



# 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 the majority 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
- Economic considerations and profit aspirations
- Emissions
- Energy
- Health, wellbeing & safety and communities
- Noise
- Quality of product and service
- Raw material use
- Solid and hazardous waste
- 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:

	<b>Name</b>	<b>Position</b>
<b>1</b>	<b>Colin Rhodes</b>	<b>M.D/FORs Counter terrorism Champion</b>
<b>2</b>	John Royce	General Manager
<b>3</b>	Judith Felton	Office Manager
<b>4</b>	Tony Berry	Assembly & Dispatch Supervisor
<b>5</b>	Oliver Rhodes	Installation Supervisor
<b>6</b>	Russell Kyte	Service Supervisor
<b>7</b>	Andreas Fantousi	Sales & Marketing Administrator
<b>8</b>	Steve Moore	HSEQ
<b>9</b>		

*Colin Rhodes*

Colin Rhodes Director Dated: January 2020

## **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 the 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;
- 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 general 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.

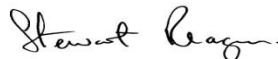
This policy is reviewed annually or as required following changes that may affect it.



Colin Rhodes

Director

Date 08/01/2020

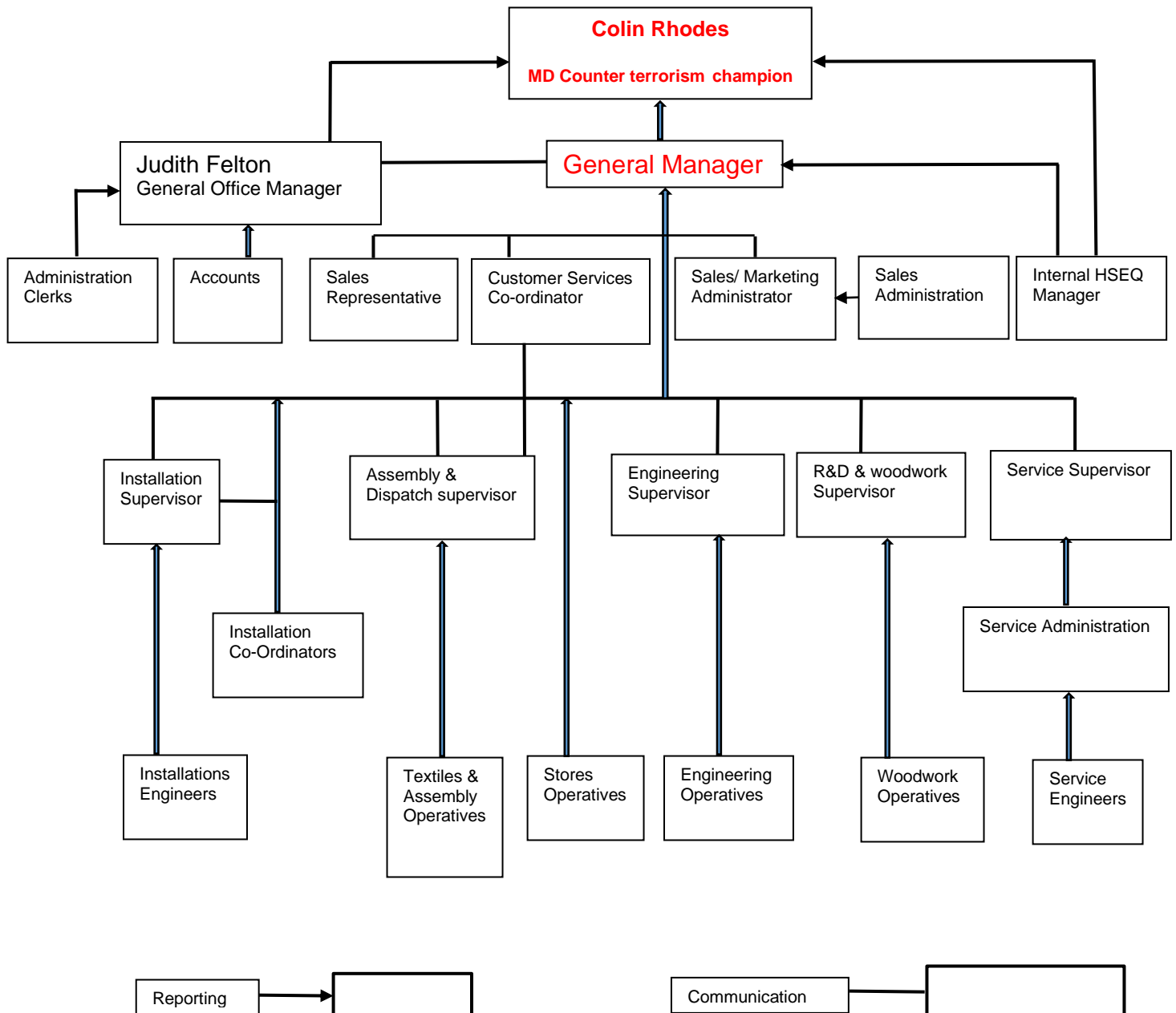


Stewart Reagan

Director

Date 08/01/2020

## 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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

## **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.

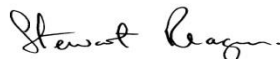
Smoking is only permitted in designated areas on construction sites and Universal Services (Sports Equipment) Limited premises.



Colin Rhodes

Director

Date 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

## **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 is provided to relevant employees through information, education and training;
- This Child Protection Policy is reviewed for effectiveness by the External Consultant HSEQ 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 08/01/2020



Stewart Reagan

Director

08/01/2020

## **7. Policy: 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.



Colin Rhodes

Director

Date 08/01/2020



Stewart Reagan

Director

08/01/2020



## **8. 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 general 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:

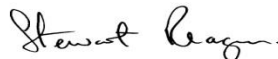
- Minimise risks to the health and safety of individual employees, other road users, vulnerable road users such as pedestrians, cyclists, motorcyclists and highway workers and the general public as a consequence of driving required as a work activity.
- Reduce the risk and subsequent cost of accidents.
- 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 General Manager.
- 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 sustainable and efficient fleet.
- 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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

## **9. 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:

- We aim to develop total customer satisfaction by way of producing competitively priced, safe and durable products, in an agreed time frame.
- 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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

## **10. Policy: 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 on the basis of 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 make 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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **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 at all times.

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 expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your General Manager or Director.

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 General Manager of the Company.

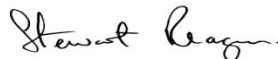
In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or 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.



Colin Rhodes

Director

Date 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **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 so as 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.

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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

### **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.
- Select and treat our suppliers fairly and objectively at all times.
- Pay our suppliers in accordance with agreed terms and deal with exceptions in a timely manner.
- Ensure that we operate our business in a sustainable and ethical manner at all times.
- 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 provide their employees with a safe working environment at all times 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 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **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 in order 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, General Manager.



Universal Services (Sports  
Equipment) UK Ltd:  
CSR Policy

Director

Date 08/01/2020



Universal Services (Sports  
Equipment) UK Ltd:  
CSR Policy

Director

Date 08/01/2020

**Colin Rhodes** – Director, **Universal Services (Sports Equipment) Limited**



## **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 coming into contact with 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 in particular. 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 up-dated 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, where by a copy is taken at the end of each working day and stored off site.

*Colin Rhodes*

Universal Services (Sports  
Equipment) UK Ltd:  
Terrorism Policy

Director

Date 08/01/2020

*Stewart Reagin*

Universal Services (Sports  
Equipment) UK Ltd:  
Terrorism Policy

Director

Date 08/01/2020

**Colin Rhodes** – Director, **Universal Services (Sports Equipment) Limited**

## **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 in order 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 as a result 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*

*Stewart Reagin*

Universal Services (Sports  
Equipment) UK Ltd:  
Modern Slavery Policy

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Modern Slavery Policy

Director

Date 08/01/2020

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **17. 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 general manager (all passwords should be emailed to the office and general manager 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.



Universal Services (Sports  
Equipment) UK Ltd:  
IT Policy

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Director

Date 08/01/2020

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**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **18. 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 the General Manager or 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 look into 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.

### **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.



Universal Services (Sports Equipment) UK  
Ltd: Whistle blowing Policy

Director

Date 08/01/2020



Universal Services (Sports Equipment)  
UK Ltd: Whistle blowing Policy

Director

Date 08/01/2020

**Colin Rhodes – Director, Universal Services (Sports Equipment) Limited**

## **19. 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\_17 Environmental Management  
P\_18 Quality Assurance  
P\_20 Fire & Emergency  
P\_21 Driving at Work  
P\_22 Complaints Procedure  
P\_25 Statement Outline – Modern Slavery Act 2015

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.

## **20. 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.

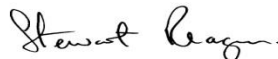
Proposed changes to this Manual by the Internal Manager HSEQ or External Consultant HSEQ are communicated to the Managing Director and General Manager and their documented approval obtained before completion and publication.



Colin Rhodes

Director

Date 08/01/2020



Stewart Reagan

Director

Date 08/01/2020

## **21. Policy Review/Revision Record**

DATE	ISSUE STATUS	NATURE OF REVIEW/REVISION
November	16	Updated following a must compliance from FORS
November	15	Updated following a must compliance from FORS
November	14	Member of staff has left
September	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 general 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.