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**COMPANY POLICIES & PROCEDURES
EMPLOYEE HANDBOOK**



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DROPP.UK Company Policies & Procedures Employee Handbook

Welcome

We are pleased to welcome you to DROPP.UK. This employee handbook is designed specifically for temporary workers who are employed through our agency. At DROPP.UK, we aim to deliver high-quality service to both our clients and our workforce, with a focus on the transport, logistics, and warehousing sectors.

Our aim

Our aim is to deliver a quality service to our customers and to provide a positive working environment for all employees. We regard our employees to be our greatest asset and seek to be a supportive and forward-thinking employer.

Whilst we will provide you with all the tools necessary to carry out your role, the hard work is down to you. We will help you to develop your skills and in return, we expect a commitment from you to work to the best of your abilities.

We expect all our employees and Managers to work together as a team, to respect each other's skills and abilities and to learn from each other. We look forward to your valuable contribution towards our continued success.

What this handbook contains

This handbook outlines DROPP.UK's employment policies, which apply to all temporary staff working under our agency. The handbook provides guidance on your responsibilities, benefits, and rights while working through DROPP.UK, ensuring you are well-informed throughout your placement. These policies will be updated regularly, and you will be notified of any changes that might affect your role.

It is very important that you read and fully understand the contents of this Employees Handbook and comply with the policies and procedures it contains at all times. You should note that breach of the Company's rules, procedures and policies may lead to disciplinary action being taken against you. If you have any queries about anything in the Handbook, you should raise them with either your Manager or Directors.

James Roberts
CEO



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Alcohol and Drugs Policy

Scope

This policy applies to all employees of **DROPP.UK**, Contractors, Suppliers Customers and Visitors to the Company.

Policy Statement

It is our intention to deal constructively and sympathetically with any employee's alcohol or drug related problems. Our primary aim will be to assist the employee with the problem in the most compassionate and constructive way as possible. Any such discussions will be held in the strictest of confidence, unless the employee agrees otherwise.

If you believe that you have an alcohol or drug issue, you should seek appropriate help. Where this affects your conduct or performance at work and you do not seek such help, the Company may deal with the matter within its disciplinary procedure. The Company's aim is to provide a safe and healthy working environment for customers, employees and visitors. Employees who consume alcohol or take drugs during their working day or who attend work having consumed alcohol or taken drugs put themselves and others at risk due to alcohol and drugs affecting a person's conduct and performance. As such, we would regard this as a failure in an individual's duty under safety legislation.

Definitions

Workplace - Any premises owned by the Company (or any of its customers) including car parking areas or premises at which the Company is undertaking any activity or those of any of its customers, prospective customers, suppliers or prospective suppliers.

Alcohol - Any alcoholic beverage or food.
Drug - Illegal substance.

Drug misuse - The use of illegal drugs or the deliberate or unintentional misuse of prescribed drugs or the use of any solvent or gas for the purposes of intoxication.

Principals

The Company strictly prohibits:

The possession or consumption without permission, of alcohol, or the possession or use of a prohibited substance whilst on Company property, reporting to work, working or attempting to work under the influence of alcohol or a prohibited substance.

Reporting to work, working or attempting to work while under the influence of any drug, prescribed or otherwise, unless directed by a doctor or where such use will not affect an employee's ability to perform their duties safely or affect the safety of others.



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Possessing, dispensing, distributing, buying, selling, offering to buy or sell a prohibited substance whilst on Company property.

Alcohol may only be consumed on site or when on Company business when it is pre-authorised such as entertaining or a work-related celebration at which times this will be in minimal quantities.

Any employee who is suspected to be experiencing the effects of drugs or alcohol on site may be immediately suspended on full pay and sent from the premises pending a full investigation of the alleged misconduct. The investigation may include obtaining medical opinion and advice.

Procedures

The following procedures must be adhered to at all times.

Notification

Any employee who is using a prescription drug which may impair their ability or affect the safety or wellbeing of others must notify their Manager as soon as medication starts, providing evidence as to the likely effects of the medication.

Staff Working at, or visiting to, other locations such as Customer Sites

The Company expects that all employees will work with both the Company rules in this area and also with any local rules applicable to their place of work. In the event that you believe that these are inconsistent, please refer to your manager at the earliest moment for clarification.

Social Functions

Employees are expected to act in a reasonable and orderly manner during any social function. Any employee whose conduct is not acceptable in these circumstances and who we believe has brought the Company into disrepute by their behaviour may be subject to disciplinary procedures.

Testing and Searching

Should the Company have reasonable cause to suspect that an employee is under the influence of drugs or alcohol on Company or customer premises or in carrying out their duties in any way, or following a Health and Safety incident, it reserves the right to require that the individual concerned is properly screened / tested by a nominated Company doctor. It also reserves the right to search the individual's person and belongings. For this the Company requires the employee's consent and should the individual refuse the Company will be forced to draw their own conclusions on the evidence available and may regard this as a disciplinary matter in its own right. Such a request may only be authorised by a Company Director and a colleague from the Company may accompany you at any search.

Driving

Please consider this policy in respect to driving, either as part of your duties or to and from work. If your job requires you to drive, any ban imposed by a Court may



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make your continued employment difficult to manage and you must inform your manager immediately. Any breach of our rules may lead to disciplinary action up to and including summary dismissal for gross misconduct.

Anti-Bribery and Fraud Policy

Scope

This policy covers all employees, suppliers, contractors, agency staff, joint venture partners and subsidiaries operating anywhere in the UK and or Overseas.

Policy Statement

DROPP.UK has a policy of fair dealing, honesty and integrity which extends to all relationships within and outside the Company. The Company is committed to rigorously investigate any infringements of this policy that occur and take appropriate action.

Specifically, the following four areas are covered within this policy for cases of bribery:

Paying Bribes

it is an offence to offer/give a financial or other advantage to a person with the intention of including that person to perform a “relevant function or activity” “improperly” or to reward that person for doing so.

Receiving Bribes

It is an offence to receive financial or other advantage intending that a “relevant function or activity” should be performed “improperly” as a result.

Bribing a foreign public official

It is an offence to offer/give financial or other advantage not only to a UK public official but also to a foreign public official with the intention of influencing them and obtaining/retaining business, where the foreign public official was neither permitted nor required by his/her local written law to be so influenced. To incur liability, there is no need for an intention that the person being bribed should perform improperly.

Failure of commercial organisation to prevent bribery

It is deemed that a “commercial organisation” commits an offence where a person “associated” with it bribes or attempts to bribe another person, intending to obtain/retain business or a business advantage for the commercial organisation.



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The only defence is that it had “adequate procedures” in place to prevent persons associated with it from bribing.

Please note that where the above states “Relevant Function or Activity” this includes any function of a public nature and any activity connected with the business. “Improper performance” means that the intention must be that the person being bribed improperly performs his/her duties that are otherwise than in good faith, an impartial manner or in accordance with a position of trust.

This policy also applies to any actual or suspected fraud, theft or instances of corruption, any investigation activity will be conducted without regard to any person’s relationship to the Company, position or length of service.

The Company is committed to providing proper procedures, risk assessment, due diligence, communication, monitoring and reviewing the Company’s commitment to this policy.

Fraud

Employees, particularly managers, are well placed to identify signs of fraudulent activity and other irregularities.

For the purpose of this policy/procedure fraud, theft, corruption and bribery are collectively termed “irregularities”.

Managers have a duty to familiarise themselves with the types of irregularities that might occur within their area of responsibility and to be alert to any indication of any occurrence. Employees that find themselves in a position where they may be compromised must immediately bring the full facts to the attention of a Director. Below is a list of examples of irregularities; this is not exhaustive.

- Falsification or alteration of accounting records
- Forgery or alteration of a cheque, bank draft, or any other document.
- Misappropriation or theft of funds, securities, supplies or assets.
- Impropriety in the handling or reporting of money or financial transactions
- Suppression or omission of the effects of transactions from records or documents
- Recording of transactions without substance
- Profiting as a result of inside knowledge of the affairs of the Company, or its subsidiaries
- Disclosing confidential or proprietary information to third parties
- Accepting or seeking anything of (material) value from vendors or persons providing services/materials to the Company
- The unauthorised destruction or removal of Company records, fixtures fittings or equipment.

All members of staff have a duty to report any actual or suspected irregularity using the reporting procedure as described in the “whistleblowing” policy

Investigation/Confidentiality



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The results of any investigation will not be disclosed or discussed with anyone other than those persons with a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected, subsequently found innocent of wrongful conduct. For those subsequently found guilty of any irregularities then disciplinary action will be taken in accordance with the Company's disciplinary policy and it may be deemed as gross misconduct leading to dismissal. In such cases the Company reserves the right to involve the Police or other Regulatory Authority as appropriate.

Disciplinary Policy & Procedure

Scope

This Policy and Procedure applies to all **DROPP.UK** employees; however, it does not form part of an employee's contract of employment with the Company.

Policy Statement

The procedure outlined below is for the purpose of promoting fairness and consistency in the treatment of employees in connection with conduct and performance. The informal procedure will be used in the first instance dependant on the severity of the situation. The aim will be to promptly resolve issues at work in a fair and consistent manner. The formal procedure will only be used where necessary and the Company hopes that this will be rarely.

Principles

The formal disciplinary procedure may be implemented at any stage if your conduct or performance warrants such action. This would be for cases of serious misconduct or gross misconduct.

You have the right to be accompanied by another member of staff of your choice, or a suitably qualified trade union official, at any stage of the formal procedure, excluding the investigation meeting as set out in more detail below.

You will be told in writing prior to the formal meeting of the alleged conduct or performance which led the Company to consider disciplinary action.

You will be allowed access to any relevant information and papers prior to the meeting.

The Company will investigate the alleged conduct or performance issue which led to the commencement of a disciplinary procedure before imposing any disciplinary sanction. In the event that an investigative meeting is held with you to discuss the issues to be addressed at the disciplinary meeting the investigative meeting will not be a disciplinary meeting.

You will be invited to attend a formal disciplinary meeting at a reasonable place and time in order to state your case in response to the allegations against you. The



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meeting will not take place unless the Company has advised you in writing of the alleged disciplinary case you are required to answer and you have been given reasonable time to consider your response. You will be expected to take all reasonable steps to attend the meeting.

You should advise the Company, in advance, of the name of the person who will be accompanying you and the names of any witnesses you may wish to invite to the meeting. The formal disciplinary meeting may be adjourned by the manager in order to investigate further or further information and you could be invited to a further meeting to reconvene the formal meeting.

You will be informed of the Company's decision following the meeting in writing and given the opportunity to appeal against any disciplinary penalty imposed. Where appropriate, information obtained during, or relating to, the disciplinary process will be kept confidential.

Probationary Employees - The formal disciplinary procedure does not apply to probationary employees. However, employees within their probation period may be dismissed summarily for committing an act of misconduct or as a result of a lack of performance during their probationary period. They will have the right to one appeal within 7 days of being given the written decision.

Procedures

Informal Procedure - It is not always necessary to use the formal disciplinary procedure if problems are dealt with early. Minor issues can be dealt with by counselling. In the first instance, your manager will discuss the issue with you, on a one to one basis, with the objective of encouraging and helping you understand the area of concern. The manager will highlight the ways to improve in order to reach the required Company standard within a given time span. The manager will make a note of the discussion for their record but this does not form part of the formal process. Should you not meet the required standard or a more serious or persistent breach of the Company standards occurs, the Formal Procedure will be used.

Formal Procedure - In most cases, formal disciplinary procedures should only be used when counselling and informal warnings have been given and these have failed to produce the required improvement, or when the seriousness of the offence warrants formal disciplinary procedures.

Investigation – The investigation will take place prior to any formal disciplinary meeting for the purpose of establishing the circumstances and facts of the case. You do not have the right to be accompanied at the investigation meeting. If at any stage during the investigation it becomes clear that there is no disciplinary case to answer, the investigation will be terminated and all relevant documentation removed on conclusion of the investigation. Where possible the investigation will be conducted by a different manager to the manager conducting the formal disciplinary meeting.

Notification of Disciplinary Hearing – If it is decided that a formal disciplinary hearing is necessary, the employee will be informed in writing with the details of



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the disciplinary case to answer, their right to be accompanied, copies of all relevant documentation, names of those attending the disciplinary hearing and the likely outcome should the allegations be upheld following the disciplinary hearing. They will also be given a minimum of 2 working days' notice to prepare for the hearing.

Misconduct - The following are examples of misconduct (this list is not exhaustive):

- Breach of Health & Safety policy or procedure
- Bad time keeping
- Failure to report incidents/ accidents
- Damage to Company property
- Breach of Company rules
- Failure to observe Company procedures
- Repeated or serious failure to follow instructions
- Minor misuse of Company facilities (for example, email and internet)

Capability - The following are examples of capability issues that may lead to the disciplinary procedure being adopted (this list is not exhaustive):

- Unsatisfactory work performance
- Poor standard of work or inadequate attention to work
- Failure to meet reasonable targets set for you by the Company

Records of the following will be kept on your personnel file:

- The complaint against you
- Your defence
- Findings made during, and actions taken after, the disciplinary procedure
- The reasons for actions taken
- Whether an appeal was lodged
- The outcome of the appeal
- Any grievances raised during the disciplinary procedure and
- Any subsequent developments.

All records kept will be treated as confidential.

Formal Sanctions

Stage 1 – First written warning

This will be given by your line manager or a manager of equivalent standing within the Company and confirmed to you in writing. This will contain a summary of the incident or circumstances leading to the warning and the consequences of future repetition. The warning will set out improvements in conduct or performance required to be achieved and maintained, the duration of the warning and consequences of failure to respond as required. You will be advised as to the right of appeal.

Stage 2 – Final written warning

This will be given by your line manager or a manager of equivalent standing within the Company



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and confirmed in writing. This warning will state that if there is further misconduct or alternatively underperformance by you then your employment will be terminated. You will be advised as to the right of appeal.



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Stage 3 – Dismissal

This stage will normally result from continued failure by you to act upon the warnings made in the previous stages of the warning procedure, although in cases of gross misconduct the earlier stages of the procedure may be omitted. Dismissal will take effect immediately, without prejudice to your rights of appeal.

Length of Warning

A warning will usually apply in the case of first written warning for six months, after which it will lapse, and twelve months in respect of a final written warning. The Company reserves the right to impose a longer or shorter period of warning in appropriate circumstances.

Serious Misconduct

Where one of the unsatisfactory capability or misconduct rules has been broken following investigation, and is shown to be due to the employee's extreme carelessness or has a serious substantial effect upon the Company, a Final Written Warning may be issued in the first instance. The employee may receive a Final Written Warning as the first course of action if the alleged gross misconduct disciplinary, upon investigation there is shown to be some level of mitigation resulting in the offence to be just short of dismissal.

Serious misconduct will result in immediate dismissal with pay in lieu of notice and accrued holiday pay.

Gross Misconduct - The following are examples of gross misconduct. Employees could be liable to summary dismissal if they are found to have acted in any of the following list (this list is not exhaustive):

- Theft either from the Company, its employees, clients, customers or agents (including the unauthorised possession or use of any of the Company's goods, materials, products or produce)
- Any fraudulent activity or deliberate falsification of records (including falsification of timesheets, expenses, travel claims and self-certification forms) or any deliberate attempt to defraud the Company, fellow employees, clients, customers or agents
- Any acceptance of bribery or any act of bribing an employee or third party in order to benefit themselves or the Company
- Unauthorised absence
- Physical violence or bullying
- Deliberate and serious damage to property
- Serious misuse of the Company property or name
- Deliberately accessing internet sites containing pornographic, offensive or obscene material
- Serious insubordination
- Unlawful discrimination or harassment
- Bringing **DROPP.UK** into serious disrepute



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- Serious incapability at work brought on by alcohol or illegal drugs or bringing intoxicants or illegal drugs on the Company's premises at any time
- Causing loss, damage or injury through serious negligence
- A serious breach of trust and confidence
- Obtaining unauthorised access to, making unauthorised use of or making unauthorised amendments to information stored on computers, computer software or computer hardware or any failure to comply with the Company's email, internet, data security and telephone use policy
- Conviction of a criminal charge relevant to the employee's employment
- Gross carelessness, incompetence or negligence, including any action or failure to act which threatens the health and safety of any fellow employee or member of the public including any disregard of safety rules which jeopardise the safety of those on the Company's premises.
- Breach of health & Safety policy/procedures likely to cause incident/accident

Gross Misconduct will result in immediate dismissal without notice or pay in lieu of notice but with accrued holiday pay.

Suspension

At any stage in the disciplinary procedure and in particular where gross misconduct is alleged the Company reserves the right to suspend you from work prior to the disciplinary meeting being held and a decision being reached. If you are suspended, your contract of employment will continue together with all rights under your contract including the payment of salary. During the period of suspension, you will not be entitled to access any of the Company's premises except at the prior request or with the prior consent of the Company and subject to such conditions as the Company may impose.

Appeals Procedure

You have the right to appeal against any disciplinary decision arising from the formal procedure.

The request for an appeal should be put in writing and set out the grounds of appeal, within seven working days, to the person to whom you report.

You have the right to be accompanied by a fellow worker or a suitably qualified trade union official.

The appeal hearing will be conducted within a reasonable period of the appeal being lodged. At the appeal hearing, the Manager/Director hearing the appeal may adjourn the meeting to investigate and or gain further information before reaching their decision.

The outcome will either be:

- To reject the appeal and confirm the original disciplinary action; or
- Uphold the appeal and reduce or revoke the original disciplinary action.



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The result of the appeal will be confirmed in writing within seven days and the decision at the appeal stage is final.

Where there is no more Senior Manager/Director to hear the appeal, the person to whom you report shall review their original decision and decide the case as impartially as possible.

Right to be accompanied

You have the right to be accompanied by a fellow worker or suitably qualified trade union official at any formal disciplinary meeting (but not at an investigative meeting).

Your companion may not answer questions asked of you directly, however at the meeting they may address the meeting in order to do any or all of the following:

- put your case
- sum up that case
- respond on your behalf to any view expressed at the meeting
- confer with you during the hearing
- they cannot answer questions on your behalf

If your chosen companion is unavailable at the time of the hearing you should suggest a reasonable alternative time that is no more than seven working days after the original time of the meeting.

Data protection

DROPP.UK processes personal data collected during the investigation stage and any subsequent stages of disciplinary action in accordance with its data protection policy. In particular, data collected as part of the investigation stage and any subsequent stages of disciplinary action is held securely and accessed by, and disclosed to, individuals only for the purposes of completing the disciplinary procedure. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK's** data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under this disciplinary procedure.

Diversity & Equality Policy

Scope

This policy applies to all **DROPP.UK** employees within the UK.

Policy Statement

DROPP.UK is committed to eliminating discrimination and encouraging diversity amongst the workforce. The Company aim is that the employees will be



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truly representative of all sections of society and each employee feels respected and able to give of their best.

Principles

Diversity is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills and experiences and encouraging and using those differences to create a productive and effective workforce.

The purpose of this policy is to provide equality and fairness for all in our employment and not to discriminate on the grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age. **DROPP.UK** opposes all forms of unlawful and unfair discrimination.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

Company Commitment

To create an environment in which individual differences and the contributions of all employees are recognised and valued.

Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.

Training, development and progression opportunities are available to all employees.

Equality in the workplace is good management practice and makes sound business sense.

Company will regularly review all employment practices and procedures to ensure fairness.

Breaches of the Company Diversity & Equality Policy will be regarded as misconduct and could lead to disciplinary proceedings.

This policy is fully supported by the Directors and Management. The policy will be monitored and reviewed annually.

Other Company policies in support of the Diversity & Equality policy included in the Company Handbook are:

Bullying and Harassment
Disciplinary
Grievance

Expenses and Travel Policy

Scope

This policy applies to all employees of **DROPP.UK**.



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Policy Statement

It is Company policy that all travel, entertainment and other expenses to be reimbursed by the Company must be reasonable and wholly, exclusively and necessarily incurred by the employee in carrying out his/her duties. All travel should be arranged in order to achieve maximum cost savings for the Company.

Employees must comply with all terms of this policy. There are stringent rules set by HMRC regarding travel and entertainment expenses. Failure to comply could result in these bodies imposing fines on the Company.

Failure to comply with this policy could result in non-payment of expenses incurred by the employee, and may be dealt with in accordance with the Company's disciplinary procedure, including dismissal in the case of fraud.

Original receipts must support all expense claims.

Copies of credit card vouchers are not acceptable. The Company reserves the right not to reimburse un-receipted expense claims.

Where expenses are incurred on behalf of more than one member of staff, the most senior staff member must pay the cost.

Principles

- Provide guidance and necessary controls for all travel, entertainment and other expenses incurred on Company business
- Provide employees with a consistent method of reporting and accounting for travel and other business-related expenses
- Set standards which identify acceptable expenses that the Company will reimburse to the employee
- Ensure that the Company complies with rules and regulations issued by the Inland Revenue and HM Customs and Excise

Responsibility

The employee is responsible for ensuring that the expense claim is complete, accurate and complies with this policy. Incomplete expense claims will be returned to the employee for amendment.

The Manager must review the claim to ensure that:

- It is complete
- The costs are reasonable
- There is compliance with the Travel and Expenses Policy
- The expenses are valid

The Manager approving the claim must do so within the authorisation limits.

Rail Travel

If rail travel is considered to be the most cost and time efficient means of transport, a standard class ticket must be purchased.



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Car Travel & Mileage Rates

Mileage undertaken on Company business will be reimbursed at reasonable rates. 45 pence for the first 10,000 miles in the tax year and 25 pence thereafter.

If you have become an employee of Company part way through a tax year, you need to take into account any business mileage incurred in your previous employment in order to establish whether you should be claiming the rate for less than or more than 10,000 miles. You may be asked to justify the claim.

What is Business Mileage?

Business mileage is defined as that incurred by employees in making a journey to or from a place they have to attend in the performance of their duties. It does not include journeys, which are ordinary commuting, i.e. from the employee's home to their place of work, or private travel.

Example 1

Home to Customer's office = 50 miles
Office to Customer's office = 75 miles

If employee travels from Home to Customer's office to Home
Business mileage = $50 \times 2 = 100$ miles

If employee travels from Home to Customer's office to Office
Business mileage = $50 + 75 = 125$ miles

Example 2

If an employee travels to the office, i.e. their place of work, first or within a few miles of their place of work, and then travels to the customer's office, business mileage is calculated as between the place of work and the customer's office.

If employee travels from Home to Office to Customer's office to Office
Business mileage = $75 \times 2 = 150$ miles

An employee cannot claim business mileage for journeys to the office on non-working days.

Claims cannot be made if an employee is called to the office as a result of an emergency.

Claims

Mileage for business purposes should be claimed on an Expense form providing the following information:

- Date of the journey
- Reason for the journey
- Journey details, including the starting point, places visited en-route and the point at which the journey ended. Details must be sufficiently precise to enable a check to be made on the mileage calculation
- Business mileage
- Mileage rate used
- Details of Car – Make, model, Registration number, Petrol/Diesel



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- Taxis/Parking/Tolls/Congestion Charge
- Taxis, parking, tolls and congestion charges will be reimbursed while travelling on behalf of Company. Efforts should be made to limit parking expenses, e.g. by using long-term offsite parking at airports.

If driving in the "congestion zone" in London, it is the employee's responsibility to pay the congestion charge and reclaim it via expenses. The maximum the Company will reimburse is £10 per day. A receipt should be obtained wherepossible.

In such circumstances, the most senior employee in attendance must pay and reclaim the expense, and explain the reason for the need for the expense.

Motoring Offences

Any motoring offence which results in a fine, e.g. speeding, parking, will be borne by the employee irrespective of whether the offence took place while the employee was on Company business.

Air Travel

Air travel arrangements must be approved by the Managing Director prior to booking.

All air travel within Europe must be economy class, using the most cost-effective travel plan. Cut-price airlines such as 'EasyJet' should be the first choice for travelling within the UK and Europe. When meetings end a few hours earlier than planned, this does not justify the additional cost of changing or upgrading air tickets. Exceptions to economy travel may be granted for short notice bookings, duration (e.g. over 6 hours), where there is a justifiable need for flexibility of travel. The Managing Director must approve in writing all non-economy flights.

Air travel within the UK should be kept to a minimum. Cheaper modes of transport must be considered first.

In all cases employees must agree with the Managing Director all air travel arrangements in advance of any bookings.

Personal and business travel should not be combined without prior written approval from the Managing Director. Should the employee extend the period of business travel for personal pleasure, the Company will not be liable for any additional costs

Overnight Expenses

When meetings or internal/external training courses are held off-site and an overnight stay is essential, employees will generally be provided with overnight accommodation of a reasonable standard which must be booked as far in advance as possible and at the lowest possible cost. Only in exceptional circumstances can hotel accommodation be booked at the last minute, with Director approval. The cost of an evening meal can be claimed against a VAT receipt. The person responsible for hosting the meeting must get authorisation from their Line Manager prior to making any reservations.



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Charges incurred at the hotel by the employee during business meetings must be settled prior to departure. All acceptable business costs will be reimbursed to the employee through the Claims procedure.

Company Credit Cards

The Company will, at its discretion, arrange for a Company Credit Card to be provided for employees if it is considered that such a facility is essential. Where a card is provided it is to be used only for the business purposes set out in this policy. The Company Credit Card can be used for business expenditure only. They must not be used for personal expenses.

Abuse of the card may result in the card being immediately withdrawn and appropriate disciplinary action being taken.

Card Cancellation

It is the employee's responsibility to report a lost or stolen card to a Managing Director. If the employee believes the card to have been used fraudulently, i.e. by a third party, the employee should immediately contact a Managing Director.

Upon termination of the employee's contract, the card must be immediately returned to the individual's Manager. The card should be cut in two and the Manager must return it to a Managing Director. If this is not possible the Manager must notify a Managing Director immediately upon receipt of notice being served. A Managing Director will immediately cancel the card. Any outstanding balance on the card may be deducted from the employee's final salary or expenses.

Employee Entertainment

As a result of strict tax rules, employee entertainment is not allowed as a general rule.

The exceptions to this are:

If the entertainment relates to the provision of lunch for a meeting that is scheduled to last for most of the day or when a Manager meets one of his/her employees for a meeting such as an appraisal, which will last at least two hours: only hot drinks, not the cost of a meal can be claimed.

Business Entertainment

Business entertainment means hospitality or entertainment of any kind which you provide (for business purposes) to anyone who is not an employee of the Company. The necessary costs of entertaining business contacts will be reimbursed on production of receipts. The level of expenditure must be reasonable and should be in line with the level of business to be undertaken or anticipated. Hospitality should not be provided because hospitality was provided to you, nor just because it is lunchtime.

The individual reclaiming the expense must include the following on the expense form:



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- The name(s) of attendees, i.e. both employees and business contacts
- **DROPP.UK** which they represent
- The purpose of the entertainment e.g. negotiation of contract

It is important that business entertainment costs are correctly categorised on expense claim forms, since the VAT on these costs cannot be reclaimed and the Company is not allowed to claim these costs against corporation tax.

Professional Subscriptions

DROPP.UK will bear the cost of one annual professional subscription where it considers that membership of **DROPP.UK** in question will enhance your effectiveness in performing your duties. The employee must agree any claim with their Line Manager in advance of payment of any subscription. Please note that the cost of professional fees may be a taxable benefit and if so will appear on the individual's P11D return following the end of the tax year.

Other Expenses

The Company will reimburse other out of pocket expenses as long as they are reasonable and wholly, exclusively and necessarily incurred by the employee in carrying out his/her duties.

Expense Claims

All employees are required to submit expense claims on a weekly basis. Expense claims which have not been submitted within two months of the end of the month in which the expense was incurred will not be reimbursed. All expense claims must be authorised by a Director and sent to the Accounts Department.

The employee's Manager must authorise the claim in the first instance. It should then be referred to a Director if the claim is over the Manager's limit of authorisation. The employee's Manager must review the claim and ensure that it is complete, that the costs are reasonable and valid before forwarding to the Director. Any amendments made to forms should be initialled by the claimant and by the individual authorising them.

Incomplete or incorrectly completed expense claims will be returned to the employee for amendment. This will result in a delay in paying the claimant. All reimbursements of expenses will be paid directly in the employee's nominated bank account by the end of the following month. This account will be the same bank account used to pay the employee's salary unless stated otherwise.

Gifts

As a general rule the Company does not believe in the receiving or giving of gifts and any employee who receives a gift from a customer, supplier or contractor must make their Manager aware of the gift immediately. The Manager will advise the Director and only on Director approval can the following occur.

In cases where the Company believes the gift was made as a genuine token of the donor's gratitude for services provided of an exceptional standard and the value does not exceed £50.00 the individual employee may be allowed to keep the gift.



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Any gift received that is thought to be a bribe will immediately be returned to the recipient. An employee who fails to return a gift on the instruction of their Manager, will be disciplined in accordance with the Company's Disciplinary procedure.

Promotional gifts such as stationery, which are not of significant value, should be distributed fairly amongst all employees. This applies in particular to those departments that receive these types of gifts on a regular basis due to the nature of their work e.g. Purchasing Departments.

Failure to disclose gifts will result in disciplinary action in accordance with the Company's Disciplinary procedure.

Any employee being entertained by a Supplier, contractor or any third party to the potential value of £100.00 or more must seek the Managing Director approval prior to accepting the invitation, failure to gain the appropriate approval will result in disciplinary action in accordance with the Disciplinary procedure.

Family Policies

Scope

This policy applies to all employees in the UK.

Policy Statement

This policy is to comply with both the letter and spirit of the law on maternity and paternity leave and pay rights. It is our aim to ensure that all employees are made aware of the benefits and entitlements.

The Company is responsible for ensuring the fair and consistent application of this policy. This policy is subject to change in accordance with changing legislation and best practice.

Maternity

Entitlement

All employees are entitled to 26 weeks' statutory maternity leave ("Ordinary Maternity Leave"), starting on or after the 11th week before the baby is due.

All employees who are entitled to Ordinary Maternity Leave are also entitled to "Additional Maternity Leave". This leave commences from the last day of the employee's Ordinary Maternity Leave and continues for a further 26 weeks. The maximum combined Ordinary and Additional Maternity Leave is therefore 52 weeks.

Pay and Benefits



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Employees will be entitled to 39 weeks' maternity pay, subject to fulfilling certain criteria. The first six weeks is paid at 90% of average weekly earnings.

The remainder is at the Statutory Maternity Pay rate ("SMP") per week or 90% of average weekly earnings, if this is less than SMP.

EWC - Expected Week of Childbirth (week your baby is due)

In all cases, maternity leave cannot commence more than 11 weeks before EWC. Please note that if an employee decides to continue to work during the four weeks prior to the expected week of childbirth, but is absent from work during this time for pregnancy related reasons, her maternity leave will start automatically from the first date of absence during this four week period.

Ordinary Maternity Leave and Additional Maternity Leave cannot be extended for reasons of ill health. If an employee is sick following maternity leave, employees should take sick leave in accordance with the usual rules on sickness. As such, they will be managed in accordance with the Company's policy on sickness absence after the end of their maternity leave.

Time Off for Ante-Natal Appointments

A reasonable amount of paid time off for the purpose of attending antenatal appointments will be allowed. The employee must notify their Manager in advance of these appointments, and provide copies of the appointment card, if requested.

Company Benefits during Maternity Leave

Ordinary and Additional Maternity Leave

Normal terms and conditions will continue to apply with the exception of salary.

Holiday

Holiday will be accrued throughout their maternity leave. It is recommended that employees check actual entitlement prior to commencing their maternity leave.

Annual Salary Review

If the annual salary review occurs during the period of absence, the employee will be notified of the reviewed salary at the same time as all other employees. The increase will become active on her return to work.

Informing the Company

Maternity Leave Form

A Maternity Leave form should be completed by the employee and sent to her Manager. This form should be completed and sent on or before the 15th week before the expected week of childbirth in order to qualify for statutory rights.



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The Company will respond in writing within 28 days of this notification stating the expected date of return. A woman who wishes to return earlier than that date must give 28 days' notice to the Company.

The start of the Ordinary Maternity Leave may be changed provided that she gives the Company 28 days' notice before the date originally notified or the new date, whichever is earlier.

MATB1

A MATBI (medical certificate) will be issued by your GP or midwife approximately 14 weeks before the expected week of childbirth. This certificate should be attached to the Maternity Leave form and submitted to your Manager.

SMP1

An employee with less than 26 weeks service with the Company at 15 weeks before the expected week of childbirth may be eligible for Maternity Allowance, which can be applied for by completing an 'SMP1' form. When the completed Maternity Leave form is received by the HR, an SMP1 will automatically be sent to those employees where it is appropriate for them to claim Maternity Allowance. The Manager will then forward all related documentation to HR. The HR Manager will acknowledge receipt in writing to the employee.

Returning to Work

Employees who take maternity leave are entitled to return to work in the job in which they were employed before their absence. If this is not possible the Company will offer, wherever possible, a suitable alternative position. The position offered will depend on the circumstances. It is assumed that the employee will be absent from work on maternity leave for the full Ordinary maternity leave period, and the full Additional maternity leave period. Therefore written confirmation of this is not legally required, unless specifically requested by the Company.

If an employee wishes to return to work before the expiry of her maternity leave, she must give 28 days' notice of her intended return date to both the Director and her Manager. If an employee fails to provide requisite notice, the Company can delay her return until the 28 days' notice period has been served, but not beyond the expiry of her leave.

By law the mother may not return to work for two weeks following the birth of the child.

Keeping in Touch Days:

Employees on maternity leave can come into work during the maternity leave for a period of up to 10 days in order to keep in touch with the Company, without losing their right to maternity leave or pay. The Company will inform employees in writing if they would like them to come in for a Keeping in Touch Day, along with details of the date/time and reasons.

Employees are entitled to refuse to come in on the day proposed and where reasonable, alternative arrangements will be made for another day/time. Employees who, following a written request from the Company, attend work on a



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Keeping in Touch Day will be paid a day's pay, which will include payment of any SMP for that day.

Employees are not entitled to come into work for more than 10 Keeping in Touch Days.

Employees Who Decide Not to Return to Work

Employees who decide not to come back to work after their maternity leave should try to discuss their decisions with their Manager before making a final decision.

Employees who decide that they do not wish to return to work should give the Company notice of termination of their employment in writing as specified in their contract.

Failure to Return to Work

If an employee does not return to work after their maternity leave they will not lose their SMP payments.

Maternity leave and Parental leave

If an employee has taken Ordinary or Additional Maternity Leave, they may request parental leave to commence as soon as they return from their maternity leave, providing the requisite notice has been given, in accordance with the terms of the parental leave policy.

Data protection

When managing an employee's maternity leave and pay, **DROPP.UK** processes personal data collected by its data protection policy / policy on processing special categories of personal data. Data collected from the point at which an employee informs **DROPP.UK** that she is pregnant is held securely and accessed by, and disclosed to, individuals only for the purposes of managing her maternity leave and pay. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK**'s data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK**'s disciplinary procedure.

When managing an employee's ordinary parental leave, **DROPP.UK** processes personal data collected in accordance with its data protection policy. Data collected from the point at which an employee informs **DROPP.UK** that she/he plans to take ordinary parental leave is held securely and accessed by, and disclosed to, individuals only for the purposes of managing his/her ordinary parental leave. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK**'s data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK**'s disciplinary procedure.

Paternity Leave and pay

Entitlement



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Eligible employees have the right to take paternity leave in relation to the birth or adoption of a child.

Leave for each child will be paid at the Statutory Paternity Pay rate per week or 90% of average weekly earnings, whichever is the lower.

To be eligible the employee must comply with the notification requirements below and must:- have or expect to have responsibility for the child's upbringing (including either one of two parents adopting a child); and

be the biological father of the child or the mother's husband and or partner (including same sex/civil partner) (this does not apply to adoptions); and have worked continuously for the Company for 26 weeks ending with the 15th week before the baby is due or the end of the week in which the employee is notified of being matched with the child.

In the case of adopters, paternity leave is not available if the employee is taking statutory adoption leave and pay. Please note that this summary applies to UK adoptions only. Employees are entitled

to take either one week or two consecutive weeks, and not odd days. Leave may be taken from the date of the child's birth or a chosen number of days after the birth, or from a chosen date, providing the period of leave is completed by the 56th day after the actual date of birth. In the case of adoptions paternity leave (and pay) can begin any time from the date of the child's placement with the adopter but must be completed with 56 days of this date.

Procedure for taking Ordinary Paternity Leave

Employees are required to notify the Company of their intention to take paternity leave by the fifteenth week before the baby is expected (or, in the case of an adoption, no later than 7 days after they are notified of a match with a child). They will need to state when the baby is due (or the date on which the child is expected to be placed for adoption), whether they intend to take one or two weeks' leave and when they want their leave to start. If they wish to change the intended start date, they must notify the Company at least 28 days beforehand.

Return to Work

Employees are entitled to return to the same job following ordinary paternity leave. **Entitlement**

to Additional Paternity Leave

Employees who are eligible for Ordinary Paternity Leave may also be eligible to take Additional Paternity Leave. Where an eligible employee's child is due on or after 3 April 2011 or the employee is notified of having been matched for adoption on or after 3 April 2011 they will be entitled to take additional paternity leave in addition to ordinary paternity leave.

Additional paternity leave must be taken as multiples of complete weeks and as one period. The minimum amount of leave that can be taken is 2 weeks and the maximum amount of leave is 26 weeks. Additional paternity must be taken in the period beginning 20 weeks after the child's date of birth or adoption placement and ending 12 months after that date of birth or adoption.

Eligibility



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To be eligible to take additional paternity leave, the employee must remain employed by the Company until the week before the first week of additional paternity leave; in birth cases, the child's mother has been entitled to maternity leave, statutory maternity pay or maternity allowance in respect of her pregnancy, or in adoption cases, the child's adopter has been entitled to one or both of adoption leave or statutory adoption pay in respect of the child's adoption; and the child's mother has returned to work.

Pay and Benefits

Employees shall be entitled to additional statutory paternity pay where the child's mother has returned to work without having taken at least two weeks of their maternity allowance, maternity pay or adoption pay period. The entitlement to additional statutory paternity pay will equate to the number of weeks of maternity allowance, maternity pay or adoption pay that remained when the child's mother returned to work.

Additional statutory paternity pay is paid at the Statutory Paternity Pay rate or at 90% of average weekly earnings if that is lower.

Employees are entitled to the benefit of all the terms and conditions of employment other than remuneration, which would have applied if they had not been absent.

Procedure for taking Additional Paternity leave

Employees who wish to take additional paternity leave in relation to a child's birth or adoption, must provide the Company with the following information as soon as possible and at least eight weeks before the date on which the employee would like to start their leave.

A written "leave notice" stating the Expected Week of Childbirth or date that you were notified of having been matched with a child, the child's date of birth or the date on which the child was placed with you and the dates on which you would like your leave to start and finish.

A signed "employee declaration" confirming that you are either the child's father or that you are the spouse, partner or civil partner of the child's mother, and apart from the child's mother, you have or expect to have the main responsibility for the upbringing of the child; and that you wish to take APL in order to care for the child.

A written "mother declaration" from the child's mother stating her name, address and National Insurance number, the date she intends to return to work; your relationship with the child; that to her knowledge you are the only person exercising an entitlement to APL in respect of the child; and that she consents to us processing this information, has to be provided.

The Company will write to confirm the start and finish dates of the additional paternity leave within 28 days of receiving the leave notice, the employee declaration and the mother declaration. If you wish to change the start date or finish date of your Additional Paternity Leave you should notify the Company at least six weeks beforehand.



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Keeping in Touch Days

Employees on additional paternity leave can come into work during the leave for a period of up to 10 days in order to keep in touch with the Company, without losing their right to paternity leave or pay. The Company will inform employees in writing if they would like them to come in for a Keeping in Touch Day, along with details of the date/time and reasons.

Employees are entitled to refuse to come in on the day proposed and where reasonable, alternative arrangements will be made for another day/time. Employees who, following a written request from the Company, attend work on a Keeping in Touch Day will be paid a day's pay, which will include payment of any statutory paternity pay for that day. Employees are not entitled to come into work for more than 10 Keeping in Touch Days.

Return to Work

Employees are entitled to return to the same job following additional paternity leave. Where an employee wishes to return to work early at least six weeks' notice must be given to the Company. The Company is entitled to postpone the employee's return to work until sufficient notice has been given.

Data protection

When managing an employee's paternity leave and pay, **DROPP.UK** processes personal data collected in accordance with its data protection policy. Data collected from the point at which an employee informs **DROPP.UK** that he/she plans to take paternity leave is held securely and accessed by, and disclosed to, individuals only for the purposes of managing his/her paternity leave and pay. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK**'s data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK**'s disciplinary procedure.

Adoptive leave and pay

Employees wishing to adopt a child and who have 26 weeks' continuous service prior to the date upon which they are matched with a child, will be entitled to 26 weeks' Ordinary Adoption Leave at the rate of SMP per week and 26 weeks' Additional Adoption Leave at which is unpaid.

Entitlement to benefits will mirror those detailed in the maternity leave policy. When managing an employee's adoption leave and pay, **DROPP.UK** processes personal data collected in accordance with its data protection policy. Data collected from the point at which an employee informs **DROPP.UK** that he/she plans to take adoption leave is held securely and accessed by, and disclosed to, individuals only for the purposes of managing his/her adoption leave and pay. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK**'s data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK**'s disciplinary procedure.



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Parental Leave Policy

Entitlement

Employees with one year's service or more qualify for up to 13 weeks' parental leave in order to care for each child under 5 years old. This applies to both mothers and fathers but cannot be transferred between them.

The leave is for each child, so if twins are born, each parent will have 26 weeks' entitlement.

An extended period of leave of 18 weeks is available to parents of disabled children, and must be taken before the child's 18th birthday.

The right to parental leave also applies where an employee adopts a child. Leave may be taken at any time within 5 years from the time the child was placed for adoption or until the date of the child's 18th birthday, whichever is sooner.

Part-time staff have the same right to parental leave, the entitlement being in proportion to the number of hours they work.

The maximum amount of leave in any one year is four weeks per child, to be taken in minimum blocks of one week (except for parents of disabled children).

Pay, Benefits and Return to Work

Parental leave is unpaid but the employee's contract continues during this period of leave. Employees have a right to return to their previous jobs after the leave expires if the leave was for a period of four weeks or less. If it was for a longer period, the employee is entitled to return to the same job or, if that is not reasonably practicable, to a similar job with the same or better terms and conditions.

Procedure

A minimum of 21 days' notice must be given to the Company for each period of leave the employee wishes to take. The employee must state both the start and finish dates.

Such leave can be postponed by the Company for up to six months if it considers that its work would be unduly disrupted by the employee taking leave at the time requested. The Company must give written notice to the employee of the postponement (with reasons for the postponement and proposed new dates) within 7 days of the employee's request.



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Flexible Working Arrangements

Scope

This Policy and Procedure applies to all employees in the UK, however it does not form part of an employee's contract of employment with the Company.

Policy Statement

The Company offers the opportunity for Flexible Working Arrangements to employees with family and caring responsibilities and commits to approaching such requests with positive intent; although the operating needs of the business will be a priority.

Procedure

The employee is responsible for making the initial application for Flexible Working in writing to their Manager, setting out their desired working pattern and how they think the Company will be able to accommodate their request. Their Manager is responsible for arranging a meeting with the employee to fully discuss the request and deciding if the Company can accommodate the request. Employees entitled to apply must have a minimum of 26 weeks continuous service with the Company and meet the following criteria.

- Have not made a request within the previous 12 months
- Have responsibility for a child under the age of 18
- Have responsibility for certain adults who require care

The employee wishing to apply can only make one application in any 12 month period and must supply the following information in their written request addressed to their Manager. The employee should also allow as much time as possible for the request to be considered before they wish the new Flexible Working arrangement to commence.

- Confirm they will have caring responsibility for an adult or child and the relationship between the employee and the child or adult.
- Specify the type of working arrangement they require and the date the employee wishes the new working pattern to commence and whether they consider the new arrangement would be a permanent or temporary requirement.
- Explain what affect their new working arrangement may have on the business and how this may be accommodated by the business.
- Confirm when and if they have previously applied for Flexible Working.

The Manager on receipt of the written request may ask the employee for more detailed information and once the Manager is satisfied that they have all the necessary detail they will arrange a meeting with the employee to discuss their request. The meeting will be arranged within 28 days of receiving all the information required from the employee. The employee has the right to be accompanied by a work colleague or an Official Trade Union Representative. The Manager will confirm their decision in writing within 14 days from the date of the



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meeting and if the request is accepted may also arrange a contractual change to the employee's contract of employment.

Alternatively the Manager may suggest a Trial Period to ensure that the new arrangement is workable within the business and equally the employee may request the new arrangement to be for a temporary period only.

If the Manager refuses the request for the new working arrangement this will be in writing stating the reasons why the proposed changes are unacceptable to the business. The employee will then have the right to appeal against the Manager's decision which must be in writing to the next level of Management within 14 days of receiving the Manager's written decision. The employee's appeal letter must state the reason for the appeal.

The appeal meeting will be arranged within 14 days from the date of the letter of appeal and the employee has the right to be accompanied as stated above. The Manager's decision will be confirmed in writing within 14 days and if a new arrangement has been agreed with the employee this will also be confirmed contractually. If the appeal request has been refused by the Manager, this will be confirmed in writing within 14 days from the date of the meeting stating the reasons for their decision. This is the final decision and the final stage of the procedure.

Procedure

If you decide to make a flexible working request you must follow this procedure. However, before making an application you should think about:

- what working pattern will help you best achieve your aims
- the financial implications a change might have on you
- what effects, if any, the change will have on the Company's business and how these might be accommodated.

Your application must be submitted to your manager and must:

- be made in writing and dated
- state that it is an application under the statutory right to apply for flexible working arrangements
- state whether a previous application has been made by you to the Company and, if so, when
- specify the change applied for and the date on which it is proposed that the change should become effective
- explain what effect, if any, you think making the change applied for would have on the Company and how, in your opinion, any such effect might be dealt with.

Your manager may agree to the formal request without discussing it with you (for example, if the details of your request have already been discussed informally).

In most cases your manager will arrange to meet with you promptly after receiving the application.

Meeting



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The time and place of the meeting will be convenient to both you and your manager. A work colleague may accompany you at the meeting. That employee will be permitted to confer with you during the meeting and to address the meeting (but not to answer questions on your behalf).

If your chosen companion will not be available at the time proposed for the meeting and you propose an alternative, mutually convenient time, the manager will postpone the meeting to the time proposed by you. Alternatively, you should consider choosing another companion. At the meeting, the requested variation to your working arrangements will be discussed fully. The impact of the change, and your ideas for how any adverse impact could be minimised, will be considered. The meeting also provides the opportunity to discuss any alternative variations which would be acceptable. Your manager may suggest implementing an agreed trial period for the new arrangements.

Agreement

If the Company agrees to the application you will receive written confirmation which will specify the contractual variation agreed to and state the date on which the variation is to take effect.

Once the Company has agreed to the changes requested in your application, a permanent variation of your contract will result, unless your manager agrees otherwise. Once a change has been made, you cannot revert to the previous terms and conditions of your employment. You may make further applications for variations (whether your first application was successful or not) provided they are made at least 12 months after the previous application.

Refusal

If your request is refused, the written notice will identify on which of the permitted grounds (listed below) the application was refused. The letter will also provide an explanation as to why those grounds apply, and set out the appeal procedure.

The application may be refused on one or more of several grounds, these being that the proposed changes will result in:

- a burden of additional cost
- a detrimental effect on ability to meet customer demand
- an inability to re-organise work among existing staff
- an inability to recruit additional staff
- a detrimental effect on quality
- a detrimental effect on performance
- an insufficiency of work during the periods you propose to work
- a planned structural change
- any other ground allowed by regulations

In deciding whether the above grounds are met, a wide range of criteria will be taken into account, including (by way of example only) the following:

- the Company's business needs



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- the suitability of the job for the flexible arrangements proposed, e.g. the nature of the work, the hours needed and the need for continuity and consistency
- the current balance of full-time and part-time employees and other flexible working arrangements within the department or team
- the feasibility of covering the remaining hours

Withdrawal of Application

The Company can treat an application as withdrawn under the statutory provisions where you have:

- notified your manager, orally or in writing, that the application is withdrawn
- without reasonable cause, failed more than once to attend a meeting or appeal meeting
- without reasonable cause, refused to provide your manager with information required in order to assess whether the contract variation should be agreed to.

Your manager will confirm the withdrawal of the application to you in writing unless you have already provided written notice of the withdrawal. You will not be entitled to make another formal application until 12 months after your original request.

Appeal

It is the Company's policy to allow an appeal against a decision to refuse an application for flexible working. If you wish to appeal you should do so within 7 days after the date on which you were notified of the decision. The notice of appeal must be addressed to your senior manager in writing, setting out the grounds for appeal. Your senior manager will hold a meeting with you to discuss the appeal. The time and place of an appeal meeting will be convenient to both you and the Company. You have the same right to be accompanied by a work colleague as at the initial meeting.

Following the appeal meeting your senior manager will write to you with a decision. If the Company upholds the appeal, the letter will specify the contract variation agreed to, and state the date on which it is to take effect. If the Company dismisses the appeal, the letter will state the grounds for the decision and contains an explanation as to why those grounds apply.

Data protection

When managing an employee's flexible working request, **DROPP.UK** processes personal data collected in accordance with its data protection policy. Data collected from the point at which **DROPP.UK** receives a flexible working request is held securely and accessed by, and disclosed to, individuals only for the purposes of managing his/her request for flexible working. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in



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accordance with **DROPP.UK's** data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK** disciplinary procedure.

Portable and Hand-Held Devices Policy

Scope

This document sets out **DROPP.UK's** policy on hand-held or portable electronic devices, such as smartphones, tablets and laptops, where they are provided to employees for use in the course of their work. The policy applies to all employees who are provided with a hand-held or portable electronic device.

Any breach of this policy will be regarded as serious misconduct, leading to disciplinary action up to and including summary dismissal.

Hand-held or portable electronic devices issued to employees remain the property of **DROPP.UK** at all times and may be withdrawn if there is any evidence that they have been misused.

Appropriate use

DROPP.UK provides some of its employees with hand-held or portable electronic devices for work-related purposes, i.e. to enable employees to communicate effectively on matters of company business. They should not be used for personal purposes.

It is important to note that employees may not at any time use hand-held or portable electronic devices issued to them by **DROPP.UK** to:

- communicate information that is confidential to **DROPP.UK**, unless authorised to do so in the course of their job;
- send or forward any message (inside or outside **DROPP.UK**) that could constitute bullying or harassment or be interpreted as offensive; or
- send personal messages, jokes, cartoons or chain letters to any person inside or outside **DROPP.UK**.

Although employees are expected to use their hand-held or portable electronic devices for the purpose of conducting company business efficiently, this does not mean that they are expected to be "on-call" at all times. Employees have the right to maintain a reasonable work-life balance.

Etiquette

Although it is recognised that hand-held or portable electronic devices are indispensable tools, they should not be overused or used inappropriately.

During a company meeting or training course, employees should have their hand-held or portable electronic devices switched off/placed in silent mode and not answered.

As regards the style and content of messages, employees should treat their hand-held or portable electronic devices in line with **DROPP.UK** policy covering



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email messages. All communications should be prepared with care and should be professional in their tone.

Safety/security

Employees issued with a hand-held or portable electronic device must take proper care of it and ensure its security at all times. For example, hand-held or portable electronic devices should not be left in unattended parked cars.

Monitoring

DROPP.UK carries out monitoring of employees' use of **DROPP.UK's** computer equipment, including hand-held or portable electronic devices or computers (in accordance with an impact assessment that **DROPP.UK** has carried out to ensure that monitoring is necessary and proportionate). This is in **DROPP.UK's** legitimate interests and is for security reasons and to detect/deter unauthorised use.

Monitoring will consist of checks on employees' hand-held or portable electronic devices, including:

- checks of telephone numbers dialled by employees;
- the subject heading and address of emails that they have sent (but generally not the content unless **DROPP.UK** believes that an employee may have been involved in serious misconduct); and
- information about internet access, including the IP address of sites that have been visited and the duration.

The results of the monitoring will be maintained in strict confidence.

Monitoring will normally be conducted by **DROPP.UK's** director team. The information obtained through monitoring may be shared internally, including with members of the HR team, an employee's line manager, managers in the business area in which the employee works and IT staff if access to the data is necessary for performance of their roles. However, information would normally be shared in this way only if **DROPP.UK** has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after 6 months, depending on the reasons for monitoring.

Information obtained through monitoring will not be disclosed to third parties (unless **DROPP.UK** is under a duty to report matters to a regulatory authority or to a law enforcement agency).

Workers have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in **DROPP.UK's** data protection policy. If workers believe that **DROPP.UK** has not complied with their data protection rights, they can complain to the Information Commissioner.



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Bringing your own device to work policy

Scope

This policy applies to employees who work remotely, for example from home, or who bring their computers (or other devices, for example mobile telephones or tablets) into work. This policy covers those employees who work exclusively on personal laptops as well as those who occasionally receive work-related emails on their mobile telephones.

Purpose

The purpose of the policy is to set out how employees should ensure that they protect any personal data while working from home or when bringing their own devices to work (BYOD). This policy should be read in conjunction with **DROPP.UK**'s data protection policy.

DROPP.UK is the data controller in relation to work-related personal data that is held on personal devices. **DROPP.UK**'s data protection officer is responsible for the implementation of this policy. If employees have any questions about data protection in general, this policy or their obligations under it, they should direct them to gdpr_contact@dropp.uk.

General Data Protection Regulation (GDPR)

The GDPR requires **DROPP.UK**'s to process any personal data in accordance with the six data protection principles (see **DROPP.UK**'s separate data protection policy). "Processing" includes obtaining personal information, retaining and using it, allowing it to be accessed, disclosing it and, finally, disposing of it. The sixth data protection principle requires **DROPP.UK** to ensure that personal data is protected by appropriate technical and organisational measures against



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unauthorised or unlawful processing or disclosure, and against accidental loss, damage or destruction.

Who is allowed to use BYOD?

All employees are permitted to use their personal devices for work-related purposes. If an employee wishes to use his/her own device for work-related activities, he/she should contact the data protection officer in writing with the name and model of the device and the purpose for which it is intended to be used.

"Special category data" is information about an individual's:

- racial or ethnic origin;
- political opinions;
- religious beliefs or philosophical beliefs;
- trade union membership (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992);
- physical or mental health or condition (including genetic or biometric data); and
- sex life or sexual orientation.

Information related to criminal records and convictions is also treated as special category data for the purposes of this policy.

Employees must not process special category data on a personal device. Employees should check whether or not any special category data has passed to their personal devices by whatever means. If an employee discovers any special category data on his/her device, he/she should notify the data protection officer immediately and arrange for its permanent deletion from the device.

Security

Before using his/her own device for work-related purposes, an employee must ensure that he/she uses a strong password to lock his/her device. The device must be capable of locking automatically (and deleting data automatically) if an incorrect password is entered after several attempts or if the device is inactive for 1 week. Employees must know exactly what data might be deleted automatically.

In addition, employees must:

- use encryption software on their devices to store personal data securely;
- ensure that if they transfer data (either by email or by other means), they do so via an encrypted channel (for example a VPN for individual services);
- ensure that they assess the security of any open network or Wi-Fi connection (employees should not use unsecured Wi-Fi networks);
- not download unverified or untrusted apps that may pose a threat to the security of the information held on their devices;
- not, under any circumstances, use corporate personal information for any purpose other than for their work and as directed or instructed by **DROPP.UK**;
- use different applications for business and personal use;
- ensure that they have a system of software in place for quickly and effectively revoking access that a user might gain to a device in the event of loss or theft;



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- make sure that any software that they use is genuine software installed under an appropriate licence agreement between the employee and the relevant manufacturer to prevent any security vulnerabilities;
- report the loss or theft of a device used for work-related activities immediately to the data protection officer; and
- report data breaches of which they become aware to the data protection officer immediately.

Employees are permitted to access any document on **DROPP.UK** Recruit's (server/network/private cloud).

Employees must always log out of **DROPP.UK**'s (server/network/private cloud between sessions).

Employees must not use public cloud-based sharing or public back-up services without prior authorisation from the data protection officer.

An employee is not permitted to download or access certain applications or types of data that require the identification of the employee's location or an additional level of authentication.

Mobile-device management

An employee must ensure that his/her device is subject to mobile-device management so that if the device is stolen, upgraded, recycled for money or given to family or friends, the employee is able to locate the device remotely and delete data on demand. The employee must limit the purpose of mobile-device management to the detection of the device and the remote deletion of data. If the device is stolen, the employee must be able effectively to wipe any confidential data on the device immediately by way of a remote "locate and wipe" facility.

Technical support

If employees require any technical support with their devices, they should ensure that the third party providing such support has access to any data insofar as is necessary to complete his/her work and that data is not transferred to a third-party device unless there is no other way of rectifying the technical problem. If data is transferred to a third-party device, the third party must warrant, and the employee must ensure, that the information is removed permanently from such third-party device once the problem has been rectified.

Retention of personal data

Employees must not retain personal data for longer than is necessary for the purpose for which it is being used, unless there is a requirement to retain it for longerto comply with any legal obligation. If an employee is in any doubt, he/she should contact the data protection officer.

Deletion of personal data



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Employees must ensure that if they delete information, it is deleted permanently rather than left in the device's waste-management system. An employee may need to use overwriting software to achieve this. However, this is not always practicable because, for example, the information is stored or categorised with other information that is still live. In these circumstances, it is sufficient for the employee to put the information "beyond use". This means that the employee must:

- ensure that he/she does not use the personal information to make any decision that affects an individual or in a manner that affects an individual in any way;
- not give any other organisation access to the personal data in any way;
- surround the personal data with appropriate technical and organisational security; and
- commit to the permanent deletion of the information if and when this becomes possible.

If an employee uses removable media, for example a USB stick, to transfer personal data, he/she must ensure that the personal data is deleted once the transfer is complete.

Co-operation with subject access requests

Any individual whose personal data is held by **DROPP.UK** has the right to make a subject access request (see the **DROPP.UK**'s data protection policy for more information). This means that, if an individual makes a subject access request, **DROPP.UK** may need to access your device to retrieve any data that is held on it about the individual. You must allow **DROPP.UK** to access the device and to carry out a search to find any information about the individual held on the device.

Third-party use of device

Employees must ensure that if family or friends use their devices, they are unable to gain access to any personal information that is work-related by, for example, password-protecting it.

Termination of employment

If an employee leaves **DROPP.UK**, he/she must delete all work-related personal data on his/her own device prior to his/her last day with **DROPP.UK**.

Monitoring

As part of its ongoing obligations under the GDPR, **DROPP.UK** will monitor data protection compliance in general and compliance with this policy, in particular. This monitoring is in **DROPP.UK**'s legitimate interests, to ensure that the policy is being complied with, and to ensure that **DROPP.UK** is complying with its legal obligations under the GDPR. Applications that have been installed for personal use will not be monitored: monitoring will be limited to business-related applications.

Monitoring will normally be conducted by members of the **DROPP.UK**'s director team. The information obtained through monitoring may be shared internally, including with members of the HR team, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles. However, information would normally only be shared in this way if **DROPP.UK** has reasonable grounds to believe that this policy has not been followed.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted.



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Workers have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in **DROPP.UK's** data protection policy. If workers believe that **DROPP.UK** has not complied with their data protection rights, they can complain to the Information Commissioner.

Consequences of non-compliance

If an employee is suspected of breaching this policy, **DROPP.UK** will investigate the matter under its disciplinary procedure. If any breaches are established, this could result in disciplinary action up to and including dismissal. An employee may also incur personal criminal liability for breaching this policy.

Review of procedures and training

DROPP.UK will provide training to all employees on data protection matters on induction and on a regular basis thereafter. If an employee considers that he/she would benefit from refresher training, he/she should contact the data protection officer. **DROPP.UK** review and ensure compliance with this policy at regular intervals.

Grievance Policy & Procedure

Scope

This policy and procedure applies to all **DROPP.UK** employees, however it does not form part of an employee's contract of employment with the Company.

Policy Statement

DROPP.UK encourages a working environment of open and honest communication amongst all employees. Should an employee have an issue with any aspect of their work or relationships at work, they should raise the issue promptly and where possible the matter should be resolved on an informal basis with their manager. The objective of the formal grievance procedure is to address concerns; problems or complaints employees may have about their employer or about problems at work that cannot be solved informally in the first instance.

Principles

It is not always necessary to use the formal grievance procedure and you are encouraged to resolve matters on an informal basis where appropriate.

You have the right to be accompanied by another member of staff of your choice, or a suitably qualified trade union official at any stage of the procedure.



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You will be expected to take all reasonable steps to attend any grievance meeting. The details of your grievance will be kept as confidential as is reasonable and necessary in the circumstances.

Procedure

Step 1

You should inform your line manager of your grievance in writing. In the event that the grievance relates to your line manager then you should raise the matter with the next most senior manager, or if there is no more senior manager, the Board of Directors who will arrange for an individual of appropriate seniority and experience to deal with it.

Step 2

You will be invited to a meeting to discuss your grievance at a reasonable time and place. An appropriate investigation into your grievance will be conducted. Following the meeting and the investigation you will be notified in writing of the decision, normally within 24 hours dependant on the timescales of the investigation.

Step 3

You have the right to appeal against the decision made at Step 2. If you feel that the grievance has not been satisfactorily resolved your appeal should be addressed to the next most senior manager. You should set out your appeal and the basis for it in writing. This must be submitted within 7 days from the date of the letter advising you of the grievance decision confirmed under Step 2.

On receipt of your letter, an appropriate investigation will be conducted, and you will be invited to attend an appeal meeting. Following the meeting and any further investigation if necessary, you will be notified in writing of the outcome of your appeal, normally within 24 hours, dependant on the timescales of any further investigation.

Dependant on the level of Management that heard your appeal under step 2, the situation may arise where there is no higher level of management within the Company to hear your appeal at Step 3. In this instant a manager of the same peer group or the manager who heard your appeal at Step 2 will review the original decision and decide the case as impartially as possible. The decision will be final.

This is the end of the internal process for raising a Grievance.

Records

The following records will be kept on your personnel file:

- Copy of the written grievance
- The Company's response
- The action taken
- Reasons for the action taken
- Whether there was an appeal and, if so the outcome; and
- Any subsequent developments.

Records will be kept confidential.

Right to be Accompanied



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You have the right to be accompanied by a fellow worker or suitably qualified trade union official at any grievance meeting.

Your companion may not answer questions directly asked of you; however, they may address the meeting in order to do any or all of the following:

- put your case
- sum up that case
- respond on your behalf to any view expressed at the meeting
- confer with you during the meeting
- they cannot answer questions on your behalf

If your chosen companion is unavailable at the time of the meeting you should suggest a reasonable alternative time that is no more than seven working days after the original time of the meeting.

Data protection

DROPP.UK processes personal data collected during informal complaints and the formal grievance procedure in accordance with its data protection policy. In particular, data collected as part of informal complaints and the grievance procedure is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints or conducting the grievance procedure. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with **DROPP.UK's** data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under **DROPP.UK's** disciplinary procedure.

Harassment Policy & Procedure

Scope

This Policy and Procedure applies to all **DROPP.UK** employees. Contractors and suppliers in the UK.

Policy Statement

Harassment damages the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other staff not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. All staff are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and incidents will be dealt with under the disciplinary procedure.



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Harassment includes

Any physical, verbal or non-verbal conduct, including that of a directly or indirectly sexual or racial nature or which is based on a person's age, disability, sexual orientation, religion or belief, and which is unwanted, unreasonable or offensive or creates an intimidating, hostile or humiliating working environment and which affects the dignity of men or women at work; or

bullying of colleagues, especially junior colleagues, by intimidatory behaviour; or

other unfavourable conduct at work, which adversely affects another employee's dignity at work.

A single incident can amount to harassment if sufficiently grave.

Examples of harassment or bullying include sexual or racial (or other discriminatory) banter; the display of material with sexual, or racial or other discriminatory overtones (even if not directed at the complainant); basing decisions affecting an employee's career on their willingness or refusal to offer sexual favours; sarcastic personal remarks about colleagues, especially by a manager; less favourable treatment on the grounds of sex, race, disability, age, sexual orientation, religion or belief (or other characteristic protected by law); over-demanding or exigent requirements.

Disciplinary action taken in accordance with the formal stage set out below may result in a formal warning or, in the case of a serious breach of this policy or repeated breaches, summary dismissal.

Prevention of Harassment

Informal stage

It is entirely in order for a recipient of unwanted conduct amounting to harassment to try to resolve the problem if he/she so prefers, by explaining to the individual concerned that the behaviour is not welcome, that it offends or makes the recipient uncomfortable and that it interferes with their work.

Anyone who has been subjected to harassing or bullying behaviour may seek confidential assistance from their Manager or a Director of the Company. All assisting staff have received training to enable them to advise and assist in devising means of preventing a re-occurrence of the unwanted behaviour.

An informal approach to an assisting staff member will be treated as completely confidential and will not result in any report to anyone within the Company, unless the complainant agrees.

If the complainant prefers, where they find it too difficult or embarrassing to take up the matter themselves, the assisting member of staff will participate in an informal meeting between them and the alleged harasser or will, at the complainant's request, approach the alleged harasser on their behalf.



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The informal stage will not result in any formal internal investigation or disciplinary action but is intended to enable the complainant to resolve the matter themselves without it going any further in the Company.

Formal stage

Where informal resolution is not appropriate, is not requested or where the outcome has been unsatisfactory, then the complainant may make a formal complaint to their Manager or a Director of the Company.

If so desired the complainant may nominate a willing member of staff to help them to prepare their complaint and will accompany them to any meetings. All complaints will be thoroughly and expeditiously investigated. They will be conducted in an independent and objective manner by someone unconnected with the allegations and at least of equal grade/status with the alleged harasser. Every effort will be made to resolve complaints quickly and, wherever possible, investigations will be completed within two weeks of the complaint being made.

Investigations will be carried out with sensitivity and with due respect for the rights of both the complainant and the alleged harasser. All those interviewed will be permitted to be accompanied by a colleague or trade union representative. The alleged harasser will receive full details of the nature of the complaint. They will be given a reasonable opportunity to consider their response and will be invited to attend a hearing at a time and location reasonably convenient to all parties, where they will be given an opportunity to respond to the allegations.

The importance of confidentiality will be stressed to all those interviewed and everyone will be strictly required not to discuss the complaint with colleagues or friends. Breach of confidentiality may give rise to disciplinary action.

The investigation will focus on the facts of the complaint. Notes will be kept of all stages of the investigation. Parties will not be required to repeat distressing or embarrassing details any more than is necessary.

Wherever possible, consideration will be given to ensuring that the complainant and the alleged harasser are not required to work together whilst the complaint is under investigation. Where it is not practicable to offer alternative duties to one or other party, the complainant and/or the alleged harasser will be given the option of remaining at home on paid leave if necessary or so desired.

The complainant will be kept informed of the general progress of the investigation and will be informed whether the complaint has been upheld and is to result in disciplinary action.

Where a complaint has been upheld, consideration will be given, wherever possible, to permitting the complainant to choose whether they wish to remain in their current post or to transfer. The Company will seek to ensure that the complainant is not in any way penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the harassment has stopped. Disciplinary action will be taken against any employee who victimises or retaliates against an employee for bringing a claim for harassment in good faith.



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Even when a complaint is not upheld, for example where the evidence is inconclusive, consideration will be given to effecting arrangements which will enable the parties not to continue to work together against the wishes of either party.

Any complaint that is unfounded and not made in good faith, for example a malicious complaint, will be treated as a disciplinary offence.

Details of all formal complaints of harassment will be collated and will be reviewed annually by the Directors with a view to ensuring that every effective step has been taken to prevent harassment at work and to monitor the effectiveness of the complaints procedure.

Third Parties

Where possible, third parties (such as contractors) will be required to indemnify the Company against acts of harassment by their employees.

General Points

This policy applies to all employees irrespective of their length of service.

All managers are asked to be vigilant in monitoring the workplace for signs of harassment, for example, increased absenteeism and high turnover of staff. Managers will discuss at exit interviews whether the reason for the employee leaving the Company's employment was harassment and will fully document the findings.

This will allow the Company to address

any problems in this area and to establish if any improvements in its existing policy are required.

Bullying

The Company will not permit or tolerate bullying behaviour in the work place. If any employee believes that they are being subjected to bullying behaviour they must report the matter as a grievance using the Company's grievance procedures. Any employee found guilty of bullying behaviour will be disciplined and may be dismissed as a result of such practices or behaviour. The following are considered to be inappropriate behaviour, however the list is by no means exhaustive and each complaint will be dealt with on individual merit:-

- personal insults;
- demoralising behaviour e.g. excessive criticism, public humiliation;
- physical abuse;
- "sending someone to Coventry" i.e. deliberately ignoring an individual;
- pranks and jokes designed to humiliate an individual



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Health & Safety Policy

Scope

This policy applies to all employees of **DROPP.UK**, Contractors, Suppliers, Customers and Visitors to the Company.

Policy Statement

This policy statement is written in order to satisfy the requirements contained within Section 2 of the Health and Safety at Work etc Act 1974, which states 'It shall be the duty of every employer to prepare and as often as may be appropriate, revise a written statement of their general policy with respect to health and safety at work of their employees and **DROPP.UK** and arrangements, for the time being in force for carrying out that policy, and to bring that statement and any revision of it to the notice of all their employees.

The Management of **DROPP.UK** is committed to its statutory obligations outlined within the Health and Safety at Work Act 1974 and all subsequent legislation to provide and maintain a healthy and safe working environment **DROPP.UK** acknowledges and accepts its duty to secure the health, safety and welfare, not only of its own employees but also that of visitors, contractors, members of the public and others who may be affected by our activities.

All employees have responsibility to take reasonable care of themselves and others who could be affected by their activities and to co-operate with managers in achieving the standards required. It is the intention of **DROPP.UK**:

- To provide, so far as is reasonably practicable, safe places and systems of work, safe plant and machinery, safe handling and storage of materials and substances
- To provide the necessary information, instruction and training to employees and others, to ensure their competence and capability
- To provide the necessary resources in the form of finance, equipment and personnel to ensure effective Health & Safety Management
- To liaise with the Health & Safety Executive and other official Organisations as necessary
- To consult with employees and their representatives on any business changes which may impact upon Health & Safety
- To ensure accidents and incidents are fully investigated and appropriate action taken to reduce the likelihood of re-occurrence
- To measure, monitor and revise, where necessary Health & Safety standards and processes
- This policy will be reviewed and revised as necessary at regular intervals.

Procedures

Responsibilities – The overall health & safety responsibility for **DROPP.UK** is held by **James Roberts** and the day to day activity by James Roberts Managing Director



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of ensuring the policy is put into practice. However all employees have the responsibility to cooperate with Managers in all health & safety matters; not interfere with anything provided to safeguard their health & safety; take reasonable care of their own health & safety; and report all health & safety concerns to **James Roberts** Managing Director.

Risk Assessments

Will be undertaken by **James Roberts** Managing Director and any action from those findings will be approved, implemented and checked to ensure that the identified risks have been removed or reduced. Risk Assessments will be reviewed every 3 months or when the work activity changes, whichever is soonest.

Consultation

DROPP.UK is committed to proper consultation with all its employees on matters relating to health & safety. This will be achieved as a standing agenda item in the regular management meetings and communicated to the employees in their weekly/monthly meetings.

Safe Plant and Equipment

James Roberts Managing Director will be responsible for ensuring that all plant and equipment that is purchased meets the required health & safety standards as well as ensuring it is properly maintained. Any existing plant or equipment requiring maintenance will be restored to the required health & safety standards. All employees are responsible for reporting any defective plant or equipment to the attention of **James Roberts** Managing Director immediately.

Safe Handling and Use of Substances COSHH

As with "Risk Assessments" detailed above all substances which need COSHH assessments will be conducted and the necessary actions will be implemented. All employees will be informed of the findings and the actions taken. Any new substances purchased will also undergo the same risk assessment. Responsibility for this is the same as detailed under Risk Assessments and will be reviewed in the same way.

Information Instruction and Supervision

DROPP.UK Employers Liability Compulsory Insurance Certificate and Health & Safety Policy Statement are located within the office and can be viewed at any time. Any employee wanting advice on matters relating to health & safety must contact **James Roberts** Managing Director. **DROPP.UK** will ensure that if young people/trainees are employed the health & safety policy will be reviewed and adjusted accordingly. Furthermore, should any of the employees be required to work out of premises under another employer's control, additional relevant health & safety information and instruction will be given.

Competency for Tasks and Training



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DROPP.UK are committed to ensuring that appropriate health & safety training is given to all new and existing employees. For new employee's health & safety training will be part of their induction on day one of joining the Company. For existing employee's health & safety training will be provided and this will include, as necessary, job specific health & safety training. Currently there are no roles within the Company that have been identified as requiring specific health & safety training. All health & safety training will be provided and monitored by **James Roberts** Managing Director. Records of all health & safety training will be acknowledged and signed for by each individual employee who receives the training and be recorded on the employee's personal files. The Company will ensure that health & safety training is monitored and any necessary additional or future training needs are identified and implemented.

Accidents First Aid and Work-Related Ill Health

In the event of a serious accident, injury or anyone falling seriously ill whilst at work, the emergency services should be called immediately on 999. Once the emergency services have taken control of the incident all employees who were witness to the incident must ensure that James Roberts Managing Director is informed as soon as possible and that a written record of the facts of the incident is made in **DROPP.UK's** Accident Book. These procedures must be followed as the Company are legally required to report certain incidents to the HSE.

For any other incident, injury or illness a local GP should be called for advice or contact the NHS Help Line direct. The Company's First Aid Box is available in the office. Once again, the incident must be reported in the Company's Accident Book. It is important for all employees to note that any accident or injury however minor must be recorded in the Accident Book. COSHH "Risk Assessments" will highlight the need for specialist health surveillance for certain jobs within the Company. At the current time, this is not required for any occupation within the Company, however, this is reviewed as part of the Company's health & safety monitoring process.

DROPP.UK will investigate all accidents and near misses to determine their underlying cause for the purpose of ensuring that there is no recurrence and using the lessons learnt to improve health and safety performance within **DROPP.UK**. **DROPP.UK** adopts a no blame culture when investigating accidents for the purpose of improving health and safety performance.

The type and level of the investigation will be appropriate to the circumstances. Those involved in the accident investigation will be competent to be so and will be provided with adequate training, information and support. The investigation report will provide a factual account of the accident, draw objective conclusions and identify practical recommendations. Agreed actions will be implemented within realistic timescales.

In the event of an external investigation by the enforcement authorities, full cooperation will be provided.

Once the area has been made safe the accident should be investigated promptly by a director/manager. The decision as to who will investigate the accident will be made after consideration of the type of accident.

The competent person conducting the investigation will appoint an investigation team if necessary and obtain specialist advice from technical experts when required. An accident investigation form should be used to record the details of the



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investigation. The level and type of investigation will depend on the circumstances and severity (or potential severity) of the accident.

The person conducting the investigation will (if necessary):

- obtain factual information regarding the accident, including the accident location, the time and date of the accident, the work activity being undertaken, the people involved and the sequence of events;
- conduct an inspection of the accident site once the area has been made safe, and take appropriate photographs;
- obtain written statements from all relevant parties;
- conduct and document interviews with relevant personnel;
- if relevant, obtain physical evidence (equipment, damaged products, etc);
- obtain and review relevant documentation (training, inspection, maintenance records, work procedures, etc); and
- review existing relevant risk assessments and corresponding arrangements.

The person conducting the investigation must ensure that personal data, including information about individuals' health, collected during the accident investigation is handled in accordance with **DROPP.UK's** data protection policy / policy on processing special categories of personal data.

Once the facts have been obtained and any required testing, analysis, etc completed, the underlying causes should be established. The investigation team should draw conclusions and identify practical recommendations to ensure that the accident does not recur. Assistance should be sought from relevant parties if required. The recommendations must be agreed with the relevant staff and the actions prioritised. The accident investigator (or nominated person) will track the actions to ensure that they are completed within the given timescales.

Relevant risk assessments will be reviewed and, where necessary, updated following the accident report.

The investigation report and form and any corresponding information will be kept for a minimum of three years.

Monitoring

DROPP.UK will monitor and review all working practices via changing needs of the business, employee feedback, formal "Risk Assessment" reviews, health & safety meetings and any investigation following a serious accident or incident. The Company will also monitor sickness absence in particular any work-related illness or any depression/stress related absence. For more detail refer to the Company's Sickness and Absence Policy. The responsibility for investigation and monitoring work related absence is James Roberts Managing Director.

Emergency Procedures and Fire Evacuation

All **DROPP.UK** employees, customers, contractors and visitors are required to familiarise and adhere to the Company's Evacuation procedures.

The Fire Evacuation Procedures for **DROPP.UK** is as Follows:

- Any Person Discovering a Fire:



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- Activate the nearest alarm call point by breaking the glass and confirm the location of the fire and call 999
- Attack the fire if possible using the correct extinguisher but without personal risk.

On Hearing the Fire Alarm:

- Leave the building immediately by the closest exit and go directly to the assembly point
- Do not stop to collect belongings and do not use the lifts
- Close all doors behind you
- Report to the assembly point, which is The Farm Driveway, left of the main entrance of the building.
- Remain at the assembly point until the all clear is given by the designated Fire Marshall or the emergency services.

For Your Own Safety:

- Study the emergency evacuation procedures
- Make sure you know where your nearest break glass is
- Make sure you know where your nearest Fire Exit is
- Make sure you know where the assembly point is
- Make sure you know who are the appointed Fire Marshalls within **DROPP.UK**.

Fire Evacuation Procedures Safety Checks – At **DROPP.UK** the responsibility for regular checking of the Company's Fire Evacuation Procedures are completed by the Fire Marshall, and they will ensure on a regular basis that the following has been completed:

- Escape routes are checked by the Fire Marshall every month
- Fire Extinguishers are maintained and checked by the Fire Marshall every month
- Fire alarms are tested by the Fire Marshall every month
- Emergency Evacuation Procedures for all Employees, Customers, Contractors and Visitor who are on the premises at the time of the test evacuation.

DROPP.UK appointed Fire Marshall will comply with **DROPP.UK** Fire Marshalls responsibilities procedures in the event of a Fire.

Security Procedures

All employees of **DROPP.UK** must ensure that they understand and comply with **DROPP.UK** Security Procedures to ensure the safe keeping of all personnel and property whilst using the premises. This includes locking valuable equipment e.g. Laptops out of sight away at night before leaving the office. They must also ensure that any visitor or contractor complies with the Security procedures. The Security Procedures are available from Managing Director and are reviewed on an annual basis.



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Sickness and Absence Policy

Scope

This policy applies to all employees of **DROPP.UK** in the UK.

Policy Statement

DROPP.UK, expects all their employees to maintain a healthy life style, look after their overall wellbeing and to attend work, on a regular basis. However, the Company does recognise that occasionally employees will be absent from work due to genuine ill health or injury and would expect employees to seek medical advice and support as soon as possible, to aid a speedy recovery. The company will offer their support in genuine cases of ill health.

Principals

- To ensure that all employees fully understand their obligations and entitlements in relation to sickness absence.
- To ensure that the Company apply a fair and consistent approach to managing and monitoring sickness and absence.

Procedure

Before or on your First Day of Absence – you must inform your Manager before 07.30am on the first day of absence that you are unable to attend work via phone call or voicemail. Text messages and emails will not be accepted as a suitable notification of absence. You must give a reason for your absence and if possible, the anticipated date of your return to work.

Keeping the Company Advised – you must keep your manager updated via phone call or voicemail of your progress and expected date of return to work and seek medical advice or appropriate support as soon as possible. Your manager must be advised before 9am on the following days by phone call or voicemail.

On the Day you Return to Work – you must complete a Self-Certification Form immediately on your first day of return, the form can be obtained from your GP surgery or Manager.

Sickness and Absence of Seven Days or More – you must obtain a Doctors Fit Note of absence on the seventh day of absence and send this to your Manager upon receipt. The seven days includes all non-working days (non-working days, Saturday, Sunday, public holidays and annual leave). If your absence continues this must be supported by additional Doctors Fit Notes. On your first day of return to work you will still be required to complete a Self-Certification Form.

The Fit Note will enable your Doctor to advise that you are able to return to work with either adjustment to your duties or working arrangements. Alternatively, your Doctor may still sign you off as unfit to work or fit to work on the Fit Note.



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If you receive a Fit Note from your Doctor with recommendations on how you should return to work you must give the Fit Note to your Manager who will discuss the Doctors advice with you. Ultimately it will be the Company's decision as to whether they can accommodate the Doctors recommendations.

Sickness Absence whilst on Leave

if you are sick during annual leave including public holidays you will not be compensated for the loss of leave unless your absence is accompanied by a Doctors Fit Note and you will be expected to complete a Self-Certification Form on your return to work.

Medical Assessment

If you have been absent due to an injury or serious illness, or absent on a regular basis for various reasons and are currently working or are returning from a long period of absence the Company may require you to see a Medical Advisor of their choice and at their expense. This is for the Company to gain professional advice with regard to your future prognosis and current wellbeing, to ensure that it safe and you are well enough to return to work, which is in accordance with your contract of employment. The Company may require you to gain a medical Fit Note from your Doctor stating that you are fit to return to work following absence. They also might conduct a return to work interview following any length of absence.

Entitlement

You will be entitled to Statutory Sick Pay, however, the Company may at their discretion and only in genuine cases of financial hardship continue to pay you at either your normal rate of pay or at a reduced rate for a period of time to be determined by the Company. The amount paid will include SSP and be reduced by any amount paid by Social Security Benefits.

Statutory Sick Pay (SSP)

Employees may not be paid if you fail to comply with the above instructions under the heading of Procedures. For the purposes of qualifying for SSP the "qualifying days" are only the days on which you are required to work and commence on the 4th day of continuous absence to a maximum of 28 weeks subject to the statutory qualifying conditions.

Accident or Injury - if you are absent from work due to an accident or injury which occurred either on or off duty any Company sick pay paid in respect of your absence will be paid as a loan. If you then recover damages and gain payment in respect of your absence from a 3rd party you must repay the Company.

Persistent Absence

If your attendance is persistently unsatisfactory and, following medical advice being sought the results exclude any underlying medical problem, then disciplinary action may be taken.

Long Term Ill Health and Work-Related Stress



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If you are absent from work for 6 weeks or more or your Doctor's Fit Note has indicated that you are suffering from a work-related illness or depression/stress. The Company will consult with you and seek medical advice in the form of a report from either your Specialist or GP and also may require you to see the Company's Medical Advisor on receipt of those reports. Your rights under the Access to Medical Reports Act 1988 will be explained to you at the time and the Company will ensure the process complies with the Act.

The Company will give support and reasonable assistance to any employee suffering from ill health and if you are not able to return to your normal duties due to ill health, whether work related or not then the Company will consider any reasonable adjustments that could be made to support your return to work. This may include consideration of suitable alternative employment with different Terms and Conditions, a change of working pattern or working part time. Throughout this process the Company will expect you to keep them fully informed and the Company will be committed to consulting closely with you throughout the process.

Following reasonable consultation with you, having gained the necessary medical advice with the long-term prognosis, if no suitable alternative employment can be found or no reasonable adjustments can be made to your working environment due to your ill health, then the Company will consider terminating your employment on the grounds of ill health.

Time Off for Dependents Policy

Scope

This policy applies to all employees of **DROPP.UK** in the UK.

Policy Statement

DROPP.UK operates the following policy in relation to emergency situations involving dependants. It explains the right to take time off to manage unexpected or sudden problems relating to a dependant and make any necessary longer-term arrangements.

Circumstances in which right to time off for dependants applies:

All employees (irrespective of length of service, and whether they are part time or full time) are entitled to take a reasonable amount of time off during working hours to take necessary action:

- to provide assistance when a dependant falls ill, gives birth or is injured or assaulted;
- to make arrangements for the provision of care for an ill or injured dependant;
- in consequence of the death of a dependant;
- because of the unexpected disruption or termination of arrangements for the care of a dependant;
- to deal with an incident that involves their child and occurs unexpectedly while the child is at school/other educational establishment.



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A dependant is:

- a spouse;
- a civil partner;
- a child;
- a parent;
- a person who lives with the employee other than as his/her employee, tenant, lodger or boarder;
- any other person who would reasonably rely on the employee for assistance if he/she fell ill or was injured or assaulted, or who would rely on the employee to make arrangements for the provision of care in the event of illness or injury; or
- in relation to the disruption or termination of care for a dependant, any other person who reasonably relies on the employee to make arrangements for the provision of care.

Procedure

An employee who needs to take time off for dependants should contact his/her line manager at the earliest opportunity. If the employee becomes aware of an emergency situation while at work, he/she should immediately speak to his/her line manager about leaving work early. The employee should explain:

- the reason for the absence; and
- how long he/she expects to be absent from work.

If the employee's line manager is unavailable, he/she must speak to an equivalent or more senior manager.

If the employee is unable to contact the manager before taking time off for dependants, he/she should contact the manager as soon as possible.

The employee must inform the line manager as soon as possible of any change in the anticipated date of his/her return to work.

When an employee makes a request to his/her line manager for time off for dependants, the line manager should process any personal data collected in accordance with **DROPP.UK** data protection policy. In particular, line managers should record only the personal information required to deal with the employee's request for time off for dependants and keep this information only for as long as necessary to deal with the request.

Pay

There is no statutory entitlement to receive pay while taking time off for dependants. Therefore, it is at the discretion of management as to whether **DROPP.UK** pay employees for any time off for dependants.

How much time off can be taken?

The right to time off for dependants will, in most cases, be one or two days. The employee must actively seek alternative longer-term arrangements for the care of a dependant as soon as possible after the emergency occurs.

If the employee is unable to make alternative arrangements, he/she must contact the line manager and explain why further absence is required. If further time off no longer qualifies as time off for dependants, it is at the absolute discretion of **DROPP.UK**



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Recruit whether or not to grant annual leave/discretionary unpaid leave at short notice.
Failure to return from a period of time off for dependants may be treated as a disciplinary matter.
Employees who need to care for a dependant in circumstances falling outside the right to take time off for dependants should refer to **DROPP.UK** 's policy on flexible working.

Providing false information

If an employee knowingly provides false information in relation to taking time off for dependants, this may be treated as a disciplinary matter, which could potentially amount to gross misconduct, rendering the employee liable to summary dismissal.

Social Networking Websites and Blogs Policy

Scope

This policy covers all **DROPP.UK** employees worldwide

Purpose of this Policy

This policy sets out the Company's position on employees' use of social networking websites and blogs, whether conducted on Company media and in work time or your own private media in your own time.

Your Responsibilities

Social networking websites and blogs offer a useful means of keeping in touch with friends and colleagues, and they can be used to exchange views and thoughts on shared interests, both personal and work-related.

The Company does not object to you setting up personal accounts on social networking websites or blogs on the internet, in your own time and using your own computer systems. However, if you require to be on Social media for work purposes within work time, then this is permitted.

You must seek approval from the Company before you link your personal social networking accounts or blogs to the Company's website.

You must not disclose Company secrets, breach copyright, defame the Company or its clients, suppliers, customers or employees, or disclose personal data or information about any individual that could breach the Data Protection Act 1998 on your blog or on your social networking website.

Social networking website posts or blogs should not be insulting or abusive to employees, suppliers, Company contacts, clients or customers.

References to the Company



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If reference is made to your employment or to the Company, you should state to the reader that the views that you express are your views only and that they do not reflect the views of the Company. You should include a notice such as the following: *'The views expressed on this website/blog are mine alone and do not reflect the views of my employer'*

You should always be conscious of your duty as an employee to act in good faith and in the best interests of the Company under Irish and UK law. The Company will not tolerate criticisms posted in messages in the public domain or on blogs about the Company or any other person connected to the Company.

You must not bring the Company into disrepute through the content of your website entries or your blogs.

Any misuse of social networking websites or blogs as mentioned above may be regarded as a disciplinary offence and may result in dismissal without notice.

You should be aware that any information contained in social networking websites may be used in evidence, if relevant, to any disciplinary proceedings.

Third Parties

You must not disclose any information that is confidential or proprietary to the Company or to any third party that has disclosed information to the Company. The Company's Data Protection Policy (detailed elsewhere in the Employee Handbook on the Intranet) provides guidance about what constitutes confidential information. This policy should be read in conjunction with the Company policy on IT for **DROPP.UK** (also detailed elsewhere in the Employee Handbook on the Intranet).

Procedure

Breaches of this policy will be dealt with under the Company's Disciplinary Procedure. You should be aware that the Company regards breach of any part of this policy as gross misconduct that may result in disciplinary action up to and including dismissal without notice.

If you become aware of information relating to the Company posted on the internet, you should bring this to the attention of your manager.

Time Away from Work - Annual Leave Policy

Scope

This policy applies to all employees of **DROPP.UK** in the UK

Policy Statement

DROPP.UK, recognises the importance of annual leave not only to their employees but also the business. Employees are encouraged to plan and take their annual leave each year and in demonstration of the Company's commitment, Company will endeavour to meet all reasonable requests.

Procedures



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All employees must complete a Holiday request form on the Internal HR System and submit it to their Manager for approval at least one month prior to taking the leave. Approval will be given on a first come first served basis and providing the proposed dates do not conflict with the interests of the business e.g. too many employees absent at the same time, then the holiday request will be granted.

On approval by the Manager, the employee must immediately add their leave dates to the HR System Holiday Planner in order for everyone to be aware of the holiday commitments, therefore avoiding conflict with proposed requests for leave.

Employees should maintain their own personal record of leave taken to assist with their own personal planning for future leave requests.

Employees will not normally be authorised to take more than 10 consecutive days annual leave at any one time. Unused annual leave will not be carried over to the following year.

Employees may on occasions be required to work on a public holiday, when this occurs an alternative day can be taken in lieu.

Entitlement

The statutory minimum paid annual leave for full-time employees is 28 days. This includes 8 public holidays.

DROPP.UK annual leave year runs from 1st January to 31st December.

Part Time employees will be entitled to pro rata of the above full-time equivalent and will be calculated in arrears in hours to ensure accurate entitlement is granted. On leaving the Company, where an employee has taken more or less of their holiday entitlement as detailed above, the final salary will be adjusted to either deduct or make an additional payment to reflect the pro rata holiday entitlement up to the date of leaving the Company.

Time off for Public Duties

Jury Service – Time off with pay will be granted if an employee is required for Jury Service. They must inform their manager as soon as they are summoned and provide any relevant attendance instructions.

In the event of the Jury Service period being unduly disruptive to Company's business, the manager will discuss this with the employee and employee must apply for alternative dates.

On attending Jury services, the employee must claim for maximum allowance from the Court in respect of loss of earnings. This must be remitted to Company. All Jury Service documentation must be submitted to Company for completion.

If an employee is not called for Jury Service or finishes early they must return to work where this is practical.

Attending Court as a Witness

If an employee is required to attend work as a witness, whether for the defence or the prosecution, they will be granted paid time off. The employee must provide their manager with written confirmation of the requirement to attend. The employee must ascertain from the Court whether they are entitled to receive compensation



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for loss of earnings, if they are then they must claim maximum amount and remit this to Company.

Attending Court as a Defendant or Claimant

Time off will be granted; however, this will normally be without pay.

Whistleblowing Policy

Scope

This policy applies to all employees of **DROPP.UK** in the UK. The Grievance and Harassment Policies and procedures are related to this policy and can be found in the Company Handbook.

Policy Statement

DROPP.UK has a policy of fair dealing, honesty and integrity, which extends to all members of the Company and is firmly committed to maintaining the highest standards of ethics, honesty, openness and accountability. It recognises that all its employees have an important role to play in achieving this goal. From time to time, all of us may have concerns about events that happen at work. Usually these concerns are easily resolved. However, it can be difficult to know what to do if you believe they concern breaches of law, serious misconduct by another person, health and safety or financial malpractice.

Principles

The Public Interest Disclosure Act 1998 (commonly known as the Whistleblowing Act) came into effect on 1st July 1999. The act sets out a framework to promote the responsible and protected disclosure of concerns on the following matters:

- That a criminal offence has been committed, is being committed or is likely to be committed
- That a person has failed, is failing or is likely to fail to comply with a legal obligation which they are subject to
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health and safety of an individual has been, is being or likely to be endangered
- That the environment has been, is being or likely to be damaged
- That information tending to show any matter falling within the matters above has been, is being or likely to be concealed.

The Differences between Whistleblowing and making a Complaint

When someone blows the whistle, they are raising a concern about a danger or illegality that affects others (customers, members of the public or fellow employee). The person blowing the whistle is usually not directly; personally affected by the danger or illegality they are simply trying to alert others.



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This is very different from a complaint. When someone complains, they are saying that they personally have been poorly treated. For instance, they may feel their Manager has treated them unfairly.

The Whistleblowing Policy should not be used to pursue a personal complaint. **DROPP.UK** has a Grievance procedure and this should be used where the complaint relates to a personal situation.

Individual Protection

The Board of Directors are committed to this policy. If you raise a genuine concern, you will not be at risk of damaging your position as a result. Provided you are acting in good faith, it does not matter whether or not your concern proves to be well founded. However, the Board does not extend this assurance to someone who acts maliciously or raises a matter they know to be untrue.

Confidentiality

The Board will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence and if you ask for your identity to be protected it will not be disclosed without your consent. If a situation arises where it is not possible to deal with the concern without revealing your identity (because your evidence is needed for court) there will be a discussion as to whether and how we can proceed.

Anonymous Information

This policy does not cover a situation where information is received anonymously. However, in these circumstances discretion will be used in the investigation of such information.

Raising a Genuine Concern

Step 1

If you have a concern about a malpractice in the first instance you should raise it with your Line Manager, a more senior Manager or with Human Resources. This may be done verbally or in writing, you should state the facts of the matter clearly and you can outline how you would like it investigated. If you have a direct or personal interest in the matter you should inform the person you have reported your concern to together with details of how you can be contacted. You should also state that you are raising your genuine concern in accordance with the Whistleblowing policy.

Step 2

If you feel unable to raise the issue with someone in your immediate Line Management or you feel that your Line Management did not provide a satisfactory resolution, please contact one of the following:

Managing Director- James Roberts

HR – **Hannah Hemsley**

Step 3

If you are unsure about whether or not to follow this Whistleblowing Policy, or you want further independent advice you may contact the **Public Concern at Work**. This is a charity completely



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independent of **DROPP.UK**, which specialises in providing free and confidential legal advice on how to raise a genuine concern about a serious malpractice at work. Public Concern at Work will also help to advise you on whether a circumstance can be properly reported to an additional body e.g. the Police.

Public Concern at Work
Telephone: +44(0)2074046609
Web: www.pcaw.org.uk

Investigation Process

Once you have raised your concern the Company will look into and assess what initial action should be taken. You may be asked how you think the matter might best be resolved. If the Company feel that your concern falls more properly within another Company Policy E.g. Harassment Policy you will be informed with an explanation as to why.

The Company will institute the appropriate enquires and or investigation and will:

- Tell you who is handling the investigation and how you can contact them
- Advise you whether your further assistance may be requested and if you request the Company will write a summary of your concern with an outline of how the Company propose to handle it.

While the purpose of this policy is to enable the Company to investigate possible malpractice and take appropriate action, if you request feedback we will respond to you in writing and give you as much feedback as we possibly can. However, we may not be able to tell you the precise action we are taking where this would infringe a duty of confidentiality owed by the Company to someone else.

If you are unhappy with the Company's response the option remains open to you to go to the other levels and bodies detailed in this policy. While **DROPP.UK** cannot guarantee that it will respond to all matters in the way you might wish, the matter will be handled fairly and properly in accordance with this policy.

Working from Home Policy

Scope

This policy applies to all **DROPP.UK** employees who work from home either on a permanent or ad-hoc basis in the UK.

Policy Statement



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DROPP.UK has a duty of care under Health & Safety regulations to ensure all employees have a safe and comfortable environment to work in. All **DROPP.UK** employees working from home have a duty to ensure they assess their home environment in order to minimise health & safety risks.

Procedures

Employees should not work from home without prior authorisation from their manager and the completion of a risk assessment of their home environment. This applies when working from home on a permanent or ad-hoc basis.

Employees working from home on an ad-hoc basis must agree beforehand with the manager the suitable time and days of the week they can work from home to ensure office coverage is maintained.

If an employee works from home they must ensure limited interruption in order to satisfactorily complete their work and cannot be responsible for either child care or other dependants who may be in the home at the time. They must also ensure that they are accessible by telephone and that any Company equipment used at home is kept secure and in good working order. They must also comply with the Company's Information and Technology and Confidentiality conditions as detailed in their contract of employment.

The Company will not provide additional equipment or adjustments to an employee's home in order for an employee to work from home - therefore it is the responsibility of the employee to ensure that the Company's standard issue equipment is operationally able to be used from their home.

The employee must ensure that they have adequate space, lighting and a comfortable safe area to work in. They should advise their Home Insurance provider they will be working from home either on a permanent or ad-hoc basis.

If an employee is scheduled to work from home and they are sick on that day, they should comply with the Sickness and Absence policy and in the first instance advise their manager by phone prior to 7.30am on the first morning of absence via phone call or voicemail.

The Working from Home Risk Assessment must be completed and signed by the employee and a copy will be kept on their personal file prior to working from home. Should an employee's circumstances or home environment change they must inform their manager immediately.

Managers at their discretion can withdraw this arrangement following consultation with the employee and giving 30 days written notice that in future the employee will work in the Company's office.

CCTV Use Policy

Scope

This policy sets out how **DROPP.UK**'s approach to the use of CCTV in the workplace affects employees.

Policy Statement



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Cameras are mainly located in the offices and car park. Using CCTV is necessary for **DROPP.UK's** legitimate interests. Cameras are installed for the purpose of detecting and preventing crime or serious misconduct by employees.

Purpose of CCTV

DROPP.UK will not use CCTV for monitoring the work of employees or finding out whether or not they are complying with **DROPP.UK's** policies and procedures.

CCTV will be installed only if, **DROPP.UK** decides after an impact assessment that, it is a necessary and proportionate way of dealing with a problem. **DROPP.UK** will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of staff privacy, and that any intrusion is fully justified.

If workers access the relevant CCTV areas, their images will be captured on CCTV.

Limits on use of CCTV

CCTV will not be operated in toilets, private offices or changing rooms, unless this is necessary for the investigation of a serious crime or there are circumstances in which there is a serious risk to health and safety or to the operation of the employer's business. CCTV will be used in this way only where it is a proportionate means of achieving the aim in the circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has a reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence. (Any covert recording will be strictly time limited)

Evidence from CCTV footage

CCTV evidence may be used against an employee in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that he or she has been guilty of serious misconduct. The employee will be given a chance to see and respond to the images in these circumstances.

Storage of CCTV footage

Images from CCTV footage will be securely stored and only authorised personnel will have access to them. This will normally be members of **DROPP.UK's** director team. It could also include members of HR, an employee's line manager, and managers in the business area in which the footage is taken. However, information would normally be shared only in this way if **DROPP.UK** has reason to believe that a criminal offence or serious misconduct has occurred.

Surveillance information may also be shared with law enforcement agencies for the purposes of detecting crime.

The images will be retained only long enough for an incident to come to light and any investigation to be conducted. In normal circumstances, CCTV footage will be securely deleted after 6 months.

Workers whose images are recorded have a right to view images of themselves and to be provided with a copy of the images. Workers making such a request should provide **DROPP.UK** with a photograph or a description of themselves, together with the relevant time and date of the image, so that they may be easily identifiable. If you want to make a request, please send the request to gdpr.contact@dropp.uk.



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Workers will be allowed access to such images within one month of the request, although in some cases, particularly where large amounts of data is processed, that time period may be extended to three months.

General Data Protection Regulation (GDPR) Policy

Scope

DROPP.UK is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. This policy sets out **DROPP.UK**'s commitment to data protection, and individual rights and obligations in relation to personal data.

Policy Statement

This policy applies to the personal data of job applicants, employees, workers, contractors, volunteers, interns, apprentices and former employees, referred to as HR-related personal data. (This policy does not apply to the personal data of clients or other personal data processed for business purposes.)

DROPP.UK has an appointed data protection officer. Their role is to inform and advise **DROPP.UK** on its data protection obligations. They can be contacted at contact@dropp.uk. Questions about this policy, or requests for further information, should be directed to the data protection officer.

Definitions

"Personal data" is any information that relates to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data. "Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

Data protection principles

DROPP.UK processes HR-related personal data in accordance with the following data protection principles:

- **DROPP.UK** processes personal data lawfully, fairly and in a transparent manner.
- **DROPP.UK** collects personal data only for specified, explicit and legitimate purposes.
- **DROPP.UK** processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.



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- **DROPP.UK** keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- **DROPP.UK** keeps personal data only for the period necessary for processing.
- **DROPP.UK** adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

DROPP.UK tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons. Where **DROPP.UK** relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of individuals.

Where **DROPP.UK** processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data.

DROPP.UK will update HR-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Personal data gathered during the employment, worker, contractor or volunteer relationship, or apprenticeship or internship is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which **DROPP.UK** holds HR-related personal data are contained in its privacy notices to individuals.

DROPP.UK keeps a record of its processing activities in respect of HR-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, **DROPP.UK** will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks **DROPP.UK** has failed to comply with his/her data protection rights; and
- whether or not **DROPP.UK** carries out automated decision-making and the logic involved in any such decision-making.

DROPP.UK will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to gdpr@dropp.uk. In some cases, **DROPP.UK** may need to ask for proof of identification before the request can be processed. **DROPP.UK** will



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inform the individual if it needs to verify his/her identity and the documents it requires.

DROPP.UK will normally respond to a request within a period of one month from the date it is received. In some cases, such as where **DROPP.UK** processes large amounts of the individual's **DROPP.UK** will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, **DROPP.UK** is not obliged to comply with it. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which **DROPP.UK** has already responded. If an individual submits a request that is unfounded or excessive, **DROPP.UK** will notify him/her that this is the case and whether or not it will respond to it.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require **DROPP.UK** to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override **DROPP.UK's** legitimate grounds for processing data (where **DROPP.UK** relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override **DROPP.UK's** legitimate grounds for processing data.

To ask **DROPP.UK** to take any of these steps, the individual should send the request to gdpr@dropp.uk.

Data security

DROPP.UK takes the security of HR-related personal data seriously. **DROPP.UK** has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where **DROPP.UK** engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Impact assessments

Some of the processing that **DROPP.UK** carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, **DROPP.UK** will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include



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considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

Data breaches

If **DROPP.UK** discovers that there has been a breach of HR-related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. **DROPP.UK** will record all data breaches regardless of their effect. If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

International data transfers

DROPP.UK will not transfer HR-related personal data to countries outside the EEA.

Individual responsibilities

Individuals are responsible for helping **DROPP.UK** keep their personal data up to date. Individuals should let **DROPP.UK** know if data provided to **DROPP.UK** changes, for example if an individual moves to a new address or changes his/her bank details. Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, **DROPP.UK** relies on individuals to help meet its data protection obligations to staff.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
 - not to disclose data except to individuals (whether inside or outside **DROPP.UK** who have appropriate authorisation;
 - to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
 - not to remove personal data, or devices containing or that can be used to access personal data, from **DROPP.UK** premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
 - not to store personal data on local drives or on personal devices that are used for work purposes; and
 - to report data breaches of which they become aware to the data protection officer immediately.
- Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under **DROPP.UK's** disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

Training



DROPP.UK

DROPP.UK will provide training to all individuals about their data protection responsibilities as part of the induction process (and at regular intervals thereafter). Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.