does not actually possess a Protected Characteristic but is perceived to have it (for example, when a person is harassed because they are (wrongly) believed to be homosexual) or associates with other people who possess a Protected Characteristic (for example, because they have a spouse who is Muslim).

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Harassment may include:

- use of insults or slurs based on a Protected Characteristic or of a sexual nature or other verbal abuse or derogatory, offensive or stereotyping jokes or remarks:
- physical or verbal abuse, threatening or intimidating behaviour because of a Protected Characteristic or behaviour of a sexual nature.
- unwelcome physical contact including touching, hugging, kissing, pinching or patting, brushing past, invading personal space, pushing grabbing or other assaults.
- mocking, mimicking or belittling a person's disability, appearance, accent or other personal characteristics.
- unwelcome requests for sexual acts or favours; verbal sexual advances, vulgar, sexual, suggestive or explicit comments or behaviour.
- repeated requests, either explicitly or implicitly for dates.
- repeated requests for social contact or after it has been made clear that requests are unwelcome.
- comments about body parts or sexual preference.
- displaying or distributing offensive or explicit pictures, items or materials relating to a Protected Characteristic or of a sexual nature.
- shunning or ostracising someone, for example, by deliberately excluding them from conversations or activities.
- 'outing' or threatening to 'out' someone's sexual orientation (i.e. to make it known).
- explicit or implicit suggestions that employment status or progression is related to toleration of, or acquiescence to sexual advances, or other behaviour amounting to harassment.

Other important points to note about harassment:

- a single incident can amount to harassment:
- behaviour that has continued for a long period without complaint can amount to harassment:
- it is not necessary for an individual to intend to harass someone for their behaviour to amount to harassment:
- it is not necessarily for an individual to communicate that behaviour is unwelcome before it amounts to harassment: and
- the onus is on each individual to be certain that their behaviour and conduct is appropriate and is not unwanted and in the case of doubt, you must refrain from such conduct.

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Disability discrimination

This could be direct or indirect discrimination and is any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Disabled persons

Any Staff member who considers that they may have a disability is strongly encouraged to speak with the Director. particularly if they experience difficulties at work because of their disability so that any reasonable adjustments to help overcome or minimise difficulties can be discussed. For these purposes. disability includes any physical or mental impairment which substantially affects your ability to perform day to day activities and has lasted (or is likely to last) more than 12 months. Disclosure of this information will be treated in confidence, if you wish it to be, so far as is reasonably practicable and we will do our best to handle matters sensitively and to ensure that you are treated with dignity and with respect for your privacy.

We will consult with you about whether adjustments are needed to avoid you being disadvantaged and may ask you to see a doctor appointed by us, to advise on this. We will seek to accommodate your needs within reason. If we consider a particular adjustment unreasonable, we will explain why and try to find an alternative solution.

Managers with responsibility for managing a member of Staff who they know or think to be disabled should speak to the Director to ensure that all relevant duties are complied with.

Making employment decisions fairly

As noted above. the Employer will recruit employees and make other employment decisions concerning promotion, training, dismissal and related issues. on the basis of objective criteria.

Managers should only stipulate criteria or conditions for employment decisions (including job selection, promotion and redundancy) which are based on a legitimate business need and which do not go further than is needed to satisfy that need. If you are in any doubt about whether particular criteria or conditions are indirectly discriminatory or justifiable, then please speak to the Director.

Recruitment

Managers involved in recruitment must:

- specify only recruitment criteria that are relevant to the job, reflect genuine business needs and are proportionate. More than one person should be involved in short listing of applicants wherever practicable:

Heating and Pipework Installations (Leeds) Ltd

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- ensure that vacancies are advertised to a diverse audience and try to avoid informal recruitment methods that exclude fair competition. In very rare cases, it may be legitimate and necessary to restrict recruitment to a particular role to certain groups, but it is essential that this is discussed with the Director so that appropriate steps can be taken to ensure legality.
- review job advertisements carefully to ensure that stereotyping is avoided and that particular groups are not unjustifiably discouraged from applying.
- not ask applicants about health or disability before a job offer is made (other than in exceptional circumstances and after having been approved by the Director). If necessary, a job offer can be expressed to be conditional upon satisfactorily passing a medical check.
- not ask candidates about any Protected Characteristic if the question may demonstrate an intention to discriminate. For example, candidates should not be asked about current or future pregnancy, childcare or related matters; and
- not make assumptions about immigration status based on appearance, accent or apparent nationality:
- so far as reasonably practicable, keep a written record of their reasons for relevant decisions.

The Employer is legally required to verify that all employees have the right to work in the UK. Prior to starting employment, all employees must produce original documents to the Employer's satisfaction, irrespective of nationality. Information about the documents required is available from the Director.

The Employer monitors applicants'

- Sex
- Disability
- Age

as part of our recruitment process. We do this to assess the effectiveness of our measures to promote equal opportunities and to help us identify and take appropriate steps to avoid discrimination, under-representation and potential disadvantage and improve diversity. Provision of this information is voluntary, and the information is kept in an anonymised format solely for the purposes stated here. The information will not be used as part of any decision-making process relating to the recruitment or employment of the person providing the information. Our recruitment policies must be reviewed at regular intervals to ensure people are being treated fairly and according to ability and merit.

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Staff training, career development and promotion

Training needs may be identified during the normal appraisal process. Appropriate training to facilitate progression will be accessible to all staff.

All promotion decisions will be made on the basis of merit and according to proportionate criteria determined by legitimate business need.

Conditions of service

Access to benefits and facilities and terms of employment will be kept under review to ensure that they are appropriately structured and that no unlawful barriers to qualification or access exist.

Discipline and termination of employment

Any redundancy selection criteria and procedures that are used, or other decisions taken to terminate employment, will be fair and not directly or indirectly discriminatory.

Disciplinary procedures and penalties will be applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Discipline and termination of employment

Part-time and fixed-term staff will be treated the same as full-time or permanent staff of the same position and enjoy no less favourable terms and conditions (pro-rata, where appropriate), unless different treatment is justified.

What to do if you encounter discrimination

If you believe that you have been the victim of discrimination, you should follow the Employer's Grievance Procedure.

Every member of Staff has a responsibility to combat discrimination if they encounter it. Staff who observe or are aware of acts that they believe amount to discrimination directed at others are encouraged to report these to the Director.

Any grievance or report raised about discrimination will be kept confidential so far as this is practicable. We may ask you if you wish your complaint(s) to be put to the alleged discriminator if disciplinary action appears to be appropriate. It sometimes may be necessary to disclose the complaint or take action even if this is not in line with your wishes, but we will seek to protect you from victimisation and, if you wish, we will seek to protect your identity. You should be aware that disciplinary action may be impossible without your co-operation or if you refuse to allow relevant information to be disclosed.

EQUAL OPPORTUNITIES POLICY

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Staff who raise a complaint about or report discrimination in good faith will be protected from retaliation or victimisation. As long as you act in good faith, the fact that you have raised a complaint or report will not affect your position within the Employer, even if the complaint is not upheld. Making a false allegation deliberately and in bad faith is a misconduct offence and will be dealt with in accordance with our disciplinary policy. Any member of Staff who attempts acts of retaliation or victimisation may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

If you make a complaint, it may be necessary to ask you to stay at home on paid leave while investigations are being conducted and the matter is being dealt with through the appropriate procedure. This may particularly be necessary in cases of alleged harassment.

Non-compliance with equal opportunities rules

Any breach of equal opportunities rules or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, up to and including immediate dismissal.


Staff should also note that:

- in some cases, they may be personally liable for their acts of discrimination and that legal action may be taken against them directly by the victim of any discrimination: and
- it may be a criminal offence intentionally to harass another employee.

Review of this policy

The board of directors of the Employer will keep this policy under review.

The Employer encourages Staff to comment on this policy and suggest ways in which it might be improved or ask any questions if they are unsure about any part of this policy or how it is applied by contacting the Director.

Signed	
	Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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General Data Protection Regulation (GDPR)

Privacy Notice for Employees

How your information will be used

- As your employer, the company needs to keep and process information about you for normal employment purposes. The information we hold, and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using the information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
- As a company perusing mechanical engineering, contracting and servicing activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process your data where our interests are overridden by your own interests.
- Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your line manager, or in some cases, external sources such as referees.
- The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with you or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.
- You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company.

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- Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, Welplan sick pay and Welplan pension payments.
- Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership or biometric data, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have to right to withdraw that consent at any time.
- In addition, we monitor computer, telephone and mobile telephone use. We also keep records of the hours you work by the way our timesheets and/or confirmation from line manager.
- Other than the mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual obligations. For instance, we may need to pass on certain information to our contractors/clients, industry standard qualification requirements, pension or health care schemes.
- We may transfer information about you to other group companies for purpose connected with your employment or management of the company's business.
- Your personal data will be stored indefinitely on our secure and safe systems. We deem this necessary in order to carry out he functions of the business correctly.
- If In the future, we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on the purpose and any other relevant information.

Your rights

- Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

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- If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
- You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.
- Heating & Pipework Installations (Leeds) Limited is the controller and processor of the data for the purposes of the DPA 18 and GDPR.
- If you have any concerns as to how your data is processed, you can contact:
- Anthony Swindells at: accounts@hpistoke.co.uk, or alternately you can write to this individual using the address on this document.

I hereby agree to the continued use of my personal data used by Heating & Pipework Installations (Leeds) Ltd for the purposes mentioned within this document.

Signed	 Managing Director
Date	31st January 2020
This policy was last reviewed:	31st January 2020
This policy will next be reviewed:	31st January 2021

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Quality Policy Statement

Heating & Pipework Installations (Leeds) Ltd was established in 1972 to Provide HVAC & Mechanical Services Engineers & Contractors, Design, Installation & Maintenance Facilities to the UK. We are based in Leeds and employ 30 people.

Quality is important to our business because we value our customers. We strive to provide our customers with products and services which meet and even exceed their expectations.


We are committed to continuous improvement and have established a Quality Management System which provides a framework for measuring and improving our performance.

We have the following systems and procedures in place to support us in our aim of total customer satisfaction and continuous improvement throughout our business:

- regular gathering and monitoring of customer feedback
- a customer complaints procedure
- selection and performance monitoring of suppliers against set criteria
- training and development for our employees
- regular audit of our quality management and performance
- management reviews of audit results, customer feedback and complaints
- Our internal procedures are reviewed regularly and are held in a Quality Manual which is made available to all employees.
- Only sourcing materials from reputable suppliers and subcontractors ensuring all materials meet with the Construction Products Regulations (CE Marking)

This policy is posted on the Company Notice Board and can also be found in the staff handbook.

Although the Managing Director has ultimate responsibility for Quality, all employees have a responsibility within their own areas of work to help ensure that Quality is embedded within the whole of the company.

Signed	
	Managing Director
Date	31st January 2020
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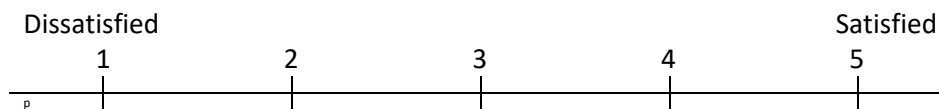
Customer Feedback

Quality is important to our business because we value our customers. We strive to provide our customers with products and services which meet and even exceed their expectations.

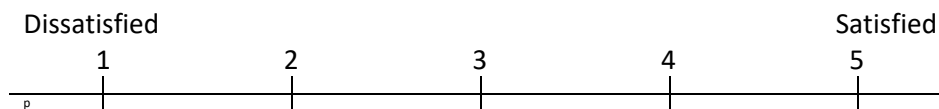
Please complete the brief questionnaire below and return to

Name		Date	
Company		Position	
Which project are you providing feedback for?			

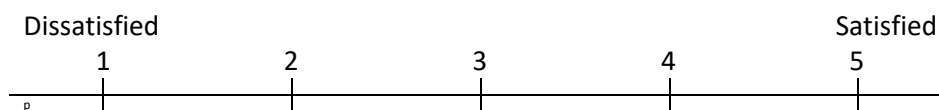
How satisfied are you with the office-based service provided to you?



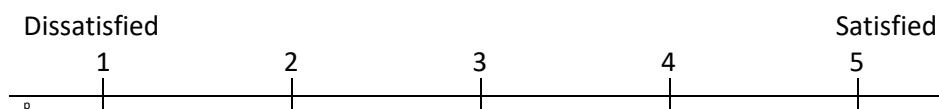
How satisfied are you with the site-based service provided to you?



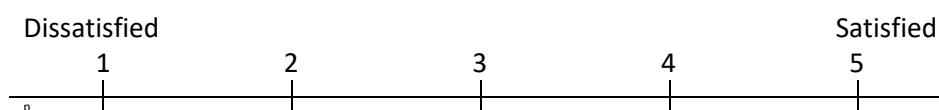
How satisfied are you with the communication between HPI and yourself?



How satisfied are you with the documentation provided to you?



Overall how satisfied are you with service provided to you?



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Any further comments

QUALITY POLICY STATEMENT

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Customer Complaints Procedure

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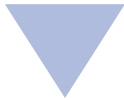


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Stage 1 Frontline Resolution
Always try to resolve the complaint quickly and to the customers satisfaction whenever we can



Provide a decision on the complaint within 24 hours unless there are exceptional circumstances



Is the customer satisfied with the decision



Complaint closed and outcome recorded. Preventative action taken in order to avert recurrence. Revised procedures are developed and implemented as considered appropriate and are reviewed at Management Review accordingly



YES

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Performance monitoring

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Training

See Separate Training Spread Sheet

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Internal Process Audit

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Management Reviews

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