

Anti-Bribery Policy

During the course of our site work, there may arise situations where working within occupied premises will lead to direct contact with children and vulnerable adults. It is our duty to ensure that these higher-risk individuals are protected from harm and the following policy is to be communicated to and followed by all employees and subcontractors working of behalf of the company.

Risk Assessment

Safeguarding measures required should be in proportion to the risk for each individual project. The appointed Project/Contract Manager is responsible for ensuring that site specific risks are assessed and controlled so far as is reasonably practicable, prior to start on site.

These control measures are to be issued to the client for their review and communicated (RAMS Briefing) to the workforce as part of the standard site induction requirements.

Safeguarding Measures

Segregation

Where possible, works are to be scheduled in hours where contact can be eliminated or reduced (e.g. work in schools outside of term time). Start/Finish and break times are to be agreed in advance to minimise interfaces with others on site.

Within a live environment the work area is to be physically segregated, as practicable for the duration of the task, by means of locked routes, fencing, barriers, tape and warning signage as necessary.

Sharing of welfare facilities should be eliminated/minimised, particularly toilet facilities within schools where the primary choice will be to allocate contractor specific facilities.

Supervision

At all times on site where vulnerable persons are present, ongoing supervision arrangements are to be in place. All workers will be required to sign in/out and ensure that their supervisor/co-workers, and the site agent/contact where applicable, is aware of their current task and work location. In higher-risk work areas, no lone working will be permitted.

Photographic identification is always to be carried, in addition to company branded workwear, so ongoing verification of persons on site can be managed.

Vetting

Should the risk assessment identify that there is a higher risk of contact with vulnerable persons (e.g. regular/prolonged), a DBS Basic Disclosure will be required. It is our policy that these will be renewed every 3 years where it is a requirement for an individual to hold a certificate.

Any client-specific requirements in excess of this policy (e.g. enhanced DBS) are to be established at the planning stage.

Code of Conduct

When working on a site with safeguarding requirements, the following rules are to be followed, to minimise risks to vulnerable individuals, and protect your own and the company's professional reputation:

- Avoid situations where you are alone with a vulnerable adult or child. Secure the work area and report to the manager/supervisor if it is not appropriate to continue.
- Minimise interaction with vulnerable persons on site. Do not engage in casual conversation and never give out your personal contact details.
- Stay within the agreed working area and use the designated access routes. Escalate to the manager/supervisor for review if you need access outside of the main work area.
- Ensure your co-workers/supervisor know where you are and what you are doing at all times.
- Do not use foul or inappropriate language at any time. Be aware of your own and your co-worker's actions and behaviour.
- Dress appropriately. Avoid any clothing that could be viewed by others to be offensive, discriminatory or provocative.
- Report any concerns with site arrangements or inappropriate conduct witnessed to the manager/supervisor or escalate directly and confidentially to senior management.

Remember that your actions, no matter the intention, could be misinterpreted by others. Always avoid placing yourself in vulnerable situations.

Risk Assessment – See below highlighted Risk:

Schedule 1: Highlighted Risks

Highlighted Risk	Likelihood of Occurrence	Safeguards
Business Lunches and Dinners	High	<p>With existing clients : Up to £30 per head no prior authorization needed, Between £30-£50 per head Managing Director authorisation required in advance of spend; Over £50 Board of Directors approval required.</p> <p>With potential clients : Up to £20 per head no prior authorisation needed, Between £20-£40 per head Managing Director with authorisation required in advance of spend; Over £40 per head Board of Directors approval required.</p>
Corporate Hospitality and Entertainment	High	<p>With existing clients: Up to £30 per head no prior authorisation needed, Between £30-£60 per head Managing Director authorisation required in advance of spend; Over £60 per head Board of Director approval required in advance of spend.</p> <p>With potential clients: Up to £20 per head no prior authorisation needed, Between £20-£40 per head Managing Director authorisation required in advance of spend; Over £40 per head Board of Directors approval required.</p>
Sponsorship	Medium	<p>With existing client, or associations related to existing client: Up to £50 ex gratia payments may be made, over this level must get Director prior authorisation.</p> <p>With potential client, or associations related to potential client: Normally we do not agree to any form of sponsorship. Directors may use discretion on a case by case basis if appropriate causes are deemed worthy of our support.</p>
Personal work done for Corporate Client employee	Medium	We will usually not act for employees of our corporate clients and will only do so where we are being properly engaged to do so for the employee and this has been approved by a director.

Schedule 2: Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to the Managing Director you become aware that a third party engages in, or has been accused of engaging in, improper business practices;

- (a) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with officials;
- (b) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (c) a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (d) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (e) a third party requests an unexpected additional fee or commission to "facilitate" a service;
- (f) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (g) a third party requests that a payment is made to "overlook" potential legal violations;
- (h) a third party requests that you provide employment or some other advantage to a friend or relative;
- (i) you receive an invoice from a third party that appears to be non-standard or customised;
- (j) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (k) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (l) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- (m) you are offered an unusually generous gift or offered lavish hospitality by a third party.

Signed:



Mr. Patrick Jnr. Devine
Managing Director

Review Date: 31st December 2021