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## HEALTH, SAFETY, ENVIRONMENT AND QUALITY POLICY STATEMENT

Mane Contract Services Ltd is dedicated to operating an Integrated Management System (IMS) to meet the requirements of BS EN ISO 9001:2015, BS EN ISO 14001:2015, BS EN ISO 45001:2018 and PAS 99:2012 in order to demonstrate our commitment to Health, Safety, Environment and Quality to all our stakeholders.

To facilitate continual improvement, measurable objectives and targets shall be set at relevant functions and levels of the organisation.

The defined organisation structure, specified responsibilities and the provision of adequate resources, shall allow for the effective implementation of this Policy and the IMS throughout the organisation.

We are committed to:

- Identifying, assessing and controlling HSEQ risks arising from our activities, products and services
- Providing safe and healthy working conditions for the prevention of work-related injury and ill health
- Compliance with identified legal and other requirements, including customer requirements, industry standards and best practice, in order to minimise risk and to prevent pollution to the environment and injury and ill health to persons
- Eliminating hazards in our working environment
- Encouraging consultation and participation of workers and their representatives
- Providing all necessary resources to ensure we comply with health, safety, environmental, quality and all other legal and other requirements
- Ensuring personnel acting for, or on behalf of the company, are competent to fulfil their duties to all relevant standards
- Ensuring full co-operation and support from our employees in contributing to the effective implementation of the IMS
- Co-operation and co-ordination with relevant stakeholders, including clients, contractors and enforcing authorities etc
- Evaluating compliance with identified legal and other requirements through pro-active and re-active monitoring and measuring activities
- Effective analysis of data arising from monitoring and measuring activities to ensure customer satisfaction and conformity with identified requirements and to measure performance and the effectiveness of the IMS.

### Responsibilities

Our Executive Chairman, Luigi Pacelli, has overall responsibility for health, safety, environment and quality. Day to day responsibilities for ensuring this policy is implemented lie with our HR & Compliance Manager, Emma Sullivan.

To ensure health and safety standards are maintained the following people have responsibility in the following areas:

First aid – Cecilia Englishby, Donna Murphy  
Mental Health First aid – Emma Sullivan, Donna Murphy  
Fire warden – Gita Gajjar, Cecilia Englishby  
Site inspection – Emma Sullivan

All employees should co-operate with supervisors and managers on health and safety, environmental and quality matters, taking reasonable care of their own health and safety and the working environment; and report all health and safety, environmental and quality concerns to an appropriate person.

## **Practical Arrangements**

### *Risk Assessment*

- We will complete relevant risk and workstation assessments and take action to reduce risk/impact.
- We will review risk assessments at least annually and when working habits or conditions change.

### *Training*

- We will induct all staff and provide appropriate training on health and safety, environmental and quality procedures.
- We will provide personal protective equipment where needed.

### *Wellbeing*

- We will implement an employee wellbeing programme giving employees access to services to support their mental and physical health.
- We will appoint a qualified mental health first aider and provide mental health awareness for our management team.

### *Driving*

- We will ensure that all cars on the Company fleet are roadworthy and all drivers are competent to drive.
- We will provide guidance on Driving & Vehicles for all employees who undertake business travel in our Employee Manual.

### *Consultation*

- We will consult with staff on matters of health and safety, environmental and quality through our employee forum and in other ways.
- We will act upon concerns escalated and ensure that we implement improvements without delay.

### *Evacuation*

- We will make sure that all staff and visitors are aware of the emergency evacuation process.
- We will ensure that all escape routes are well signed and kept clear at all times.
- Evacuation plans are tested from time to time and updated if necessary.

## **Contractor Liaison**

The Company shall share information on risk(s) with other organisations, such that a co-ordinated approach to implementing risk control measures can be achieved.

The Company shall ensure that arrangements include:

- informing other employers of any risks to their employees from work to be carried out by The Company and any necessary controls to be introduced;
- make method statements / work package plans / task briefings available to affected parties, where identified;
- co-operate with other employers working in the same area regarding the implementation of control measures for the adequate overall control of risk;
- providing access to: premises, worksites and employees for the purpose of inspections and audit(s) by employers who may be affected by The Company operational activities.

## **Employee Competence and Training**

The company shall ensure that all new employees are made aware of the Company's commitment to HSEQ as part of their general induction training.

All new employees will be assessed for competency skills and training prior to employment and where applicable will be recorded on the competency and skill matrix.

All training needs will be identified through regular work appraisals. The company is committed to using industry approved training providers.

The company will ensure that this policy is communicated and available to all relevant stakeholders as appropriate.

This policy and the IMS shall be reviewed for effectiveness and suitability at least annually as part of the management review process.

This statement represents my commitment on behalf of the company.

## **Safe Plant & Equipment**

All office equipment is routinely PAT tested and visual inspections are conducted upon the quarterly office inspection.

Plant is provided, inspected and managed by the client on site.

## **Hazardous Substances**

Hazardous substances are limited within our working environment and appropriate controls put in place to assess the significance of the hazard, review safety data sheet advice, implement training, supervision and relevant PPE or other equipment. A COSHH index and assessment is maintained and communicated to relevant parties.

## **Information, Instruction and Supervision**

The organisation communicates on health and safety matters with its workforce, using a number of methods. All employees are given a full induction on joining and this includes information on the office safety and welfare arrangements. Employees are briefed in regards to any safety issues and changes in procedures or arrangements. Any safety concerns can be addressed with the Compliance Manager or the HR department at any time, and our Employee Representatives act as a point of escalation for any safety matters to be discussed and consulted on at our monthly Employee Forum meetings.

All job descriptions define the hierarchy for management, supervision, subordinates and deputising.

## **Accidents and Work Related Ill Health**

Where an accident, incident, close call or near-miss occurs on site we request the co-operation of our client in providing us details so that we can monitor safety issues. We will consult and communicate any relevant information and warnings to our workforce, and put in place additional control measures where appropriate.

Any concerns that arise over safety or competence of the workforce will be immediately addressed, to prevent or reduce accidents, incidents and ill-health.

**Asbestos**

Our head office location has been surveyed for asbestos and relevant documentation retained that there is no risk.

Mane requests all clients provide the relevant asbestos survey and site risk assessment to evidence control measures implemented to deal with sites where asbestos risk is present. Where a risk of asbestos exists Mane will provide workers who have the relevant training in asbestos awareness. All certificates of training and competence are verified and retained on the workers file.

**Welfare Facilities**

The organisation provides welfare facilities for its workforce, and these are inspected frequently to ensure that arrangements are adequate and in good condition. Arrangements include hygienic toilet facilities, comfortable area for rest and relaxation, and clean drinking water & other refreshments.

**Construction (Design and Management) Regulations 2015**

In relation to the Construction (Design and Management) Regulations 2007, Mane discharges its duties under the regulations by checking the competence of all contractors supplied, providing training and supplying relevant safety information to our contractors, ensuring our client provides adequate welfare facilities and undertaking monitoring activities, such as site inspections.

**Signed****Position**

CEO

Date: 1 September 2021

## HEALTH & SAFETY RULES AND RESPONSIBILITIES

### TEMPORARY WORKERS

It is the responsibility and legal requirement of every temporary worker to co-operate with the company to ensure a successful implementation of the Health and Safety Policy and Objectives as required by the Health and Safety at Work Act 1974 and the Management of Health and Safety Regulations 1999.

All temporary workers will receive necessary information on health, safety and welfare so as to maintain a safe workplace.

All persons having an effect upon health and safety within the company have a duty both to themselves and others to ensure that they act at all times, in a manner which does not cause or ignore unacceptable level of risks.

It is the temporary worker's responsibility to carry competency (and their Sentinel card at all times when working on a client work (Rail Managed Infrastructure)).

Operatives engaged in work on the Rail's Managed Infrastructure wearing contact lenses, must always carry their prescription glasses when or near the line in accordance with the requirements of RT3170 A Guide to Personal Track Safety.



It is the temporary worker responsibility to inform the employer of any change in medical circumstances.

Temporary workers are reminded of the following requirements:

- a) If they consult a medical practitioner or pharmacist and medication is prescribed or advised, they must advise the medical practitioner or pharmacist of the nature of their work so that appropriate information on possible side-effects and their effect on safety and efficiency at work can be given.
- b) If they are in any doubt as to their fitness to carry out their duties while on medication, they must consult their supervisor or manager who will obtain advice from the Occupational Health Care Services if required.

Managers or Supervisors will:

- a) Record details of the medication (name/dosage/period of time that the medication will be taken).
- b) Obtain advice from the Occupational Health Care Service, as to the individuals ability to carry out normal duties whilst taking the medication and guidance on the type of work on which the person can be safely employed.
- c) Not allow the individual to undertake safety critical duties until the Occupational Health Care Service advice has been given.

## **RULES**

This section details the rules and standards which relate to all temporary workers of Mane whilst at work. It is the responsibility of all temporary workers to follow these rules and to behave in a safe manner whilst at work.

A deliberate disregard of these rules and procedures will be considered as a disciplinary offence, which could lead to dismissal.

Failure to comply with health and safety legislation is a criminal offence and could result in prosecution by the enforcing authority.

## **WORKING PRACTICES**

- a) No machine or equipment is to be operated by any person, unless they have been authorised to do so and have received appropriate training/qualification in its operation.
- b) Any faults, defects, including damage or mal-function in any item of machinery, equipment or tool must be reported immediately to the Manager / Supervisor.
- c) All notices and warning signs displayed in the workplace are to be read and you are to ensure that you understand and obey all instructions.
- d) All safety equipment and facilities (*e.g. fire extinguishers and first aid equipment*), provided in the interests of health, safety and welfare are not be misused or willfully damaged.
- e) All emergency procedures relevant to your work area are to be obeyed.
- f) All injuries received at work must be reported on the day of accident to the Manager/Supervisor.

## **GROSS MISCONDUCT**

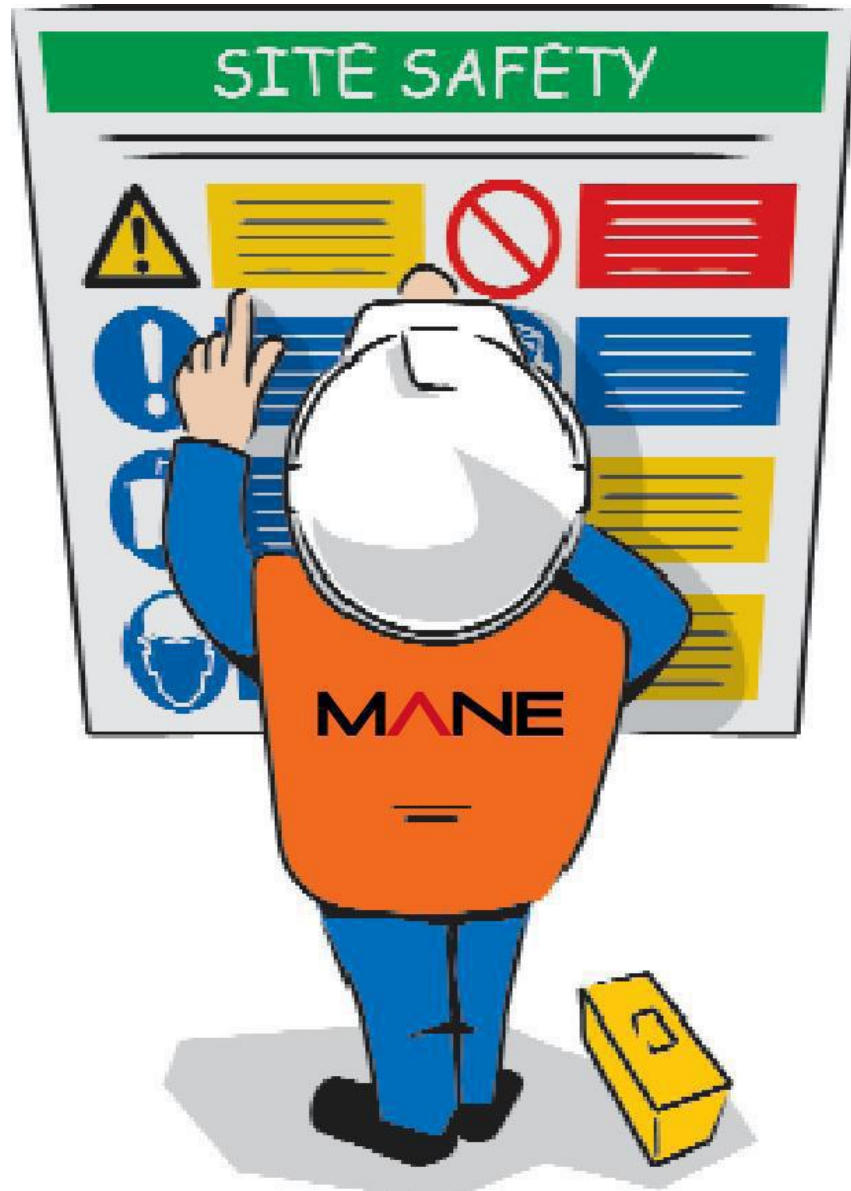
Any temporary worker found to have acted in any of the following ways may, under the Company disciplinary procedure be liable to summary dismissal: -

- a) Willful breaching the safety rules or safety policy
- b) Operating any machine, plant or equipment without authority
- c) Misusing items provided for first aid
- d) Recklessly interfering with or misusing anything provided in the interest of health, safety or welfare at work.
- e) Defacing or removing notices, signs, labels or any other warning device
- f) Smoking in designated "No Smoking" areas



- g) Making false declarations or interfering with evidence following an accident or dangerous occurrence
- h) Not conforming to site rules, e.g. failure to wear hard hats, not wearing safety footwear.

*Please note that this list is not exhaustive.*



## MOBILE PHONE POLICY

This policy is to ensure that all employees of Mane Contract Services and those working within Network Rail's Managed infrastructure are aware of the distractions and safety risks of carrying and using a mobile phone.

### MOBILE PHONE SAFETY

- If you are calling a mobile phone, always ask if it is safe for the other person to talk and offer to call back if it is not
- Always switch off your mobile phone if there is a known risk on an explosive atmosphere such as when refueling equipment or vehicles with petrol.
- Do not use a mobile phone within 3 metres of location cabinets or exposed circuit boards.

### WHILST UNDERTAKING SAFETY CRITICAL WORK AND/OR WHEN ON OR NEAR THE LINE

- A mobile phone must only be used when standing still in a position of safety
- Do not use a mobile phone whilst walking on or near the line Always switch off your phone if you are acting as a lookout
- Site wardens must not make or receive calls while performing their duties Personal mobile phones must always be switched off
- In an emergency, any mobile phone may be used – e.g. to call the signaler, electrical control operator or the emergency services
- Train crew must abide by these instructions whilst on or near the line

### WHEN DRIVING A TRAIN OR ON TRACK PLANT

- The driver must not use a mobile phone whilst the train is moving Incoming messages should be recorded on voicemail and calls returned at a convenient time, whilst the train is stationary Drivers may use a mobile phone to report a fault with the cab radio to a signaler
- In an emergency, any mobile phone may be used – e.g. to call the signaler, electrical control operator or the emergency services
- Drivers should ask anyone entering the cab to switch off their mobile phone

### WHILST DRIVING A ROAD VEHICLE

- It is an offence not to be in full control of a road vehicle you are driving
- The driver should not use a hand held mobile phone whilst the vehicle is moving, even with a hands free kit
- The use of fitted hands free speaker phones should be kept to a minimum Stop the vehicle in a safe place before making a call
- Voicemail should be used if it is essential for a driver to be contacted. They should stop regularly to check messages and return calls
- Drivers should ask passengers to switch off their mobile phones if they are distracting

Signed



Position CEO

1 September 2021



## ACCIDENT & INCIDENT POLICY

Mane Contract Services recognise our responsibilities under the Management of Health & Safety at Work Regulations 1999 to provide a safe place and systems of work to all employees, visitors and contractors.

We do accept however that there are occasions where incident or loss may not be reasonably foreseeable due to novel or unique circumstances resulting in personal injury, damage to property or a dangerous occurrence. In order to meet circumstances where proactive processes in the pursuance of an ultimately safe workplace have not prevented incident, Mane will:

- Implement the requirements of the Reporting of Incident, Diseases and Dangerous Occurrences Regulations;
- investigate any accidents, incidents, close calls or near-misses which occur on Mane's premises, to include identification of root cause and preventative/corrective action;
- ensure any accidents, incidents, close calls or near-misses which occur on a Client's site are recorded and root cause identified for any preventative/correction action to be implemented, where appropriate;
- provide necessary and suitable PPE which is compatible with other equipment, the user and the task especially those of a safety critical nature;
- provide information, training and advice on the use, storage, cleaning, maintenance, disposal and replacement of PPE provided;
- monitor the continued suitability, use, storage, cleaning, maintenance, disposal and replacement of PPE issued;
- inspect any visitor PPE for suitability and provide temporary replacement if unsuitable;
- ensure all PPE meets the specific requirements of Network Rail and Railway Group Standards; and
- provide replacement PPE as required.

The arrangements in place to implement this policy form part of the company's day to day operational procedures as defined under procedure MQP104 Operational Control and as such are reviewed on a continuous basis. A formal review will take place on an annual basis. Where opportunities for improvement in the management of PPE or safety problems are identified they will be tackled promptly, and with sufficient resources, to ensure that they are dealt with adequately.

The implementation of this policy will be monitored at various levels throughout the company in order to ensure compliance with its objectives.

**Signed**



**Position**

CEO

Date: 1 September 2021



## ACCIDENT & INCIDENT REPORTING PROCEDURE

It is the responsibility of all employees to ensure that all accidents, however minor, are reported in accordance with Company procedures and NR/L2/INV/002 Accident & Incident Reporting and Investigation standard.

- All dangerous occurrences and potential hazards should be reported immediately to your immediate supervisor so that necessary actions can be taken to reduce risks.
- All personnel will report all accidents no matter how minor, including close calls, near misses and occupational ill health to their supervisors immediately.
- Please make sure all accidents are reported to the company promptly. Ensure
- that the first aider treats injury and appropriate actions are taken.
- Ensure all relevant information is recorded in the Client Accident book at the location of work. All incidents/accidents reported to Mane will be initially investigated. An Accident, Incident, Close Call or Near-Miss report will be raised.
- All reports, interviews and witness statements will be recorded in writing and held on file at Mane office
- All incident or accident reportable under RIDDOR will be reported accordingly to the HSE (Health & Safety Executive).

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require that certain accidents are reported to the HSE by the quickest possible means either by their website or phone.

These are

- Death
- Major injury
- Member of public taken to hospital
- Dangerous occurrence



Regardless of how minor an injury may appear, we are required by law to record it. Injuries resulting from accidents from work which cause incapacity for more than three days (not including the day of the event, but includes non-working days) must be reported to the HSE at <http://www.hse.gov.uk/riddor> within ten working days. Serious accidents, including where death of a person is involved, will be notified to the HSE, the Health and Safety Manager and the Managing Director immediately by the quickest practicable means (normally by phone). This must be followed up in writing within ten working days.

If something happens which does not result in a reportable injury, but clearly could have done, then it may be a dangerous occurrence. The procedures for reporting dangerous occurrences are the same as that for serious accidents.

## ALCOHOL & DRUGS POLICY STATEMENT

This Alcohol and Drugs Policy Statement is applicable to all Mane Contract personnel. The Company shall take all reasonable steps to ensure that all relevant personnel are made aware of this Policy statement.

Mane Contract Work Instruction MQW209 Alcohol and Drugs defines the process and responsibilities for ensuring compliance with Railway Industry Standard RIS-8070-TOM, Network Rail Company Procedure NR/L1/OHS/051 and preventing, so far as is reasonably practicable, offences under the Transport and Works Act 1992. Control measures include:

- Screening for alcohol and drugs prior to employment on Rail Infrastructure
- An annual, unannounced, random screening of relevant personnel (5% of our Sentinel Primary Sponsored staff between the duration of our RISQS audits)
- Arrangements with a Rail Infrastructure approved provider for “for cause” screening
- Reporting of results to Sentinel
- Review of the Alcohol and Drugs Policy at least annually

### Persons under Mane’s control shall:-

- Not come to work in an unfit state through drugs or alcohol
- Not consume alcohol at work
- Not use, possess or supply a drug of abuse at work or on Rail Infrastructure premises
- Not discontinue with an agreed course of treatment for an alcohol or drugs related problem without good reason
- Undergo testing for Alcohol and drugs when requested to do so

When being prescribed medication relevant personnel shall notify their Doctor of the nature of activities they are engaged in. They shall ensure their Supervisor/Line Manager are immediately notified of any prescribed or “over-the-counter” medication being taken that may affect or impair their safe performance.

Personnel that believe they have drugs or alcohol related problems and pro-actively raise the issue (i.e. not after being involved in an incident or being nominated for a test) shall be provided confidential support. However, other personnel in contravention of this Policy shall be subject to appropriate disciplinary action.



**Signed**

**Position** CEO

**Date** 1 September 2021



## ALCOHOL & DRUG SCREENING

It is Mane Contract Services policy and procedure that:

All new applicants are referred to a Network Rail approved Medical practitioner for a pre-employment alcohol & drugs screening providing a screen has not been performed in the last 12 months or if the applicant cannot provide evidence by way of an original Alcohol & Drugs certificate.



Personnel in safety critical posts and those transferring from a non-safety critical post to a safety critical post are screened for both alcohol & drugs.

Random sampling is undertaken once a year of at least 5% of the workforce involved with safety critical works. This will be undertaken through an approved medical practitioner. A representative number of personnel will be selected at random on a “first out of the hat” principle.

For cause sampling will be undertaken if a Mane employee is involved in a serious accident or incident and is directly implicated in the cause or if an individual’s behaviour leads to suspicion that they may be under the influence of drugs or alcohol, whilst undertaking safety critical work. This will be undertaken through the currently approved medical practitioner.

In case of for cause sampling as a result of suspicious behaviour, the individual will be removed from the work gang and put on temporary suspension pending the result of the screening. The company identification and Sentinel card will be withheld. The customer and Sentinel will be informed of the temporary suspension.

Should the result be negative, the customer and Sentinel will be informed of the result. The suspension will then be lifted.

**Positive results or failure to co-operate or provide the specimens will result in instant dismissal from Mane Contract Services Ltd and notification sent to Sentinel.**

## ALCOHOL & DRUG BRIEFING

Substances covered within the policy: Alcohol  
Illegal drugs  
Abuse of legal substances (such as solvents)  
Prescription and non prescription medicines  
Herbal remedies  
Alcohol and Drugs can affect:  
Co-ordination  
Reaction time  
Judging distance  
Short term memory  
Decision making



### Statistics:

22% of fatal road traffic accidents (RTAs) in the UK, the drivers have illegal drugs in their bloodstream

81% of clubbers had driven after recreational drug use, with many believing that cannabis had little or no impact on their driving skills...

#### The effects of Cannabis:

Cannabis is the most commonly traced drug in drivers, with over 800,000 drivers travelling under the influence of it every year in the UK.

Some people think that cannabis is a safer substitute<sup>4</sup> to drinking, but it can cause concentration to wander, which can affect reaction times.

In a study by the Transport Research Laboratory, people who drove a car at 66mph had a stopping distance of around 270ft, but after smoking Cannabis this increased on average by 15% to 310ft.

In a slalom test, those who had just smoked Cannabis knocked over 30% more cones.

#### The effects of Cocaine:

This is a psycho-stimulant that can lead to misjudging driving speed and stopping distances.

It can cause a distorted sense of light and sound AND a feeling of over-confidence.

#### The effects of Ecstasy:

A stimulant drug, with hallucinogenic properties, that can distort your sense of vision. Your concentration can be affected.

You may become over-confident and are more likely to take dangerous risks

#### The effects of Ketamine, LSD and magic mushrooms:

Drugs such as these with hallucinogenic properties can strongly influence the senses, so you may react to objects or sounds that aren't there.

Co-ordination skills are likely to be greatly affected, and you may experience anxiety and blurred vision.

#### The effects of Speed (amphetamines):

While Speed (amphetamines) might give you a sense of heightened alertness and confidence, they can be highly dangerous as they distort your perceptions and can make you feel anxious, prone to panic attacks and lose co-ordination.

#### You must not:

Come to work in an unfit state as a result of consuming alcohol or taking any drug.

Consume alcohol whilst at work, this includes such times as lunch breaks, business meetings and when on call.

Carry or supply any illegal drug or other drug of abuse in the workplace or while at work.

Discontinue an agreed course of treatment for a drug or alcohol related problem without good reason.

#### You must:

Agree to take an Alcohol and Drug test if requested.

Tell your sponsor about any drug or alcohol-related problem you have or think you may be developing.

Tell your sponsor about any prescription or over the counter medication you are taking which could affect your ability to work safely.

**Failure to meet the requirements of the policy will normally result in disciplinary action being taken against you by your sponsor and your Sentinel competences could be withdrawn for a period of up to five years.**



### PERSONAL PROTECTIVE EQUIPMENT POLICY

Mane Contract Services recognise our responsibilities under the Management of Health & Safety at Work Regulations 1999 to undertake risk assessment and reduce any potential risk to As Low as Reasonably Practicable through a hierarchy of techniques. The provision of Personal Protective Equipment (PPE) will only be used as a last resort when risk cannot reasonably be managed or engineered out.

Additionally, we recognise our responsibilities under the Personal Protective Equipment Regulations 1992. In compliance with these regulations, we will:

- carry out a specific assessment of personal protective equipment needs for all posts, activities and work;
- provide necessary and suitable PPE which is compatible with other equipment, the user and the task especially those of a safety critical nature;
- provide PPE free of charge where it is necessary to safely perform the duties assigned;
- provide information, training and advice on the use, storage, cleaning, maintenance, disposal and replacement of PPE provided;
- monitor the continued suitability, use, storage, cleaning, maintenance, disposal and replacement of PPE issued;
- inspect any visitor PPE for suitability and provide temporary replacement if unsuitable;
- ensure all PPE meets the specific requirements of Network Rail, Railway Group Standards and London Underground;
- provide replacement PPE as required.

The arrangements in place to implement this policy form part of the company's day to day operational procedures as defined under procedure MQP108 Working on the Rail's Managed Infrastructure and London Underground contract QUENSH as such are reviewed on a continuous basis. A formal review will take place on an annual basis. Where opportunities for improvement in the management of PPE or safety problems are identified they will be tackled promptly, and with sufficient resources, to ensure that they are dealt with adequately.

The implementation of this policy will be monitored at various levels throughout the company in order to ensure compliance with its objectives.

Signed



Position

CEO

Date

01 September 2021

## HOURS WORKED POLICY STATEMENT

Mane Contract Services Ltd (Mane) recognise our responsibilities under the Health & Safety at Work Act 1974 to provide a safe system of work and thereby reduce any potential risk to ALARP (as low as reasonably practicable). Mane acknowledges the increase in risk to our employees, other contractors, passengers, visitors and those affected by working excessive hours.

For safety critical work posts, these are the limits of working time are as defined in Network Rail Standard NR/L2/OHS/003 Fatigue Management.

These are:-

### **Network Rail Standard NR/LS/OHS/003**

- Not work more than 13 turns of duty within any 14 consecutive days. Not work more than 72 hours in any 7 day period.
- Have a minimum rest period of 12 hours between consecutive shifts.
- Not work more than 12 hours in any one shift (or other lesser period) as appropriate to the health and safety requirements for the particular task to be undertaken.
- Where Mane are engaged to work on Signaling and Telecommunications Testing, we will not work more than 13 turns of duty in any 14 day period and no more than 23 turns of duty in any two consecutive 14 day periods (starting and ending on any day of the week).

For the purpose of controlling fatigue and the management of work and travel time, the following definitions and guidance will apply in accordance with Network Rail Guidance Note NR/GN/INI/001:

### ***Definitions***

- **Door to door time** – a period of time identified as the combined total of travel time and work time.
- **Travel time** – a period of time directly from rest location to place of work including return journey irrespective of terms of payment or modes of transport.
- **Work time** – a period of time, inclusive of breaks, during which an employee is undertaking work activities.

### ***Guidance***

In accordance with the definitions, door to door time should not be planned to exceed a maximum of 14 hours.

**LUL Contract QUENSH conditions**

- The longest shift in any roster shall be 12 hours.
- The minimum amount of rest between two shifts shall be 11 hours.
- As determined by LU or LU's suppliers the consecutive days that may be worked before a rest period shall be either:
  - a) 6 consecutive days, followed by a rest period of not less than 24 hours.
  - b) 12 consecutive days, followed by 2 consecutive rest days, each of which is not less than 24 hours.
- Within any 14 day period, 2 rest periods, each of which is not less than 24 hours.

The limits set shall be exceeded only in exceptional circumstances and then only with a written safety justification for each individual.

Where the minimum amount of rest is not met in these circumstances, compensatory rest is permitted.

**DLR Safety Critical Hours Monitoring**

- No more than 12 hours are to be worked per turn of duty; 12 hours minimum rest period between rostered shifts;
- No more than 13 turns of duty are to be worked consecutively.
- No more than 72 hours are to be worked in consecutive turns of duty.

The arrangements in place to implement this policy form part of the company's day to day operational procedures as defined under work instruction MQW211 and as such are reviewed on a continuous basis. A formal review will take place on an annual basis. Where opportunities for improvement in the management of safe working hours or safety problems are identified they will be tackled promptly, and with sufficient resources, to ensure that they are dealt with adequately.

The implementation of this policy will be monitored at various levels throughout the company in order to ensure compliance with its objectives.

**Signed**



**Position**

CEO

**Date** 01 September 2021

## EXCEPTIONAL CIRCUMSTANCES

### **EXCEEDING WORKING TIME LIMITS**

In emergency situations to cover essential work, and provided no alternative arrangements can be made, the limits shown above may be exceeded if authorised by a nominated Health and Safety representative of the client – in accordance with NR/LS/OHS/003 and LUL Contract QUENSH Conditions.

### **PLEASE FOLLOW THE FOLLOWING PROCEDURE IN THIS CASE:**

Client should contact Mane at the earliest opportunity when an exceedance is authorised (on occasions this may be after the exceedance has been worked) to explain the reason for the additional hours requirement and the anticipated extension time.

The Client will take responsibility for producing a risk assessment for each exceedance.

Should it be agreed that you will continue to work to the extended timescale, you will complete and sign the Surplus Requirement section on the time sheet to reflect the extended hours.

You should liaise with the Client's site supervisor/H&S representative and request that the extended hours be authorised on the Surplus Requirement section of the timesheet.



## GRIEVANCE & DISCIPLINARY PROCEDURE

If a Temporary Worker has any grievance relating to a work assignment, the matter should be raised initially with the Client's Manager/Supervisor. If the Temporary Worker is unable to obtain a satisfactory response to the grievance, the matter should be referred to a Mane Contract Services' Director for consideration.

Appropriate action will be taken to investigate and deal with any grievance raised or disciplinary issues identified.

The following list of Rules is for general guidance. Each case will be judged on its individual merits.

Summary dismissal (without notice or pay in lieu of notice) may be necessary in case of gross misconduct. The following are examples of offences which will normally result in summary dismissal:

- Violent, dangerous or irresponsible behavior
- Serious breach of health and safety rules
- Theft or any other criminal offence
- Contravention of the Mane Contract Services Drugs and Alcohol Policy
- Falsification of competence certification

The following may be regarded as cases of general misconduct:

- Poor application to work
- Poor time keeping
- Disruptive conduct
- Wearing of dirty high visibility clothing

The first instance of general misconduct will generally result in a verbal or written warning. Repetition could lead to further warnings or dismissal.

The Temporary Worker may appeal against disciplinary action in accordance with the Grievance procedure. Details of how to appeal can be obtained from the HR Manager by calling 01923 470590 or e-mailing [hr@mane.co.uk](mailto:hr@mane.co.uk).



## REFUSAL TO WORK ON THE GROUNDS OF HEALTH & SAFETY

Mane Contract Services Ltd recognises the provision made under the Health & Safety at Work etc Act 1974 for the rights of persons to cease work if they reasonably consider it to be unsafe.

The purpose of this work instruction is to detail the manner in which Mane gives the opportunity for employees, temporary workers or contractors to stop working should they consider the working environment or the working practice to be unsafe.

All employees should be aware they can report any incidents, unsafe acts, concerns and safety related issues to the National Confidential Reporting System (CIRAS 0800 4 101 101 <https://www.ciras.org.uk/>) operated by Railway Group Members (RGM's) where they do not feel able to report through normal channels.

### METHOD

Anyone who believes that a task or condition will endanger either themselves or others work, should cease, move to a Position of Safety and the situation be immediately reported to the COSS on site.

The situation will be reviewed and consideration will be given to the safety impact on the individual and others.

As a result of the review, the system of work will either be confirmed as safe or amended. If the individual is satisfied with this outcome, they will resume work.

If the individual remains unsatisfied, the COSS will contact the Client site supervisor or Duty Manager (or on-call manager if outside normal working hours), as deemed necessary.

The client will review the situation and where possible, immediate action must be taken

If the situation cannot be resolved, a review will be undertaken against all legislative, railway groups, Network Rail company standards and industry best practice.

As a result of this further review, the system of work will either be confirmed as safe or amended. If the individual is satisfied with this outcome, they will resume work.

If the review fails to produce a satisfactory outcome, the disputed system of work will cease and the client will be informed.

**Please note: Contractors of Mane Contract Services Ltd will not be penalised if they refuse to work on the grounds of health and safety.**

### RESPONSIBILITY

**Individual**

**COSS**

**COSS**

**Individual**

**Client**

**Mane Manager**

**COSS**

**Mane Manager**



## ANTI-CORRUPTION AND BRIBERY POLICY

### Policy statement

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, *third party* means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as *workers* in this policy).

### What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving (or receipt) of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law; it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; g) it is given openly, not secretly; and gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your manager OR the HR manager.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

### What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure; c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return; threaten or
- retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or f) engage in any activity that might lead to a breach of this policy.

### Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the HR Manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

### Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the HR Manager.

### Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the HR Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out at the end of this policy statement.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

### Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the



business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager OR the HR Manager. Concerns should be reported by following the procedure set out in our Whistle blowing Policy. A copy of our Whistle blowing Policy can be found in the Employee Handbook.

#### What to do if you are a victim of bribery or corruption

It is important that you tell the HR Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

#### Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

#### Training and communication

Training on this policy forms part of the induction process for all new workers. All existing workers will receive instructions (and training, where appropriate) on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

#### Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HR Manager has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

### Monitoring and review

The HR Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR Manager.

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

### Potential risk scenarios: "red flags"

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

If you encounter any of these red flags while working for us, you must report them promptly to your manager OR to the HR Manager OR using the procedure set out in the Whistle blowing policy: you become aware that a third party engages in, or has been accused of engaging in, improper business practices;

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

We will ensure that this policy is communicated and available to all relevant stakeholders as appropriate.

This policy shall be reviewed for effectiveness and suitability at least annually as part of the management review process.

This statement represents my commitment on behalf of the company.

Signed



Position

CEO

Date: 1 September 2021

## MEDICAL SELF DECLARATION FORM



Name: .....

Medical Self Declaration Form		
PLEASE ANSWER ALL QUESTIONS AND SUPPLY ANY ADDITIONAL INFORMATION IF NEEDED It is important to be accurate with your answers to the question listed below.	YES	NO
Do you have diabetes needing insulin?		
Do you suffer from epilepsy or fits?		
Have you ever had blackouts, dizziness or any condition which may cause sudden collapse or incapacity?		
Do you get discomfort/pain in the chest or shortness of breath during exercise?		
Do you have difficulty in moving rapidly over short distances, including slopes, steps or rough ground?		
Do you have difficulty in looking over either shoulder?		
Do you have any difficulty with your eyesight?		
Do you wear glasses for normal vision?		
Do you wear contact lenses?		
Do you have difficulty hearing normal conversations?		
Are you taking medication that causes dizziness or drowsiness?		
Have you used illegal drugs within the last 12 months?		
Have you had any alcohol related illnesses during the last 12 months?		
Have you ever failed a medical or alcohol & drug test associated with Rail work?		
Do you/Have you ever suffered from HAVS (hand arm vibration syndrome)?		
Please note, operatives wearing contact lenses MUST always carry their glasses when working on Network Rail Infrastructure. <b>It is your responsibility to notify us if there are any changes in your health which affects your answers to the above questions.</b>		
Please supply any additional health information that you feel necessary:		

Signature: .....

Date: / /



## EQUAL OPPORTUNITIES & DIVERSITY POLICY STATEMENT

### Policy statement

The Company is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

The Company aims to ensure that no employee or candidate is subject to unlawful discrimination, either directly or indirectly, on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability, age, political beliefs, and membership or non-membership of a trade union (the **protected characteristics**).

The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to our separate Anti-harassment and bullying policy.

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

### Who is covered by the policy?

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, volunteers, interns, casual workers and agency staff (collectively referred to as staff in this policy).

### Who is responsible for this policy?

All managers must set an appropriate standard of behaviour, led by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact the HR Manager.

### Scope and purpose of the policy

This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment. We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

### Forms of discrimination

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally. Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement that applicants for a job must be clean shaven puts members of some religious groups at a disadvantage. Such a requirement will need to be objectively justified.

Harassment related to any protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy. Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

### Recruitment and selection

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include an appropriate short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with Human Resources approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of Human Resources (who should first consider whether such matters are relevant and may lawfully be taken into account).

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from Human Resources or the UK Border Agency.

To ensure that this policy is operating effectively, and to identify groups that may be under-represented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any

other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

#### Staff training and promotion and conditions of service

Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

#### Termination of employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

#### Disability discrimination

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your Human Resources Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Human Resources Department may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

#### Fixed-term employees and agency workers

We monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

#### Part-time work

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

### Breaches of this policy

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-Bullying & Harassment Policy. If you are uncertain which applies or need advice on how to proceed you should speak to the HR Manager.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

### Monitoring and review of the policy

Equal Opportunities practice is developing constantly as social attitudes and legislation change. The Company will keep its policies under review and will implement changes where these could improve equality of opportunity. This commitment applies to all the Company's employment policies and procedures, not just those specifically connected with Equal Opportunities and Diversity.

**Signed**



**Position**

CEO


Date: 1 September 2021





## LIFESAVING RULES


Network Rail's Lifesaving Rules reflect the ongoing commitment to eradicate all injuries and fatalities. The rules have been implemented and put into action at Mane, to ensure we are at the forefront of current safety expectations within the industry. We have fully embedded them within our own safety culture, recognising that accidents can happen whether you are site or office based. The seriousness around the rule change to the use of hands-free phones is particularly evident, now that it's considered more dangerous than being under the influence of drugs or alcohol. With nearly half of fatalities in our industry having been whilst driving, now more than ever, it's imperative to set an example.

### Working responsibly


 Always be sure the required plans and permits are in place, before you start a job or go on or near the line.


 Always use equipment that is fit for its intended purpose.

 Never undertake any job unless you have been trained and assessed as competent.


 Never work or drive while under the influence of drugs or alcohol.


### Driving

 Never use a hand-held or hands-free phone, or programme any other mobile device, while driving.


 Always obey the speed limit and wear a seat belt.

### Working with electricity


 Always test before applying earths or straps.

 Never assume equipment is isolated – always test before touch.

### Working at height

 Always use a safety harness when working at height, unless other protection is in place.

### Working with moving equipment

 Never enter the agreed exclusion zone, unless directed to by the person in charge.



**RETURN TO WORK FORM**

**This form is to be completed after any non-attendance on a Rail Infrastructure site.**

*SELF CERTIFICATION (to be completed by the employee)*

Name of absentee:
Job Title:
First Day of absence:
Date returned to work:
Number of working days absent:
Reason for absence:

*RETURN TO WORK MEETING (to be completed by the manager)*

Was a doctor seen in this time? Y / N If yes, please provide doctor's name and address.
Doctor's name and address:
Any medication prescribed? Y / N If yes, please specify medication, dosage and when the course of medication ends.
Medication details:
Who the absent was reported to and on what date:
Name:
Date:
State briefly why the absentee was unfit for work (specify nature of illness or injury. Words like "illness" or "unwell" are not enough), whether they are assessed as fit to return to work and any ongoing support needed:

<b>Manager's Name:</b>	
<b>Signed:</b>	
<b>Date:</b>	

Please note: A copy of this form must be retained on the absentee's file.

It is the responsibility of the contractor to inform their account manager if they are unable to attend work for any reasons, to ensure we comply with our back to work policy.

**To be completed by Employee/Employer on behalf of the employee where the employee is unable to complete the form in a timely manner.**

## MISCONDUCT POLICY

The primary objective of the Company's Misconduct Policy is to ensure that all disciplinary matters are dealt with fairly and consistently and to encourage an improvement in individual conduct or performance.

The Company encourages an individual and their manager to resolve minor conduct issues informally where possible. Formal steps will be taken if the matter cannot be resolved informally, or if an informal discussion is not appropriate (for example, because of the seriousness of the allegation). Each case will be judged on its individual merits.

Summary dismissal (without notice or pay in lieu of notice) may be necessary in case of gross misconduct.

The following are examples of offences which will normally result in summary dismissal:

- Violent, dangerous or irresponsible behaviour
- Serious breach of health and safety rules
- Theft or any other criminal offence
- Contravention of the Mane Contract Services Drugs and Alcohol Policy
- Falsification of competence certification

The following may be regarded as cases of general misconduct:

- Poor application to work
- Poor time keeping
- Disruptive conduct
- Wearing of dirty high visibility clothing

The first instance of general misconduct will generally result in a verbal or written warning. Repetition could lead to further warnings or dismissal.

The individual may appeal against disciplinary action in accordance with the Grievance procedure. Details of how to appeal can be obtained from the HR department.

### **Breaches of the Sentinel Scheme Rules**

Breaches of the Sentinel Scheme Rules by either an Individual or a Sponsor include (but are not limited to) the following:

- Any fraudulent or falsification of documentation or records relating to safe working.
- Any conviction related to theft or attempted theft of railway materials
- Any breach in working hours by reporting or endeavouring to report for a shift of work, having previously undertaken a shift on Managed Infrastructure within the last 12 hours (known as double shifting); unless a risk assessment has been conducted by the Primary Sponsor and suitable controls implemented
- Any event of presenting a falsified or copied Sentinel Card, or claiming a false identify for the purposes of trying to gain entry on Managed Infrastructure, undertaking a training/assessment activity, presenting themselves for a medical examination of drug and alcohol test
- Attempting to cheat any assessment for a Sentinel managed competence and/or trying to gain access to an online or paper assessment for a Sentinel managed competence outside of an accredited assessment centre

- The infringement of any health and safety legislation or Managed Infrastructure policies, standards or rules include the Lifesaving Rules deemed as reckless contravention and a requirement of Section 1.16 of the Sentinel Scheme Rules
- Any event of negligence which causes, or has the potential to cause loss, damage or injury
- Any event of physical violence while at work
- Any event of deliberate damage to Managed Infrastructure property
- Any allegation of a breach of the Sentinel Scheme Rules which is found to be false and is proven to have been made with malicious intent
- Any other event that fails to adhere to the Sentinel Scheme Rules.

Where misconduct has taken place, Mane shall follow the process as follows to deal with the matter as promptly as possible.

- Report the matter to Sentinel where a breach of the scheme rules has been observed
- Place a temporary suspension on relevant competencies where it is deemed appropriate
- Conduct an investigation into the alleged breach or misconduct, which will involve
  - Inviting the individual/s under investigation to a meeting to provide a statement
  - Meeting with other parties witness to the alleged breach or misconduct
  - Providing evidence to support the investigation
  - Forming a decision on the evidence and recommendations for action by applying the 'Fair Culture' Consequences Model.
  - Notifying Sentinel Investigations team and the individual under investigation of the outcome and actions
  - Ensuring any recommendations are actioned and the effectiveness is reviewed
- Provide an opportunity for appeal
- Give ongoing support to facilitate a return to normal duties where recommendations allow

Mane will not de-sponsor an individual following an alleged breach of the Sentinel scheme rules until an investigation is concluded.

Any decisions made will also be in line with the investigations and formal review process found in the Sentinel Scheme Rules.

**Signed**



**Position**

CEO

Date: 1 September 2021

## MODERN SLAVERY TRANSPARENCY STATEMENT

Mane Contract Services Ltd is committed to preventing slavery and human trafficking throughout our operations and business partners. We aim to ensure that we operate our business to the highest professional and ethical standards.

### Our business structure

We operate as a recruitment company providing temporary and permanent work opportunities to individuals in the engineering sector. We employ over 60 employees at our office in Watford, Hertfordshire. We trade primarily with businesses throughout the UK and Europe, but also with a growing number of non-European businesses.

### Associated policies

We have a number of policies and processes to support this policy statement and to develop a zero-tolerance approach to slavery and human trafficking. These include, but are not limited to:

- Equal Opportunities and Diversity policy
- CSR and Sustainability policy
- Anti-Corruption and Bribery policy
- Whistle-blowing policy
- Ethical Trading policy
- Purchasing procedure
- Employee code of conduct
- Company values
- Supplier code of conduct
- Employee, Client and Candidate Charters.

### Risk management

We have conducted a risk assessment of our anti-slavery and human trafficking compliance in order to understand where we may need to take further action to improve detection and prevention. We are satisfied that our assessment demonstrates a good level of compliance but we will be looking to improve upon this.

### Monitoring

We carry out regular monitoring in the form of:

- Checks on ID and Right to Work.
- Verify all candidates are legally old enough to take up employment.
- Monitoring wage rates to meet the National Minimum and Living Wage.
- Compliance with AWR day one and week 12 requirements.
- Conduct regular site inspections.
- Investigate any accidents, incidents, near misses or close calls.
- Fatigue management programme and software to manage pre-shift planning of hours and post-shift monitoring.

**Effective action**

We recognise that effective prevention of slavery and human trafficking is an ongoing exercise and that we need to continue developing our policies and procedures to support this policy. Over the coming year we intend to take the following action.

- Make commitment to the GLAA's Construction Protocol
- Continue to improve employee awareness through 'Are you alright?' campaign/materials
- Communicate with our stakeholders on our actions
- Establish ways to support our clients and give them reassurance

We will report on the effectiveness of our actions in our next policy statement.

**Training**

To ensure the prevention, detection and reporting of modern slavery this policy has been communicated to all employees and managers and we carry out regular monitoring in the form of:

- Checks on ID and Right to Work. We do not hold original documents, these are returned to the candidate.
- Verify all candidates are legally old enough to take up employment.
- We do not charge fees for work-finding services and our payment processes are transparent.
- All requirements must meet the National Minimum and Living Wage, as appropriate.
- Compliance with AWR day one and week 12 requirements.
- Communicate relevant health & safety information, provision of necessary workwear and regular site inspections.
- Record and investigation any accidents, incidents, near misses or close calls.
- Monitoring of working hours using fatigue management software compliant with new fatigue risk calculator.
- Confidential reporting procedure is well-communicated, including CIRAS membership.
- Suppliers are issued with our Code of Conduct setting out expectations for both parties.

We will ensure that this policy is communicated and available to all relevant stakeholders, as appropriate.

This policy shall be reviewed at least annually as part of the management review process.

**Signed****Position**

CEO

Date: 1 September 2021

## PRIVACY POLICY STATEMENT

### INTRODUCTION

Mane Contract Services Ltd (“We”) are committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation. The Regulation aims to harmonise data protection legislation, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your rights under the GDPR are set out in this notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### WHO WE ARE AND WHAT WE DO

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We also provide managed services. We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;

We collect information about you to carry out our core business and ancillary activities.

### INFORMATION WE COLLECT ABOUT YOU

The information we collect about you can be obtained in one of the following ways;

- Information you give to us  
This is information about you that you give us by filling in forms on our website; [www.mane.co.uk](http://www.mane.co.uk), or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site or services.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, information about your wellbeing, financial information, compliance documentation, references, verification of qualifications and experience and your right to work in the UK, curriculum vitae and photograph, telephone call recordings, links to your professional profiles available in the public domain, e.g. LinkedIn, Twitter, business Facebook or Yammer.

- Information we obtain from other sources  
This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and our company website.

When you use our website; [www.mane.co.uk](http://www.mane.co.uk), we do not monitor or use your IP address or other personal data to identify you.



In this case we will inform you, by providing you with this privacy notice, within a maximum of 30 days of collecting the data that we hold personal data about you and for what purpose we intend to retain and process it.

We are working closely with third parties including Socium. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

#### **PURPOSE OF PROCESSING DATA**

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary and permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

## LEGAL BASIS FOR PROCESSING

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate) or permission to post your photograph in a public domain (if you are an employee).

### *Our legitimate business interests*

Our legitimate interests in collecting and retain your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment or temporary worker placements. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

We use personal data in a manner that is expected of a recruitment agency or recruitment business, and put in place safeguards to ensure the privacy and security of personal data. We also offer the opportunity for personal data to be removed from our records providing there is no contractual or legal obligation for us to retain data.

## SENSITIVE PERSONAL DATA

Sensitive personal data will be subject to stricter controls. Examples of sensitive personal data include racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health condition.

The individual's express written consent will be sought at the point at which sensitive personal data is collected.

### *Consent*

Should we want or need to rely on consent to lawfully process your data we will request it orally, by e-mail or be an online process for the specific activity we require consent for and record your response on our system. You have the right to withdraw your consent to this particular process at any time.

## DISCLOSURE OF YOUR INFORMATION

We will share your personal information with:

- Any member of our group both in the EEA and outside of the EEA.
- Selected third parties including:
  - Clients for the purpose of introducing candidates to them;

- Candidates for the purpose of arranging interviews and engagements;
- Suppliers for the purpose of training, competency testing, medicals and drug and alcohol testing;
- Employee benefit providers for the purpose of providing employee benefit schemes, such as pension and life insurance;
- Insurance broker and insurers for the purpose of obtaining relevant insurance policies and handling insurance claims;
- Subcontractors including e-mail marketing specialists, event organisers, professional auditors, payroll bureaux and other financial service providers;
- Any organisation to which we sell our business or assets
- Any company or organisation that we are legally obliged to provide your personal data to

## **DATA STORAGE, SECURITY & RETENTION**

The data we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area (EEA). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. Mane Contract Services Ltd will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy notice.

Personal data is primarily stored electronically on our information systems, Bullhorn, Socium, ADP, Tempest, and Sage. These systems operate on secure servers. Any payment transactions will be encrypted (using SSL technology). Where we have given you (or where you have chosen) a password to gain access to certain parts of our site, systems or servers, you are responsible for keeping this password confidential and we ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site, any transmission is at your own risk. Once we have received your information we will use strict procedures and security features to try to prevent unauthorised access.

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests, contractual agreements and legal obligations.

The Company has determined the retention periods for personal data according to the nature of the personal data, its perceived accuracy, and our legal and/or contractual obligations.

Our current retention schedule is available upon request.

The Company will review the nature of the information being collected and held on an annual basis to ensure there is a sound business reason for requiring the information to be retained.

## **RESPONSIBILITY**

The Company has appointed a Data Representative as the named individual responsible for ensuring all personal data is controlled in compliance with the GDPR. Our Data Representative is Emma Sullivan, HR & Compliance Manager.

Employees, Client contacts and Third-party suppliers who have access to personal data must comply with this Policy and adhere to the procedures laid down by the Data Representative. Employees who fail to comply with the Policy and procedures may be subject to disciplinary action up to and including summary dismissal. External parties will be subject to investigation and appropriate sanctions.

## **EQUAL OPPORTUNITIES MONITORING**

Where personal data obtained about candidates is to be held for the purpose of Equal Opportunities monitoring, all such data will be made anonymous.

## YOUR RIGHTS

The GDPR provides you with the following rights.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. This request may be subject to documentary evidence such as evidence of qualification.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it.

**Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party in certain formats, if practicable.

**Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office (ICO). The ICO can be contacted through this link <https://ico.org.uk/concerns/>

The Company will review personal data regularly to ensure that it is accurate, relevant and up to date.

In order to ensure the Company's records are accurate and up to date, employees, client contacts, candidates and supplier contacts must notify the Company as soon as possible of any change in their personal details.

Employees, client contacts, candidates and supplier contacts will be entitled to amend any incorrect details and these corrections will be made to all files held on the Company's information systems. The request must be made in writing and may be subject to documentary evidence, e.g. certificate of qualification.

## ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUESTS")

You have the right to access personal data held about you. The Company will arrange for you to see or hear all personal data held about you within one month of receipt of a written request. Please send your request to [hr@mane.co.uk](mailto:hr@mane.co.uk).

## CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy notice in the future will be posted on our Company website and intranet. Where appropriate, changes will also be notified to you by e-mail. Please check back frequently to see any updates or changes.

## CONTACT

If you have any questions, comments or requests regarding this privacy notice you are welcome to address these in writing to Emma Sullivan at [hr@mane.co.uk](mailto:hr@mane.co.uk).

Signed



**Position** CEO

Date: 1 January 2021

## CONTACT DETAILS

### Rail Team

+44 (0)1923 470730

E-mail: [rail@mane.co.uk](mailto:rail@mane.co.uk)

### Payroll Help Desk

Tel: +44 (0)1923 470520

E-Mail: [payroll@mane.co.uk](mailto:payroll@mane.co.uk)

**CIRAS on Free-phone 0800 4 101 101**

**Freepost CIRAS, text on 07507 285887 or at [www.ciras.org.uk](http://www.ciras.org.uk)**



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