



PROACTIVE GAS SAFETY LTD

## POLICY DOCUMENTS

Signed.....*C. D. Brown*..... (Director)

Date: September 2023

Policy Review Date: 01 September 2024

PGS will keep under review its policy and procedures on an annual basis in line with current guidance and legislation.

# CONTENTS

<b>Policy Document</b>	<b>Page</b>
Bribery & Corruption policy	<b>3</b>
Disability policy	<b>4</b>
Environmental policy	<b>5</b>
Equal opportunities policy	<b>6</b>
Ethical Policy	<b>7</b>
GDPR Policy	<b>8-9</b>
Harassment Policy	<b>10</b>
Health & Safety at work policy	<b>11</b>
Modern slavery policy	<b>12</b>
Quality Policy	<b>13</b>

---

## **BRIBERY AND CORRUPTION POLICY**

Proactive Gas Safety is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

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

It is an offence in the UK to:

- Offer, promise, or give a financial or other advantage to another person (i.e., bribe a person) whether within the UK or abroad, with the intention of inducing or rewarding improper conduct.
- Request, agree, to receive or accept a financial, or other advantage (i.e., receive a bribe) for or in relation to improper conduct.
- Bribe a foreign public official.

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person while doing business, intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for PGS. PGS can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could also suffer substantial reputational damage in connection with this offence.

It is not acceptable to give, promise, or offer, a payment, gift, or inducement with the expectation that a business advantage will be received, or to reward a business advantage already given.

It is not acceptable to accept a payment, gift or inducement from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

The duty to prevent, detect and report any incident of bribery, and any potential risks, rests not only with the Management Team but applies equally to all employees and associated persons.

PGS will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. It is also committed to ensuring nobody 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 corruption offence has taken place or may take place in the future.

PGS will use reasonable actions to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.

If an employee or associated person is found guilty of giving or receiving a bribe, they will be personally criminally liable and may be subject to disciplinary action.

Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

---

## DISABILITY POLICY

It is PGS's policy that disabled people including job applicants and employees will be able to participate in all PGS's activities fully on an equal basis with people who are not disabled.

Disabilities may be either physical or mental impairments, that have a substantial and long-term effect upon a person's ability to carry out normal day to day activities.

PGS will not, for a reason relating to a person's disability, treat disabled people less favourably than it treats others unless genuinely justified.

Due to the wide variety of potential disabilities, and the likelihood of a disability affecting different people in different ways, it would be inappropriate to prescribe rules on how issues concerning disabled people should be dealt with.

However, the Management Team will take all reasonably practical steps to ensure that disabled people are not less favourably treated or disadvantaged by comparison to people who are not disabled in relation to their work, working environments or by arrangements made by PGS.

The Management Team will not make assumptions but discuss with the disabled person to find out how their disability affects them and what steps they think might help. Expert advice may be sought where necessary.

## ENVIRONMENTAL POLICY

PGS is committed to minimising the impact of its activities on the environment and will strive to ensure that every aspect of its business is conducted in accordance with sound environmental practices.

We will reach this by:

- Consuming material goods in moderation using recyclable products where possible
- Consuming energy and fuels in the most efficient manner possible and reviewing this usage frequently in order to minimise consumption at every opportunity
- Managing our business operations to prevent pollution.
- Ensuring all waste is disposed of in a safe and responsible manner.
- Encouraging appropriate consideration of environmental issues in the professional services we provide to our clients.
- Encouraging the adoption of similar principles by our suppliers.
- Raising awareness of environmental issues amongst our staff and enlist their support in improving the Company's performance.
- Complying with environmental legislation.
- Having a minimal use of single use plastics.



## EQUAL OPPORTUNITIES POLICY

PGS is committed to a policy of treating all its employees and job applicants equally. No employee or potential employee shall receive less favourable treatment or consideration on the ground of race, religion, nationality, ethnic origin, sexual orientation, gender, age, disability, marital status or part time status, or will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

There should be no discrimination on the account of race, religion, ethnic origin, sexual orientation, gender, age, disability, nationality or marital or part time status.

PGS will appoint, train, develop, reward, and promote based on merit and ability.

All employees have personal responsibility for the practical application of PGS's equal opportunities policy which extends to the treatment of job applicants, employees, clients, and visitors.

PGS's grievance procedure is available to any employee who believes that they may have been unfairly discriminated against. The harassment complaints procedure set out in this policy is available to any employee who believes that they may have been harassed. Employees will not be victimised in any way from making such a complaint in good faith. Complaints of this nature will be dealt with seriously, with sensitivity, in confidence and as soon as possible.

Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment will be treated as gross misconduct. Allegations of discrimination which are not made in good faith will also be considered as a disciplinary matter. Confidential records of ongoing matters dealt with in accordance with this policy will be kept.

In the case of any doubt or concern about the application of this policy, please consult a member of the Management Team.

### Recruitment and Selection

The following principles shall apply whenever recruitment or selection for positions takes place:

- individuals will be assessed according to their personal capability to carry out a given job.
- assumptions that only certain types of people will be able to perform certain types of work must not be made.
- any qualifications or requirements which have or may have the effect of inhibiting applications from any person should only be maintained if they can be justified in terms of the position.
- any age limits applied to a job shall only be justified in terms of the position.
- all applications will be processed in the same way.
- written records of interviews and reasons for appointment and non-appointment will be kept.
- if it is necessary to assess whether personal circumstances may affect performance, this will be done objectively, without questions or assumptions being made which are based on stereotype beliefs about certain types of people.
- with regards to a disability, PGS will make reasonable adjustments to eliminate or if that is not reasonably practicable, reduce the disadvantage unless justified.

## ETHICAL POLICY

PGS is committed to the practice of responsible company behaviour, we endeavour to protect and promote the human rights and basic freedoms of all its employees and associates.

PGS is vehemently opposed to the use of slavery in all forms; cruel, inhuman, or degrading punishments; and any attempt to control or reduce freedom of thought, conscience, and religion.

PGS will ensure that all of its employees and associates are entitled to their human rights as set out in the [Universal Declaration of Human Rights and the Human Rights Act 1998](#).

PGS will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

PGS is committed to complying with all relevant employment legislation and regulations. PGS regards such regulations and legislation as the minimum rather than the recommended standard.

PGS does not accept any corporal punishment, harassment in any form, or bullying in any form.

### Suppliers

PGS expects all suppliers to work towards and uphold similar ethical and moral standards.

PGS will investigate the ethical record of potential new suppliers before entering into any agreement. Further, PGS reserves the right to request information from suppliers regarding the production and sources of goods supplied.

PGS reserves the right to withdraw from any agreement or other arrangement with any supplier who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

## GDPR POLICY

PGS respect our employees' and clients' privacy and are determined to protect all personal data.

We currently collect and process the following information:

### Client details – requesting officer

Personal data will be stored within PGS Contact Management System, (CMS) this data is only accessible to members of PGS staff involved in the processing of orders and for marketing purposes where consent is given.

Data will be held for at least 3 years and reviewed annually and removed if no longer relevant.

The CMS is stored on a secure server owned by PGS and access is controlled via password.

Data will also be stored in a client file which is also hosted on a secure server and access is limited to PGS staff.

### Client details - delegates

PGS keep records of delegate personal data which includes details of training undertaken, full name and signature. In addition, if the delegate is on a course which requires certification from our Awarding Organisation, EAL, then they will be asked to provide date of birth.

This information is required to issue certification/proof of training and to advise the company/delegate when training expires.

Post training, data is scanned by PGS trainers and uploaded to Office 365 where data is processed and removed, data is then stored on PGS secure servers in client files.

### Client details - prospects

Personal data of potential clients is stored within the CMS. This data is only accessible to members of PGS staff involved in the processing of orders and for marketing purposes.

Data is reviewed at regular intervals and removed if no longer relevant.

The CMS is stored on a secure server owned by PGS and access is controlled via password.

Consent: Before making contact via email or phone PGS will attempt to seek consent from the data subject. If consent is rejected, then the data will be removed.

### PGS Website

PGStraining.com has a valid security certificate.

PGStraining.com is hosted by wordpress.org and access to the website administration is limited and access is restricted to specific employees of PGS.

When personal data is collected from users, this information is stored securely, and is used either to process the customer order, or, when consent is given, to add to our CMS for marketing purposes.

### Zendesk live chat

This is a third-party online chat function, used to handle client enquiries in real time.

Optional collection of name, email address and the contents of web session.

Session transcripts are offered if email address is provided at the start of the chat or when prompted at the end.

Chat sessions will be retained for two years and will not be shared with any other organisations.

Websites have a valid security certificate.

<https://dashboard.zopim.com/>

<https://www.zendesk.com/>



### Staff details

PGS hold personal data on employees. Staff data is stored on a secure drive with access limited to Management. All information is processed in-house. Payroll is managed in-house.

### Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you make a request to be removed from our records then this will be actioned by Helen Brewin, Company Director and Secretary.

[admin@pgstraining.com](mailto:admin@pgstraining.com)

4 Mere View Barn, Park Lane, Pickmere, WA16 0LG  
01606 872864

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Proactive Gas Safety Ltd  
4 Mere View Barn, Park Lane, Pickmere, WA16 0LG  
[admin@pgstraining.com](mailto:admin@pgstraining.com)  
01606 872864

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## **HARASSMENT POLICY**

It is PGS's policy that the harassment of any of its employees is unacceptable behaviour. All employees have the right to work in an environment which is free from any form of harassment. Anyone found to be in breach of this policy will be liable to disciplinary action which could result in their dismissal.

Harassment takes many forms and occurs on a variety of different grounds and can be directed at one person or many people. An essential characteristic is that it is unwanted by the recipient and that the recipient finds the conduct offensive or unacceptable. Conduct becomes harassment if it is persistent, and it has been made clear that it is regarded by the recipient as offensive although a single incident may amount to harassment if sufficiently serious. Harassment is unlawful in many cases and individuals may legally become personally liable for their actions.

All allegations of harassment will be dealt with seriously, promptly and in confidence. Workers who feel that they have been subject to harassment must not hesitate in reporting to the Management Team. Retaliation against an employee who brings the complaint of harassment is a serious disciplinary offence which may constitute gross misconduct.

PGS Management Team will provide, in confidence, advice and assistance to employees subject to harassment and assist in the resolution of any problems whether through informal or formal means.

## HEALTH & SAFETY AT WORK POLICY

PGS is committed to providing for the health, safety and welfare of all employees and will observe the Health & Safety at Work Act 1974 and all relevant regulations and codes of practice made under it from time to time.

PGS is responsible for the following:

- assessing the risk to the health and safety of employees and others who may be affected and identifying what measures are needed to comply with its health and safety obligations
- providing and maintaining protective clothing and equipment
- ensuring that all necessary safety devices are installed and maintained
- providing information, instruction, training and supervision in safe working methods and procedures
- providing and maintaining a healthy and safe place of work
- promoting the co-operation of employees to ensure safe and healthy conditions of systems of work
- establishing emergency procedures as required
- monitoring and reviewing the management of health and safety at work
- keeping safety under review and making any revision it deems necessary from time to time. All such revisions will be brought to the attention of the employees.

### Employee compliance

This policy needs the full co-operation of all employees who are expected to give all possible assistance aimed at its successful implementation, to take reasonable care for their own safety and that of others. In order to achieve this end, every employee must:

- comply with any safety instructions and directions issued by PGS.
- take reasonable care for their health and safety and health and the safety of other persons (e.g., other employees, contractors, clients, etc) who may be affected by their acts and omissions at work, by observing safety rules which are applicable to them.
- co-operate with PGS to ensure that the aims of the health and safety policy statement are achieved, and any duty or requirement imposed on PGS by or under the relevant statutory provisions is complied with.
- report and co-operate in the investigation of all accidents or incidents that may have led or may lead to injury.
- use equipment or protective clothing provided in accordance with the training they have received.
- report any potential risk or hazard or malfunction of equipment to the appropriate person.

Any failure by an employee to comply with any aspect of PGS's health and safety procedures, rules or duties specifically assigned to the employee in respect of health and safety will be regarded by PGS as misconduct which will be dealt with under the terms of the disciplinary procedure.

All accidents should be reported, however trivial, and the accident will then be recorded in PGS's accident book.

## MODERN SLAVERY POLICY

PGS recognises that modern slavery is a crime and a violation of fundamental human rights and has a zero-tolerance approach to modern slavery.

Modern slavery takes various forms, all in common is the deprivation of a person's liberty by another to exploit them for personal or commercial gain. It is a global phenomenon that is both inter and intra-national, affecting an estimated 45 million people worldwide. There is no typical victim, though it is often more prevalent amongst the most vulnerable, and within minority or excluded groups.

PGS is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation.
- We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

To that end, we confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain, we confirm the following:

- We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.
- We have made enquiries of businesses that supply directly to us and we are confident that no relevant offence is committed in that business.
- Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence of slavery or human trafficking.

We understand that certain industry sectors and geographical regions entail greater risk of exploitation than others. We do not believe that our supply chain is in one of those sectors. Where it is reasonably practicable, we ensure that businesses in our supply chain have made a similar statement relating to slavery and human trafficking.

We also encourage all employees to report on any matters relating to slavery or human trafficking in our supply chains of which they become aware.

## QUALITY POLICY

Quality is important to our business because we value our clients. We strive to provide safety training which meets and even exceeds their expectations.

PGS operates an internal quality assurance (IQA) system to ensure that all our training delivery and assessment meets the assessment standards set by the awarding body with which we work.

The IQA system aims to maintain consistency and accuracy set by the awarding body and ensure that PGS' practices, resources, processes and procedures meet the requirements of the qualifications that we deliver.

IQA is carried out on an ongoing basis.

We have the following systems and procedures in place to support us in our aim of total client satisfaction and continuous improvement throughout our business:

- regular gathering and monitoring of customer feedback
- a customer complaints procedure
- training and development for our employees
- regular internal audit of our processes
- regular external audit by EAL, an Awarding Organisation, of our internal processes
- measurable quality objectives which reflect our business aims
- management reviews of audit results, customer feedback and complaints

Although the Directors have ultimate responsibility for Quality, all employees have a responsibility within their own areas of work to help ensure that Quality is embedded within the whole of the company.