Diverse
Recruitment Group

Core Policies & Acknowledgement

Diverse Recruitment Group
30 Dukes Place, London, EC3A 7LP

Social Personnel · Imperium Recruiting · Amaré Health · Imperium Solutions · PILLAR Partnership · CHOICE VETS · mcm medical

Diverse Recruitment Group
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t: 0203 892 9340
www.diverserecruitmentgroup.co.uk

As an organisation that engages with a large number of candidates, we have a responsibility to ensure all our staff correctly understand the policies and procedures in place.

Please read the below document, which covers both internal company policy and external policy thoroughly. Please also send a signed copy of the last page to your hiring manager, or bring it with you on your first day with us.

The following policies should be read thoroughly:

Internal policy:

Health & Safety
Grievance
Disciplinary and Dismissal
Social Media
Employee Confidentiality
Performance Review
Whistleblowing

External:

GDPR
QA & Safer Recruitment
Modern Slavery Statement
Managing Allegations
Safeguarding

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Document Number	Title	Print Date
DRGCP05	Health & Safety Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
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Health & Safety Policy

Section 1: General statement of policy

Company Policy

It is the policy of Diverse Recruitment Group to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information and training as they need for this purpose.

Diverse Recruitment Group accepts its responsibility for health and safety of other persons who may be affected by Diverse Recruitment Group's activities.

Following the identification of work-related risks and hazards, Diverse Recruitment Group will take preventative and protective measures. It is also the policy of Diverse Recruitment Group to ensure that its business is conducted in a manner so as to reduce the risks to members of the public. Diverse Recruitment Group may require you to attend such training and/or induction programmes to meet the aims of Diverse Recruitment Group.

The allocation of duties for safety matters, the identity of competent persons appointed with responsibilities, and the arrangements made to implement this policy are set out in this policy and in associated health and safety records.

This policy will be kept up to date, to reflect changes in the nature and size of Diverse Recruitment Group. To ensure this, the policy and its effectiveness will be reviewed annually

Company's responsibilities

It is the duty of management to:

- Provide and maintain systems of work that are safe and without risk to health.
- ensure safety and the absence of risks to health in connection with handling of equipment, storage, and transport.
- Provide information, instruction, training, and supervision.
- Maintain all places of work in a safe condition.
- Provide and maintain a safe working environment.

Your responsibilities

All employees and workers have a duty in law to act responsibly and to take reasonable care for the health and safety at work of both themselves and their colleagues. This duty can be carried out by:

- Working safely and efficiently.
- Using any protective equipment provided and meeting statutory obligations.
- Adhering to Diverse Recruitment Group procedures for securing a safe workplace. Individuals will be nominated to undertake health and safety duties as required.
- Reporting incidents that have led to injury or damage;

All such incidents must be recorded and reported to Fiona Nalwoga (Compliance Director) using the internal report form, which is available from Reception 30 Dukes Place. Any failure to adhere to this policy and the procedures set out in it will be considered a serious disciplinary offence and is one which may lead to dismissal as per the companies' disciplinary process laid out on page 72 of the Employee Handbook.

Security

If you are responsible for setting the alarm, failure to set the alarm may result in disciplinary action being taken.

Fire & Emergency

You must observe the evacuation procedures laid down in the event of a fire or any other emergency. You must be aware of the location of the emergency exits, assembly points and first aid kit. Procedures to be carried out in the event of a fire or emergency will be found on the notice board

Section 2: Responsibilities

Ultimate responsibility for health and safety rests with the Board of Directors, with delegation of duty to the PA to Directors and The Space Liverpool Street (Building Managers for 14 New Street). Those named must be fully aware of their duties, details of which should be included in their job description.

1. **Overall and final responsibility within Diverse Recruitment Group rests with:**
   Name: Tommy Love
   Status: Managing Director
   Telephone extension: 0203 892 9341
   Mobile Phone: 07850 444 849
   Email: tommy@socialpersonnel.com

2. **Person responsible for ensuring this health and safety policy is put into practice on a day-to-day basis is:**
   Name: Danielle Cross
   Status: PA to Directors
   Telephone extension: 0203 908 8399
   Email: danielle@socialpersonnel.com

3. **In the absence of the person named in 2 (above), s/he will be deputised by:**
   Name: Callum Carscadden
   Status: Executive Director
   Mobile Phone: 07717687683
   Email: callum@diverserec.co.uk

4. **In the event of accidents and dangerous occurrences, such incidents should be reported to:**
   Name: **Kyle Stuart-Woodard**
   Status: **Building Manager**
   Telephone extension: 0203 409 6010
   Email: liverpoolstreet@thespace-uk.com

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Section 3: Risk assessments

1. **Risk assessments will be undertaken by:**
   Name: Danielle Cross
   Status: PA to Directors
   Telephone extension: 0203 409 6010
   Email: danielle@diverserec.co.uk

2. **The findings of the risk assessments will be reported to:**
   Name: Kelly Glover
   Status: Building Manager
   Telephone extension: 020 3908 2200
   Email: aldgate@thespace-uk.com

3. **Action required to remove/control risks will be approved and implemented by:**
   Name: Kelly Glover
   Status: Building Manager
   Telephone extension: 020 3908 2200
   Email: aldgate@thespace-uk.com

4. **Risk assessments will be reviewed by:**
   Name: Tommy Love
   Status: Managing Director
   Telephone extension: 0203 892 9341
   Mobile Phone: 07850 444 849
   Email: tommy@socialpersonnel.com

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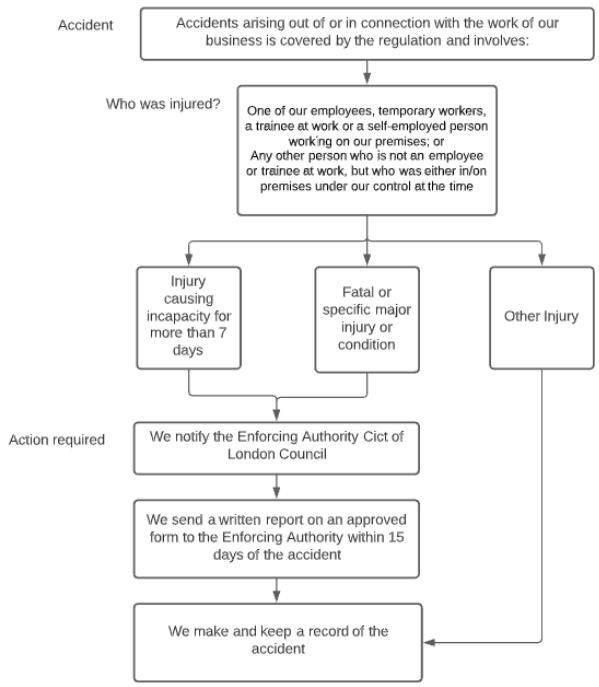
Section 4: Accident Reporting



Section 5: Emergency Services

1 Nearest Hospital with a Casualty Department:
Royal London Hospital
Whitechapel Rd,
E1 1FR

2 Police Station
City of London Police
Bishopsgate,
EC2M 4NP

3 Fire Station
Shoreditch Fire Station
235 Old St,
EC1V 9EY

4 Employer Contact
Name: Danielle Cross
Status: PA to Directors
Telephone extension: 0203 409 6010
Email: danielle@diverserec.co.uk

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Section 6: Fire safety

It is essential that adequate equipment and staff training is provided on this subject. The Fire Safety Procedure is designed and maintained by 14 New Street

1. **Fire Safety Training Officer:**
   Scott Duggins
   Scott@socialpersonnel.com

2. **Fire Drills are the responsibility of:**
   Scott Duggins
   Scott@socialpersonnel.com

3. **Fire equipment maintenance company:**

DH Group
Unit 4, Beeding Court,
Business Park,
Upper Beeding,
Steyning
BN44 3TN

4. **Rules/Procedure in the event of a fire:**

- If the fire alarm sounds, Leave office room in orderly fashion
- Do not use lifts
- Exit via fire safety corridor
- Meet at fire safety point (Devonshire square)

Section 7: Workplace equipment

All workplace equipment should be treated with respect and checked regularly

Responsibility for inspecting all workplace equipment:

Name: Danielle Cross
Status: PA to Directors
Telephone extension: 0203 409 6010
Email: danielle@diverserec.co.uk

Frequency of Inspections:
Fixed equipment: Annually

Portable equipment: Yearly PAT testing
Records located at: Business Support Office

Companies/Persons responsible for maintenance and repair:

Name: Kelly Glover
Status: Building Manager
Telephone extension: 020 3908 2200
Email: aldgate@thespace-uk.com

Name: Danielle Cross
Status: PA to Directors
Telephone extension: 0203 409 6010
Email: danielle@diverserec.co.uk

Inspection procedure:
Weekly Contracted Maintenance. Our weekly allocated handyman is on site every Monday 09:00 – 16:00, Daily inspections of building and site and capturing of maintenance issues in maintenance log. Fire alarm test every Thursday morning.

General rules governing the safe use of portable electrical equipment:
Any equipment within 12 months does not require testing. After 12 months, PAT testing required by external engineer. Service conducted by The City of London engineers.

Section 8: Health and safety training

Good training will ensure that employees are competent to carry out their tasks, thus reducing risk to health and safety.

Person(s) responsible for health and safety training within Diverse Recruitment Group

Name: Danielle Cross
Status: PA to Directors
Telephone extension: 0203 409 6010
Email: danielle@diverserec.co.uk

Person(s) responsible for special training

Name: Kelly Glover
Status: Building Manager
Telephone extension: 020 3908 2200
Email: aldgate@thespace-uk.com

Section 9: Information, instruction, and supervision

Health and safety information can be found:

Business Support
Where employees or temporary workers work at locations under the control of another employer, health and safety risk assessments may need to be performed by the other employer.

Person(s) responsible for ensuring any necessary risk assessments are carried out by the other employer:

Name: Fiona Nalwoga
Status: Compliance Director
Email: fiona@diverserec.co.uk

Person(s) responsible for ensuring that all employees and temporary workers, who work at locations under the control of other employers, are given all the health and safety information relevant to the other employer and their assignment (including whether personal protective equipment is required and if so, how it will be supplied):

Name: Fiona Nalwoga
Status: Compliance Director
Email: fiona@diverserec.co.uk

Person(s) responsible for ensuring all employees and temporary workers working at location(s) under the control of another employer receive the necessary health and safety training:

Not Applicable

Section 10: Noise and temperature

Excessive noise impairs hearing and increases pulse rate, blood pressure and breathing rate. Noise levels will be assessed, and any risks prevented. Similarly, the temperature inside the premises will be kept at a reasonable level.

Person Responsible for assessing noise and temperature levels:

Name: Danielle Cross
Status: PA to Directors
Telephone extension: 0203 409 6010
Email: danielle@diverserec.co.uk

Section 11: First-aid and medical facilities on Diverse Recruitment Group's premises

First Aid requirements must be met for all employees whether they are working at the designated premises or elsewhere. Employees must be made aware of the provision, and records must be kept of treatment administered.

First-Aiders

Name(s): Becca Difford-Smith
Status: Head of Marketing
Telephone extension: 07963431898

Email: becca@diverserec.co.uk

Name: Bethany O'Leary
Status: Operations Assistant
Telephone: 07592315276
Email: beth@imperiumresourcing.com

First-Aid Box/First Aid Room is located at:

3rd Floor Kitchen

The Accident Book is located at:

Reception desk – Ground Floor

The following is a guide to the contents of Diverse Recruitment Group's first-aid box:

FIRST-AID BOXES		TRAVELLING FIRST AID KITS	
Guidance Card	1	Guidance Card	1
Individually wrapped sterile adhesive dressings (assorted sizes and appropriate to work e.g. detectable for food handlers	20	Individually wrapped sterile adhesive dressings	6
Sterile eye pads	2		
Individually wrapped triangular bandages (preferably sterile)	4	Triangular bandages	2
Safety Pins	6	Safety Pins	2
Medium sized individually wrapped sterile unmedicated wound dressings (approx. 12 x 12cm)	6	Individually wrapped moist cleaning wipes	Several
Large sterile individually wrapped unmedicated wound dressings (approx. 18 x 18cm)	2	Large sterile unmedicated dressing (approx. 18 x 18cm)	1
Disposable gloves	1	Disposable gloves	1

SECTION 12: Rules for visitors to Diverse Recruitment Group's premises

The rules are:

Visitors are required to sign in at reception on the ground floor.

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Companies will be notified of a visitor and asked to collect the individual from the ground floor reception.

Visitors will be always accompanied and in the event of a fire will follow instructions from representatives of Diverse Recruitment Group and The Space UK.

At the end of their time in the building visitors will be able to sign out at the reception desk on the Ground Flour

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DRGCP011	Griveance Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

Who is covered by the procedure?

This procedure applies to all employees regardless of length of service. It does not apply to agency workers or self-employed contractors. However, it does not form part of your contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case.

Using the grievance procedure

Most grievances can be resolved quickly and informally through discussion with your line manager. If this does not resolve the problem, you should initiate the formal procedure below reasonably promptly.

Step 1: written grievance

You should put your grievance in writing and submit it to your line manager. If your grievance concerns your line manager, you may submit it to an alternative manager.

The written grievance should set out the nature of the complaint, including any relevant facts, dates, and names of individuals involved so that we can investigate it.

Step 2: meeting

We will arrange a grievance meeting, normally within one week of receiving your written grievance. You should make every effort to attend.

You may bring a companion to the grievance meeting if you make a reasonable request in advance and tell us the name of your chosen companion. The companion may be either a trade union representative or a colleague, who will be allowed reasonable paid time off from duties to act as your companion.

If you or your companion cannot attend at the time specified you should let us know as soon as possible and we will try, within reason, to agree an alternative time.

We may adjourn the meeting if we need to carry out further investigations, after which the meeting will usually be reconvened.
We will write to you, usually within one week of the last grievance meeting, to confirm our decision and notify of you of any further action that we intend to take to resolve the grievance. We will also advise you of your right of appeal.

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Step 3: appeals

If the grievance has not been resolved to your satisfaction you may appeal in writing to the Managing Director, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within two weeks of receiving the appeal. This will be dealt with impartially by a more senior manager who has not previously been involved in the case. You will have a right to bring a companion.

We will confirm our final decision in writing, usually within one week of the appeal hearing. There is no further right of appeal.

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Document Number	Title	Print Date
DRGCP20	Disciplinary Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

Disciplinary Policy

Disciplinary Rules

These Disciplinary Rules should be read in conjunction with our Disciplinary Procedure. It is our policy to ensure that any disciplinary matter is dealt with fairly and in accordance with the Disciplinary Procedure.

If you are in any doubt as to your responsibilities or the standards of conduct expected you should speak to your line manager.

Rules of conduct

While working for us you should always maintain professional and responsible standards of conduct. You should:

a) observe the terms and conditions of your contract, particularly about:
i. hours of work.
ii. confidentiality.
iii. outside interests.
b) observe all our policies, procedures and regulations which are included in this Staff Handbook or notified to you from time to time by means of notice boards, e-mail, the intranet or otherwise.
c) take reasonable care in respect of the health and safety of colleagues and third parties and comply with our Health and Safety Policy.
d) comply with all reasonable instructions given by managers; and
e) Always act in good faith and in our best interests and those of our customers and staff.

Failure to maintain satisfactory standards of conduct may result in action being taken under our Disciplinary procedure.

Misconduct

The following are non-exhaustive examples of matters that will normally be regarded as misconduct and will be dealt with under our Disciplinary Procedure:

a) Minor breaches of our policies.
b) Minor breaches of your contract.

c) Damage to, or unauthorised use of, our property.
d) Poor timekeeping.
e) Poor performance.
f) Disruptive behaviour.
g) Time wasting.
h) Unauthorised absence from work.
i) Refusal to follow instructions.
j) Use of our telephones for personal calls.
k) Use of personal mobile telephones (for non-business purposes);
l) Obscene language or other offensive behaviour.
m) Negligence in the performance of your duties.
n) Smoking in no-smoking areas; or
o) Breach of our Dress Code Policy.

This list is intended as a guide and is not exhaustive.

Gross misconduct

Gross misconduct is a serious breach of contract and includes misconduct which, in our opinion, is likely to prejudice our business or reputation or irreparably damage the working relationship and trust between employer and employee. Gross misconduct will be dealt with under our Disciplinary Procedure and will normally lead to dismissal without notice or pay in lieu of notice (summary dismissal).

The following are non-exhaustive examples of matters that are normally regarded as gross misconduct:

a) Theft, or unauthorised removal of our property or the property of a colleague, contractor, customer, or member of the public.
b) Fraud, forgery, or other dishonesty, including fabrication of expense claims and time sheets.
c) Actual or threatened violence, or behaviour which provokes violence.
d) Deliberate and /or serious damage to our buildings, fittings, property or equipment, or the property of a colleague, contractor, customer, or member of the public.
e) Serious misuse of our property or name.
f) Deliberately accessing internet sites containing pornographic, offensive, or obscene material.
g) Repeated or serious failure to obey instructions, or any other serious act of insubordination;
h) Unlawful discrimination or harassment;
i) Bringing the organisation into serious disrepute.
j) Being under the influence of alcohol, illegal drugs, or other substances during working hours.
k) Causing loss, damage, or injury through serious negligence.
l) Serious or repeated breach of health and safety rules or serious misuse of safety equipment.

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m) Unauthorised use or disclosure of confidential information or failure to ensure that confidential information in your possession is kept secure.
n) Acceptance of bribes or other secret payments.
o) Conviction for a criminal offence that in our opinion may affect our reputation or our relationships with our staff, customers or the public, or otherwise affects your suitability to continue to work for us.
p) Possession, use, supply, or attempted supply of illegal drugs.
q) Serious neglect of duties, or a serious or deliberate breach of your contract or operating procedures.
r) Unauthorised use, processing, or disclosure of personal data contrary to our Data Protection Policy.
s) Harassment of, or discrimination against, employees, contractors, clients, or members of the public, related to gender, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, disability, religion or belief or age contrary to our Equal Opportunities Policy or our Anti-harassment and Bullying Policy.
t) Giving false information as to qualifications or entitlement to work (including immigration status) to gain employment or other benefits.
u) Knowingly taking parental, paternity or adoption leave when not eligible to do so or for a purpose other than supporting a child.
v) Making untrue allegations in bad faith against a colleague.
w) Victimising a colleague who has raised concerns, made a complaint or given evidence information under our Anti-harassment and Bullying Policy, Grievance Procedure, Disciplinary Procedure or otherwise.
x) Serious misuse of our information technology systems (including misuse of developed or licensed software, use of unauthorised software and misuse of e-mail and the internet).
y) Undertaking unauthorised paid or unpaid employment during your working hours.

This list is intended as a guide and is not exhaustive.

Disciplinary Procedure

The aims of this Disciplinary Procedure and its associated Disciplinary Rules are to set out the standards of conduct expected of all staff and to provide a framework within which managers can work with employees to maintain satisfactory standards of conduct and to encourage improvement where necessary.

It is our policy to ensure that any disciplinary matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action.

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What is covered by the procedure?

This procedure is used to deal with misconduct. It does not apply to cases involving genuine sickness absence, proposed redundancies. In those cases, reference should be made to the appropriate policy or procedure elsewhere in this Staff Handbook.

This procedure does not apply whilst any employee is within a period of probation.

Minor conduct issues can often be resolved informally between you and your line manager. These discussions should be held in private and without undue delay whenever there is cause for concern.

Where appropriate, a note of any such informal discussions may be placed on your personnel file but will be ignored for the purposes of any future capability hearings. In some cases, an informal verbal warning may be given, which will not form part of your disciplinary records. Formal steps will be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

You will not normally be dismissed for a first act of misconduct, unless we decide it amounts to gross misconduct or you have not yet completed your probationary period.

If you have difficulty at any stage of the procedure because of a disability, you should discuss the situation with your line manager as soon as possible.

Confidentiality

Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with an investigation or disciplinary matter.

You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure.

You will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against you, unless we believe that a witness's identity should remain confidential.

Investigations

The purpose of an investigation is for us to establish a fair and balanced view of the facts relating to any disciplinary allegations against you, before deciding whether to proceed with a disciplinary hearing. The amount of investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents.

Investigative interviews are solely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary hearing has been held.

You do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a companion if it helps you to overcome any disability, or any difficulty in understanding English.

You must co-operate fully and promptly in any investigation. This will include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending investigative interviews if required.

Criminal charges

Where your conduct is the subject of a criminal investigation, charge, or conviction we will investigate the facts before deciding whether to take formal disciplinary action.

We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.
Suspension

In some circumstances we may need to suspend you from work. The suspension will be for no longer than is necessary to investigate the allegations and we will confirm the arrangements to you in writing. While suspended you should not visit our premises or contact any of our clients, customers, suppliers, contractors, or staff, unless you have been authorised to do so by the Managing Director.

Suspension of this kind is not a disciplinary penalty and does not imply that any decision has already been made about the allegations. You will continue to receive your full basic salary and benefits during the period of suspension.

Notification of a hearing

Following any investigation, if we consider there are grounds for disciplinary action, you will be required to attend a disciplinary hearing. We will inform you in writing of the allegations against you, the basis for those allegations, and what the likely range of consequences will be if we decide after the hearing that the allegations are true. We will also include the following where appropriate:

a) a summary of relevant information gathered during the investigation.

b) a copy of any relevant documents which will be used at the disciplinary hearing; and
c) a copy of any relevant witness statements, except where a witness's identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

We will give you written notice of the date, time, and place of the disciplinary hearing. The hearing will be held as soon as reasonably practicable, but you will be given a reasonable amount of time, usually two to seven days, to prepare your case based on the information we have given you.
The right to be accompanied

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may be either a trade union representative or a colleague. You must tell us who your chosen companion is, in good time before the hearing.

A companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so.

If your choice of companion is unreasonable, we may require you to choose someone else, for example:

a) if in our opinion your companion may have a conflict of interest or may prejudice the hearing; or
b) if your companion works at another site and someone reasonably suitable is available at the site at which you work; or
c) if your companion is unavailable at the time a hearing is scheduled and will not be available for more than five working days.

Procedure at disciplinary hearings

If you or your companion cannot attend the hearing you should inform us immediately and we will arrange an alternative time. You must make every effort to attend the hearing, and failure to attend without good reason may be treated as misconduct. If you fail to attend without good reason or are persistently unable to do so (for example for health reasons), we may have to take a decision based on the available evidence.

You may bring a companion with you to the disciplinary hearing (see above).

At the disciplinary hearing we will go through the allegations against you and the evidence that has been gathered. You will be able to respond and present any evidence of your own. Your companion may make representations to us and ask questions but should not answer questions on your behalf. You may confer privately with your companion at any time during the hearing.

You may ask relevant witnesses to appear at the hearing, provided you give us sufficient advance notice to arrange their attendance. You will be given the opportunity to respond to any information given by a witness. However, you will not normally be permitted to cross-examine witnesses unless, in exceptional circumstances, we decide that a fair hearing could not be held otherwise.

We may adjourn the disciplinary hearing if we need to carry out any further investigations such as re-interviewing witnesses in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

We will inform you in writing of our decision and our reasons for it, usually within one week of the disciplinary hearing. Where possible we will also explain this information to you in person.
Disciplinary penalties

The usual penalties for misconduct are set out below. No penalty should be imposed without a hearing. We aim to treat all employees fairly and consistently, and a penalty imposed on another employee for similar misconduct will usually be considered but should not be treated as a precedent. Each case will be assessed on its own merits.

Stage 1 - First written warning. It will usually be appropriate for a first act of misconduct where there are no other active written warnings on your disciplinary record.

Stage 2 - Final written warning. It will usually be appropriate for:

a) misconduct where there is already an active written warning on your record; or
b) misconduct that we consider sufficiently serious to warrant a final written warning even though there are no other active warnings on your record.

Stage 3 - Dismissal. Dismissal will usually only be appropriate for:

a) any misconduct during your probationary period.
b) further misconduct where there is an active final written warning on your record; or
c) any gross misconduct regardless of whether there are active warnings on your record. Gross misconduct will usually result in immediate dismissal without notice or payment in lieu of notice (summary dismissal). Examples of gross misconduct are set out above in our Disciplinary Rules.

Alternatives to dismissal. In some cases, we may at our discretion consider alternatives to dismissal. These will usually be accompanied by a final written warning. Examples include:

a) Demotion.
b) Transfer to another department or job.
c) A period of suspension without pays.
d) Loss of seniority.
e) Reduction in pay.
f) Loss of future pay increment or bonus.

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g) Loss of overtime.

The effect of a warning

Written warnings will set out the nature of the misconduct, the change in behaviour required, the period for which the warning will remain active, and the likely consequences of further misconduct in that active period.

A first written warning will usually remain active for six months and a final written warning will usually remain active for 12 months. In exceptional cases verging on gross misconduct, a final written warning may state that it will remain active indefinitely. Your conduct may be reviewed at the end of a warning's active period and if it has not improved sufficiently, we may decide to extend the active period.

After the active period, the warning will remain permanently on your personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings.

Appeals against disciplinary action

If you feel that disciplinary action taken against you is wrong or unjust you should appeal in writing, stating your full grounds of appeal, to the Managing Director within one week of the date on which you were informed of the decision.

If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if your appeal is successful you will be reinstated with no loss of continuity or pay.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light, we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing.

We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

Where possible, the appeal hearing will be conducted impartially by a more senior manager who has not been previously involved in the case. You may bring a companion with you to the appeal hearing (see above).

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We may adjourn the appeal hearing if we need to carry out any further investigations in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

Following the appeal hearing we may:

a) confirm the original decision.
b) revoke the original decision; or
c) substitute a different penalty.

We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.

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Document Number	Title	Print Date
DRGCP14	Social Media Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

Social Media Policy

1. Policy Overview

1.1 We recognise that the internet provides unique opportunities to participate in interactive discussions and share information on topics using a wide variety of social media, such as Facebook, Twitter, blogs, and wikis. However, employees' use of social media can pose risks to our confidential and proprietary information, and reputation, and can jeopardise our compliance with legal obligations.

1.2 To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate business purposes, we expect employees to adhere to this policy.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Who is covered by the policy?

2.1 This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff (collectively referred to as staff in this policy).

2.2 Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

3. Scope and purpose of the policy

3.1 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, and all other internet postings, including blogs.

3.2 It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.

3.3 Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

3.4 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.

4. Personnel responsible for implementing the policy

4.1 The Managing Director has overall responsibility for the effective operation of this policy.

4.2 All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

4.3 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Managing Director. Questions regarding the content or application of this policy should be directed to the Managing Director.

5. Compliance with related policies and agreements

5.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:

(a) breach our information and communications systems policy.
(b) breach our obligations with respect to the rules of relevant regulatory bodies.
(c) breach any obligations they may have relating to confidentiality.
(d) breach our Disciplinary Rules.
(e) defame or disparage the organisation or its affiliates, customers, clients, business partners, suppliers, vendors, or other stakeholders.
(f) harass or bully other staff in any way.
(g) breach our Equal opportunities policy.
(h) breach Data protection (for example, never disclose personal information about a colleague online).
(i) breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

5.2 Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

5.3 Employees who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

6. Personal use of social media

Personal use of social media is never permitted during working time or by means of our computers, networks and other IT resources and communications systems.

7. Monitoring

7.1 The contents of our IT resources and communications systems are our property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other

kind of information or communications transmitted to, received, or printed from, or stored or recorded on our electronic information and communications systems.

7.2 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your acknowledgement of this policy and your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving, and printing of transactions, messages, communications, postings, logins, recordings, and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

7.3 We may store copies of such data or communications for a period after they are created and may delete such copies from time to time without notice.

7.4 Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from the organisation.

7.5 For further information, please refer to our Electronic information and communications systems policy.

8. Business use of social media

8.1 If your duties require you to speak on behalf of the organisation in a social media environment, you must still seek approval for such communication from your manager, who may require you to undergo training before you do so and impose certain requirements and restrictions regarding your activities.

8.2 Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the inquiry to the Managing Director and do not respond without written approval.

8.3 The use of social media for business purposes is subject to the remainder of this policy.

9. Responsible use of social media

9.1 The following sections of the policy provide staff with common-sense guidelines and recommendations for using social media responsibly and safely.

9.2 Protecting our business reputation:

(a) Staff must not post disparaging or defamatory statements about:

(i) our organisation.

(ii) our clients.

(iii) suppliers and vendors; and

(iv) other affiliates and stakeholders,

but staff should also avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly.

(a) Staff should make it clear in social media postings that they are speaking on their own behalf. Write in the first person and use a personal e-mail address when communicating via social media.

(b) Staff are personally responsible for what they communicate in social media. Remember that what you publish might be available to be read by the masses (including the organisation itself, future employers, and social acquaintances) for a long time. Keep this in mind before you post content.

(c) If you disclose your affiliation as an employee of our organisation, you must also state that your views do not represent those of your employer. For example, you could state, "the views in this posting do not represent the views of my employer". You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

(d) Avoid posting comments about sensitive business-related topics, such as our performance. Even if you make it clear that your views on such topics do not represent those of the organisation, your comments could still damage our reputation.

(e) If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from making the communication until you discuss it with your manager.

(f) If you see content in social media that disparages or reflects poorly on our organisation or our stakeholders, you should contact your manager. All staff are responsible for protecting our business reputation.

9.3 Respecting intellectual property and confidential information:

(a) Staff should not do anything to jeopardise our valuable trade secrets and other confidential information and intellectual property using social media.

(b) In addition, staff should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for the organisation, as well as the individual author.

(c) Do not use our logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without prior written permission.

(d) To protect yourself and the organisation against liability for copyright infringement, where appropriate, reference sources of information you post or upload and cite them accurately.

(e) The contact details of business contacts made during your employment are regarded as our confidential information, and as such you will be required to delete all such details from your personal social networking accounts, such as Facebook accounts or LinkedIn accounts, on termination of employment.

9.4 Respecting colleagues, clients, partners, and suppliers:

(a) Do not post anything that your colleagues or our customers, clients, business partners, suppliers, vendors, or other stakeholders would find offensive, including discriminatory comments, insults, or obscenity.

(b) Do not post anything related to your colleagues or our customers, clients, business partners, suppliers, vendors, or other stakeholders without their written permission.

10. review of this policy

10.1 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Managing Director

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Document Number	Title	Print Date
DRGCP13	Employee Confidentiality	
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V2	Callum Carscadden	24/08/2022
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Employee Confidentiality Policy

Policy brief & purpose

We designed our company confidentiality policy to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. We want to make sure that this information is well-protected.

We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes.)

Scope

This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Policy elements

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information at all times

- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for our company, they're obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures
We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by senior management to allow employees to access certain confidential information

Exceptions
Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit

- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorizations. We're bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action. We'll investigate every breach of this policy. We'll terminate any employee who willfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.

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Performance Review Policy

Policy brief & purpose

Our employee performance review policy describes how we coach, evaluate and reward employees. We base our performance management systems on constructive feedback and open communication between managers and team members.

Scope
This policy applies to all employees. We will clarify our performance appraisal process and provide guidelines for managers on how to lead their teams and assess employee performance.

We have built our performance management practices to:

- Ensure you understand your job responsibilities and have specific goals to meet.
- Provide you with actionable and timely work feedback.
- Invest in development opportunities that help you grow professionally.
- Recognize and reward your work in financial or non-financial ways (e.g. awards.)

Policy elements
What is good performance?
Our company has a general definition of what good performance looks like. To achieve a good performance evaluation, you should:

- Meet your targets consistently.
- Complete your job duties as expected.
- Show a willingness to learn and develop.
- Follow our Code of Conduct and other company policies.
- Have a good attitude and collaborate well with your colleagues.

Each employee may excel in one aspect and need improvement in another. But, to remain employed with our company, you should meet a minimum standard for all of these aspects and show a willingness to improve where appropriate.

Periodical reviews

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We conduct annual performance reviews. During these reviews, your manager will fill out your performance evaluation report and arrange a meeting with you to discuss your review. Through these discussions, managers aim to:

- Recognize employees who are good at their jobs.
- Talk about career moves and employee motivations.
- Identify areas of improvement.

Periodical reviews apply to employees who have completed their onboarding period.

Rewards
Pay increases or bonuses aren't guaranteed. But we encourage managers to recommend rewards for their team members when they deserve them. There won't be any forced ranking or other comparison between employees, as our goal is to help all employees improve and develop their careers.

Training
Training and development opportunities are available for all employee's year long. But, if managers identify a team member's training needs in a specific area, they can discuss this with their team member during performance reviews. That way, they can set up an improvement plan.

On-the-job training, job shadowing and other training methods are also appropriate when managers intend to promote an employee in the near future. We encourage managers to discuss future career moves with their team members, so they can determine what type of training is appropriate.

Frequent communication
Managers should meet with their team members once per [*week*] to provide feedback and talk about their work and motivations. This way, team members can receive feedback in a timely manner and avoid surprises during their annual performance review.

During performance meetings, both parties should feel free to discuss any concerns they have. If you need to talk to your manager about a particular issue, reach out as soon as possible.

Managers' responsibilities
If you manage a team, you are responsible for your team members' performance. To conduct effective regular meetings and performance evaluations, we expect you to:

- **Set clear objectives**. Your team members should know what you expect of them. When you first hire someone to your team, ensure they understand their job duties. Set specific goals for each team member (and team-wide if applicable.) Renew those goals during annual performance reviews.
- **Provide useful feedback**. During scheduled meetings with your team members, give them guidance and praise, as appropriate. Be fair and specific to help them understand and implement your feedback.
- **Keep your team members involved**. There should be two-way communication between you and your team. Make your expectations clear, but always take your team members' motivations and aspirations into account. Discuss training and development opportunities that may interest your team members.

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- **Keep logs with important incidents about each one of your team members**. These logs help you evaluate your team, but they may also prove useful if you want to terminate, reward or promote your team members.

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Whistleblowing Policy

Introduction

Diverse Recruitment Group is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all its practices.

We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

This policy does not form part of any contract; Diverse Recruitment Group reserves the right to amend this policy at any time without prior notice.

Who can raise a concern under this policy?

This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers, and limited company contractors.

No qualifying length of service is required to raise a concern under this policy.

When to use this policy

This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed (excluding those in relation to bribery and corruption, which should be reported using the procedure set out in the Anti-Bribery and Corruption Policy); or

- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject (excluding those in relation to bribery and corruption, which should be reported using the procedure set out in the Anti-Bribery and Corruption Policy.); or

- that a miscarriage of justice has occurred, is occurring or is likely to occur; or

- that the health or safety of an individual has been, or is being or is likely to be endangered; or

- that the environment has been, is being or is likely to be damaged; or

- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

You must reasonably believe that the disclosure is being made in the public interest.

It does not matter if you are mistaken about your concern, but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

Disclosures that are not covered by this policy

You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between Diverse Recruitment Group and our lawyers regarding a specific case).

If your concern relates to your own treatment as an employee of Diverse Recruitment Group, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

If your concern relates to your own treatment or personal circumstances at work but you are not an employee of Diverse Recruitment Group, you should use our complaints procedure instead of the grievance procedure.

Our complaints policy is available on request.

If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities, you may need to raise the concern directly with the hirer instead.

Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

How to raise a concern

If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.

If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with the Head of HR (or designated Local Authority Whistleblowing Officer) or Danielle Cross on: danielle@socialpersonnel.com

If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with the following member of management: Tommy Love (Managing Director – Diverse Recruitment Group) or the Trust Management.

A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.

You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:

- the nature of the concern.
- why you believe it to be true.
- the background and history of the concern; and
- relevant dates where possible.

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

How we respond to concerns raised under this policy

We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly, and professionally.

We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

You may bring a colleague [or trade union representative] to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Any concerns you raise in line with this policy will be recorded in our Central Database.

After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of the progress of the investigation as it is carried out and when it is completed and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.

We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.

If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing. If you agree to this, you will be offered advice and support.

Confidentiality

All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action to resolve the issue.

However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf.

We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Public Concern at Work is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section under paragraph 10 below.

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Protection and support for those raising concerns

We hope that all staff will feel able to voice their concerns freely under this policy.

Diverse Recruitment Group is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform Danielle Cross at Diverse Recruitment Group immediately.

Diverse Recruitment Group will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action

To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.

If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of Diverse Recruitment Group can use our grievance procedure to address the issue instead.

Further information and contacts

If you have any queries about the application of this policy, please contact Danielle Cross on: danielle@socialpersonnel.com in the first instance.

Public Concern at Work is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 7404 6609. Further information is available on their website at www.pcaw.co.uk.

The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 8pm and Saturday from 9am to 1pm.The website can be found here: www.acas.org.uk.

If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.

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Privacy Policy – GDPR Update

Contents

All organisations that process personal data are required to comply with data protection legislation. This includes, in particular, the Data Protection Act 1998 (or its

successor) and the EU General Data Protection Regulation (together the 'Data Protection Laws'). The Data Protection Laws give individuals (known as 'data subjects') certain rights over their personal data whilst imposing certain obligations on the organisations that process their data.

As a recruitment business Diverse Recruitment Group collects and processes both personal data and sensitive personal data. It is required to do so to comply with other legislation. It is also required to keep this data for different periods depending on the nature of the data.

This policy sets out how Diverse Recruitment Group implements the Data Protection Laws. It should be read in conjunction with the Data Protection Procedure.

In this policy the following terms have the following meanings:

'consent' means any freely given, specific, informed and unambiguous indication of an individual's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of persona data relating to him or her;

'data controller' means an individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data;

'data processor' means an individual or organisation which processes personal data on behalf of the data controller;

'personal data'* means any information relating to an individual who can be identified, such as by a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data;

'processing' means any operation or set of operations performed on personal data, such as collection, recording, organisation, structuring, storage (including archiving), adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

'pseudonymisation' means the processing of personal data in such a manner that the personal data can no longer be attributed to an individual without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable individual.

'sensitive personal data'* means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health, an individual's sex life or sexual orientation and an individual's criminal convictions. [Note 1]

* For the purposes of this policy we use the term 'personal data' to include 'sensitive personal data' except where we specifically need to refer to sensitive personal data.

'Supervisory authority' means an independent public authority which is responsible for monitoring the application of data protection. In the UK the supervisory authority is the Information Commissioner's Office (ICO).

Diverse Recruitment Group may hold personal data on individuals for the following purposes:

- Staff administration;
- Advertising, marketing and public relations
- Accounts and records;
- Administration and processing of work-seekers' personal data for the purposes of providing work-finding services, including processing using software solution providers and back office support
- Administration and processing of clients' personal data for the purposes of supplying/introducing work-seekers

1. The data protection principles

The Data Protection Laws require Diverse Recruitment Group acting as either data controller or data processor to process data in accordance with the principles of data protection. These require that personal data is:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept for no longer than is necessary for the purposes for which the personal data are processed;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures; and that
- The data controller shall be responsible for, and be able to demonstrate, compliance with the principles.

2. Legal bases for processing

Diverse Recruitment Group will only process personal data where it has a legal basis for doing so (see Annex A). Where Diverse Recruitment Group does not have a legal reason for processing personal data any processing will be a breach of the Data Protection Laws.

Diverse Recruitment Group will review the personal data it holds on to a regular basis to ensure it is being lawfully processed and it is accurate, relevant and up to date and those people listed in the Appendix shall be responsible for doing this.

Before transferring personal data to any third party (such as past, current or prospective employers, suppliers, customers and clients, intermediaries such as umbrella companies, persons making an enquiry or complaint and any other third party (such as software solutions providers and back-office support)), Diverse Recruitment Group will establish that it has a legal reason for making the transfer.

3. Privacy by design and by default

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Diverse Recruitment Group has implemented measures and procedures that adequately protect the privacy of individuals and ensures that data protection is integral to all processing activities. This includes implementing measures such as:

- data minimisation (i.e. not keeping data for longer than is necessary);
- pseudonymisation;
- anonymization
- Cyber Essentials Certified

For further information on The Governments "Cyber Essentials" certificate please refer to the website: https://www.cyberessentials.ncsc.gov.uk

Diverse Recruitment Group shall provide any information relating to data processing to an individual in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. Diverse Recruitment Group may provide this information orally if requested to do so by the individual.

1. Privacy notices

Where Diverse Recruitment Group collects personal data from the individual, Diverse Recruitment Group will give the individual a privacy notice at the time when it first obtains the personal data.

Where Diverse Recruitment Group collects personal data other than from the individual directly, it will give the individual a privacy notice within a reasonable period after obtaining the personal data, but at the latest within one month. If Diverse Recruitment Group intends to disclose the personal data to a third party, then the privacy notice will be issued when the personal data are first disclosed (if not issued sooner).

Where Diverse Recruitment Group intends to further process the personal data for a purpose other than that for which the data was initially collected, Diverse Recruitment Group will give the individual information on that other purpose and any relevant further information before it does the further processing.

2. Subject access requests

The individual is entitled to access their personal data on request from the data controller.

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3. Rectification
The individual or another data controller at the individual's request, has the right to ask Diverse Recruitment Group to rectify any inaccurate or incomplete personal data concerning an individual.

If Diverse Recruitment Group has given the personal data to any third parties it will tell those third parties that it has received a request to rectify the personal data unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however Diverse Recruitment Group will not be in a position to audit those third parties to ensure that the rectification has occurred.

4. Erasure
The individual or another data controller at the individual's request, has the right to ask Diverse Recruitment Group to erase an individual's personal data.

If Diverse Recruitment Group receives a request to erase it will ask the individual if s/he wants his personal data to be removed entirely or whether s/he is happy for his or her details to be kept on a list of individuals who do not want to be contacted in the future (for a specified period or otherwise). Diverse Recruitment Group cannot keep a record of individuals whose data it has erased so the individual may be contacted again by Diverse Recruitment Group should Diverse Recruitment Group come into possession of the individual's personal data at a later date.

If Diverse Recruitment Group has made the data public, it shall take reasonable steps to inform other data controllers and data processors processing the personal data to erase the personal data, taking into account available technology and the cost of implementation.

If Diverse Recruitment Group has given the personal data to any third parties it will tell those third parties that it has received a request to erase the personal data, unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however Diverse Recruitment Group will not be in a position to audit those third parties to ensure that the rectification has occurred.

5. Restriction of processing
The individual or a data controller at the individual's request, has the right to ask Diverse Recruitment Group to restrict its processing of an individual's personal data where:

- The individual challenges the accuracy of the personal data;
- The processing is unlawful and the individual opposes its erasure;
- Diverse Recruitment Group no longer needs the personal data for the purposes of the processing, but the personal data is required for the establishment, exercise or defence of legal claims; or

The individual has objected to processing (on the grounds of a public interest or legitimate interest) pending the verification whether the legitimate grounds of Diverse Recruitment Group override those of the individual.

If Diverse Recruitment Group has given the personal data to any third parties it will tell those third parties that it has received a request to restrict the personal data, unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however Diverse Recruitment Group will not be in a position to audit those third parties to ensure that the rectification has occurred.

6. Data portability

The individual shall have the right to receive personal data concerning him or her, which he or she has provided to Diverse Recruitment Group, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller in circumstances where:

- The processing is based on the individual's consent or a contract; and
- The processing is carried out by automated means.

Where feasible, Diverse Recruitment Group will send the personal data to a named third party on the individual's request.

7. Object to processing

The individual has the right to object to their personal data being processed based on a public interest or a legitimate interest. The individual will also be able to object to the profiling of their data based on a public interest or a legitimate interest.

Diverse Recruitment Group shall cease processing unless it has compelling legitimate grounds to continue to process the personal data which override the individual's interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

The individual has the right to object to their personal data for direct marketing.

8. Enforcement of rights

All requests regarding individual rights should be sent to the person whose details are listed in the Appendix.

Diverse Recruitment Group shall act upon any subject access request, or any request relating to rectification, erasure, restriction, data portability or objection or automated decision-making processes or profiling within one month of receipt of the request. Diverse Recruitment Group may extend this period for two further months where necessary, considering the complexity and the number of requests.

Where Diverse Recruitment Group considers that a request under this section is manifestly unfounded or excessive due to the request's repetitive nature Diverse Recruitment Group may either refuse to act on the request or may charge a reasonable fee considering the administrative costs involved.

9. Automated decision making

Diverse Recruitment Group will not subject individuals to decisions based on automated processing that produce a legal effect or a similarly significant effect on the individual, except where the automated decision:

· Is necessary for the entering into or performance of a contract between the data controller and the individual;
· Is authorised by law; or
· The individual has given their explicit consent.

Diverse Recruitment Group will not carry out any automated decision-making or profiling using the personal data of a child.

Reporting personal data breaches
All data breaches should be referred to the persons whose details are listed in the Appendix.

1. Personal data breaches where Diverse Recruitment Group is the data controller:

Where Diverse Recruitment Group establishes that a personal data breach has taken place, Diverse Recruitment Group will take steps to contain and recover the breach.

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Where a personal data breach is likely to result in a risk to the rights and freedoms of any individual Diverse Recruitment Group will notify the ICO.

Where the personal data breach happens outside the UK, Diverse Recruitment Group shall alert the relevant supervisory authority for data breaches in the effected jurisdiction.

2. Personal data breaches where Diverse Recruitment Group is the data processor:

Diverse Recruitment Group will alert the relevant data controller as to the personal data breach as soon as they are aware of the breach.

3. Communicating personal data breaches to individuals

Where Diverse Recruitment Group has identified a personal data breach resulting in a high risk to the rights and freedoms of any individual, Diverse Recruitment Group shall tell all affected individuals without undue delay.

Diverse Recruitment Group will not be required to tell individuals about the personal data breach where:

- Diverse Recruitment Group has implemented appropriate technical and organisational protection measures to the personal data affected by the breach, in particular to make the personal data unintelligible to any person who is not authorised to access it, such as encryption.
- Diverse Recruitment Group has taken subsequent measures which ensure that the high risk to the rights and freedoms of the individual is no longer likely to materialise.
- It would involve disproportionate effort to tell all affected individuals. Instead, Diverse Recruitment Group shall make a public communication or similar measure to tell all affected individuals.

All individuals have the following rights under the Human Rights Act 1998 (HRA) and in dealing with personal data these should be respected at all times:

· Right to respect for private and family life (Article 8).
· Freedom of thought, belief and religion (Article 9).
· Freedom of expression (Article 10).
· Freedom of assembly and association (Article 11).

· Protection from discrimination in respect of rights and freedoms under the HRA (Article 14).

If you have a complaint or suggestion about Diverse Recruitment Group's handling of personal data then please contact the person whose details are listed below:

· adding, amending or deleting personal data;

Callum Carscadden: callum@diverserec.co.uk

· responding to subject access requests/requests for rectification, erasure, restriction data portability, objection and automated decision making processes and profiling;

Callum Carscadden: callum@diverserec.co.uk

· reporting data breaches/dealing with complaints;

Callum Carscadden: callum@diverserec.co.uk

Alternatively you can contact the ICO directly on 0303 123 1113 or at https://ico.org.uk/global/contact-us/email/

a) The lawfulness of processing conditions for personal data are:

- Consent of the individual for one or more specific purposes.
- Processing is necessary for the performance of a contract with the individual or in order to take steps at the request of the individual to enter into a contract.
- Processing is necessary for compliance with a legal obligation that the controller is subject to.
- Processing is necessary to protect the vital interests of the individual or another person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.
- Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of personal data, in particular where the individual is a child.

b) The lawfulness of processing conditions for sensitive personal data are:

- Explicit consent of the individual for one or more specified purposes, unless reliance on consent is prohibited by EU or Member State law.
- Processing is necessary for carrying out data controller's obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual.
- Processing is necessary to protect the vital interests of the individual or another individual where the individual is physically or legally incapable of giving consent.
- In the course of its legitimate activities, processing is carried out with appropriate safeguards by a foundation, association or any other not-for-profit body, with a political, philosophical, religious or trade union aim and on condition that the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without the consent of the individual.
- Processing relates to personal data which are manifestly made public by the individual.
- Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
- Processing is necessary for reasons of substantial public interest on the basis of EU or Member State law which shall be proportionate to the aim pursued, respects the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the individual.
- Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee [NOTE 21], medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional and subject to the necessary conditions and safeguards.
- Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the individual, in particular professional secrecy.
- Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and

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provide for suitable and specific measures to safeguard fundamental rights and interests of the individual.

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Document Number	Title	Print Date
DRGCP15	QA & Safer Recruitment Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

QA & Safer Recruitment Policy

Policy Statement:

Diverse Recruitment Group aim to promote high standards in all areas, through a robust, thorough, and fair recruitment process, which meet the needs of all. We will guide and support our employees to develop a solid foundation of skills and knowledge that will prepare them for a full and exciting career in recruitment.

Our Aims

We will provide an environment where employees can learn and provide opportunities for training/development
We will promote ethical/safe recruitment policies with the aim of ensuring that vulnerable children and adults are protected.
We will constantly strive towards high standards in recruitment and always work in the best interests of our candidates and their service users.

Scope:

This policy outlines the process for Quality Assurance and Safer Recruitment, it details best practice and ensures that operationally we are in line with business rules and legislation.

The QA and Safer recruitment policy consider all parties involved with the assessment of a candidate's suitability for work, key stake holders are defined as:

- Employees
- Management
- External Auditors
- External Clients
- Insurance Providers

The policy shall be reviewed and maintained in line with advice supplied by Government Bodies, Framework Organisation, and specific client agreements.

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SAFER RECRUITMENT POLICY FOR NHS CLIENTS

INTRODUCTION

This policy has been developed to embed safer recruitment practices and procedures throughout and to support the creation of a safer culture by reinforcing the safeguarding and well-being of vulnerable adults, children, and young people. This policy complies with guidance outlined in 'Safeguarding Children and Safer Recruitment in Education-January 2007' and dealing with allegations of abuse against staff and volunteers.

his policy reinforces the conduct outlined in 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' as well as the Companies whistle blowing policy all staff are expected to be familiar with.

This policy is an essential element in creating and maintaining a safe and supportive environment for all employees, temporary staff and categories of agency staff and aims to ensure both safe and fair recruitment and selection of all staff by:

- attracting the best possible candidates to vacancies
- deterring prospective candidates who are unsuitable from applying for vacancies
- identifying and rejecting those candidates who are unsuitable to work with vulnerable people

Diverse Recruitment Group is committed to equality and diversity and encourages applicants from all backgrounds. Diverse Recruitment Group commits to using disciplinary procedures to deal effectively with those employees who fail to comply with internal policies and procedures regarding equality and safeguarding.

As a recruitment business we are under a duty to refer any allegation of abuse against a temporary agency worker to the Local Authority Designated Officer within one working day of the allegation being made (in line with our Safeguarding Policy). A referral will be made if a member of internal staff to temporary agency worker has:

- behaved in a way that has harmed, or may have harmed a vulnerable person
- possibly committed a criminal offence against or related to a vulnerable person
- behaved towards a vulnerable person in a way that indicates he or she will pose a risk of harm if they work regularly or closely with vulnerable people

As a recruitment business we are under a duty to refer to the Disclosure and Barring Service (DBS), any member of agency staff who, following disciplinary proceedings, is dismissed because of misconduct towards a vulnerable person and we may refer any concerns we have before the completion of this process.

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ROLES & RESPONSIBILITIES

The Senior Managers at Diverse Recruitment Group will:

- ensure the company has effective policies and procedures in place for the safe and fair
- recruitment and selection of both internal and agency staff in accordance with legal requirements
- monitor the company's compliance with them
- ensure that all staff have completed safer recruitment training

Individual staff will:

- ensure that the company operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance
- ensure that all appropriate checks have been carried out on temporary staff who are placed with our clients
- monitor our agency staff's compliance with this document
- promote the safety and well-being of vulnerable people at every stage of this process

INVITING APPLICATIONS

All advertisements for posts of regulated activity will include the following statement.

"Diverse Recruitment Group is committed to safeguarding vulnerable people. All post holders are subject to appropriate vetting procedures and a satisfactory Disclosure and Barring Service Enhanced check".

All applicants will receive a pack containing the following information after initial screening:

- Job description and person specification
- Location of the temporary assignment
- Pay rate
- Duration of assignment

Prospective applicants must complete, in full, and return a signed application form. Along with the necessary compliance and reference information. Incomplete application forms will be returned to the applicant and candidates will not be progressed for temporary roles until such information is provided in full.

SHORT LISTING AND REFERENCES

Candidates will be short listed against the person specification for the post.

Two references, one of which must be from the applicant's current/most recent employer, will be taken up before the selection stage so that any discrepancies may be probed during this stage of the procedure.

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References will be sought directly from the referee, and where necessary, will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Where necessary, previous employers who have not been named as referees may be contacted to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Referees will be asked specific questions about the following:

The candidate's suitability to work with vulnerable people
Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of vulnerable people
The candidate's suitability for the post

Reference requests will include the following:
Suitability of written work and assessments
Sickness record
Attendance record
Disciplinary record

All appointments are subject to satisfactory references, vetting procedures and DBS clearance.

INVITATION TO INTERVIEW

Candidates called to interview will receive:

An email confirming the interview and any other selection techniques
Details of the interview day including details of the panel members
Further copy of the person specification
Details of any tasks to be undertaken as part of the interview process
The opportunity to discuss the process prior to the interview

THE SELECTION PROCESS

Selection techniques will be determined by the nature and duties of the post, but all vacancies will require an interview of short-listed candidates.

where possible Interviews should always be face-to-face. However, Skype or other suitable technology may also be used.

Candidates will be required to:

Explain any gaps in employment
Explain satisfactorily any anomalies or discrepancies in the information available to the panel
Declare any information that is likely to appear on the DBS disclosure
Demonstrate their ability to safeguard and protect the welfare of vulnerable people.

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EMPLOYMENT CHECKS

An offer of appointment will be conditional, and all successful candidates will be required to:

- Provide proof of identity
- Complete an enhanced DBS application and receive satisfactory clearance
- Provide proof of professional status
- Provide actual certificates of qualifications
- Complete a confidential health questionnaire
- Provide proof of eligibility to live and work in the UK

All checks will be:

- Confirmed in writing
- Documented and retained on the personnel file
- Recorded on the companies CRM
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Employment will only commence subject to all checks and procedures being satisfactorily completed.

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Document Number	Title	Print Date
DRGCP01	Modern Slavery Statement	
		Date Prepared
V2	Callum Carscadden	23/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

Modern Slavery Statement

This statement is made as part of Diverse Recruitment Group's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Diverse Recruitment Group operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year April 2021 to April 2022. It was approved by The Board of Directors on 26th February 2021.

Callum Carscadden
C Carscadden
Executive Director

1. Our Business

Diverse Recruitment Group is a limited company operating in the recruitment sector. We provide Temporary, Interim, Permanent and Consultancy services into the recruitment industry, within the Public Sector, Social Care, Healthcare, Veterinary, Consultancy, Infrastructure & Construction sectors. Diverse Recruitment Group is an independent business.

1.1. Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are met by us and are undergo a rigorous vetting process by our staff prior to commencing employment. All of the temporary workers we supply are identified by our staff. Some of these work-seekers may choose to operate through their own limited companies.

The hiring companies that we work with are predominantly Local Authorities, NHS Trusts, Charitable Organisations, Independent Fostering Companies or private

companies located across the UK. The permanent/temporary staff that we supply live are sourced from within the UK.

1.2 . Other relationships

As part of our business, we also work with the following organisations:

- The Recruitment and Employment Confederation
- Association of Professional Staffing Companies
- Freelancer & Contractor Services Association (FCSA)
- Professional Passport

2. Our Policies

Diverse Recruitment Group has a modern slavery policy available on our website. Please visit: www.diverserecruitmentgroup.co.uk

In addition, Diverse Recruitment Group has the following policies which incorporate ethical standards for our staff. These are:

- Anti-Bribery Corporate Policy
- Data Protection (GDPR compliant) Policy
- Whistleblowing Policy
- QA and Safer Recruitment Policy
- Safeguarding Policy
- Compliants Policy
- Employee Handbook

2.1 . Policy development and review

Diverse Recruitment Group's policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our regulatory bodies. We review our policies annually or as needed to adapt to changes.

3. Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers. We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

4. Our Performance

As part of monitoring the performance of Diverse Recruitment Group, we track the following general key performance indicators:

- Usage of Umbrella Company solutions by temporary workers
- The number of referrals from a single source (business or personal)
- Requests for specific staff from a single authority

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the percentage of workers supplied from audited jobs boards
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

5. Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed regularly.

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Document Number	Title	Print Date
DRGRP15	Managing Allegations Policy	
		Date Prepared
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Standard	Approved By	Date Approved

Managing Allegations Policy

Diverse Recruitment Group follow stringent quality guidelines and takes every reasonable precaution to ensure that all candidates deployed to its Clients maintain the highest standards of professional and personal conduct.

Our stringent vetting procedures ensure that any candidate found to have a history of unacceptable conduct or practice, will not be offered a place on our register. Through our continuous and active monitoring, any difficulties our candidates may be experiencing are promptly highlighted, enabling us to step in and pre-empt potential issues.

However, despite our stringent quality procedures, and the vulnerable position that Candidates often find themselves in, occasionally difficult or sensitive issues do arise. Both client and candidate feedback is essential to us in order to ensure we continually work towards improving our service.

In the event of more serious allegations, for example:

- Physical Assault
- Verbal Offence
- Discrimination

Social Personnel has set out the following procedures which **MUST** be adopted by staff when dealing with incidents of this nature as well as the responsibilities of Diverse Recruitment Group with regard to Child Protection/Safeguarding issues.

Any candidate who has a complaint made against them is automatically suspended and not placed elsewhere until the matter has been fully resolved.

Procedure:

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Diverse Recruitment Group has a central Incident File in which staff can record the details of any allegation or complaint against a candidate, together with a detailed account of all actions taken during any investigation. Copies of statements and all correspondence are kept as well as a chronological sequence of events.

Following the receipt of a complaint or report of an incident, we would explain that we have certain procedures for handling incidents and that we will be happy to set these in motion if the client wishes. In deciding how far to pursue the investigation, we are usually guided by the client's attitude to the incident.

If the incident is considered by the client serious enough to warrant further investigation, we adopt the following procedure:

Stage 1.

- Does the client wish to terminate the arrangement for the candidate's services?
- Do they want to terminate this arrangement Immediately?
- Does the client wish to retain the candidate's services pending investigation?
- Does the client require a replacement candidate?

Stage 2.

- Inform the client that we will conduct our own investigation of the incident by interviewing the candidate in the presence of their union representative/Colleague/Independent representative (We always advise the candidate that we have been informed of an incident and ask for their version of events, prior to telling them what has been stated by the client).
- Prior to such investigation, we request a written statement from the client, together with any supporting statements outlining the nature of the allegations.
- Following such investigation, we will record the response of the candidate and report back to the client.

Stage 3.
Following receipt of a written report from the client, we write to the candidate concerned and ask him/her to attend a meeting at our office. We advise them that it would be in their own interest to be accompanied by a representative.

Stage 4.
We write to the client informing them of the steps we have taken.

Stage 5.
We arrange a meeting and ensure that 2 representatives (one to conduct the investigation and the other to act as a witness and note taker) are present:

- Introduce parties to each other
- State that this is not to be regarded as a disciplinary procedure, merely an investigation of a formal allegation which we have received

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- The details of the allegation are presented at this point (copies are handed out only with prior consent from the client) and the candidate is invited to comment.
- The candidate's comments are noted and read back to them for confirmation that we have noted the response accurately. If, however, the candidate denies the charge, we simply note his/her comments and say that we will report these back to the client. We inform them that following this meeting, the client may or may not wish to pursue matters and that we will keep them informed of further developments.

Stage 6.

Following the meeting we will then write to the client to report on the outcome of our investigation. The client is advised that if the matter cannot be resolved and that the seriousness of the allegation warrants further action, to adopt whatever measures would normally come into force to meet legal requirements.

During the course of any such proceedings a senior representative of Social Personnel will be available to attend, if requested, any meetings to share information and co-operate fully with the Authority pending a final decision. All internal paperwork will also be made available.

Following the outcome of any such investigation, we are guided by the Authority's decision when considering the candidate's future as a member of our register.

Post-Registration:

If Social Personnel receives information following registration of a candidate which may be relevant to his/her suitability for a post with a client, we would first assess its severity. If it is apparent that the information is of a serious nature and could be a child protection issue, then we would notify all relevant parties immediately and implement the following procedure:

• Managers will immediately make their Director aware of any candidate having serious allegations made against them.
• Any candidate who presents false documentation or has a serious allegation made against them is referred to The Health and Care Professions Council (HCPC). This is the regulatory body responsible for investigating allegations of serious misconduct against Social Workers in England.
• If an allegation is of a less serious nature and does not require referring to the above department, we will suspend the candidate and require them to attend an interview with Social Personnel about the incident as previously described.

How are cases referred?

The client or Diverse Recruitment Group can refer a case to the HCPC, upon which they will conduct an investigation and if appropriate, a panel hearing to decide whether the social worker should continue in practice, be admonished or removed from the register entirely.

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Summary:

It is Diverse Recruitment Group's utmost priority that incidents and complaints are dealt with in a fair manner.

If at any time a complainant is not satisfied with the treatment of their complaint, then Diverse Recruitment Group has a clear line management structure for the complaint to be referred to a more senior level.

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Document Number	Title	Print Date
DRGCP11	Safeguarding Policy	
		Date Prepared
V2	Callum Carscadden	24/08/2022
Effective Date	Reviewed By	Date Reviewed
Standard	Approved By	Date Approved

Safeguarding Policy

Safeguarding Officer: Fiona Nalwoga
Compliance Director
0754903237

Core safeguarding principles

Diverse Recruitment Group acknowledges the duty of care to safeguard and promote the welfare of children and vulnerable adults and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All children and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse.

This policy applies to all internal staff at Diverse Recruitment Group as well temporary workers, candidates, and contractors. Diverse Recruitment Group is fully compliant with Keeping Children Safe in Education – September 2016. Diverse Recruitment Group is committed to ensuring their work is consistent with safeguarding and promoting the welfare of children and vulnerable adults. All candidates placed by Diverse Recruitment Group are expected to take all reasonable steps to ensure they are alert to possible child abuse and neglect, and to familiarise themselves with arrangements for safeguarding children in the organisations where they are placed.

Safeguarding Aims and Objectives

This policy is designed to meet the above principles by ensuring that:

- Those who are known to be unsuitable do not gain access to children or vulnerable adults.
- Those who become unsuitable are detected at the earliest stage and prevented from continuing to work with children and vulnerable adults.
- Those who intend to do harm are prevented at every possible stage from entering the workforce.
- It is as simple as possible for an individual to report that they are being harmed or feel at risk of being harmed.
- Clear procedures will be implemented where child protection issues arise.
- Effective management is provided for staff, temporary workers, candidates and contractors through support and training.
- All necessary checks are made on staff, temporary workers, candidates, and contractors.
- Diverse Recruitment Group stays up to date with developments on safeguarding best practice, reporting, and auditing our safeguarding activities annually and reviewing and updating our policies and practices every 12 months.

- Those who are identified as being at risk of abuse are afforded every practicable protection by Diverse Recruitment Group and our subcontractors/partners.
- Diverse Recruitment Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority.
- Those we discover are being abused are afforded the relevant protection and assistance by the relevant bodies as soon as practicably possible.
- At an individual and collective level, employees are involved in ensuring Safeguarding is embedded across our services to ensure a whole organisation approach so that individuals are adequately covered by this policy

Recruitment and Selection Process

Diverse Recruitment Group are also committed to protecting children and vulnerable adults through a careful recruitment and selection process, a whistle blowing policy and guidance on appropriate behaviour. Diverse Recruitment Group's rigorous procedures ensure that any candidate found to have a history of unacceptable conduct or practice, will not be placed.

As part of our safeguarding policy Diverse Recruitment Group will:

- promote and prioritise the safety and wellbeing of children and vulnerable adults.
- ensure all candidates undergo a full compliance process.
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to children and vulnerable adults.
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.
- ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored.
- prevent the engagement of unsuitable individuals.
- ensure robust safeguarding arrangements and procedures are in operation.

This policy will be widely promoted and is mandatory for everyone involved in Diverse Recruitment Group. Failure to comply with this policy and the company's safeguarding procedures will be addressed without delay and may result in disciplinary action.

Legislation

Every effort has been taken to ensure the revisions made in this review process are in line with the relevant legislation, including:

- Working together to safeguard Children 2015
- The Children Act 1989
- The Adoption and Children Act 2002:
- The Children act 2004
- Rehabilitation of Offenders Act 1974
- Keeping Children Safe in Education (2016)
- Disqualification under the Childcare Act 2006 (2015)
- Counter Terrorism and Security Act 2015 (inc. the 'Prevent Duty')
- Disclosure and Barring Service (DBS) Code of Practice
- Protection of Freedoms Act 2012
- National Minimum Standards under Section 23(1) of the Care Standards Act.
- Department of Health Protection of Vulnerable Adults Scheme
- Independent Safeguarding Authority (ISA) Scheme

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- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013
- Health and Social Care Act 2008
- Modern Slavery Act 2015
- Mental Capacity Act 2005
- Human Rights Act 1998

Definitions

'Safeguarding' - is about embedding practices throughout the organisation to ensure the protection of children and/or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

'Abuse' - Keeping children safe in education September 2016 defines abuse and neglect and gives four clear categories of abuse as:

- Physical abuse; Sexual abuse; Emotional abuse and Neglect

'Child' – is used to define anyone under the age of 18 (Children Act, 1989).

'Young people' are children who are 16 to 17 years old.

'Age of consent' (the legal age to have sex) in the UK is 16 years old*.

'Vulnerable adult' is a person who has attained the age of 18 and for a range of reasons may be, either temporarily or permanently and in different situations, potentially vulnerable.

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

Diverse Recruitment Group conducts the following safeguarding checks and has sight of all original documents before supplying a candidate into any establishment.

- Face to face interview
- Proof of identify
- 5 years written professional references
- Enhanced DBS disclosure
- Proof of address using DBS list of acceptable documents
- Proof of National Insurance number
- Entitlement to work in the UK
- Full 5-year employment history with no gaps
- Original qualifications
- Visa requirements (where applicable)
- Overseas police check (where applicable)

All candidates are required to apply for an Enhanced DBS certificate through Diverse Recruitment Group. This certificate is renewed every 12 months. The candidates may apply for the DBS Update Service. In this case an online check will be done every 12 months.

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Responsibilities

All staff, temporary workers, candidates, and contractors placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff, temporary workers, candidates, and contractors to promote good practice by being an excellent role model; contributing to discussions about safeguarding; and to positively involving people in developing safe practices. All staff, temporary workers, candidates, and contractors should:

- Read, understand, accept, and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries.
- Report any concerns or disclosures related to the protection and safety of children and vulnerable adults.
- Undertake mandatory child protection and vulnerable adult training and awareness sessions where provided.
- Help educate learners, including children, young people, and adults in matters of keeping safe, and acting as a good role model.

All staff, temporary workers, candidates, and contractors working through Diverse Recruitment Group are expected to keep children safe by contributing to:

- Providing a safe learning environment.
- Identifying children who are suffering or likely to suffer significant harm and taking the appropriate action with the aim of making sure they are kept safe at home and in the education setting.
- Making a note and reporting to the designated member of staff any major incident, or signals which give cause for suspicion or concern. It is the candidate's responsibility to adhere to the specific guidelines set out in each Clients own safeguarding policy.
- Under no circumstance should a candidate intervene on his or her own.

Duty to make a referral to the DBS

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or vulnerable adult, there is a legal duty on Diverse Recruitment Group to report that person to the Disclosure and Barring Service using their guidance. Available here https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs. The DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

The Diverse Recruitment Group will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a child's or vulnerable adult's welfare or who believe that a child or vulnerable adult may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

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Whistle Blowing

All staff, temporary workers, candidates, and contractors should bring matters of concern to the attention of Diverse Recruitment Group and concerns can be reported directly using our Whistleblowing Policy. Once you have shared your concerns you should submit them in writing giving names, date, and places where appropriate. No action will be taken against you if the concern proves to be unfounded but was raised in good faith. All staff, workers, candidates, and contractors should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Include concern raised and not acted upon by the safeguarding leads. Allegations that are made frivolously, maliciously or for personal gain will lead to termination.

Once a disclosure against anyone has been made, Diverse Recruitment Group will consider whether the allegation should be escalated and who it should be directed too. Only after notifying and consulting with the relevant individuals (or, in the most serious cases, the police) will Diverse Recruitment Group undertake an investigation.

Summary:

All staff, temporary workers, candidates, and contractors must be aware that they have a professional duty to share information with other recruitment firms to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by Diverse Recruitment Group.

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Policy Acknowledgement

Please sign this page and send a copy to your hiring manager, or alternatively, print off the last page and bring it in on your first day.

I have read and understood the above policies and will implement the recommended protocol when needed.

Full Name_____

Signed_____