



# Policy Manual

Universal Services (Sports Equipment) Limited

Company Registration Number 05381217

Registered in England

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# 1. Foreword

The purpose of this manual is to formally document the policies of Universal Services (Sports Equipment) Limited in respect of our company culture, health, safety, the environment, and quality within our ISO 9001:2015 and ISO 14001:2015 Scope of “design, manufacture, supply, installation and maintenance of physical education, sports and fitness equipment”.

Where appropriate, references may have been made to the relevant Procedures or other documents that detail the methods for achieving the policies. These reference documents are available to interested parties upon request and will not be included with this Policy Manual.

## 2. Introduction to Universal Services (Sports Equipment) Limited

Universal Services (the Partnership) established in 1978 and transferred to Universal Services (Sports Equipment) Limited on 1st January 2012 is a wholly owned, independent English company. Our production of sports equipment involves the processing of steel, wood, and supplementary components. Buildings at our Essex site consist of an administration block, stores, timber mill, fabrication shop and the finishing department. Significant investment in recent years means that much of our machinery uses the latest technology to maintain the high standards of our products with a workforce committed to our health, safety, environmental and quality aims.

### What We Stand For

We are dedicated to balancing the way our business is run and the way our services are provided to ensure we help deliver a better future for everyone.

The Company is focused on a sustainable business process to the satisfaction of customers, employees, and communities, with the aim of minimising negative effects on 10 Sustainability Areas within our business process and ultimately generating positive impacts:

- Don't-Walk-By attitude
- Noise
- Economic considerations and profit aspirations
- Quality of product and service
- Emissions
- Raw material use
- Energy
- Solid and hazardous waste
- Health, wellbeing & safety, and communities
- Water

The Company expects employees to conform to all policies in this Policy Manual and the Universal Services (Sports Equipment) Limited Team Handbook and to comply with the relevant legislation and will give full backing to continually improving these policies, providing finance and resources and support all those who endeavour to carry them out. The policies are reviewed annually or as required following changes that may affect them.

Designated responsibilities Officers of the policies in this Policy Manual are:

	Name	Position
1	Colin Rhodes	M.D and FORs Counter terrorism Champion
2	John Royce	Director
3	Debbie Benfield	Office Manager
4	Tony Berry	Assembly & Dispatch Supervisor FORS practitioner (FORS, Fuel, emissions, and road risk champion)
5	Russell Kyte	Service Operations Manager
6	Andreas Fantousi	Sales & Marketing Manager
7	Martin Curtis	Installation Supervisor
8	Azeez Amoo	HSEQ

Colin Rhodes Director Dated: February 2025

### 3. Policy Statement: Health and Safety

We strive to provide the safest and healthiest working conditions possible within our **Zero Impairment** activity. Zero Impairment to the Company means eliminating the risk of harm to people. Achieving Zero Impairment across our business means managing and designing out of risks in everything we do to protect the people that are Universal Services (Sports Equipment) Limited.

So far as is reasonably practicable we will:

- a. provide and maintain vehicles, plant and systems of work which are safe and without risk to health and the environment;
- b. provide a safe place of work with safe access and egress;
- c. provide a safe working environment that is without risk to health;
- d. ensure safety, absence, or control of risks in use, handling, storage and transport of articles and substances;
- e. provide adequate welfare facilities and arrangements for welfare of work;
- f. provide adequate supervision as is necessary to ensure the health and safety of employees.
- g. provide adequate instruction and training as necessary to ensure the health and safety of employees. All employees will receive all aspects of training appropriate to their responsibilities.
- h. provide adequate information including legal requirements to ensure the health and safety of employees;
- i. ensure, so far as is reasonably practicable, that the conduct of the Company’s activities do not endanger persons not in our employment but who may be affected by operations under our control e.g., visitors and the public;
- j. ensure our employees are aware of their responsibilities:
  - 1) to exercise reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions at work, and
  - 2) to co-operate with the company, as far as may be necessary, to enable them to carry out their health, safety, and environmental obligations.

Universal Services (Sports Equipment) Limited expects employees to conform to all Company policies and to comply with the relevant legislation applicable to health, safety, welfare at work and the environment. They should exercise all reasonable care for their own health and safety and that of others who may be affected by their acts and omissions. Wilful disregard by any employee of any health, safety or environmental rule is considered sufficient cause for, and may lead to disciplinary action.

Employees will not be penalised for informing management of any malpractice.

We will give full backing to continually improving this policy, providing finance and resources and support all those who endeavour to carry it out and shall not compromise health and safety in trying to achieve our objectives.

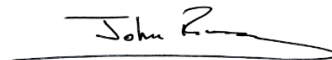
This policy is reviewed annually or as required following changes that may affect it.



Colin Rhodes

Director

Date 10/03/2025

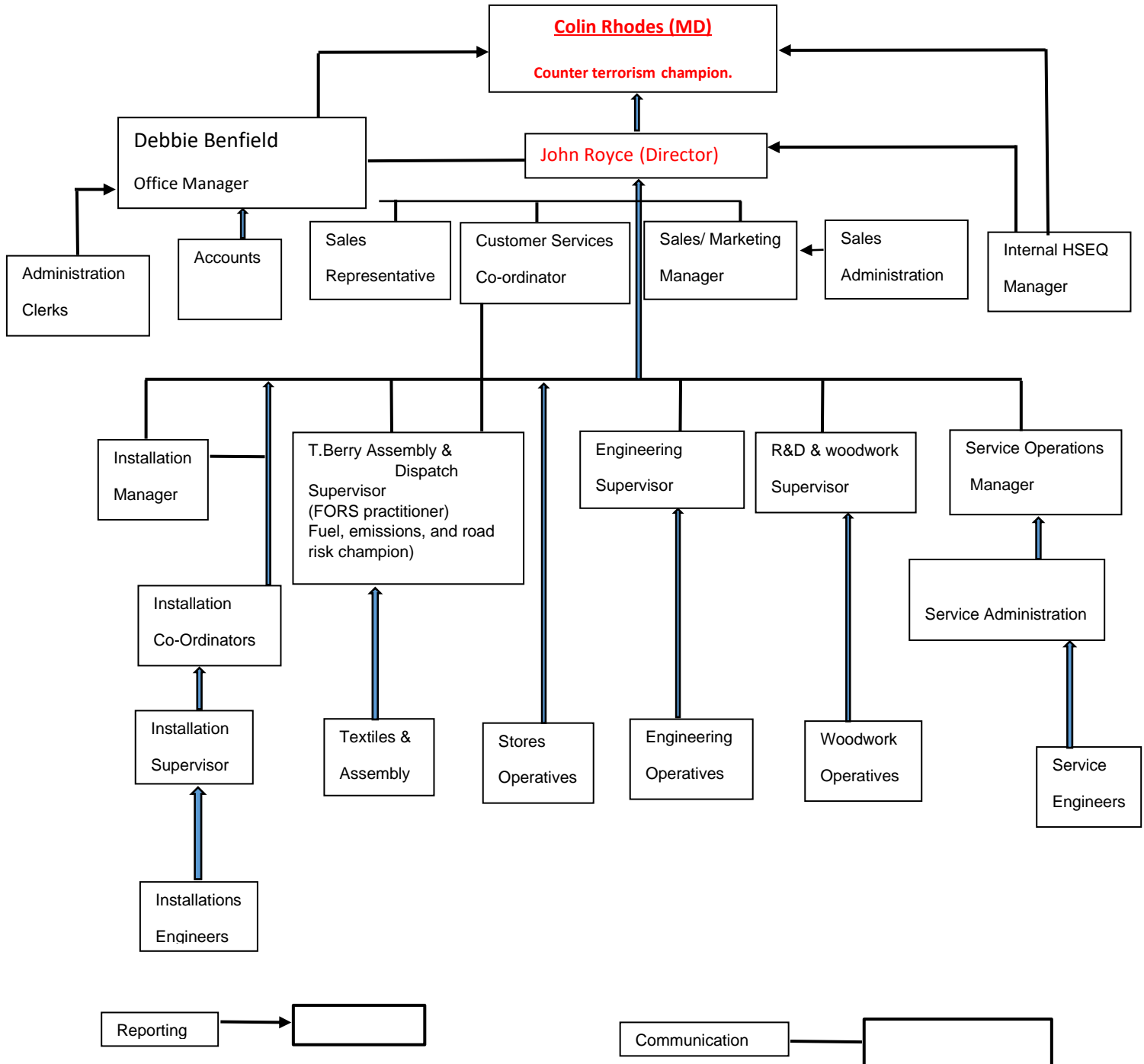


John Royce

Director

Date 10/03/2025

## Management Reporting Tree



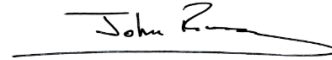
## 4. Policy: Refusal to Work

Every employee has the absolute right to decline to carry out work if they feel it is not safe to do so and will not be penalized for informing management of any malpractice. Any situation arising which leads to an individual refusing to work for health and safety reasons must be reported to management as soon as possible, and no work should be recommenced until the issue(s) causing concern have been addressed. The company additionally provides full confidential reporting arrangements via the Internal HSEQ. Managers and staff are also encouraged to report any unsafe acts or conditions, which they have witnessed.

We expect employees to conform to all Universal Services (Sports Equipment) Limited policies and to comply with the relevant legislation applicable to health, safety, welfare at work and the environment. Employees should exercise all reasonable care for their own health and safety and that of others who may be affected by their acts and omissions. Wilful disregard by any employee of any health, safety or environmental rule is considered sufficient cause for, and may lead to disciplinary action.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

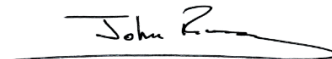
## 5. Policy: Drugs, Alcohol and Smoking

The use, possession, consumption, storage, or sale of illicit drugs on Company or clients' premises is illegal and to report for work having taken drugs if discovered will result in disciplinary action in accordance with the Universal Services (Sports Equipment) Limited Disciplinary Procedure.

Smoking is only permitted in designated areas on construction sites and Universal Services (Sports Equipment) Limited premises.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 6. Policy: Child Protection

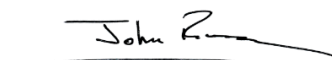
Universal Services (Sports Equipment) Limited fully recognises its responsibilities for Child Protection.

Our policy applies to all employees who carry out our works at establishments where there may be children. The main elements of our policy are to ensure that:

- Site employees are subject to identity and Disclosure Barring Service (DBS) checks.
- DBS records, kept in personnel files by the General Office Manager are reviewed and updated on three-yearly minimum basis and approval status provided to interested parties as required.
- Awareness of child protection issues are provided to relevant employees through information, education, and training.
- This Child Protection Policy is reviewed for effectiveness by the HSEQ Manager on an annual-minimum basis. Employees working on clients' premises receive guidance on Child Protection by review of subject information on the relevant Risk Assessment/Method Statement (RAMS).



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

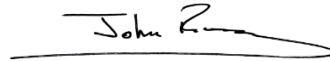
## 7. Noise Policy

Universal Services (Sports Equipment) Limited recognises that sound only becomes noise (often defined as “unwanted sound”) when it exists in the wrong place or at the wrong time such that it causes or contributes to some harmful or otherwise unwanted effect, like annoyance or sleep disturbance. Unlike many other pollutants, noise pollution depends not just on the physical aspects of the sound itself, but also the individual human reaction to it. Neighbourhood noise can include noise from industrial and commercial activities. Noise can generally be expected as a fact of everyday life, but it can also be regarded as unwanted sound or pollution. It can sometimes however generate irritation, annoyance, discomfort and induce a stress response in people. As a part of our commitment to be neighbourly Universal Services (Sports Equipment) Limited has wherever possible adopted the following actions.

1. A Bi-annual noise assessment controlled by the register, document D\_54\_2.
2. Vehicles to be reverse parked into bays so that they can drive straight out to prevent early morning noise pollution.
3. Vehicles to be loaded at night to prevent early morning noise pollution.
4. Bi-annual audits from the local authority environmental officer.
5. Ear protection Zones around the factory.
6. Noise Risk Assessments on the use of tools.
7. Vehicles fitted with reverse alarm disable switch.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 8. Policy Statement: Quality and Environmental Management

Universal Services operates an Integrated Management System, which has been developed in accordance with the requirements of ISO 9001 and 14001 2015. Universal Services are committed to a continual improvement programme in respect to Quality, Health and Safety and Environmental performance within our scope of business activities. To achieve these commitments:

Quality:

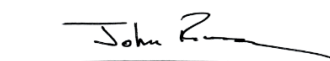
- “To meet our customers’ requirements, Universal Services (Sports Equipment) Limited strives to deliver high quality, reliable products on time and at competitive prices whilst doing our utmost to minimise our environmental impact.”
- All products are designed with safety in mind.
- We continually work to improve our organisation, service, and procedures and in turn this will establish a confidence level and relationship with customers which will build a strong future.
- Ensure that documented procedures are maintained, monitored and whenever possible, improved upon to provide a service which confirms to the specified requirements of each of our clients.
- Ensure that management and staff are fully conversant with the company objectives through an ongoing programme of training and awareness for all personnel.

Environment:

- We have adopted the principles, of prevention of pollution, prevention of waste and the efficient use of materials and energy. Universal Services monitor and review waste production at regular Intervals.
- We take environmental factors into account when making decisions on investments such as in buildings, plant, machinery, equipment, manufacturing, and customer services.
- We continually strive to improve the energy efficiency of our buildings and facilities and to reduce the amount of water used at our premises. To that effect we foster staff participation in all environmental matters.
- We minimise waste, especially hazardous waste and whenever possible recycle materials; we dispose of all waste we produce through safe and responsible methods.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 9. Policy: Driving at Work and Passenger Safety

Aim:

The aims of this policy are to minimise the risk of accident/incidents involving employees, other road users and the public whilst driving at work and to assist Universal Services (Sports Equipment) Limited to comply with relevant statutory duties and promote a more sustainable way to operate the company fleet.

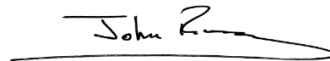
Policy Objectives:

The objectives of the policy are to:

- Minimise risks to the health and safety of individual employees, other road users, vulnerable road users such as pedestrians, cyclists, motorcyclists and highway workers and the public because of driving required as a work activity.
- Reduce the risk and subsequent cost of accidents.
- Ensure compliance with the law regarding motor vehicles under the Company's control.
- Ensure that only those persons who are authorised undertake the driving of company vehicles as part of their work activity and that there is full compliance with DVLA standards.
- No passengers are allowed in company vehicles unless they are employees or are covered under the company insurance scheme.
- No more than one passenger is allowed in the company vans or the HGV.
- All passengers must comply with the Highway code, Company risk assessments and method statements.
- If as a passenger you are concerned about a driver's behaviour, or their standard of driving, and you don't feel that you can raise the issue directly, report the incident as soon as possible to your line manager or Director.
- Purchase Company vehicles that are suitable for their intended use.
- Encourage green and ergonomic principles in the purchase of all vehicles used for Company business.
- Ensure vehicles under Universal Services (Sports Equipment) Limited control are, in so far as is reasonably practicable, maintained in accordance with manufacturers' recommendations and are roadworthy.
- Preserve the effectiveness of this policy by ensuring that privately owned vehicles are not under any circumstances used for Company business purposes.
- To operate a more environmentally sustainable and efficient fleet by eliminating or limiting engine-idling to as low as possible.
- To ensure all fuels are purchased and recorded through UK Fuels which have policy that ensure they are reputedly sourced.
- To ensure all required trainings for drivers are completed as part of induction
- The above objectives are achieved by following the company's procedure P\_21 Driving at Work, Risk Assessment, Safe Systems of Work, the F.O.R.S. process and other associated documents, and the recording and reviewing of information collated during company activities to strive for continual improvement.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025



## 10. Conditions of Employment, Equal Opportunities and Diversity Policy

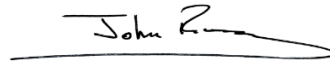
The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally. The Company will take all reasonable steps to employ, train and promote employees based upon their experience, abilities, and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age, or disability. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age, or disability. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

- Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment.
- Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation.
- Serious breaches of these conditions of employment, equal opportunities and dignity at work statements will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.
- Employees should draw the attention of their supervisor/manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.
- Universal services UK will follow the rules and recommendations as set out in the "Equality Act 2010".

Management makes sure that these business aims, and objectives are communicated to all employees through information, training, and instruction to promote the awareness of customer satisfaction.



Colin Rhodes  
Director Date 10/03/2025



John Royce  
Director Date 10/03/2025

## **11. Policy: Anti-Bribery, Hospitality & Gifts and Disclosure in the Public Interest**

All employees and associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold the Company’s core values by operating in an ethical, professional, and lawful manner always.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe. The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is always expected of all employees and associated persons. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to the Director or M.D.

The giving of business gifts to clients, customers, contractors, and suppliers is allowed provided the following requirements are met:

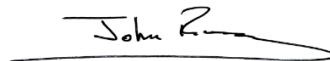
- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- It complies with local laws and the “Bribery Act 2010”.
- It is given in the Company’s name, not in the giver’s personal name
- It does not include cash or a cash equivalent (such as gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is given openly, not secretly
- It is approved in advance by a director or the M.D. of the Company.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know, or suspect is offered or provided with the expectation that it will obtain a business advantage for them. Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a “facilitation payment”, is also strictly prohibited. Facilitation payments are not commonly paid in the UK, but they are common in some other jurisdictions.

Universal Services UK, after following any internal disciplinary procedure reserve the right to follow this up by contacting an outside agency such as the Police, which could result in a five-year prison sentence and an unlimited fine.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 12. Policy Statement: Fire Safety

It is the policy of Universal Services (Sports Equipment) Limited to ensure, so far as reasonably practicable, to recognise, accept and implement our management responsibilities as an employer to prevent injury and ill-health, and provide a safe working environment for all our employees. The Company also accepts its statutory duties to conduct its undertaking in such a way to ensure those persons not in our employment and who may be affected by our work activities, are not exposed to risks to their health and safety.

So far as is reasonably practicable we will:

- a. ensure compliance with relevant legislation;
- b. undertake a suitable and sufficient fire risk assessment of the premises and activities undertaken;
- c. provide a safe working environment that is without risk to health;
- d. identify and implement reasonably practicable measures to control the risks from fire;
- e. conduct regular fire evacuation drills and testing of emergency equipment;
- f. conduct regular fire safety checks;
- g. provide adequate fire training and instruction to employees to ensure the health and safety of them and others;
- h. ensure effective liaison with the local Fire Authority where appropriate;

We expect employees to conform to all Universal Services (Sports Equipment) Limited policies and to comply with the relevant legislation applicable to health, safety, welfare at work and the environment. They should exercise all reasonable care for their own health and safety and that of others who may be affected by their acts and omissions. Wilful disregard by any employee of any health, safety or environmental rule is considered sufficient cause for, and may lead to disciplinary action.

Employees will not be penalised for informing management of any malpractice.

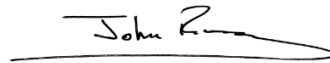
There are fire wardens for each area who carry out a sweep system for designated areas.

The Company will give full backing to continually improving this policy, providing finance and resources and support all those who endeavour to carry it out.

This policy is reviewed annually or as required following changes that may affect it.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

### **13. Policy Statement: Sustainability and Ethical Procurement**

We are committed to providing a quality service. An integral part of ensuring this is to conduct our business in a sustainable and ethical manor and uphold all our other policies that contribute to achieving this aim. We shall operate in compliance with all relevant legislation and expect our supply chain to conform to our own high standards as a minimum.

- Our sustainability objective is to ensure a continuous improvement in decisions measured against delivering sustainable and ethical trading. More specifically we aim to avoid adverse social and environmental impacts in the supply chain, the reduction of environmental impact from business operations and the purchase of products that meet recognised environmental standards. We are committed to using only FSC or PEFC certified timber and sheet materials purchased from recognised audited suppliers.

- Our ethical objective is to ensure that people in the supply chain are treated with respect and have rights with regard to employment; freedom of association; payment of a living wage; working hours that comply with national laws; equal opportunities; recognised employment relationship; freedom from intimidation; and a safe and healthy working environment. We respect the principles set out within the United Nations Universal Declaration of Human Rights.

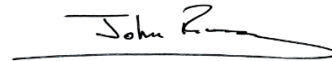
We shall:

- Expect all our employees to adhere to all our company policies.
- Always select and treat our suppliers fairly and objectively.
- Pay our suppliers in accordance with agreed terms and deal with exceptions in a timely manner.
- Ensure that we always operate our business in a sustainable and ethical manner.
- Continue to purchase products and materials responsibly and aim to learn more about our supply chain.
- Expect our suppliers to operate in compliance with relevant legislation to their business activities and always provide their employees with a safe working environment and treat their employees fairly and with dignity.
- Expect our suppliers to also procure their products and materials in a sustainable and ethical way knowing about their own supply chain.

This policy is reviewed annually or as required following changes that may affect it.



Colin Rhodes  
 Director      Date 10/03/2025



John Royce  
 Director      Date 10/03/2025

## 14. Corporate Social Responsibility Policy

Universal Services UK Ltd recognise that Corporate Social Responsibility (CSR) matters are of increasing importance to staff and interested parties, including candidates and clients, and are fundamental to the continued success of the organisation.

Universal Services UK Ltd believes that its CSR Policy shall provide long-term benefits to its employees, customers, partners, and individuals in all communities around the world, and will focus on the eight key areas:

**Employees** – Respecting the values of employees, providing good conditions of work and equal opportunities. Employee retention: our aim is not to lose employees and so lose all of their knowledge and experience. improving employee satisfaction and through training, developing their intellectual capacity for their greater benefit and quality of life.

**Health and Safety** – Embedded in all activities and processes for the provision of a safe working environment, wherever that may be.

**Environmental Impacts** – business development activities to maximise on recycling opportunities and minimise the risk of pollution, waste, and nuisance to neighbours.

**Sustainable development** – Long term impacts arising from the communities that the Group interact with including energy efficiency of dwellings, transport, meeting social and economic needs.

**Relationships with Customers** – Being responsive to customer needs and providing a quality assured service that intrinsically incorporates all relevant legislative considerations.

**Suppliers and Partners** – Treating suppliers fairly and driving CSR codes of practice throughout the goods and services supply chain.

**Community involvement** – Charitable giving and engagement with local communities through funding, support, and work experience programmes.

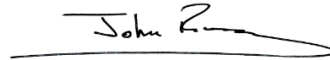
**Ethos** – Encouraging high standards of professionalism throughout the company and promoting best practice in respect of ethical behaviour. The Organisations CSR shall be implemented and maintained through the following key Policies:

- ☑ Equal Opportunities & Diversity
- ☑ Ethical Conduct
- ☑ Fair Competition
- ☑ Anti-Bribery
- ☑ Whistleblowing Policy
- ☑ Quality Assurance
- ☑ Health & Safety
- ☑ Environmental
- ☑ Supply Chain Code of Practice

The Group are pleased to engage with all interested parties regarding CSR matters. For further information contact John Royce, Director.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## **15. Universal Services Counter Terrorism and Security Policy**

### **Statement:**

**Universal Services (Sports Equipment) Limited does not support or condone, in any shape or form, any type of terrorism:**

We pride ourselves in our ability to identify any potential security threats to people or property.

Our Employees have driver policies and procedures that they follow, some of them daily.

We have in our portfolio HM services customers, with whom we work closely with on security matters.

We train our staff in counter terrorism tactics and have written procedures for them to follow.

We have appointed The Director Colin Rhodes as our Counter Terrorism Champion. Contact the office to report an incident to him.

### **Background:**

In recent years, fleets have had to face an increasing security threat: the possibility that one of their vehicles may be used in a terrorist attack. Last year, 14 people were killed in London in three separate Vehicle as a Weapon (VAAW) attacks where commercial vehicles have been used as ramming devices. Having said this, at the time of writing this policy, the threat to the UK from terrorism remains high, with the threat level set at "severe".

Security services acknowledge that terrorists are increasingly relying on home-grown, 'low-tech', 'lone agent' attacks against public spaces in the West, with propaganda being distributed favouring vehicles as a weapon.

However, although it may feel like this attack method is becoming more widespread, the likelihood of a vehicle attack is low: 37 million vehicles are registered in the UK, UK residents make around 15.5m rental transactions in the country each year (10.9m: cars, 4.6m: vans), yet only a handful have been used as weapons in this way.

### **Risk Assessment:**

Because of the type of work that Universal services carries out, we believe that the risk of our Employees meeting any form of terrorist activity is extremely low.

The thinking behind this, is.

- 1- We very rarely have vehicles that travel outside of the country. (The last time was to Europe in 2016)
- 2- We do not carry any high-risk loads or any loads that are of a high value.
- 3- We do not carry any large amounts of money.
- 4- All our drivers are vetted and checked as per employment and FORs guidelines.
- 5- We do not travel by pre-planned or regular routes, and in fact we are very rarely at any location for more than one visit per year.
- 6- We have no customers who work in areas that could be considered extremely contentious.
- 7- Our site is in a remote location and has not historically had any reported break-ins or vandalism in the area.
- 8- The site has only one access and egress point, which is locked and gated when the site is not in use.

Because we assessed the risk to be very low, our policy reflects this.

By using Pro-active measures, rather than a Reactive measure after the event. With the above assessment in mind.

### **Prevention Policy:**

- 1- All vans and lorries are sign written.
- 2- All vans and lorries are fitted with telematics.
- 3- All vehicles are fitted with alarms.
- 4- All drivers are warned that they are not allowed to pick up hitch hikers.
- 5- All drivers must lock their vehicles when they are not with them.
- 6- All drivers must have had their FORS training in counter Terrorism in the last 24 months.
- 7- Any employee who is issued with a company phone has the phone either password or fingerprint protected.
- 8- All drivers report to the managers, who organised the creation of the Counter Terrorism Policy

### **Drivers Policy:**

- Daily walk-around, thorough checks on the vehicle and assessing any potential tampering.
- Plan routes in advance to avoid any difficult manoeuvres and situations.
- Do not leave vehicle unlocked or unattended with the engine running or keys in ignition.
- Stay in safe and secure parking areas when parking overnight and taking rest breaks.
- Whenever out of sight of your vehicle ensure that it is secured.
- Understand what to look for when stopped by authorities, Driver and Vehicle Standards Agency and undercover police.
- Look out for suspicious behaviour. Be the eyes and ears of the road.
- Be aware of 'ACT' – Action Counters Terrorism and 'Run, hide, tell' Government campaigns.
- **United Kingdom:** 999 is the official **emergency number** for the **United Kingdom**, but calls are also accepted on the European Union **emergency number**, 112. All calls are answered by 999 operators. Calls are always free. Always contact the office for any instructions or help required,

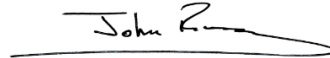
Copy this link into your browser, for information: - <https://www.gov.uk/ACT>

**Operators Policy:**

- We ensure drivers are following the FORS professional development via driver training, toolbox talks and Government videos.
- We have a policy in place on terrorism and vehicle attacks for all staff.
- We distribute policies and procedures to all staff concerned and get them acknowledged.
- We Investigate areas of the business that could be vulnerable to suspicious activity, for example, the security of our site and vehicles and driver whereabouts.
- We do not use agency drivers, so ensuring that we are aware of the individuals that will be driving our vehicles.
- We ensure drivers are aware of key, site, and vehicle security.
- The building is fitted with an alarm system that is in line with our insurance policies specifications.
- The premises are covered with a CCTV system that is in line with our insurance policies specifications.
- We carry out regular reviews of the effectiveness of our security, but. After.
  1. A security incident within the business
  2. A security incident in our neighbourhood
  3. A change in our business practice, and
  4. When information is received about threats
- Our policy is reviewed periodically and updated if required, (controlled by the register).
- We employ an outside contractor to deal with our IT security. On top of this we have system back procedure, whereby a copy is taken at the end of each working day and stored off site.



Colin Rhodes  
 Director      Date 10/03/2025



John Royce  
 Director      Date 10/03/2025

## **16. Universal Services (Sports Equipment) UK Ltd: Modern Slavery Policy, Anti-slavery and Human Trafficking Policy**

### **1. Policy statement**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels and directors.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **2. Responsibility for the policy**

- 2.1 The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under their control comply with it.
- 2.2 The stores and Sales staff has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### **3. Compliance with the policy**

- 3.1 Employees must ensure that they read, understand, and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. We are all required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Employees must notify a line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.
- 3.5 If any Employee believes or suspects a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If any Employees are unsure about whether an act, the treatment of workers more generally, or their working conditions within any of our supply chains constitutes any of the various forms of modern slavery, raise it with your Line Manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Line Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our anything to report Procedure.

### **4. Communication and awareness of this policy**

- 4.1 The reading of this policy, forms part of the induction process for all employees who work for Universal Services (Sports Equipment) UK Ltd
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

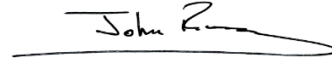


**5. Breaches of this policy**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Colin Rhodes  
 Director Date 10/03/2025



John Royce  
 Director Date 10/03/2025

**17. Living Wage Policy**

**Policy status**

This policy was adopted by the Company on 21<sup>st</sup> April 2023 and last reviewed 21-04-2023.

**Scope**

The aim of this policy is to ensure that Universal Services (sports equipment) Ltd commitment to the Living Wage is documented, communicated, and implemented.

**Responsibilities**

All employees and those who act on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise. A breach of this Policy by staff will be a disciplinary offence and will be dealt with according to Universal Services (sports equipment) Ltd disciplinary procedures.

**Our commitment**

Universal Services (sports equipment) Ltd is committed to paying a minimum of the Real Living Wage (As defined by the Living Wage Foundation) to all employees and ensuring, as far as reasonably practical, that those within the Universal Services (sports equipment) Ltd supply chain do the same.

Universal Services (sports equipment) Ltd recognises that payment of the Living Wage provides benefits to us as an employer and to the wider community as follows: -

- Staff retention and reduced staff turnover
- Increased employee engagement
- reduced employee absenteeism
- an increased commitment to our organisation
- a practical demonstration of our ethical employment practices
- a contribution to reduction in poverty affording people the opportunity to provide for themselves and their families.

For Universal Services (sports equipment) Ltd our commitment to the Living Wage means that we will continue to pay at least the Real Living Wage for all our staff who are employed directly by us; and we will aim to ensure (to the extent permitted by law) that our contractor and sub-contractor community also pay a minimum of the Real Living Wage to their employees and staff.

**Formal review**

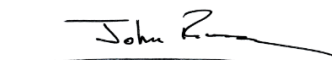
We formally review this policy annually to ensure it is relevant and up to date.

Staff induction and training

To ensure that all who work at Universal Services (sports equipment) Ltd understand this policy and our commitment, this policy is provided to all new employees during their induction period. In addition, special training and refresher training is given to staff who work within relevant departments.



Colin Rhodes  
 Director Date 10/03/2025



John Royce  
 Director Date 10/03/2025

## 18. IT Security Policy

These regulations apply to the use of all local facilities at and to facilities provided by the Company to its employees for use at home or off site. Please note that breaches of this policy will be considered Gross Misconduct, and you may be dismissed. Hardware owned, leased, rented or otherwise by Universal Services (Sports Equipment) Limited employees or third parties approved by the Company may be directly connected to the network only by arrangement with, and with the explicit approval of a director. Such equipment may access the network or other facilities only in accordance with the terms of these regulations.

The facilities may be used only in connection with employees' work for the Company. They must not be used for work of undeclared financial benefit to employees or the transmission of unsolicited commercial material without the express permission, in writing, of a director.

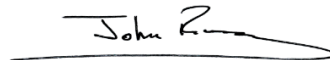
You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner – in particular, you must not:

- Access, store or distribute material which is designed or likely to cause annoyance, inconvenience, needless anxiety or offence.
- Access, store or distribute obscene or indecent material, pornography, etc.
- Access, store or distribute defamatory material.
- Access, store or distribute material such that the copyright of another person is infringed.
- Use computing equipment for playing games other than at lunchtime.
- Use for any kind of personal gain (e.g., advertising goods or services).
- Gain deliberate unauthorised access to facilities or services accessible via local or national networks or access, store or distribute programmes designed to facilitate such access.
- Engage in activities which waste resources (your own or other people's time, networks, or computers) or which are liable to cause a disruption or denial of service to other users. This includes the following: introduction of viruses into computer systems; use of Internet Relay Chat facilities; use of peer-to-peer networking products; use of internet TV, radio, or similar streamed media services; use of social networks such as Facebook, Bebo and YouTube etc.
- Use the Company's IT systems to keep a personal "blog".
- Engage in activities which are illegal, or which might contribute to the commission of an illegal act.
- Engage in any transaction purporting to be representing the Company when not authorised.
- You must not gain unauthorised access to or violate the privacy of other peoples' files, corrupt, or destroy other peoples' data or disrupt the work of other people.
- It is your responsibility to prevent inappropriate access to your files. Your password must be kept safe, changed regularly and not be disclosed to anyone except the office and Director (all passwords should be emailed to the office and Director as and when they are changed).
- You must not send electronic mail, which is irresponsible, or likely to cause offence nor use network messaging without authority. "Irresponsible" use includes unsolicited postings to large numbers of people or indiscriminate postings.
- It is easy for viruses to enter the network therefore you should never open attachments from an unknown source.
- Never use the internet to transmit confidential personal or business sensitive information.
- A modicum of personal email is acceptable during lunch breaks, but not where the perusal and sending of such infringes on the work of either in terms of denial of service to others due to bandwidth issues, or in loss of working time to the Company.
- The Company does not normally examine the contents of email or files belonging to computer users, but it reserves the right to do so, if necessary, to maintain the functionality of the system or where the Company has reason to suspect that these regulations are being breached. Users are therefore advised that such monitoring can and may occur. Please note e-mail messages even when they have been deleted from the Company's e-mail system can be traced, retrieved and the person or persons involved in creating or forwarding any offending e-mail identified. E-mails are admissible in a court of law.
- The Company will hold you personally liable if they or their customers suffer any loss or damage to its reputation as a result of any breach of these conditions.
- You must comply with the requirements of all relevant legislation.

We are guardians of considerable amounts of sensitive data, and it is vital for our business integrity that care is taken to safeguard both the information and the database systems themselves.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## **19. Public Interest Disclosure Policy (Whistle Blowing Policy)**

We encourage an open culture in all our dealings with employees, managers and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with. The procedure below provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, home workers and contractors, who feel they need to raise certain issues, in confidence.

The Public Interest Disclosure Act 1998 (commonly known as the 'Whistle Blowing Act') protects workers who raise legitimate concerns about specified matters from being dismissed by the Company or being subjected to detrimental treatment or victimised by either the Company or colleagues as a result, provided certain criteria are met. Certain kinds of disclosures qualify for protection, and these are set out below. These are disclosures of information which a worker reasonably believes are made in the public interest and tend to show one or more of the following relevant failures is either happening now, took place in the past, or is likely to happen in the future.

- A criminal offence has been committed including offences such as theft, fraud or acts of bribery.
- A person has failed, is failing, or is likely to fail to comply with a legal obligation which they are subject to.
- A miscarriage of justice.
- A danger to health and safety of any individual.
- Damage to the environment.
- Deliberate covering up of information tending to show any of the above five matters.

The procedure is not a substitute for the Disciplinary and Grievance policy and is not a channel for you to raise matters in relation to your terms and conditions of employment. The procedure allows you to have your concerns treated in confidence.

### **Your Protection**

If you raise a genuine concern, you will not be at risk of damaging your position as a result. Provided you are acting in the public interest it does not matter whether or not your concern proves to be well founded. You must however make your complaint to the right person and in the right way as detailed in this policy. The Company does not of course extend this assurance to someone who acts from an improper motive and raises a matter they know to be untrue.

### **Your Confidence**

The Company 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. Therefore, 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 (for instance because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed. This policy does not cover the situation where information about malpractice is received anonymously; however, discretion will be used in the investigation of such information.

### **How to raise your concern**

#### **Stage 1: Internal Line Management**

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager or a more senior manager. This should be done in writing. It will help if you state the facts of the matter clearly. You can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage.

#### **Stage 2: Alternative Contacts**

If you feel unable to raise the matter with someone in your line management, for whatever reason, please speak to a director. If you want to raise the matter in confidence, we will ensure that practical measures are put in place to protect your identity. We will contact you by the most secure means. We will not disclose your identity without your consent, unless we are required to do so by law.

Once you have reported your concern, the Company will investigate it to assess initially what action should be taken. If your concern falls more appropriately within other policies, we will tell you. A manager will be asked to carry out the investigation.

The disclosure will be treated seriously and promptly investigated and as part of the process the worker will be interviewed and asked to provide a written statement. Once the Company has finalised the investigation any necessary action will be taken.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.


There are outside agencies that, should you feel that your issue has not been resolved that you could contact, such as. ACAS - 0300 123 1100, Citizens advice - 0808 223 1133, Protect - 020 3117 2520.

**If you are dissatisfied**

If you are unhappy with the Company's response, you may then go to the proper authority. However, we do ask that matters are reported to the Company in the first instance. While we cannot guarantee that we will respond to all matters in the way that you might wish, the matter will be handled fairly and properly. By using this policy, you will help us to achieve this.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 20. Health and Wellbeing Policy

**Definition**

The Health & Safety Executive define stress as being “the adverse reaction people have to excessive pressures or other types of demand placed on them”. However, it is important that the difference between “pressure” and “stress” be acknowledged: pressure does not necessarily give rise to stress and pressure can sometimes motivate. Whilst acknowledging that pressure and stress may also be caused by a range of external issues, Universal Services (Sports Equipment) Ltd prime responsibility is to address work related stress.

**Causes of stress.**

The Health & Safety Executive (HSE) has identified six primary areas of risk in the causes of stress. The following HSE chart identifies the main causes of stress and provides a brief indicator of what can be done to manage these risks:

Cause of Stress	What can be done
<p>1. <u>Demands.</u> Employees often become overloaded if they cannot cope with the amount of work or type of work, they are asked to do.</p>	The job design and the provision should be considered to identify ways to manage the overload. Consideration should also be given to alternative work patterns and environment.
<p>2. <u>Control.</u> Employees can feel disaffected and poorly perform if they have no say over how and when they do their work. Management micromanaging employees work.</p>	Consideration should be given as to how employees are involved in decision making and their contribution as individuals and as part of teams.
<p>3. <u>Support.</u> Employees can feel isolated and stressed if they feel they cannot speak with their line managers or if they do not feel they have adequate support or provided with constructive feedback and advice</p>	Employees should be given the opportunity to discuss the issues causing stress with their line manger sympathetically and should be kept informed of any developments or changes.
<p>4. <u>Relationships.</u> Employees can often experience problems relating to bullying, harassment, or discipline because of poor working relationships or lack of recognition or reward.</p>	The policies and procedures relating to handling grievances, absence, misconduct and bullying and harassment should be reviewed on a regular basis.
<p>5. <u>Role</u> Employees can feel anxious if there is ambiguity regarding their role or where there is a lack of clarity in terms of what is expected of them.</p>	Particular attention should be paid to the induction of new staff and the creation of meaningful and well-structured job descriptions. Every effort should be made to maintain a close link between individual targets and organisational goals.
<p>6. <u>Change</u> Changes in market demands, technology, world affairs and organisational structure can lead to insecurity and uncertainty. Management changing their minds or changing the work at the last moment.</p>	Where changes are anticipated every effort must be made to communicate/consult with all those affected and to discuss and resolve issues together.

**1. Statement of Principles.**

1.1 This policy forms part of the Universal Services (Sports Equipment) Ltd.’s general Health & Safety policy arrangements as well as contributing to the promotion of good health. It encompasses such matters as smoking, alcohol, and drugs, nutrition, physical activity & stress.

1.2 Universal Services (Sports Equipment) Ltd. is committed to providing a working environment and management practices which promote employee wellbeing and good health.

1.3 Universal Services (Sports Equipment) Ltd. will fulfil its commitment by:

- Identifying potential hazards or circumstances which might contribute to inappropriate levels of work-related stress and conduct risk assessments to eliminate or control the risks from such stress. These circumstances and risk assessments will then be kept under review.
- Increasing awareness and understanding of stress related issues and the importance of general good health and wellbeing through identification, prevention, control and subsequent monitoring of causes of stress at work including where appropriate training and health promotion

- Providing where appropriate training for all managers and supervisory staff in good management practices appropriate to this policy.
- Providing a confidential counselling service for staff whose wellbeing is adversely affected by stress.
- Ensuring that appropriate resources are provided to enable managers to implement Universal Services (Sports Equipment) Ltd.'s agreed staff wellbeing strategy.

1.4 In turn, staff must play their part and take a responsible approach to health and wellbeing issues, including assisting those conducting risk assessments of stress in the workplace.

## **2. Policy Objectives**

2.1 The aims of the policy are to:

- Provide advice and information about minimising risks to health
- Outline specific responsibilities
- Educate staff about the causes, effects, and management of stress
- Provide relevant support to staff, ensuring managers are both proactive and respond in a timely manner to concerns raised by employees.

2.2 To achieve these objectives Universal Services (Sports Equipment) Ltd will:

- Carry out risk assessments to identify health and wellbeing issues related to work
- Implement appropriate control measures to minimise risks to health and wellbeing
- Monitor and audit arrangements to improve the quality of the working environment
- Raise awareness of the causes, signs and symptoms of stress and stress-related illness, and of the ways in which the Universal Services (Sports Equipment) Ltd supports individuals
- Provide training to all managers on the Health & Wellbeing Policy and how to use it effectively
- Educate employees in techniques for recognising and coping with potentially stressful situations
- Provide information about appropriate welfare services to all employees

2.3 The following have been identified as appropriate measures of employee performance and wellbeing for the purposes of managing health & wellbeing:

- Absences will be recorded and monitored for developing patterns
- Exit questionnaires will be used and followed up with exit interviews where appropriate
- Other forms of data gathering may also be used where changes are anticipated every effort must be made to communicate / consult with all those affected and to discuss and resolve issues together.

2.4 The policy recognises that employees' tolerance thresholds differ and that non-work factors may play a part in determining an individual employee's response.

## **3. Responsibilities**

3.1 All staff have a responsibility to comply with Health & Safety measures instituted by Universal Services (Sports Equipment) Ltd. The following people will have an involvement as follows:

3.2 Senior Management are responsible for ensuring:

- The engagement of management at all levels in the importance of managing employee wellbeing.
- Allocation of appropriate resources, to enable managers to deliver the agreed strategy proactively, use of the counselling service and health referrals for expert opinion, assess the nature and scale of risk to the health of its staff in order to implement appropriate preventative and protective steps.
- That the identified proactive initiatives, behaviours, systems, and policies are embedded in the culture of the organisation.
- That the strategy is driven via collective responsibility at Senior Management level.
- That support, and guidance is provided to staff on the Health & Wellbeing Policy
- Provide support to employees experiencing stress and advise them and their line-managers of the support available.

3.3 Supervisors:

In addition to the general duties of all managers, Supervisors influence the culture in their part of the organisation. Their specific responsibilities include:

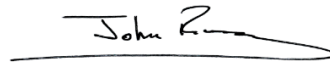
- Active implementation and promotion of the principles and behaviours contributing to positive staff wellbeing.
- Alertness to employees' personal circumstances and offering additional support were appropriate to members of staff experiencing risks to their wellbeing derived from outside of work, e.g., bereavement or separation.
- Ensuring effective communication between management and staff
- In particular, ensuring effective communicating where there are organisational and /or procedural changes which can give rise to increased levels of stress in the workplace.
- Ensuring that bullying, harassment, and discrimination are not tolerated in the workplace.
- Request HR to carry out stress risk assessments when it is identified that an employee is suffering from stress or where there is a perceived risk of stress and ensure that any reasonable measures identified are implemented.
- Ensure that employees are always consulted over all aspects of their employment that may cause stress or impact on their health and well-being when changes affecting them are planned.
- Ensure that employees receive appropriate training and resources to carry out their duties.
- Ensure that staff are provided with appropriate developmental opportunities.
- Manage absence in accordance with the Absence Management Policy
- Consider workloads to ensure jobs are realistic and manageable.
- Monitor working hours, overtime, and holidays to encourage individuals to take breaks as required by legislation.
- Familiarise themselves with the Dignity & Respect at Work Policy concerning bullying and harassment
- Recognise that employees may have experiences in their personal lives that may make them vulnerable to pressures at work and which may have a temporary influence on their work performance e.g., health issues or personal circumstances.
- Treat all discussions with employees around personal stress as confidential unless it is necessary to involve others to deal with the issue and the employee gives written agreement for disclosure.
- Where appropriate discuss issues around stress with the Health and Safety manager.

3.4 Employees will:

- Take reasonable care of their own health and safety and co-operate with Management in any measures taken to reduce stress
- Be committed to avoiding causing health and wellbeing problems for other employees, including acting in accordance with the principals of the Dignity & Respect at Work Policy
- Be proactive in identifying occasions when they may be suffering from health and wellbeing problems, either work-related, or due to external factors and alert their supervisors to these where appropriate.
- Where employees feel unable to discuss the issues with their supervisors, they are encouraged to discuss it with their Health & Safety Officer, Universal Services (Sports Equipment) Ltd recognises that, as with Dignity and Respect at Work, where the manager may be a cause of stress, in part or in full, concerns over stress can be immediately taken to a more senior manager.
- Take advantage of opportunities for counselling and training when recommended.



Colin Rhodes  
Director Date 10/03/2025



John Royce  
Director Date 10/03/2025

## **21. Mental Health, Fatigue and Wellbeing Policy**

Universal Services (sports equipment) Ltd recognises that mental ill health and stress are associated with many of the leading causes of disease and disability in our society. Promoting and protecting the mental wellbeing of our workforce is important for individuals' physical health, social wellbeing, and productivity.

Mental wellbeing in the workplace is relevant to all employees and everyone can contribute to improved mental wellbeing at work.

Addressing workplace mental wellbeing can help strengthen the positive, protective factors of employment, reduce risk factors for mental ill health and improve general health. It can also help promote the employment of people who have experienced mental health problems and support them once they are at work.

The purpose of this policy is to provide direction and guidance to employees and line managers on the management of mental health and wellbeing concerns.

Definitions:

- **Mental Health** is defined as a state of wellbeing in which an individual can cope with the normal stresses of life and can work productively. However, when a person is suffering from mental ill health their emotional wellbeing has been affected.
- **Stress** is defined as "the adverse reaction people have to excessive pressure or other types of demand placed on them".
- **Health** is defined by the World Health Organisation (WHO) as "...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity".
- **Wellbeing**: "...a state of being with others, where human needs are met, where one can act meaningfully to pursue one's goals, and where one enjoys a satisfactory quality of life".
- **Fatigue**: A lack of energy, feeling weak or being too tired to participate in family, work, or leisure activities.
- **A mental health condition** is considered a disability if it has a long-term effect on normal day-to-day activity.
- **A long-term effect** is one which lasts, or is likely to last, at least 12 months.

Universal Services (sports equipment) Ltd is committed to the protection and promotion of the mental health and wellbeing of its employees and those who may be affected by its operations.

**Policy Aim:** To provide a working environment that promotes and supports the mental health and wellbeing of all employees.

**Scope:** This policy will comply with Health and Safety legislation and best practice guidelines.

- The relevant legislation includes:
- The Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Equality Act 2010

This policy was developed in accordance with existing organisational policies, procedures, SSoW, and RAMs. This policy will be owned at all levels of the company, developed, and implemented across all departments, evaluated and reviewed as appropriate.

**Objectives;** To tackle workplace factors that may negatively affect mental wellbeing, and to develop management skills to promote mental wellbeing and manage mental health problems effectively. To develop a culture based on trust, support, and mutual respect within the workplace. As an employer we aim to create and promote a workplace environment that supports and promotes the mental wellbeing of all employees. We acknowledge that certain working conditions, home life and practices can negatively affect employees' mental wellbeing, including aspects of work organisation and management, and environmental and social conditions that have the potential for psychological as well as physical harm.

**Policy actions:**

- To build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying, harassment and racism)
- To increase employee knowledge and awareness of mental health and wellbeing issues and behaviours.
- To reduce stigma around depression and anxiety in the workplace.
- To facilitate employee's active participation in a range of initiatives that support mental health and wellbeing.
- Give employees information on and increase their awareness of mental wellbeing.
- Include information about the mental health and wellbeing policy in the employee induction programme.
- Provide systems that encourage predictable working hours, reasonable workloads, and flexible working practices where applicable.



- Ensure all staff have clearly defined job descriptions, objectives and responsibilities and provide them with good management support, appropriate training, and adequate resources to do their job. Have a clearly defined role within the organisation and a sense of control over the way their work is organised.
- Establish effective two-way communication to ensure staff involvement, particularly during periods of organisational change.
- Ensure that job design is appropriate to the individual, with relevant training, supervision and support provided as required.
- Ensure a physical environment that is supportive of mental health and wellbeing including a sound, ergonomically designed workstation or working situation with appropriate lighting, noise levels, heating, ventilation and adequate facilities for rest breaks.
- Provide training for designated staff in the early identification, causes and appropriate management of mental health issues such as anxiety, depression, stress, and change management. To provide support for employees experiencing mental health difficulties.

Policy actions:

- Ensure individuals suffering from mental health problems are treated fairly and consistently and are not made to feel guilty about their problems.
- Manage return to work for those who have experienced mental health problems and in cases of long-term sickness absence, put in place, where possible, a phased return to work.
- Offering assistance, advice and support to people who experience a mental health problem while in employment.
- Ensure employees are aware of the support that can be offered through, their own GP, or a counsellor.
- Make every effort to identify suitable alternative employment, in consultation with the employee, where a return to the same job is not possible due to identified risks or other factors.
- Treat all matters relating to individual employees and their mental health problems in the strictest confidence and share on a 'need to know' basis only with consent from the individual concerned.

Policy actions:


- Show a positive and enabling attitude to employees and job applicants with mental health issues. This includes having positive statements in any recruitment literature.
- Ensure that all staff involved in recruitment and selection are briefed on mental health issues and the Disability Discrimination Act and are trained in appropriate interview skills.
- Ensure all line managers have information and training about managing mental health in the workplace. To recognise and understand that a mental health condition can be considered a disability Where a long-term mental health condition could affect an employee's health, safety or welfare, reasonable adjustments will be made to their role. We ensure that the needs of disabled staff are covered by our risk assessments and if necessary, undertake an individual risk assessment for the work of the employee, taking into account their abilities and disabilities.
- To recognise and understand that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors.

Policy actions:

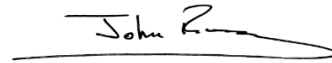
- Adopt the principles of the HSE Stress Management Standards for employees or groups of employees that it is felt may be affected by stress.
- Identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- Consult with employee representatives on all proposed action relating to the prevention of workplace stress.
- Provide training in good management practices, including those related to health and safety and stress management.
- Provide information on confidential counselling and adequate resources.
- Align with other relevant Company policies and procedure such as physical activity, alcohol and absence management.
- Responsibilities: Everyone has a responsibility to contribute to making the workplace mental wellbeing policy effective.
- Managers have a responsibility to:
  - Monitor the workplace, identify hazards and risks, and take steps to eliminate or reduce these as far as is reasonably practicable.
  - Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
  - Assist and support employees who are known to have mental health problems or are experiencing stress outside work for example, due to bereavement or separation.
  - Ensure staff are provided with the resources and training required to carry out their job.
  - Arrange workloads to ensure that people are not overloaded.
  - Arrange working hours and overtime to ensure that staff are not overworking and monitor holidays to ensure that staff are taking their full entitlement.
  - Ensure staff are provided with meaningful developmental opportunities.
  - Organise training and awareness courses on workplace mental wellbeing in conjunction with suitable experts.

- Provide advice and support to employees and managers in relation to this policy.
  - Monitor and report on levels of sickness absence which relate to mental health problems including stress-related illness.
- Employees have a responsibility to:
    - Raise issues of concern and seek help from their line manager.
    - Accept opportunities for counselling when recommended.

Communication, all employees will be made aware of the mental health and wellbeing policy and the facilities available. This will be part of our policy document, which will be included in the employee induction packs. Regular updates will be provided to all employees via their line management.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 22. Waste and Sharps Policy

Universal Services (sports Equipment) Ltd as a sports equipment installer, seek to promote and protect the efficient use of the world's resources without detriment to its inhabitants.

We recognise that in our day-to-day operations inevitably have an impact on the environment in several ways and wish to minimise the potentially harmful effects of such activity wherever and whenever possible.

As part of our continuing drive for quality in all the things we do, we have developed this policy. This will enable us to set, publish and promote targets by which our efforts are displayed and head towards sustainable environmental improvements that can be measured and monitored. In this way, our aim is to protect the health and safety of our employees and our customers whilst contributing to the future wellbeing of the environment. We have undertaken to help every employee to understand and implement the relevant aspects of this policy in their day-to-day work through regular communication. Our Managing Director has accepted specific responsibility for policy development and authorised the co-ordination and evaluation of the performance of our environmental programme. We are committed to minimising the impact of our operations on the environment by means of a programme of continuous improvement.

In particular: -

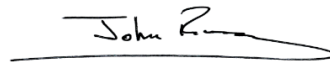
- i. Meet and where appropriate exceed the requirements of current and future relevant legislation.
- ii. Seek to use energy saving materials in all operations, re-use rather than dispose whenever possible and promote recycling and the use of recycled materials where possible.
- iii. Reduce where possible the level of harmful emissions.
- iv. Market products that are fun to use and fit for the purpose and conform to all applicable environmental and other legislation.
- v. Work with and monitor our suppliers to minimise the impact of their operations on the environment through our quality purchasing policy which includes related human rights, moral and ethical issues relative to the country in which they operate.
- vi. Minimise noise and other impacts on the local environment.
- vii. Support our local council in environmental issues.
- viii. Include all environmental issues in programmed meetings i.e., The AGM
- ix. This policy is communicated on induction within Universal Services (sports Equipment) Ltd and confirms the commitment of our directors and employees.
- x. Large amounts of confidential wastepaper will be disposed of by contacting the Director who will arrange for disposal. The confidential waste will subsequently be shredded and recycled by a specialist recycling contractor.
- xi. All recyclable waste will be divided into individual waste streams and placed in the skips provided for this purpose. If waste is so large it must be isolated and placed beside the metal skip for dismantling into component parts.
- xii. All drivers are informed of routing arrangements and the need to cut emissions wherever possible, for example, keeping engine idling to the bare minimum.
- xiii. In the case of employees encountering any Drugs related waste, they are to isolate it and leave it in situ. Immediately inform a manager or in the case of syringes inform the local authority, who.

Aim to collect and safely dispose of this potentially hazardous material the same day as it is reported. Let them know.

- details of where the items have been found.
- how many and the type of items
- your contact details - in case an officer cannot find the item.
- Do not touch the item.
- Do not put it in a litter bin.
- Do not try to flush it down a toilet.



Colin Rhodes  
Director      Date 10/03/2025



John Royce  
Director      Date 10/03/2025

## 23. First Aid Policy

### Relevant Legislation

The Health and Safety at Work (etc) Act 1974  
 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013  
 The Health and Safety (First Aid) Regulations 1981

### Definitions. First Aid is defined as.

- providing help for the purpose of preserving life and minimising the consequences of injury or illness until such time as professional medical support can be obtained; and
- treating minor injuries which would not otherwise receive any treatment, or which do not warrant treatment by a medical practitioner.

### Policy statement

- Universal Services has a responsibility to ensure that adequate arrangements are put in place to provide sufficient first aid provision. It will do this via a First Aid Needs Assessment.
- Although there is no requirement in law to provide first aid to anyone other than employees, the Universal Services will make provision for the benefit of its delivery drivers and visitors.

### Responsibilities

The Directors have the overall day to day responsibility for health and safety matters at Universal Services. The Directors delegate responsibility for undertaking aspects of these duties through line management and identified roles. The following people are identified as having responsibilities (in addition to any other responsibilities under other health and safety policy) for the management of first aid provisions, and for those relevant persons, that fall under their control:

Heads of Department are responsible for ensuring that:

- any authorised first aiders under their control are provided with sufficient time to attend training and to maintain the first aid equipment for which they are responsible.
- all new starters are given basic health and safety information relating to first aid provision and how this can be accessed in their first month at work.
- any first aid equipment under their control is adequately maintained, stored in a safe place, accessible to first aiders and ready for use at all times.
- Line Managers are responsible for ensuring that their team is made aware of the first aid provision and procedures available within their department and are responsible for ensuring suitable and sufficient first aid signage is provided and maintained.

Directors will:

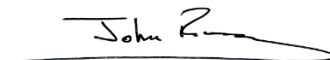
- ensure that Universal Services has enough trained first aiders by carrying out a first aid needs assessment and reviewing this assessment annually or after any significant change, whichever is the sooner.
- ensure that first aiders receive adequate and timely training.
- consider any request for additional first aid provision made by a line manager.
- review and revise this policy annually or after significant change, whichever is the sooner.

First aiders will:

- attend any mandatory training arranged for them in respect of first aid.
- attend any first aid emergency as necessary and will administer first aid as appropriate and in accordance with the training they have received.
- maintain simple, factual records and provide information to the emergency services as required.
- ensure the first aid kit for which they are responsible, is kept fully stocked and up to date.
- 



Colin Rhodes  
 Director      Date 10/03/2025



John Royce  
 Director      Date 10/03/2025

## 24. Manual Handling Policy

### Introduction

More than a third of all over-three-day injuries reported each year to the HSE are caused by manual handling. The Management of Health and Safety at Work Regulations & Manual Handling Regulations, place a requirement on the employer and employee to reduce the hazards to health associated with the manual handling of loads. Manual handling is the transporting or supporting of an animate or inanimate load, including lifting, lowering, pushing, pulling, holding, carrying, throwing, and moving by the application of bodily force to that load.

### Policy

The aim of this policy is to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees while they are at work, in relation to manual handling activities. Universal Services put in place measures to protect employees from the risks of Manual Handling these measures will include:

- Avoiding the need for hazardous manual handling operations.
- Assessing the risk of injury from manual handling.
- Reducing the risk from manual handling as far as is reasonably practicable.

### Company Responsibilities:

- Identify whether formal manual handling assessment is required.
- Ensure that manual handling risk assessments have been undertaken where required.
- Implement manual handling control measures where appropriate.
- Ensure that affected employees are suitably trained and informed. Employees complete Human focus e-Learning online training in Manual Handling.

### Employee Responsibilities:

- Follow all systems of work laid down for their safety.
- Make full and proper use of equipment provided for their safety.
- Report any defects in systems, practices, or equipment.
- Attend training when required to do so.
- Take reasonable care of their own health and safety and that of others. Inform their line manager when they believe that there is a risk of injury.

### Non-Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety regarding addressing any breach, they should seek senior management support. Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk. Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy.

### Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Directors.

However, all employees are required to adhere to and support the implementation of the policy. Universal Services will inform all employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company. This policy will be implemented through the development and maintenance of procedures along with training.

### Reviewing Policy

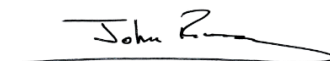
This policy will be reviewed annually and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

### Additional Information

If you require any additional information or clarification regarding this policy, please contact your line manager. In the unlikely event where you are unhappy with any decision made, you should use the Company's formal Grievance Procedure. To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements change.



Colin Rhodes  
Director Date 10/03/2025



John Royce  
Director Date 10/03/2025

## 25. Bullying, harassment and discrimination policy

Universal Services we have a zero-tolerance approach to any form of bullying, harassment or discrimination. We know that experiencing inappropriate behaviour can make working life miserable and take an emotional, physical and mental toll on our colleagues. We will always take any allegations very seriously.

This Policy explains:

- How we expect our colleagues to behave
- What to do if you see or experience inappropriate behaviour
- How we can all help to create a respectful working environment
- How to access impartial emotional support whether you are experiencing inappropriate behaviour, you have been accused or you are supporting a colleague

This Policy applies to all.

### Crucial bits

We all have a responsibility to create a culture where bullying, harassment and discrimination doesn't happen in our workplace and challenging it or reporting it if we see it happening.

Just so you're aware, if we find that you've bullied, harassed or discriminated against someone, made false allegations, or treated a colleague badly because they've raised a legitimate concern, we regard this as potential gross misconduct and you may be dismissed under the Disciplinary Policy.

### What is bullying?

Bullying can be described as unwanted behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

The bullying might:

- be a regular pattern of behaviour or a one-off incident
- happen face-to-face, on social media, in emails or calls
- happen at work or in other work-related situations
- not always be obvious or noticed by others

Examples of bullying at work could include:

- someone has spread a malicious rumour about you
- your Line Manager keeps giving you a heavier workload than everyone else
- someone keeps putting you down in meetings
- someone holding back information or deliberately "losing" information
- being excluded from team social events
- someone at the same or more junior level as you keep undermining your authority

Bullying is not:

- Being held accountable for your performance or behaviour
- Constructive feedback
- Conflict or difference of opinions

### What is harassment?

Harassment is when bullying or unwanted behaviour is about or because of any of the following protected characteristics under discrimination law (Equality Act 2010)

- Sex
- Disability
- Age
- Race and ethnic or national origin
- Sexual orientation
- Gender reassignment/Trans or Non-Binary Status
- Religion or religious belief

It includes unwanted conduct that is sexual in nature and treating someone badly because they either rejected it or because they went along with it.

Harassment is unlawful under the Equality Act 2010 and equality legislation in Northern Ireland.

If someone's behaviour is unwanted and causes offence, even if it wasn't done on purpose, it may be harassment. The unwanted behaviour doesn't have to be aimed at you for you to be offended by it. If it creates an intimidating or offensive environment for you or anyone else, then it could be harassment.

Examples of harassment at work could include:

- Sexually suggestive jokes, comments or innuendo, offensive gestures or whistling
- Unnecessary touching
- Suggestions that sexual favours may further someone's career, or that refusing them may damage it
- Offensive remarks about a groups or an individual's race, ethnic or national origin
- Ridicule or assumptions based on racial stereotypes
- Spreading rumours or gossip about someone's sexual orientation or gender
- Excluding someone because of their political opinion or religious group

Harassment can include:

- A serious one-off incident
- Repeated behaviour
- Spoken or written words, imagery, graffiti, , mimicry, jokes, pranks or physical behaviour that affects the person

It's still against the law even if the person being harassed does not ask for it to stop.

Harassment because of pregnancy or maternity is treated differently under the discrimination law but is still unlawful under the prohibition of direct sex discrimination.

Also, whilst the law on harassment doesn't cover marriage and civil partnership, harassment because of marriage/civil partnership, is still unlawful under the prohibition of direct discrimination.

## What is discrimination?

By law, being discriminated against is when you are treated unfairly because of any of the following:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

These are known as 'protected characteristics'. It's against the law for anyone to treat you less favourably because of them.

Examples of direct discrimination at work could be:

- Someone is not offered a promotion because they're a woman and the job goes to a less qualified man
- A manager rejects a colleague for a wine buying team because they believe the colleague is Muslim because of their name and would therefore not want to work with alcohol.

## Victimisation

The law also protects people against victimisation – which means being treated badly because they have, or they plan to, or they are thought to have:

- Brought an employment tribunal claim alleging discrimination
- Complained about discrimination
- Given evidence or information in relation to someone else’s claim about discrimination.

## Getting advice

If you feel that you’re being bullied, harassed, or discriminated against, it can sometimes be difficult to decide how you want to deal with it. It can help to talk this through with someone. We would always suggest that you speak to your line manager initially to talk things through or with another manager if you don’t feel comfortable.

If you have witnessed bullying, harassment or discrimination its best not to stay silent. If you can, speak to the person to who the negative behaviour is directed towards and ask them what support they need.

## Resolving things informally

It’s always better to try to sort things out informally if possible. Explaining to the person responsible how it makes you feel and asking them to stop may get things resolved. They might not realise the impact of their words or actions or have meant to offend you.

But if you don’t feel able to speak to the person, talk to your manager about the problems you’re having. If it’s appropriate, your manager may speak to them confidentially to say that their behaviour is inappropriate and needs to change. Wherever possible your manager will aim to resolve things quickly and informally without the need to use a formal process. Dealing with things informally is often much less stressful and quicker for everyone involved than a formal process

If you don’t feel you can speak to your manager, or your complaint is about them, you can speak informally to your manager’s line manager.

## Making a formal complaint

If you don’t feel able to sort things out informally, you can make a formal complaint. Making a formal complaint should usually be a last resort. To do this, you’ll need to raise a grievance. You’ll need to put your grievance in writing and send it to your manager - or if your complaint is about your manager, to their manager. See the [Grievance policy](#) for more information.

We know it’s not an easy thing to do to speak up about these things, so we’ll investigate this as quickly as possible. If we find evidence, we’ll take appropriate action against those involved.

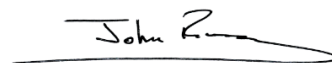
Sometimes, your manager may decide that the nature of the grievance is such that it needs to be considered formally, for example if the complaint is very serious or where the informal approach would not be appropriate.

## Support and protection for colleagues

If you raise a concern in good faith, or you’ve witnessed bullying, harassment or discrimination at work, we’ll give you support. We won’t allow you to suffer negative treatment in your employment because of it. Also, if you’ve been accused of bullying, harassment or discrimination and we find this is untrue, we won’t allow you to suffer negative treatment in your employment because of it. We’ll also give you support if you need it.



Colin Rhodes  
Director Date 10/03/2025



John Royce  
Director Date 10/03/2025



## 25. List of Procedures

P	01	Human Resources
P	02	Monitoring and Measurement
P	03	Records and documents
P	04	Planning
P	05	Design and Development
P	06	Purchasing
P	07	Production
P	08	Measurement Analysis and Improvement
P	09	Management Review
P	10	Internal Audit
P	11	Control of Nonconforming Product
P	12	Business Continuity
P	13	SMS Degreasing Plant
P	14	Occupational Health and Safety
P	15	Hazard Identification, Risk Assessment and Controls
P	16	Sales
P	17	Environmental Management
P	18	Quality Assurance
P	19	Accident Reporting
P	20	Fire & Emergency
P	21	Driving at Work
P	22	Complaints Procedure
P	23	Credit Card
P	24	Filling Calor
P	25	Statement Outline – Modern Slavery Act 2015
P	26	Tax Evasion
P	27	Pre-Employment Procedure
P	28	Accident Reporting and Investigation Policy and Procedure.

The above Procedures cover the core of our part Integrated Management System (IMS) and we reserve the right to establish new Procedures to support the integrity of the IMS without adding them here unless they are significant to its effective operation.

## 26. Review, revision and location of this document

The Company’s policies and procedures are reviewed as necessary and not less than annually. These reviews will take account of the results from monitoring activities, both active and reactive, and where necessary policy and procedures are revised.

Where work significantly alters and new hazards or impacts are introduced, the risk assessments, method statements and, where necessary, the policies are revised to ensure all necessary controls are in place to safeguard the health and safety of the Company’s employees and others affected by our work activities.

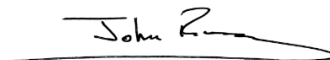
If any amendments to current practices and procedures are made and/or any new work equipment introduced, those employees affected are consulted in a timely and efficient manner through information, training, and education and by use of Controlled Notice Board No. 2 (Adjacent to vending machine in the main factory).

The control of this Manual is in accordance with P\_03 Records and Documents. Hard copies of this Manual are uncontrolled and should be used for reference purposes only.

Proposed changes to this Manual by the Internal Manager HSEQ or External Consultant HSEQ are communicated to the Managing Director and Director and their documented approval obtained before completion and publication.



Colin Rhodes  
Director Date 10/03/2025



John Royce  
Director Date 10/03/2025

## 27. Policy Review/Revision Record

DATE	ISSUE STATUS	NATURE OF REVIEW/REVISION
March 2025	25	Annual Review
March 2024	24	Amended format of document
February 2024	23	Annual Review and title change
April 2023	22	Added living wage Policy, Mental Health, Fatigue and Wellbeing and waste Policy
February 2023	21	Annual Review
February 2022	20	Annual Review
March 2021	19	New staff member
August 2020	18	Internal Promotions
February 2020	17	Annual Review
November 2019	16	Updated following a must compliance from FORS
November 2019	15	Updated following a must compliance from FORS
November 2019	14	Member of staff has left
September 2019	13	Combined two of the other policies into the one heading – New staff member
July 2019	12	Updated following a must compliance from FORS
February 2019	11	Recommendations following Achilles audits
January 2019	10	Updated following a must compliance from FORS
December 2018	9	Recommendations following Achilles’ audit
November 2018	8	Combined Quality and Environmental policy
July 2018	7	Inclusion of a Management Reporting Tree
December 2017	6	Various changes to reflect current situation following Registration to BS EN ISO 9001:2015 and BS EN ISO 14001:2015.
August 2016	5	2016 Targets added to Section 13.
August 2016	4	Updated procedures list and added reference to subject 2015 ISO revisions.
August 2014	3	Reference to visitors and public now more specific.
January 2014	2	Addition to H&S policy and addition of Sustainability and Ethical Procurement Policy.
November 2013	1	First issue in this format.