



Document ID QBD.20	Title All Policies	
Effective Date 01/04/2024	Reviewed by Christopher Moore	Date Reviewed 01/04/2024
	Approved by Christopher Moore	Date Approved 01/04/2024

Privacy Policy

K4 Group Services Limited ("we," "us," "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website, www.k4group.co.uk, use our services, or engage with us in other ways. Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site or use our services.

1. Information We Collect

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

- **Personal Data:** Personally identifiable information, such as your name, shipping address, email address, and telephone number, and demographic information, such as your age, gender, hometown, and interests, that you voluntarily give to us when you register with the Site or our services or when you choose to participate in various activities related to the Site and our services.
- **Derivative Data:** Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.
- **Financial Data:** Financial information, such as data related to your payment method (e.g., valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Site. [We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, [insert payment processor], and you are encouraged to review their privacy policy and contact them directly for responses to your questions.]
- **Data from Social Networks:** User information from social networking sites, such as [social media sites], including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks.
- **Mobile Device Data:** Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you access the Site from a mobile device.

2. Use of Your Information

We may use information collected about you via the Site or our services to:

- Facilitate account creation and logon process.
- Send you administrative information, such as information about your account and our terms, conditions, and policies.
- Fulfill and manage purchases, orders, payments, and other transactions related to the Site.
- Provide you with updates and information on services you have requested or agreed to receive.
- Improve the Site and our services.
- Monitor and analyze usage and trends to improve your experience with the Site.
- Offer new products, services, mobile applications, and/or recommendations to you.
- Perform other business activities as needed.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.



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3. Disclosure of Your Information

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights: If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation.

Third-Party Service Providers: We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

Business Transfers: We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Affiliates: We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

Other Third Parties: We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

4. Security of Your Information

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse.

5. Policy for Children

We do not knowingly solicit information from or market to children under the age of 13. If we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe we might have any information from or about a child under 13, please contact us at [insert contact information].

6. Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

7. Your Rights

Depending on your location, you may have the following rights regarding your personal information:

- The right to access – You have the right to request copies of your personal information.



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- The right to rectification – You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal information, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal information, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal information, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our contact information below.

8. Contact Us

If you have questions or comments about this Privacy Policy, please contact us at:

K4 Group Services Limited
4th Floor, Holdsworth House, 65-73 Staines Road. TW3 3HW
admin@k4group.co.uk
02031433998

9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons. We will notify you of any changes by posting the new Privacy Policy on our website. You are advised to review this Privacy Policy periodically for any changes.



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Child Protection Policy and Statement

1. Introduction

Children, young people, and anyone who is particularly vulnerable are entitled to encounter a safe and enjoyable environment at social and educational organised events. Our company recognises its legal and moral duty to see to it that we provide these people with the best possible care when we are the security provider at such events.

We are dedicated to adopting and carrying out policies that mandate that all security personnel understand their strict obligation to protect children from abuse or other harm our personnel are required to follow our procedures adopted to protect children and to report any abuse of similar problems to the authorities.

At both indoor and outdoor functions and events, in the course of providing security services, we always strive to protect children, young people and others particularly vulnerable against abuse or harm. We endeavour to educate and train both employees and any volunteer security personnel to carry out this mission and be prepared to address specific child protection issues.

Each of our employees who perform security functions are fully licensed and trained by the Security Industry Authority, government initiated regulatory body for the security industry.

The Children's Act of 1989 defines a child/young person as anyone under the age of 18. Children's Act 1989).

2. Policy Statement

We believe that:

- Nothing is more important than the welfare of a child.
- Every child, regardless of gender, age, culture, ability, language, racial origin, sexual identity or religious belief and/or sexual identity is entitled to a safe and fun environment in which to pursue their religious, pleasure oriented or educational interests.
- It is our duty to protect children from degrading treatment, discrimination and other forms of harm through all possible measures. We endeavor to respect children's feelings, wishes, and rights.
- We must take seriously and investigate thoroughly all allegations or suspicions of abuse of or poor practices aimed at children and will promptly involve the authorities in any such incident.
- All our employees may, from time to time, with children while providing security services. Therefore, they are all screened and CRB checked as required by Security Industry Authority regulations. We provide all such employees with training and additional guidance concerning child protection measures to be taken. The CRB check and any screenings of employees are carried out by independent personnel not directed by the company.
- To be effective in protecting children, we must work in cooperation with event organisers, stakeholders, parents and children.

3. Monitoring and Reviewing the Policy and Procedures

Child protection measures and procedures must be periodically reviewed and monitored. A regular report must be given to management concerning this by the Managing Director.



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The implementation of procedures should be regularly monitored and reviewed. The Managing Director should regularly report progress, challenges, difficulties, achievement gaps and areas where changes are required to the Security Approval Ltd management team.

This policy must be subject to overall review at least every three years or whenever the law or this organisation undergoes a major change.



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Complaints Policy

We acknowledge that, no matter how hard we try to do our best, mistakes sometimes occur, and we may occasionally not give our Stakeholders, Employees or Clients the high quality of service that they properly expect from us.

We welcome, in those situations, being told that this has happened in the form of a Complaint.

When this occurs, which should be rarely, we will make every effort possible to quickly and efficiently remedy the problem, acknowledging directly our responsibility to correct errors, and doing so without compromising the rights and expectations of our Stakeholders, Employees, or Clients.

We incorporate everything we learn from addressing a Complaint to make our future quality of service better and to avoid similar problems from happening in the future.

We pledge to address Complaints:

Swiftly: A formal acknowledgement within 24 hours, If the complaint has not been resolved to send an interim response at the 3 day point, A full and final response at the 7 day point, A follow up 10 – 14 days after the final response to ensure the complainant is still happy with the resolution.

Efficiently: The Director of the business will personally take charge of the investigation of the complaint and directly communicate with the complainant to attempt to resolve the problem without delay.

Transparently: Documentation will be kept of the full results of the investigation and provided to the complaining party.

Honestly: If we have made an error or mistake, we will frankly acknowledge it. If our service was deficient in any way that was within our reasonable control, we will do our utmost to ensure that the complaining party does not suffer the consequences.

If you have a Complaint, please communicate with the K4 Group Services Team via Email, postal letter, fax, or telephone. Complaints can be addressed to any of our staff members.



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Corporate Social Responsibility Policy

This policy sets out our view of our corporate responsibilities for the environment and communities in which we operate and for the well-being of our staff, partners, public and clients. Some of these responsibilities are spelled out in more detail in other documents.

Every person we work with and for makes important and unique contributions to the community, to their own organizations, and to our work. We appreciate and honour their diversity in every way it manifests itself and encourage diversity as basic in all our interaction with the community and with our partners, associates, employees and clients.

We acknowledge our responsibility to care for our employees, to provide them with meaningful employment through which they can support themselves and their families, and to do everything possible to ensure their ongoing workplace welfare, health, and safety.

We are committed to ensuring our clients and the general public have a secure and safe environment, and we attempt to safeguard their property, including intellectual property, just as much as we would protect our own.

Through the operation of our Environmental Policy, our Policy on Equality and Diversity and our Health and Safety Policy, we seek to improve and maintain the environment in the communities in which we operate. We oppose both child labour and forced labour and do not engage in either practice.

We at K4 Group Services pride ourselves in dealing with our employees, business partners, and clients in an honourable and honest way always.



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Drugs and Alcohol Policy

4. General

Many workplace accidents, injuries and significant lost productivity are caused by alcohol or drug abuse on an annual basis. Our company policy is to have a work force that does not engage in the illegal use of drugs or in the abuse of alcohol. We regard any alcohol or drug abuse by employees as very serious and something that this company cannot tolerate or condone.

We actively discourage any alcohol or drug abuse outside the workplace. Use of illegal drugs or alcohol at the workplace or any company premises is absolutely forbidden.

5. Possession, Use or Sale

Possession use or sale of drugs or alcohol on company property, at any work site, or while on the job is grounds for serious disciplinary action which may include termination. Legal consequences may also occur.

All employees must be in good physical and mental condition for work when their shift starts and must be there on time, which drug or alcohol abuse interferes with. Our company endeavours to provide a working environment that is safe, healthy, and drug-free.

6. Drug Testing

When there is reasonable suspicion that an employee has engaged in prohibited use of drugs or alcohol, the company reserves the right to make them undergo an alcohol or drug test. Reasonable suspicion is defined as including, but is not limited to:

- Any evidence of alcohol or drug use of a physical or testimonial nature
- The occurrence of an accident involving the employee, or an
- Apparent impairment of work performance.

Refusal to submit to a requested alcohol or drug test can result in discipline, with sanctions ranging to and including termination.

7. Prescription Medication

Prescription medication or over-the-counter medication that can negatively impact on an employee's work performance should be avoided if at all possible. If use of such medication renders an employee unable to properly or safely perform their job duties, their employment may be suspended or terminated.

Employees who are taking prescription medication or over-the-counter medication that can negatively impact their job performance must inform their supervisor of this prior to reporting to work.



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8. Reporting Criminal Convictions

Employees convicted of any criminal drug offense, regardless of where it took place must report such conviction to the company in writing within three days. A similar report must be made in writing within three days of any pending court appearance or police caution for a drug related incident.

9. Drug or Alcohol Rehabilitation Programs

Our company endeavors to assist employees who want to undergo rehabilitation or treatment for dependency on alcohol or drugs. Employees will not be terminated for trying to seek help for such problems and treatment of rehabilitation program enrolment will not be noted in an employee's personnel file.

Employees enrolled in such programs must consent to being subjected to random drug testing and will be terminated if they fail such tests.

K4 Group Services employees with a drug or alcohol problem are encouraged to ask the company for help.



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Environmental Policy

K4 Group Services wishes to ensure their employees that we minimize any negative impact our operations could potentially have on the environment.

Accordingly, our policy is to:

- Always strive to better our performance regarding environmental issues and use the best environmental management practices as part of our business operations.
- Try to minimize our use of resources and to attempt to efficiently use those resources that we must consume.
- Attempt to reduce our carbon footprint to comply with our targeted objectives.
- Responsibly apply the principles of waste reduction, waste reuse and waste recycling as per our waste management practices.
- Try to prevent pollution at our premises and work sites.
- Take environmental issues and energy performance into account in facility purchases, design, refurbishment and management.
- Take environmental issues, including climate change, into account when buying services and goods.
- Obey all applicable environmental laws and regulations.

The company monitors progress on these goals, seeks feedback from employees and customers on these issues, and informs employees about the importance of environmental issues. We work with our employees, service partners, landlords and their agents and customers to improve our performance on environmental issues. We take sustainability and other environmental issues into account when providing security services.



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Equal Opportunities & Diversity Policy and Statement of Intent

K4 Group Services members and staff oppose racism and sexism in all the forms in which it is manifested. We pledge to implement policies that treat all persons in all the functions of our business equally on the basis of race, sex, class, colour, ethnic origin, nationality, sexuality, marital status, age, trade union activity or membership, physical or mental disability, or religious belief. We endeavour to promote these values within the places where we operate and with individuals, organizations or entities that we come into contact with.

K4 Group Services is dedicated to taking action to carrying out this policy.

K4 Group Services states that it is an equal opportunities employer. Accordingly:

In providing Security Services and employing persons to provide these services, K4 Group Services endeavors to make any employment decisions on the basis of equality of opportunity and fair treatment for all persons.

No one or group seeking services, a job, or contracts with us will be treated with discrimination on the basis of sex, sexuality, age, race, class, colour, nationality, ethnic origin, marital status, trade union membership or activity, physical or mental disability, or religious belief.

K4 Group Services, in the course of implementing this policy, will strive to aid disadvantaged person groups to benefit from its provided services, and attempt to identify the needs of such persons and groups.

We will compile and review records of the ethnic/racial origin and sex of everyone applying for services or jobs from us to aid in implementing this equal opportunity policy.

Additional information can be found at:

ACAS WEBSITE www.acas.org.uk/media/word/7/r/Equality-policy-template.doc

For and on behalf of K4 Group Services.



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Health and Safety Statement of Intent

1. Our company strives to take strict measures to monitor and control Health & Safety as an integral part of running our business operation. I am responsible for communicating this policy to all employees.
2. We will, so far as is possible:
 - a. Make sure that all working practices and work equipment are safe and that they do not pose a risk or hazard to Safety and Health.
 - b. Make sure that needed measures are carried out to safely use, store, and transport all substances and materials.
 - c. Give all needed training, supervision, instruction and information to make sure that all employees have a working environment that does not endanger their Health or Safety.
 - d. Control all workplaces, equipment and utilized transport in a condition that is safe and free from Health and Safety risks
 - e. Make sure that employees have access to adequate facilities to safeguard their welfare
 - f. Take measures to protect the Health and Safety of visitors, contractors and any members of the public who could be impacted by our operations
 - g. Give employees all needed information concerning procedures to protect their Health and Safety and the Health and Safety of others, and, when needed, consult with them to improve how our company handles these issues.
 - h. Make sure that all employees carry out their Health and Safety responsibilities and work with management to carry out this policy
 - i. Monitor how this policy is carried out in the workplace.
 - j. Make Sure sufficient funds are available to implement this statement.
3. Accident Reporting – reporting of employee absence 7 day as per RIDDOR 2013 legislation)

For Additional information go to www.hse.gov.uk/simple-health-safety/index.htm

Company name: will also regularly review this policy to see if any changes are needed.



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Lone Working Policy

K4 Group Services is committed to ensuring that all its employees have a safe working environment. We support and encourage each of our employees to attempt to improve and maintain workplace Health and Safety.

A risk assessment of the work site will be carried out and completed before a security officer is assigned to work alone during the daytime (at an empty site) or overnight (at any site). The emphasis in such an assessment is to take all measures to protect our personnel. All site risk assessments shall be reviewed whenever site conditions are known to have changed, and, in any event, at least on an annual basis.

A security officer assigned to work alone shall be supplied with a mobile phone by the company and is required to use it every hour to make a check call to K4 Group Services 24 hour Communication Centre. If a call is not received, a Customer Service Manager or a Supervisor will be sent to the work site to investigate whether the security officer is experiencing difficulties, and, if so, to assist the officer. If these persons are not available or have been sent to the site and have not called back to the control Centre, local law enforcement shall be notified and asked to investigate.

A complete list of instructions for the assignment shall be kept at the work site. Those instructions will include a description of any Safety or Health issues present and pinpoint high risk areas at the site. They will also spell out the Client's and Company's customary procedures to be followed.

Emergency phone numbers for the client's personnel (who hold keys for the site) shall be given to security officers, and also numbers for local emergency services and responders. Security officers must be fully familiar with the assignment instructions and be able to comply with them during their on-duty hours. Such instructions shall be reviewed and, if needed, amended when the Client requires, when site conditions change or, at a minimum, on an annual basis.



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Media Handling Policy

10. Overview

K4 Group Services has an excellent reputation. We are well known as providing top notch professional security services, and have strong ties with our customers, whose respect we have earned over time.

From time to time, we may receive information inquiries about our company from members of the news media. News reports about our services can assist members of the public, including our customers, potential customer, and business partners to appreciate what we do and how we swerve our communities. We try to be open to media inquiries and to supply them with truthful information.

11. Purpose

This policy aims at ensuring that we always strive to provide relevant, truthful, timely, and complete information in response to media inquiries.

12. Scope

This policy is intended to apply to all personnel employed by the company.

13. Designation of Company Spokesperson

The Company Director is the person responsible for communicating with the media on behalf of the company.

Should any member of staff be involved in any incident or event that attracts media attention they are reminded that all communications with the media are to be authorised by the director or their appointed spokesperson. Employees are reminded that they are not authorised to make any statements on behalf of the company or client to the media nor are they permitted to answer any questions about the company or clients; any comments made by the employee are of their own expression and not those of the company or clients, and the employee must ensure that this is clearly understood by the media.

The company have elected the company Director to be the authorised spokesperson for the business and any requests for comment should be directed to the Director. Where appropriate, the Director will in association with the client prepare a joint statement, which may be communicated in a press release or through the company solicitors.

14. Media Communication Guidelines

If a representative of the media contacts an employee of the company, they may be seeking:

- Particular information about the company and the services that it provides.
- Information about sudden events, including legal and regulatory actions, accidents, thefts, arrests, employee or customer complaints or natural disasters.
- Comment or reaction to new developments in the security industry or concerning our services;
- Background information for more general news stories involving the communities our company serves.



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Any calls from media representatives should be forwarded to corporate communications. Employees should not say that they are not permitted to speak with reporters or that they must get permission to do that. Instead, reporters should be told that the company policy is to send all media questions to the company Director.

The media representatives should be extended the same professionalism and politeness that we show to customers and other members of the public. Their inquiries should be answered with a referral to the Director quickly. This is an important part of promoting our company and its image.

Employees contacted by the media should immediately inform the Director who may ask for your assistance in preparing a response. Do not permit a media representative pressure you to immediately respond to questions, since a considered response is always preferable and more likely to convey relevant and correct information.

15. Photograph and Film Guidelines

When a media representative asks to be allowed to take photos or film inside our premises or at a worksite, their request should be forwarded to the company Director. Without the Director's approval, no such permission can be granted. The Director will not give approval except after consulting with the manager of the site.

Factors to be considered in deciding whether to grant such permission includes whether it will disrupt work operations, the company has anything to gain from granting the request, the current condition and age of the facility, and whether the facility is currently clean and suitable to be pictured or filmed.

Media including camera crews may show up at our premises or a worksite, especially in a crisis situation or if some external organization or group has planned a boycott or demonstration at our premises or a worksite.

Such unannounced visits by media representatives and their camera crew should be treated professionally and politely. The Director should be notified immediately. The Director may want to contact the media representative's editor or other supervisor. They cannot be allowed to enter without permission.

Our company has no control over the taking of photos or filming outside our premises or worksites on public property, such as courtyards, walkways or public parking lots, so no employee should interfere with such activities there.

Members of the media should not be permitted to block the entrance and exit passages to our facilities or worksites or interfere with the normal conducting of business by our company and its customers.

Media representatives may be notified if our customers complain about any disruption they have caused as to access to walkways or parking lots. Employees should remain aware that anything that they say to the media may be reported in print or broadcast.

16. Seeking Media Coverage

When an employee has an idea about good news story to provide to the media, they should seek permission to do so from the Director, who is the only one authorized to approve seeking media coverage. Do not contact the media without getting approval. Some types of news may be appropriate only for internal company promotion, such as in an employee newsletter.



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Quality Policy

The quality policy describes the fundamental principles against which we, At K4 Group Services, operate and which will support the achievement of our objectives, vision and values. We recognise that success in reaching our objectives depends on our ability to create real and perceived value for customers in everything we provide. We also acknowledge that we depend on the people we work with as well as our processes to achieve this.

K4 Group Services aims to be recognised as a best in class provider of security services through our management team supporting our people in the delivery of customer service excellence; together with efficient and effective operational processes and an ongoing programme of training and development.

Our success will be measured through the achievement of our quality objectives. And this can best be achieved through the recruitment of highly motivated, customer focused officers, supported by our managers at all levels of the business, and by the recognition that our people are the public face of the business and significantly impact on the customer's perception of how we operate and the service we deliver. We must therefore ensure that we create an environment that makes K4 Group Services a good place to work for all of our employees.

We are committed to comply with all regulatory requirements of security business and we aim to continual improve our security services and measure those at regular intervals.

This policy is a controlled document and shall be reviewed and amended, where applicable, to ensure that it remains relevant to the Company's business.



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Recruitment and Selection Policy

We aim to provide equal opportunities in employment, and our recruitment and selection procedures reflect that. We correctly train our HR staff or other such members of staff who have recruitment and selection responsibilities, to ensure that they avoid unlawful discrimination, both of the conscious and the unconscious varieties.

Our policy is to hire, promote, and advance employees solely on the basis of merit. All decisions related to hiring, recruitment, promotion or advancement will be made on this basis.

From time to time, all job descriptions, if utilized, shall be reviewed and revised to make sure that they comply with our policy of equal opportunity.

When we place advertisements for job vacancies, we will take these issues into account, and they will be non-discriminatory in nature.

We are committed to providing fair treatment to each and every job applicant, and considering them only on the basis of their ability to carry out the essential functions of the job. All job interview questions must be of a nondiscriminatory nature, and only concern job requirements.



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Sexual Harassment Policy

K4 Group Services regards sexual harassment as a type of unacceptable misconduct that interferes with a proper employment relationship. Employees have a right to expect that their workplace and working environment will be free of any and all discrimination or conduct that is harassing, disruptive or coercive. Sexual harassment is strictly prohibited and will result in discipline, with the sanctions ranging up to and including termination.

17. Sexual Harassment Definition

Sexual harassment includes non-consensual verbal, physical, or visual sexually oriented conduct or materials, requests for sexual favors, or sexual advances. This includes anything that is objectionable or offensive to the person exposed to it, and includes, but is not limited to, sexual epithets, suggestive or derogatory slurs, gestures or comments, and offensive drawings, pictures, cartoons or posters.

Our policy is based on the legislative definition of sexual harassment. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that occur under the following conditions

- When conduct of this nature constitutes either an explicit or implicit condition or term of employment (such as when it impacts promotion, training, timekeeping or overtime assignments)
- When submission to or rejection of the conduct is utilized as a factor in making employment decisions (such as for hiring, promotion, or termination)
- When the conduct interferes with an individual's work performance or results in a hostile, intimidating, or offensive work environment

Sexual harassment may also involve employee conduct that interferes unreasonably with another employee's work performance through the creation of a hostile, intimidating, or offensive workplace environment. Sexual harassment includes any behavior by employees aimed at other employees including, but not limited to, explicit or subtle pressure for sexual activity, touching or language of an inappropriate nature, asking for or demanding sexual favors, or physical assault.

18. What is excluded from the definition of sexual harassment?

Sexual harassment does not include socially acceptable occasional remarks or compliments or common friendly terms of greeting. It only encompasses unwelcome behavior, and that which interferes with work effectiveness by decreasing morale or being personally offensive.

18.1 Non-Employee Harassment

Our company tries to protect all employees from harassment by customers, vendors and other non-employees that they come into contact with.

19. Procedure for Complaints

Employees who believe that they have been subject to sexual harassment should report it right away to the company Director or any other supervisory personnel. Employees are encouraged to make such reports in writing, to create a record, but verbal complaints are also accepted and welcome. Any such complaints are taken seriously



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and are promptly and fully investigated. The confidentiality of the person involved and witnesses shall be protected from unneeded disclosure insofar as it is possible to do so. The individuals have a right to be informed of the results of the investigation.

Under usual circumstances, the individual will be contacted by the company within five days of their complaint and informed as to what steps are being taken in response. When a direct supervisor or other superior is the perpetrator of the sexual harassment, their conduct should be reported to their supervisor or the company Director.

20. Discipline

If an employee, including a supervisor, is determined to have harassed an applicant for employment or current employee, disciplinary sanctions will be imposed which may include reprimands, suspension, or termination. Legal responsibility may also be imposed.

21. Managerial Responsibility

Managers and supervisors are charged with the responsibility of carrying out this policy with their area supervised. Sexual harassment is a violation of this policy and is also unlawful. The company acknowledges its responsibility to prevent, stop, and remedy workplace sexual harassment, to promptly investigate any complaints, and to immediately take corrective action to remedy the problem.

22. Retaliation Prohibited

The company is opposed to and will not tolerate any retaliation against an employee who themselves complains about sexual harassment or who serves as a witness in an investigation of a sexual harassment complaint.

23. Amendment of Written Policy

This policy may be amended in writing from time to time, with any new version appearing in the employee handbook. We encourage employees to review this document now and whenever it is amended.



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Smoking Policy

24. Purpose

This policy is intended to protect all K4 Group Services employees, service users, customers and visitors from second-hand tobacco smoke exposure and to comply with the Smoke-free Premises Regulations 2007.

Exposure to second-hand smoke, also known as passive smoking, increases the risk of lung cancer, heart disease and other illnesses. Ventilation or separating smokers and non-smokers within the same air space does not completely stop potentially dangerous exposure.

25. Policy

Smoking is prohibited throughout the entire workplace with no exceptions. This includes company vehicles. This policy applies to all employees, consultants, sub-contractors, customers or members and visitors.

26. Implementation

Overall responsibility for policy implementation and review rests with company director. All staff are obliged to adhere to, and facilitate the implementation of the policy.

The company director shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They'll also have to give all new personnel a copy of the policy on recruitment/induction.

Appropriate 'No smoking' signs will be clearly displayed at the entrances to and within the premises.

27. Non-compliance

Local disciplinary procedures should be followed if a member of staff does not comply with this policy. The procedures set out on page 12 of the booklet 'Helping to get your business or organization ready for the new law on smoking' should be followed if a customer, visitor or passenger does not comply. Those who do not comply with the smoking law are also liable to a fixed penalty fin and possible criminal prosecution.

28. Help to Stop Smoking

Support for smokers who want to stop will be provided. Sources of support are: Smoke line 0800848484, the Public Health Department of your local NHS Board, or your local GP surgery. Contact details can be found in your local directory.

29. Vehicles

All work vehicles must be kept e smoke-free always except if only the same person ever uses them and never carries passengers.



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30. Employer Duties

- We display No Smoking Signs as legally required.
- We make sure that to ensure employees, customers and visitors do not smoke in our workplaces or vehicles.
- We look into and promptly investigate complaints about employees, customers or visitors smoking.
- We train, inform and consult employees concerning this policy.

31. Enforcement of this Policy

Failure to comply with this policy will be dealt with through the company's disciplinary procedures. Visitors or members of the public who breach the policy will be asked to stop smoking and will be asked to leave the premises if they fail to comply with this request. All breaches of this policy will be recorded in writing by the organisation. Be aware that, in addition to action taken under this policy, the local council may take legal action against individuals who smoke in Smoke-free places or vehicles.



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E-Cigarette & Vaping Policy

32. Purpose

To protect indoor air quality and to protect the health, safety, and comfort of clients, employees, customers, and visitors of K4 Group Services.

E-cigarettes pose health risks and contain detectable levels of carcinogens and toxic chemicals. These chemicals are also present in secondhand emissions. E-cigarettes are not a safe alternative to smoking, and there is no scientific evidence that they help smokers quit.

33. Policy

This e-cigarette policy prohibits the use of electronic nicotine delivery systems (also known as e-cigarettes, e-cigars, e-hookahs, and e-pipes) anywhere that tobacco smoking is prohibited.

No vaping is permitted within the facilities of K4 Group Services at any time. This includes, but is not limited to, common work areas, auditoriums, classrooms, conference and meeting rooms, private offices, elevators, hallways, medical facilities, cafeterias, employee lounges, stairs, restrooms, employer-owned or leased vehicles, and all other enclosed facilities.

This policy is effective immediately.

34. Definition

Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices.

35. Procedure

- 35.1 Staff, visitors, and clients will be informed of the K4 Group Services e-cigarette-free policy through signs posted throughout properties owned and operated by K4 Group Services.
- 35.2 The K4 Group Services will assist employees or visitors who want to quit vaping by helping them access smoking cessation programs and materials.
- 35.3 Any client or visitor observed using e-cigarettes on owned or leased premises will be asked to discontinue in a tactful manner.
- 35.4 Any employee violations of this policy will be handled through the standard disciplinary procedure.



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Training and Development Policy

K4 Group Services promises to provide a training and development program for its staff that is structured and includes both vocational and occasional refresher training. The goal is to ensure success while enabling a high standard of service. This is also provided to comply with the Private Security Industry Act of 2001, the applicable legislation.

We will:

- Provide induction training for new staff and those transferring to new areas of our business
- Provide the required training for those seeking promotion so that they are appropriately prepared for achieving their new responsibilities
- Provide adequate training on health and safety for all employees
- Ensure that employees are aware of the availability of all training courses
- Develop a training plan for everyone, appropriate to each individual
- Review individual training plans during annual appraisals.

We train staff members to be able to handle all tasks relevant to their specific assignments and to maintain or acquire the necessary specialist skills. Training is provided at continuation, refresher and contingency levels.

This policy has been reviewed and approved by the Directors of the firm and has the support of all management levels in K4 Group Services.



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Transfer of Undertaking (Protection of Employment) Regulations "TUPE"

The transfer of the ownership of a business, trade or other undertaking from one particular provider to a second subsequent provider is governed by The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

These regulations outline that such a transfer does not end the employment contract of an employee of the transferor. Once the transfer is completed, all duties, liabilities, powers and rights of the transferor, under the employment contract, are deemed transferred to K4 Group Services.

All terms and conditions of the existing employment contract remain in effect except for provisions relating to pensions. We will check all TUPE transferees' personal files compliance with BS7858:2019 to complete any gaps in screening and vetting. We will provide induction training; assess any training needs to All TUPE transferees. Company will also provide training to all TUPE Transferees within 12 weeks.

Should any changes take place in the regulation, this policy will be revised after reviewing it on a once-a-year basis.



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Violence at Work Policy

K4 Group Services employees who meet the public may encounter violent or aggressive behavior. At times, members of the public may attack, threaten, or curse them.

The Health and Safety Executives define violence as "Any incidence, in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his or her employment".

The most common type of incident our employees typically encounter involves verbal abuse and threats. Physical attacks occur less frequently. In addition to the use of unlawful physical force against a person, violence may also involve the uttering of verbal abuse and threats (whether with or without a weapon), rude innuendoes or gestures, and racial/ sexual harassment.

Violence of any kind can cause significant emotional stress even when there is not a physical injury. A risk of physical injury may be implied by threats. Those who damage an employee's personal property and belongings can also instill fear of future physical attack and thereby cause emotional distress and stress.

36. Statement

As an employee, we will spare no reasonable effort and precautions needed to protect our employees' safety and health at work and to help prevent aggression and violence of all kinds.

Employees, who are assaulted, threatened, or who have suffered verbal abuse while working will receive all possible support and assistance by the company, including efforts to protect them while working on our clients' premises.

37. Reporting of Incidents

We make an: "Incident Report form" which will be available from Reception, which employees and managers should use to report any incidence of violence, aggression, threats or verbal abuse at work whenever and wherever it occurs. Reporting such incidents is legally required under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulation's 2013 (RIDDOR).

38. What are Reportable Injuries?

The following injuries are reportable under RIDDOR when they result from a work-related accident:

- The death of any person
- Specified Injuries to workers
- Injuries to workers which result in their incapacitation for more than 7 days
- Injuries to non-workers which result in them being taken directly to hospital for treatment, or specified injuries to non-workers which occur on hospital premises.

Certain accidents are reportable to the HSE's Incident Contact Centre. The Health and Safety Coordinator must be notified as soon as practicable after incidents causing the following injuries:

- Fractures, other than to fingers, thumbs and toes
- Amputations



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- Any injury likely to lead to permanent loss of sight or reduction in sight
- Any crush injury to the head or torso causing damage to the brain or internal organs
- Serious burns (including scalding) which:
 - Covers more than 10% of the body
 - Causes significant damage to the eyes, respiratory system or other vital organs
- Any scalping requiring hospital treatment
- Any loss of consciousness caused by head injury or asphyxia
- Any other injury arising from working in an enclosed space which:
 - Leads to hypothermia or heat-induced illness
 - Requires resuscitation or admittance to hospital for more than 24 hours

39. Incident Report Form

This form should be completed as soon as possible after the event, preferably by the member of staff involved. The report form covers the following:

- Details of person assaulted
- Details of assailant/s if known
- Details of incident (including any injury suffered, treatment received)
- Outcome (whether the Police were called)
- Possible contributory factors/improvements

40. Signs of AGGRESSIVE

- Staring eyes
- Sweating
- Fidgeting/wringing of the hands
- Loud excited speech
- Finger wagging

41. Actions to Defuse the Situation

- Staying calm and speaking slowly so as not to be drawn into heated argument
- Avoiding aggressive body language such as hands on hips, wagging fingers, looking down at the aggressor
- Use gentle, measured calm speech
- Listen attentively to what the person has to say and show compassion
- Do not argue and try not to respond until the person has got their frustration out of their system.
- Make eye contact but try not to stare
- Maintain an open posture – avoid crossed arms, finger wagging or hands on hips
- Give the person plenty of personal space

42. Should you be Threatened or Physically Assaulted?

- Try to escape
- Raise the alarm – by shouting if necessary
- Call the police – either yourself, or by getting someone to do it for you
- Report the matter to your manager as soon as possible



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Make a note of what happened, including:

- Time and date
- Location of the incident
- Names and addresses of any witnesses
- What you were doing at the time of the incident
- What the outcome was – i.e. injury, verbal abuse, damage to property etc.

Waste and Recycling Policy

K4 Group Services believes in promoting sustainability through prudent waste management and recycling. We attempt to lower our use of materials, reuse materials when we can, and attempt to recycle materials and utilize recycled materials whenever possible. We keep these principles in mind in managing office products, including paper and electronic equipment including computers, plastic, glass, cans, and batteries.

To carry out these goals, we educate and inform our staff about policies and issues and make recycling receptacles available on our premises. We use suppliers, whenever possible, who will aid in collecting and recycling used products that they have supplied, and always seek waste reduction, waste recycling and waste minimization information from suppliers and vendors that we use.



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Accident/Incident Investigation Policy

43. Policy Statement

All employees of K4 Group Services must report any accidents or other incidents that result in an injury or property damage to their immediate supervisor. Such reports must be made as soon as possible. Any incidents that had the potential to cause property damage or serious injury but did not should also be reported. Management must receive a report of all accidents or incidents from supervisors as soon as possible. Each report will undergo analysis to determine the cause of the accident or incident and to see if any steps should be taken to prevent further injury or damage from occurring in the future.

44. Definitions

Accidents are occurrences that are unplanned and that result in injury to a person or results in property damage.

They are divided into the following categories:

- A Critical Injury is any serious injury that:
 - Exposes a life to jeopardy;
 - Results in unconsciousness;
 - Causes substantial blood loss;
 - Causes the fracture of an arm or leg but not a toe or finger;
 - Causes the amputation of an arm, leg, foot or hand but not a toe or finger;
 - Results in burns to a major portion of the body; or
 - Results the loss of eyesight to at least one eye.
- **First Aid** involves injuries that are more minor that can be treated on the jobsite without any employee losing days.
- **An Incident** is an occurrence resulting in property damage without any injury to employees or other persons.
- **Lost Time Injury** (LTI) is an injury serious enough that an employee is prevented from going to work on the next day.
- **Medical Aid** is defined as an injury not serious enough to require the employee to take any more than the day of the injury itself off of work, but serious enough to require medical treatment from a physician.
- **A Near Miss** constitutes an event in which an injury or damage might have taken place if conditions had been somewhat different.
- **Occupational Illness** is those medical conditions in which an employee suffers damage to their health from exposure to any workplace chemical, biological or physical agents.

45. Role of Supervisor in an Accident Investigation

Both, Site Health and Safety Coordinator and the immediate Supervisor must participate in thorough investigations and reporting, on an Accident Investigation Form of all incidents or accidents involving employees. They must also take witness statements and gather any and all other relevant information and take care to see that any injured person receives needed medical treatment.



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Supervisors should forward all such forms, statements and information gathered, to the Health and Safety Department. If an employee requiring First Aid later needs further medical aid, the supervisor should notify the Health and Safety Department and have the treating doctor or therapist complete a Functional Abilities Form.

The supervisor should maintain contact with the injured employees as often as needed, or a minimum of weekly contact. Assistance is available from the Health and Safety Department.

46. Step by Step Procedure

- A worker reports an accident at work to a supervisor.
- Any first aid needed is provided.
- The injured worker is taken to a hospital or doctor's office for further medical treatment.
- The employee is provided with an Ensure Return to Work package.
- Steps are taken, when there is a critical injury, to eliminate the hazard that caused the accident if that can be done, or guard the scene of the accident to prevent further injuries.
- Preparation an Accident/Incident Report form spelling out the causes of the incident after an investigation.
- A copy of the report form should be sent to the Health and Safety Department.
- Report all incidents or accidents including placing them in the following categories:
 - First Aid
 - Incidents and Near Misses
 - Lost Time Injuries
 - Medical Aid



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Social Media Policy

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, micro blogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. The following principles apply to professional use of social media on behalf of K4 Group Services as well as personal use of social media when referencing K4 Group Services:

- Employees need to know and adhere to the Company’s Code of Conduct, Employee Handbook, and other company policies when using social media in reference to K4 Group Services.
- Employees should be aware of the effect their actions may have on their images, as well as K4 Group Services image / reputation. The information that employees post or publish maybe public information for a long time.
- Employees should be aware that K4 Group Services may observe content and information made available by employees through social media. Employees should use their best judgement in posting material to ensure that it is neither inappropriate nor harmful to K4 Group Services, its employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that could potentially create a hostile work environment.
- Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should always check with the Human Resources Department and/or supervisor.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized K4 Group Services spokespersons
- If employees find or encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- Social media use shouldn't interfere with employee’s responsibilities at K4 Group Services. K4 Group Services Computer systems are to be used for business purposes only. When using K4 Group Services computer systems, use of social media for business purposes is allowed (ex: Facebook, Twitter, K4 Group Services blog sand LinkedIn), but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.
- It is highly recommended that employees keep K4 Group Services related social media accounts separate from personal accounts, if practical.



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Anti-Corruption and Bribery Policy

47. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

48. Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

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. We 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.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. 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.

49. Scope

49.1 Who is covered by the policy?

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.

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 employees in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;



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- Charitable contributions.

49.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

49.3 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies; or
- To any public employee or government officials or representatives, or politicians or political parties.

Employees may not accept any gift or hospitality from our business partners if:

- There is any suggestion that a return favour will be expected or implied.
- Where a manager's approval is required above, if the manager is below Director level then approval must be sought from an appropriate Director.
- If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.
- 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.
- Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approva

49.4 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary/Account department, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

49.5 Political Contributions



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We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

49.6 Charitable Contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. 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 compliance manager.

All charitable contributions should be publicly disclosed.

50. 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 employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the Company Secretary or the confidential helpline as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

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.

51. 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.

52. 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 or concerns, these should be raised with your line manager OR the Company Secretary or through the confidential helpline.



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53. What to do if you are a Victim of Bribery or Corruption

It is important that you tell the Company Secretary/ Accounts Dept or the confidential helpline _____ NEED TO ADD NUMBER _____ 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.

54. Protection

Employees 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 compliance manager] immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

55. Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

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.

56. 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 Company Secretary 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 and are given adequate and regular training on it.

57. Monitoring and Review

The Company Secretary 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.



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

Employees 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 Company Secretary.

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



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Business Ethics Policy

K4 Group Services believes that it is important for K4 Group Services and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that K4 Group Services meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, K4 Group Services is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of K4 Group Services where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the K4 Group Services, its employees and its stakeholders.

We will ensure that K4 Group Services is meeting its aims with regard to social impact and ethical behavior and that its stakeholders perceive K4 Group Services in a positive light.

58. Procedure

- All employees will be provided with ethics training as part of the induction Programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
- All employees are required to adhere to the K4 Group Services policy and procedure on business ethics. Employees who breach K4 Group Services policy on business ethics will be subject to disciplinary action up to and including dismissal.
- Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
- K4 Group Services has a Code of Conduct which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available on in the Staff Handbook.
- The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
 - Data protection/Access to employee data.
 - Whistleblowing.
 - The giving and receiving of gifts.
 - Confidentiality.
 - Relationships with competitors, suppliers, advertisers, etc.
 - Equal opportunities, discrimination and harassment.
 - Moonlighting.
 - The environment.
- K4 Group Services adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:
 - Process personal data fairly, lawfully and in a transparent manner.
 - Obtain personal data only for one or more specified and lawful purposes and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
 - Ensure that personal data is adequate, relevant and not excessive for the purpose or purposes for which it is held.
 - Ensure that personal data is accurate and, where necessary, kept up-to-date.
 - Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained.



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- Ensure that personal data is kept secure.
- Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

K4 Group Services' employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the K4 Group Services' Data Protection/Access to Employee Data policy should speak to their manager in the first instance.

- K4 Group Services encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. K4 Group Services recognizes that effective and honest communication is essential if malpractice is to be effectively dealt with and K4 Group Services success ensured.
- K4 Group Services does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
- A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any K4 Group Services confidential information, either during their employment or after their employment has ended. Confidential information includes information on the K4 Group Services present or potential customers or suppliers and any information relating to the K4 Group Services business, including marketing, corporate or financial plans.
- K4 Group Services recognizes that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While K4 Group Services has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the K4 Group Services.
- K4 Group Services is committed to equality of opportunity and diversity in the workplace. It is the K4 Group Services policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, K4 Group Services will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately.
- Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the K4 Group Services. Although K4 Group Services has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where K4 Group Services considers that this is incompatible with its interests and, in any event, unless employees have obtained prior written authorisation from senior management.
- K4 Group Services is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the K4 Group Services equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.



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Modern Slavery Policy Statement

This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that K4 Group Services has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. K4 Group Services has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

1. Our Suppliers

K4 Group Services operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate the contract at any time should any instances of modern slavery come to light]

2. Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

3. Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain.



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Data Protection & GDPR Policy

1. Data Protection

In order to operate effectively and fulfil its legal obligations, K4 Group Services needs to collect, maintain and use certain personal information about current, past and prospective employees and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act 2018 (DPA)- including GDPR.

2. Data Protection Principles

All personal data must be processed in accordance with the eight Data Protection Principles. The essence of these principles is set out below together with brief, non-exhaustive practical examples of when these principles may have relevance to you.

Personal data must:

- Be processed fairly and lawfully;
- Be obtained only for one or more specified or lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Be accurate and, where necessary, kept up-to-date;
- Staff must notify changes of name, address, telephone number, bank and marital status to the HR Department soon as possible. The HR Department will endeavour, periodically, to ask staff to confirm that such personal data held by the Company is accurate. Staff should advise the Company of any changes to their contact details or to any other details that may be of relevance.
- Not be kept for longer than is necessary
- Be processed in accordance with the rights of data subjects.
 - For example, employees have a right of access to the information that the Company holds about them. Upon receipt of a written or email subject access request the Company shall disclose all the information that it is required to do so by law.
 - If any member of staff receives any letter from a customer, business contact, other employee, or any other third party requesting any information about them then they must pass the letter to the Data Protection Officer.
 - Employees should, if they are making a subject access request of the Company, send their access request to the Director.
 - Access to personal data must be restricted to authorised individuals for approved purposes
- Be protected by appropriate technical and organisational measures against unauthorised or unlawful processing, against accidental loss or damage.
 - The Company may take steps to put in place technical methods (i.e. firewalls, encryption, password protection, etc.) or organisational methods (hierarchy of access to personnel files, locking cabinets etc.) of protecting personal data where the importance of the personal data makes this appropriate.
 - All employees who have access to personal data controlled by the Company whether or not on computer, and whether in the office or at home or elsewhere, must take adequate precautions to



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ensure confidentiality so that neither the Company, nor any individual employed by the Company, becomes exposed to criminal or civil liability as a result of the loss, destruction or disclosure of personal data. All individuals must fully comply with all Company procedures and requirements in this regard.

- Staff should ensure the security of data at all times. Staff must not leave personal data on screen or on desk tops when they are not at their desks. Paper records should be stored securely unless under active consideration. A clear desk policy should be observed.
- Not be transferred to a country or territory outside the European Economic Area unless there is a clear legal basis in the Act for making the transfer.

3. Data Processing

Personal data provided by or about an individual to the Company will be processed in accordance with the Act. Data about an individual will only be processed for lawful and fair purposes. The Company is the legal person who determines the manner in which and the purposes for which personal data may be used. The Data Protection Officer who has the main responsibility internally for managing data protection issues and compliance in the Company is the Director. Personal data about an individual will be processed for various purposes which may include:

- to assess his/her application to become an employee;
- To administer the contractual sick pay system;
- To address any health and safety issues;
- To facilitate management decisions;
- To detect fraud;
- To administer any personal health insurance benefit or other similar benefit;
- To administer the employment relationship so that the Company may properly carry out its duties, rights and obligations to the employee. Such processing will principally be for HR, administrative, regulatory or payroll purposes.

4. Sensitive Personal Data

Certain personal data is given special status in data protection legislation. This personal data is called sensitive personal data. Sensitive personal data is personal data consisting of information as to:

- Racial or ethnic origin.
- Political opinions.
- Religious beliefs (or other beliefs of a similar nature).
- Trade union membership
- Physical or mental health
- Sex life
- Commission or the alleged commission of an offence.
- Proceedings for any offence, the disposal of such proceedings or the sentence of any Court in such proceedings.

Subject to the exceptions set out below and elsewhere in this procedure, sensitive personal data shall generally only be processed after the employee has given express consent. The Company may in certain situations process the data without your consent if it is necessary for processing taking place for one of the following purposes:

- Ensuring health and safety of employees;



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- Ensuring a safe working environment;
- Maintaining records of statutory sick pay or maternity pay;
- Protecting the person and property of people entering on to the company premises or customer site;
- Carrying out any other obligation or enforcing any right under employment law;
- Participating in legal proceedings or obtaining legal advice.
- For the administration of justice.
- For medical purposes by a health professional.

Sensitive personal data relating to racial or ethnic origin may be processed without express consent in order to K4 Group Services the effectiveness of the Company's Race Equality Policy and Procedure. The Company may also process such sensitive personal data about you without your explicit consent where it is otherwise entitled to do so by virtue of a condition under Schedule 3 to the Act.

5. Requests for Information

Employees about whom the Company holds personal data has the right to be:

- Told whether their personal data is being processed by or on behalf of the Company and, if so, to be given a description of:
 - The personal data held;
 - The purposes for which it is being processed and;
 - The recipients of the personal data
- Given a copy of the personal data in an intelligible format (unless to do so is disproportionate or the person has agreed to an alternative way of providing access)
- Given any information available regarding the source of the personal data

For any subject access request. Written requests should be directed to the Director. If you are a member of staff and you receive a written request, then you should forward this to the Director immediately. The request for information will be dealt with promptly and in any event within 30 days from the Company receiving:

- The written request for the personal data;
- Sufficient details to allow the Company to respond to it;
- Sufficient details to confirm the identity of the person making the request; and

Where the provision of information would reveal the identity of a third party, the information may not be provided unless either the consent of that third party is obtained or it is reasonable to proceed without their consent. All requests for access to personal data must be made in writing (which includes e-mails). You should be aware that where access requests are made via e-mail and the Company need not respond until it is satisfied as to the identity of the individual making the request. Personal information relating to employees cannot normally be disclosed to an unauthorised third party. These include family members (see Para 25 below), friends, local authorities, government bodies and the police. There are only certain circumstances when personal information can be given to such third parties and these include:

- Prevention or detection of a crime
- Apprehension or prosecution of offenders
- Prevention of serious harm to a third party
- Protection of the vital interests of the data subject, e.g. release of medical data where failure could result in serious harm or death
- Ensuring health and safety.



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Employees have the right to expect documentary evidence to support such requests.

6. Management of Personal Data

Where we take any decision which significantly affects any member of staff exclusively upon the results of an analysis of his/her personal data carried out by automated means then we will provide that person with notice of this fact as soon as reasonably practicable thereafter. If the decision is connected with a contract entered into between the Company and another person or is taken for the purposes of considering whether to enter into or with a view to entering into such a contract, the other person will be allowed to make representations on the outcome of that decision (perhaps as part of a formal grievance procedure).

In the event of a potential intended or actual transfer of a business, the Company will take all reasonable steps to limit disclosure of personal data about employees to any of the third parties concerned by for instance, the omission of names or other identifying particulars. However, staff should be aware that some personal data such as name, address, position, salary levels may be transferred to a prospective operator (or other similar party) of any part of Company operations as part of a due diligence process. Where this happens, the Company will place contractual obligations on the prospective operator to keep the staff's information safe. The transferee shall cease to be a third party on the date of the formal transfer, except in respect of the personal data concerning certain rights and obligations such as those relating to pensions – not required under the Transfer of Undertakings (Protection of Employment) Regulations 2003 as amended by the Trade Union Reform and Employment Rights Act 1996.

7. Responsibilities

We expect all employees to use computers, email and the Internet responsibly and in accordance with the data protection principles. You should make yourself aware of the provisions contained in the Company's IT Policy. Employees are expected to adhere to this procedure and to ensure that those for whom they are responsible both adhere to this policy and protect computer systems and personal data from security risks. Where necessary, managers should seek advice from the IT Department to assist in these goals.

Employees must become familiar with the aims of this procedure and follow the guidelines set out. In particular Employees should:

- Seek advice from the Director where they have any doubts as to whether or not the processing of personal data that they require to carry out in the course of their employment complies with the Act;
- Not use personal information that they hold in the course of their employment for any reason other than the performance of their employment duties. To procure personal information from the Company and use it without its consent is likely to constitute a criminal offence under the Act;
- Provide all assistance to the Director in the conduct of any audit or preparing a response to a subject access request;
- Keep information that you process for the Company safe and secure in accordance with any procedures issued by the Company. Where no procedures are set out explicitly, you should exercise a degree of care over the personal data that you process by considering the harm that may result were the information to be disclosed unintentionally. Guidance on appropriate levels of security can be obtained from the Director.
- Not keep duplicate records relating to Employees or students for the purposes of our employment where a centralised filing option is available. Keeping your own records unnecessarily can complicate the process of responding to subject access requests.
- Notify the Director immediately should you detect any potential or actual breach of the Act.



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8. Security

Any breaches of this Procedure in relation to personal data security will result in disciplinary action and, in serious cases, may result in the dismissal of an employee of the Company.

Employees will be authorised to gain access to certain computer systems, programs and data. No employee must attempt, alone or with others, to gain access to data or programs to which they have not been authorised to gain access. Employees must not disclose personal details of other Employees to unauthorised third parties where this information is personal data in respect of which the Company is the data controller.

9. Training

Employees will receive training on the importance of Data Protection during their induction training, and further reminders will be given during the monthly supervisor visits. This policy will be used to K4 Group Services for the employee's awareness of the Data Protection Act, so further training needs can be identified.