



HORSERACE BETTING LEVY BOARD

POLICIES & PROCEDURES

JULY 2014

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CHIEF EXECUTIVE'S FOREWORD

Dear Colleagues

I am pleased to introduce this updated Policies and Procedures Manual, which is intended as a useful point of reference for all staff and a helpful guide for new employees.

Your specific terms and conditions of employment are set out in your Contract of Employment. The policies and procedures in this Manual do not form part of the Contract of Employment, but you are expected to conform to them.

In our organisation, we aim for high standards of quality, efficiency and professionalism in all our activities. HBLB is committed to achieving this through several routes, including best practice employment policies. These policies are set out in this Manual, and are designed to achieve a constructive relationship between the HBLB and its employees whilst providing scope for employees' development.

The success of our organisation and our own well-being at work depend on mutual understanding and co-operation. This Manual is intended to help us achieve that and it is therefore important that you read and understand it. The Manual is not, however, intended to replace normal relationships between employees and management and you should consult, through the Directors, on any matters where you require further information or clarification concerning your employment.

Yours sincerely

A handwritten signature in black ink that reads "Alan Delmonte". The signature is written in a cursive style and is positioned above a long, thin horizontal line that extends to the right.

Alan Delmonte

Updated July 2014

JOINING HBLB

Recruitment and Selection Policy

HBLB's policy is to select employees on their individual merits and abilities irrespective of gender, sexual orientation, gender reassignment, marital status, race, nationality, colour, ethnic background, religion, belief, age or disability, and in line with the Equal Opportunities and Diversity Policy.

Our methods of recruitment and selection aim to ensure that candidates are treated courteously, fairly and equitably, with dignity and respect.

All new employees have an individual induction programme designed to acquaint them with the following:

- HBLB's role, objectives and organisation.
- HBLB's work.
- Information on remuneration and benefits, and HBLB's employment policies, including the Equal Opportunities and Diversity Policy and Harassment and Bullying procedures.
- Health and Safety policy and procedures.
- IT Systems Use and Social Media Use policy and rules.
- Job-specific induction and training.

New employees learn about the ways in which the Levy is used to support horseracing by attending the BHA Industry Overview training day on the background to the racing and betting industries. This will usually take place within a year of joining HBLB.

New employees are issued with a contract of employment setting out their terms and conditions of employment within eight weeks of joining HBLB.

New employees should refer to their line manager or the Senior Executive Assistant for any further information to help them during induction.

Induction

The Induction Policy is applied to all new employees, each of whom has an individual induction programme at the start of employment. The programme, which is co-ordinated by the Senior Executive Assistant and the new employee's line manager, includes some standard elements that apply to all new employees and some individual elements tailored to their own role and learning needs. Their line manager should normally be in the office on the new employee's first day and as far as possible during the first week. The aims of induction are to settle new employees into HBLB and their roles speedily and effectively, to provide them with support to learn about HBLB and their jobs, and to set clear expectations of them in the initial phases of their work. Induction includes the following elements:

- Employment and 'domestic' administration.
- HBLB policies and procedures, including HR/employment policies, IT and health and safety.
- Learning about the role and work of HBLB and how the new employee's job fits in.
- Learning about the job.
- Learning about the external environment in which HBLB works.
- Assessing the effectiveness of induction.

Within eight weeks, new employees will have an informal post-induction meeting with their line manager or Director. The aims are to assess how well the new employee is settling down, confirm that s/he is receiving the support needed to learn about HBLB and his/her job, and provide an opportunity to discuss and deal with any issues that have arisen. The meetings are a useful way of assessing the efficacy of induction; they are also used to gain feedback on the recruitment process.

The following areas are discussed during post-induction meetings:

- How well the new employee has settled in.
- The extent to which s/he has understood HBLB's role and his/her job.
- Whether s/he is receiving sufficient information, guidance, training and feedback to learn his/her job.
- Relationship with their line manager and colleagues.
- Whether the job is as expected on the basis of recruitment interviews and the job description.
- Whether the new employee has all the equipment needed to carry out the job.
- Whether s/he has any unresolved queries, issues or difficulties.
- His/her views on the recruitment and induction processes and any suggestions for improvement.
- What information would have been helpful to have been given during the induction process.

After the meeting, the line manager or Director makes a note of the discussion, and, after agreement and signature by the new employee, places it on his/her personal file (the new employee also keeps a copy). Any issues will be progressed as agreed and feedback given as agreed.

Probation

The normal probationary period for new employees is six months, during which new employees have regular progress reviews (usually monthly) with their line manager or Director. Towards the end of the period, an overall review of progress and performance to date takes place and, if this is satisfactory, probation ends. If it is unsatisfactory, probation may be extended or the employment terminated. Employees receive written confirmation in each of these cases.

If an employee wishes to terminate their employment during the probationary period, they are required to give one week's notice in writing. HBLB may also terminate employment during the probationary period by giving one week's notice in writing.

TRAINING AND PERFORMANCE

HBLB believes that learning and development for employees in line with its business requirements is an investment essential to its continued success. HBLB is committed to the continuing development of all employees throughout their employment. This is supported by the policies and procedures outlined below.

Employee training and development records are monitored for compliance with the Equal Opportunities and Diversity Policy and with legislation by the Remuneration Committee.

Training and Development Procedure

Employees and their line manager or Director identify corporate, group and individual training and development needs, usually at the time of their annual Staff Appraisal, but these may also be identified at other times during the year. These stem from departmental objectives, operational developments and other developments such as the need to comply with legislation.

Agreed training and development needs/activities, whether for groups or individuals, are included in the annual Training Plan and Budget. The Training Plan and Budget is planned as part of HBLB's annual budgeting processes.

Further Education

As part of continued training and development, employees are encouraged to undertake formal courses of study which lead to recognised qualifications that will support them in fulfilling their potential in relation to their job at HBLB. The following arrangements apply where support for a course of study has been agreed with their Director through the Staff Appraisal process.

HBLB will fund the course fee, subject to the employee completing the course satisfactorily. HBLB will pay the course provider directly before the course begins. Evidence of completion will be required.

HBLB will fund any additional fees for examinations that directly arise from the course, subject to the employee sitting the examination, and the cost of necessary books and/or course materials to a maximum of £100 per year of the course.

Further Education Costs Clawback

If the employee's employment with the HBLB terminates for any reason within 12 months of the date that the employee receives any training provided or arranged by the HBLB under the Staff Appraisal process, they may be required to repay the HBLB a sum determined by the following formula, at the discretion of the Chief Executive:

$$C \times (12-M)/12$$

where C = training costs and M = the number of complete months between the date the employee received the training and the date the employment terminates.

Any sums owing by the employee to the HBLB under this agreement may be deducted from any wages/salary owing to the employee which would otherwise be payable at any time after notice of termination of employment has been given.

If the employee fails to make any payment due on or before the date payment is required, interest shall run from that date at the rate of 4% per annum above base and will accrue daily.

Promotion Policy

HBLB seeks to ensure that all employees have the opportunity to use their capabilities to the full; this is supported by the following commitments:

- All vacancies are notified to all staff so that individuals have the opportunity to apply for the post if they wish.
- All employees have an equal opportunity for promotion irrespective of gender, sexual orientation, gender reassignment, marital or civil partnership status, maternity or pregnancy, race, nationality, colour, religion, belief, ethnic background, age or disability. This will be monitored to ensure that there is equality of opportunity in promotion.

EQUAL OPPORTUNITIES AND DIVERSITY

HBLB is committed to providing a working environment that ensures all employees are treated with dignity and respect, and to equal opportunities for all, irrespective of gender, sexual orientation, gender reassignment, marital or civil partnership status, maternity and pregnancy, race, nationality, colour, ethnic background, religion, belief, age or disability. This policy is designed, with the associated policies and procedures, e.g. on harassment, to prevent both direct and indirect discrimination on any of these grounds and to support a positive approach towards equal opportunities and diversity.

The policy applies to all employees and any person who acts on the behalf of HBLB and extends to all dealings with members of the public, Board members and other business contacts.

Discrimination

‘Discrimination’ is conduct which, intentionally or unintentionally, treats a person less favourably than others on the grounds of one of the following protected characteristics: gender, sexual orientation, gender reassignment, marital or civil partnership status, maternity and pregnancy, race, nationality, colour, ethnic background, religion, belief, age or disability, or causes detriment to the recipient of that conduct on those grounds. There are six types of discrimination:

- a) Direct discrimination occurs when a person or a group of people is treated less favourably than others in similar circumstances on at least one of the grounds listed above in the Equal Opportunities and Diversity policy.
- b) Discrimination by association: applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- c) Perception discrimination: applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex. This is direct discrimination against an individual because others think they possess a particular characteristic. It applies even if the person does not actually possess that characteristic.
- d) Indirect discrimination occurs when a provision, criterion or practice applied by the HBLB adversely affects a person or a group of people considerably more than another and cannot be justified in terms of a legitimate business aim.
- e) Harassment.
- f) Victimisation.

HBLB will not tolerate discrimination by or against its employees or visitors and endeavours to ensure that none of its decisions or actions cause discrimination.

If any employee is found to have discriminated against another person, disciplinary action will be taken against them. This may include summary dismissal. Employees should also be aware that, in addition, in some circumstances discrimination is a criminal offence.

If an employee believes that s/he has been discriminated against, s/he should raise the matter with their Director informally, or, where the matter involves their Director or their department, to the Senior Executive Assistant. Where the situation is more serious, s/he should raise the matter through the grievance procedure. A separate procedure exists for harassment or bullying.

Disability

There is no obligation on any employee to disclose a disability to HBLB but if an employee discloses a disability, then HBLB will consider reasonable adjustments that could be made to employment arrangements or to the premises in order to accommodate the disability. HBLB will treat all information disclosed on disability as confidential.

Harassment, Bullying and Victimisation

Everyone has the right to be treated with dignity and respect and it is HBLB's policy not to tolerate any form of harassment, bullying or victimisation of its employees.

Definition of Harassment

The definition of harassment has two parts:

1. Harassment occurs where, on grounds of race, ethnic or national origin or for a reason relating to a person's disability, sex, sexual orientation, gender reassignment, religion/belief or age, a person is subjected to unwanted conduct that has the purpose (intentional) or effect (unintentional) of either:
 - i. violating that person's dignity, or
 - ii. creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
2. Where no intent to offend can be established (i.e. any offence caused was completely unintentional), the unwanted conduct will only be regarded as having the 'effect' of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment if that could be regarded as a reasonable conclusion when taking all the circumstances into account, including (in particular) the perception of the person who has been harassed.

Harassment can range from extremes such as violence to less obvious forms like ignoring someone. Whatever the form, it is behaviour by another employee or third party that is unwanted and offensive to the recipient or an observer. It could include the following; however, this is not an exhaustive list:

- Unwanted physical contact.
- Offensive jokes, language, gossip, slander, songs, letters or emails.
- Offensive posters, graffiti, obscene gestures, flags, bunting and emblems.
- Isolation or non-cooperation and exclusion from social activities.
- Coercion for sexual favours.

- Pressure to participate in political or religious groups.
- Intrusion by pestering, spying and stalking.
- Failure to safeguard confidential and/or sensitive personal information.

Definition of Bullying

Bullying is a separate issue to harassment, but the effects can be the same. It is conduct, or the misuse or abuse of position or power, to coerce others by fear or to oppress them by threat. It can also be described as the intentional intimidation or belittling of someone through the misuse of conduct, power or position, leaving him/her feeling hurt, upset, humiliated, vulnerable or helpless. Bullying can take the form of aggressive behaviour, intimidation, constant criticism or undermining in front of colleagues. It may be verbal, psychological or physical. It is not always obvious and may be subtle. The following are examples of bullying; however, this is not an exhaustive list:

- Shouting at another employee.
- Humiliating attacks on another employee's personal or professional performance, and criticising a person in front of others.
- Spreading malicious rumours and/or making malicious allegations about another person's character or standing.
- Publicly undervaluing another employee.
- Withholding information deliberately in order to adversely affect another employee's performance.
- Excluding or isolating people by deliberately not talking to them; encouraging others to ignore or isolate another employee.
- Abusive, threatening or insulting words or behaviour.

Definition of Victimisation

Victimisation is where a person is treated less favourably than others because, for example, s/he has brought proceedings against, or given evidence against, or complained about a person who has been or has allegedly been harassing, bullying or discriminating against others.

Employer's Responsibility

HBLB will take action to prevent discrimination, harassment, bullying and victimisation, encourage incidents to be reported and ensure that satisfactory solutions to problems are applied. HBLB has a duty to take such action under the common law duty of care and health and safety law, as well as under discrimination law.

Employees' Responsibility

All employees have responsibility for, and self-interest in, ensuring that HBLB has a working environment which maintains dignity and respect and which discourages discrimination, harassment, bullying and victimisation. All employees are therefore expected to behave in ways which support a non-hostile working environment for themselves and other employees. Everyone is

expected to play their part in making HBLB's policy a reality and be prepared to take appropriate action if they observe or have evidence that someone else is being discriminated against, harassed, bullied or victimised.

Directors and Managers have a responsibility to ensure that discrimination, harassment, bullying and victimisation do not occur and that their own standards of conduct and those of other employees do not give offence.

Complaints Procedures for Harassment, Bullying and Victimisation

If any employee thinks s/he is being harassed, bullied or victimised, s/he can do something about it using the procedures below.

Informal Procedure

Complaints should preferably be dealt with internally and informally. In some circumstances, the problem can be resolved speedily and with minimum risk to confidentiality. It pays to act quickly to reduce personal embarrassment and suffering and avoids disruption to work and working relationships.

In many cases, it is sufficient for the employee affected to raise the problem with the person concerned, pointing out that the behaviour is unacceptable. However, if the employee affected would find this difficult or embarrassing, s/he may raise the matter informally with the Senior Executive Assistant or a Director.

Formal Procedure

Where an employee believes that more serious harassment, bullying or victimisation has taken place, or where an informal approach has failed, the formal procedure should be used. The procedure is similar to the grievance procedure but with some modifications as appropriate to ensure that confidentiality and impartiality are maintained.

The complaint should be made in writing to the Senior Executive Assistant (or, if the complaint is against the Senior Executive Assistant, to a Director) who will ensure that the matter is investigated.

The following principles will apply:

- The response will be prompt, thorough and impartial.
- Both parties will be offered representation.
- The person about whom the complaint has been made will be given details of the complaint and the right to, and time to, respond.
- There will be a timescale for resolution of problems.
- Confidentiality for all.

Harassment, bullying and victimisation are very serious matters. Therefore, if a complaint is upheld, the perpetrator may be subject to HBLB's disciplinary proceedings.

In serious cases this can lead to dismissal. Staff guilty of sexual or racial harassment may also render themselves personally liable under the Equality Act.

Malicious Complaints

Where a complaint is untrue and has been brought out of spite, or for some other unacceptable motive, the complainant will be subject to HBLB's disciplinary procedure, as will any witnesses who have deliberately misled HBLB during its investigations.

FAMILY FRIENDLY POLICIES AND PROCEDURES

Maternity

HBLB operates Maternity Policy in accordance with statutory requirements. For details please refer to: <https://www.gov.uk/browse/employing-people/time-off>

Enhanced Maternity Pay

Employees who have a minimum of 2 years' continuous service with HBLB, at 15 weeks before the expected week of childbirth, will be entitled to receive enhanced maternity pay as follows:

- Full pay (based on average weekly earnings) for the first 12 weeks.
- Statutory rate for the remaining period of the maternity leave, up to a maximum of 27 weeks (or 90% of average weekly earnings if less).

However, if the employee leaves HBLB within 3 months of returning from maternity leave, HBLB has the discretion to claim back the enhanced element of the maternity pay (any pay above the statutory level).

Paternity

HBLB operates Paternity Policy for ordinary and additional paternity leave in accordance with statutory requirements. For details, please refer to: <https://www.gov.uk/browse/employing-people/time-off>.

Enhanced Ordinary Paternity Pay

Employees who have a minimum of 2 years continuous service with HBLB, at 15 weeks before the expected week of childbirth, will be entitled to receive enhanced ordinary paternity pay as follows:

Full pay based on average weekly earnings (which includes the statutory element) for the length of ordinary paternity leave.

Adoption Leave

HBLB operates Adoption policy in accordance with statutory requirements. For details please refer to: <https://www.gov.uk/browse/employing-people/time-off>.

Parental Leave

HBLB operates Parental Leave policy in accordance with statutory requirements. For details please refer to: <https://www.gov.uk/browse/employing-people/time-off>.

Eligibility

To qualify for parental leave, employees must:

- Have or expect to have parental responsibilities for a child under the age of 5 years, or under the age of 18 years if the child is disabled
- Have one year's continuous service with HBLB

Length and timing of Parental Leave

Employees may take 13 weeks' parental leave in total for each child or 18 weeks per child in the case of disabled children.

An employee can take leave in blocks of one week or more, and up to a maximum of 4 weeks in a year. If the child is disabled, parental leave may be taken in days.

Notification

Circumstances permitting, employees must give HBLB 21 days' notice in writing of the intention to take parental leave, and this must also be submitted to the Senior Executive Assistant using the employee's personal absence form following the usual process.

HBLB reserves the right to postpone the leave if its work would be adversely affected by the employee's absence. The leave cannot, however, be postponed if it is to follow immediately the birth of a child or an adoption placement.

Emergency and Compassionate Leave

All types of leave covered in this section must be taken in accordance with the notification requirements and procedures below, and recorded on the employee's personal absence form.

Time Off for Dependants

HBLB recognises that there may be occasions, albeit rare, where it is necessary for employees to have an extended period of absence from work to care for a dependant in an emergency. It is open to all employees irrespective of length of service.

Definition of a Dependand

A dependant is the spouse, partner, child or parent of the employee, or other relative living with the employee, or someone who reasonably relies on the employee. It does not include someone who lives in the household as an employee (for example, a housekeeper) or as a tenant, lodger or boarder.

Eligibility

Although not exhaustive, an emergency is defined as when a dependent:

- Is ill, or has been injured or assaulted.
- Is having a baby.
- Needs the employee to make longer term arrangements because they are ill or injured.
- Needs the employee to deal with an unexpected disruption or breakdown in care, such as a child minder or nurse falling ill or failing to turn up.
- Goes into labour.

Having to deal with an unexpected incident involving the employee's child during school hours is also covered. Leave to handle domestic emergencies such as the washing machine breaking down or a pet requiring a visit to the vet do not qualify.

What is considered to be a 'reasonable' amount of time off depends on the circumstances. Usually, one or two days will be sufficient for the employee to make suitable arrangements to deal with the emergency.

Payment

Emergency leave is unpaid.

Notification

If an employee needs to take emergency leave, s/he must notify his/her line manager by telephone as soon as possible and no later than 9.15am on the first day of absence; agreement will be reached with the line manager or Director on when the employee is expected to return to work.

Compassionate Leave

Compassionate leave is usually granted when a close family member of an employee dies and is usually for making arrangements relating to the death or attending the funeral. A close family member is a partner, husband, wife, child or parent, or family member who lived in the same household as the employee.

The actual amount of paid leave will be left to the line manager or Director's discretion although the following guidelines in respect of paid compassionate leave are given below:

- Death of a family member (three days)
- To attend a funeral of a family member (one day)
- Making funeral arrangements for dependants (one day)

Compassionate leave is paid. If an employee needs to take leave relating to the death of a partner or family member, s/he must notify his/her line manager or Director as soon as possible; agreement will be reached with the line manager or Director on the amount and timing of any compassionate leave granted. This leave should also be logged using the employee's absence form and following the usual process.

Flexible Working

HBLB operates Flexible Working policy in line with statutory requirements. For details please refer to: <https://www.gov.uk/browse/employing-people/contracts>.

ATTENDANCE AND ABSENCE

Attendance and Absence Policies and Rules

HBLB is a small organisation, and appropriate arrangements regarding holidays and other types of leave are therefore needed to facilitate planning and management of the work in order to minimise disruption for colleagues and the organisation.

The Senior Executive Assistant regularly monitors all forms of absenteeism in HBLB. Attendance and absence procedures and rules are set out below.

Annual Holiday

Each employee's annual holiday entitlement is set out in their contract of employment. The normal annual paid holiday entitlement for full time employees who joined in or after 2003 is 25 days a year. A pro-rated entitlement may apply to part-time employees, depending on how many days of the week they work.

The annual holiday year runs from 1 January to 31 December and HBLB encourages all employees to take their full holiday entitlement during the year. Employees should agree the dates with their line manager or Director as far in advance as possible. All holiday must be recorded on each employee's personal absence form, which should be given to their line manager for authorisation and then returned to the Administrative Secretary for recording purposes.

A maximum of 10 working consecutive days may be taken at any one time except with the express permission of a Director and under exceptional circumstances.

There is no right to carry forward any unused annual leave, other than in exceptional circumstances and at the discretion of the Chief Executive.

Off-Site Meetings and Activities

Non-Executive level employees must agree attendance at off-site meetings or other activities with their line manager in advance so that arrangements can be made to ensure that there is sufficient cover for them in the office in their absence and that HBLB complies with its Health and Safety responsibilities.

Sickness Absence and Injury Leave

On the first day of absence caused by sickness and injury, the employee must notify their line manager or Director by telephone before 9.15am, or as soon as practicable after that time. The employee must give the likely date of their return and their reason for absence, e.g. sickness and/or injury. The employee must keep his/her line manager or Director up to date on his/her absence and health on a daily basis throughout the absence, unless other arrangements have been agreed.

After seven calendar days of absence, the employee must have obtained a doctor's certificate and sent it to their line manager. If the absence continues for a longer period of time than the certificate states, the employee must obtain and submit a doctor's certificate for each additional period of absence without any break in the total period of certification of absence.

Failure to comply with these notification and certification rules, or abuse of the policy may result in disciplinary action and/or the loss of company sick pay and/or the loss of statutory sick pay.

For any period of absence caused by sickness and injury, irrespective of the length of absence, the employee must complete their personal sickness absence form on his/her return to work and absenteeism will be monitored by the Senior Executive Assistant.

HBLB reserves the right under certain circumstances to require an employee to provide a medical certificate for every absence, even for absences of one day, or to attend a medical examination.

Return to Work Interviews

Directors should meet with their employees following a series of short term absences or a period of long term absence, to discuss their absence and any relevant issues arising from it. The return to work interview does not imply formal action will follow.

The return to work interview gives the opportunity:

- To check the employee is able to continue with their work and agree any further actions, for example short-term changes to working arrangements to facilitate the return to work.
- To confirm that appropriate certificates (where appropriate) have been provided to cover their absence.
- To review the attendance record and establish trends in absence.
- For the employee to discuss in private any medical, work or domestic problems that may exist. If an employee does not feel comfortable discussing their medical or domestic situation with their Director, the Director may decide to refer the employee to a more appropriate individual. This could be another Director whom the employee would feel comfortable talking to, or the Senior Executive Assistant.
- For the Director to provide an update on how the work has been covered and other work issues that may have arisen during the period of absence.

The return to work interview should always be carried out in private no matter how short the absence and should be conducted sympathetically and according to individual circumstances.

Dentist, Doctor and Hospital Appointments

Wherever possible, employees should make these appointments outside working hours. Where this is not possible and appointments have to take place during the working day, the employee should endeavour to make the appointment for the beginning or end of the working day. Employees must request time off in advance from their line manager, unless it is an emergency appointment.

Jury Service

If an employee is called on for jury service, s/he must notify his/her line manager or Director as soon as possible. The employee will be required to claim from the Court for loss of earnings, via a Loss of Earnings Certificate issued by the Clerk of the Court and the employee's salary for the period of absence on Jury Service will be reduced by the amount paid to him/her by the Court. The employee will be required to provide evidence to HBLB of the amount paid to him/her by the Court in respect of loss of earnings. If the Jury Service is to exceed ten days, the employee must inform his/her line manager or Director as soon as this is known to him/her. Different payment arrangements to those above may apply.

Public Duty Leave (including Magistrates and Territorial Army)

HBLB will consider giving up to five days unpaid leave a year to employees who wish to participate in public duties. The amount of leave that may be granted will be at the discretion of the Chief Executive. Employees who are considering participating in a public duty should discuss the proposal with their Director prior to undertaking the commitment to ensure that the time demand that the activity would involve is compatible with the demands of their job at HBLB.

Time Keeping

Hours of work are set out for all employees in the individual's contract of employment. Any variation to these hours on a permanent basis must be approved in writing by the employee's Director.

All employees are required to maintain accurate timekeeping. Occasional reasonable requests by an employee to start work later than the normal time, to leave early, to take more than the normal time for the lunch break or to be absent for reasons unconnected with work at other points during the working day will be considered. All such requests must be put to their line manager for approval in advance. Arrangements for the employee to make up the lost time will be agreed if the request is granted.

If an employee is late to work on any day, s/he must see his/her line manager on arrival to report the reason for lateness. If possible, the employee should telephone the line manager before arrival to report the lateness and reason.

Poor timekeeping, persistent lateness or persistent short time without the prior approval of the Director may lead to disciplinary action against the employee.

Absence without Permission

If an employee does not attend work on any working day or part of a working day without the prior approval of his/her line manager, s/he may be deemed to be absent without permission and will forfeit pay for that day or part day.

Unauthorised absence may lead to disciplinary action against the employee.

Returning to Work after Absence

After returning from any period of absence (sickness or other), the employee and their line manager should meet to ensure that the employee is brought up to date on work and other developments that have occurred during their absence.

Other Leave

Information on compassionate, emergency, maternity, paternity, parental and adoption leave is set out in the section entitled 'Family Friendly Policies and Procedures'.

REMUNERATION AND BENEFITS

HBLB aims to offer pay and benefits that will attract, motivate and retain suitably qualified/experienced and high calibre employees. The Remuneration Committee in consultation with the Directors will monitor levels of remuneration regularly to ensure that they are appropriate for the work done, that they are equitable, fair and competitive in the marketplace and that there is no direct or indirect discrimination in the remuneration of HBLB employees.

Remuneration Procedure

Salaries are set at the commencement of employment, taking into account the Job Description and the relevant experience and qualifications of the job holder.

Salaries are normally reviewed once a year and any changes usually come into effect on 1st April. Employees will be notified in writing of any change to their salary.

HBLB is obliged to take into consideration any instructions that may be laid down at any time by the Government on public sector remuneration, including any monitoring that is required for the purposes of equal opportunities.

Employees' annual salary and the frequency and method of payment are set out in their contract of employment. Any deductions, statutory and other, are shown in the employee's monthly pay slip. Employee queries on pay and payslips should be raised with the Finance Manager.

Benefits

The benefits to which an employee is entitled are set out in his/her contract of employment. Further information on the benefits can be sought from the Finance Manager.

Expenses

A copy of the Expenses Policy is available from the Finance Manager.

WORKING TOGETHER EFFECTIVELY

Communication Policy

HBLB is committed to open communication with employees on employment and other matters relevant to their interests.

Communication Procedure

HBLB will:

- As required, hold employee meetings in which employees will be informed about, and have the opportunity to raise issues about, their employment or other matters relevant to their interests.
- Consult with employees on employment matters individually or collectively as appropriate, and provide opportunity for any changes to employment policies to be explained to all employees.

Ensure that matters of interest to or affecting employees are communicated internally as and when appropriate.

Employees will:

- Read notices circulated via the email system.
- Keep confidential any information designated as confidential.

Whistleblowing

HBLB is committed to ensuring high standards of integrity and propriety in all its work and activities. The aim of this policy is to promote the means for employees to report any unlawful or improper conduct or actions at work and give employees confidence that they may expose malpractice without penalty to themselves. The whistleblowing procedure should be used by employees where they have any concerns regarding possible unlawful actions or malpractice in the organisation. This procedure is designed for internal whistleblowing.

The procedure is for use by employees when they are asked to act in a way which:

- Is illegal, e.g. fraud or theft
- Is improper
- Is unethical
- Is in breach of a legal obligation, constitutional convention or professional code
- Would endanger a person's health and safety
- Would cause damage to the environment

- May involve maladministration
- Is inconsistent with the Code of Practice on Standards in Public Life or the Code of Conduct for Staff
- Would deliberately conceal information tending to show any of the above

The procedure is also for use by employees if they have evidence of any of the above on the part of others and to report a fundamental issue of conscience.

This policy and procedure is designed to comply with the Public Interest Disclosure Act, which protects employees who blow the whistle from adverse repercussions to themselves if they make a disclosure in good faith. Employees are not protected if they commit a criminal offence by making a disclosure, for example by breaking the Official Secrets Act.

Managers' Responsibility

Every manager has a right and duty to ensure that employees are able to express any concerns about matters at work easily and that their concerns are dealt with promptly, objectively and fairly. Managers have a duty to respect an employee's request for his/her concerns to be treated in confidence.

Employees' Responsibility

Every employee has a right and a duty to raise, immediately and internally with their line manager or Director, any matter of concern that they may have about HBLB's business.

Whistleblowing Procedure

Any employee who raises a concern under this procedure in good faith will not be penalised for doing so.

Employees may ask for their concerns to be treated in confidence under this procedure, and the request will be respected. However, in some situations this may make it difficult to investigate or resolve the concern. In these cases, the situation will be discussed with the employee as to how to proceed. If the employee wishes to remain anonymous, it may not be possible to give the employee personal feedback. An anonymous report will be considered, although this policy and procedure were not designed with this in mind.

This procedure is not intended as a mechanism for raising matters relating to employment. The HBLB Grievance Procedure should be used for this purpose.

Use of the whistleblowing procedure may lead to the exercise of other procedures but is not intended to replace them.

Disciplinary action may be taken against employees who raise malicious or ill-founded concerns.

In the first instance, the employee may approach a Director or the Chief Executive to try to resolve the matter informally. However, if the employee believes that this is inappropriate or wishes to take the matter further after discussion with a Director or the Chief Executive, s/he may report the matter formally to the Chief Executive.

The employee should set out his/her concerns in writing, describing in detail the situation or actions and forward the written statement under strictly confidential cover to the Chief Executive. The Chief Executive, having examined the matter promptly and thoroughly, will respond to the employee within 14 working days of the completion of the examination.

If the employee is not satisfied with the Chief Executive's response s/he may appeal in writing, under strictly confidential cover, to HBLB's Chairman within 10 working days of receipt of the Chief Executive's response. The written statement should explain the employee's concern, the reasons for the concern and the reasons why the Chief Executive's response did not meet the concern. Any relevant correspondence or other documentation should be attached to the written statement to the Chairman.

The Chairman will ensure that the matter is fully investigated and respond to the employee under strictly confidential cover within 20 working days of completion of the investigation.

If HBLB's response does not represent a reasonable response, the employee may make a written report, in strict confidence, and accompanied by all relevant correspondence and other documentation, to the appropriate official in HBLB's sponsoring Government department, the Department for Culture, Media and Sport (DCMS). This is usually the Permanent Secretary.

If the employee is dissatisfied with the response from the DCMS, s/he may report the matter to the Civil Service Commissioners.

Disciplinary Policy and Procedure

HBLB aims to encourage and maintain high standards of individual conduct, attendance and job performance among its employees and expects all employees to conform to a range of rules that reinforce those standards. The purpose of the disciplinary policy and procedure is to help ensure that employees achieve and maintain these standards, providing a fair and consistent mechanism for dealing with cases when HBLB's required standards are not met. HBLB's aim in using the disciplinary procedure is to bring about improvements, where necessary, in an employee's conduct, attendance or performance. Employees will be liable to disciplinary action in cases of unsatisfactory conduct, attendance or performance, or where HBLB's rules are breached.

The term 'working day(s)' when used in this policy denotes Monday to Friday inclusive.

Operating Principles of the Procedure

The disciplinary procedure should operate in a fair and consistent manner and without undue delay. The following principles will apply at every stage of the procedure:

- a) No disciplinary action will be taken against an employee until the matter has been fully investigated.
- b) An employee may be suspended on full pay while a disciplinary investigation is in progress. The employee may be prohibited from entering HBLB's premises during any period of suspension. Suspension is not in itself a disciplinary sanction.
- c) The employee will be given written details of the complaint against them and, except in the very exceptional cases of gross misconduct, they will have opportunity to state their case at a disciplinary meeting before any disciplinary decision is made or disciplinary sanction imposed. The written details will usually be given to the employee at least 48 hours before the meeting. Prior to the disciplinary meeting, the employee will be given a copy of any document that HBLB feels is relevant to the issues to be decided.
- d) The employee must take all reasonable steps to attend any disciplinary meeting at the time, date and place notified to them.
- e) The employee will have the right to be accompanied at any disciplinary meeting or appeal meeting by another HBLB employee or a trade union official. (The union official has to be certified by the union in writing that they have experience or training in acting as a companion at disciplinary meetings). At the meeting, the companion may confer with the employee, address the meeting and respond on the employee's behalf to views expressed at the meeting but may not answer questions directed at the employee. If the employee chooses to be accompanied, they should, before the meeting, inform HBLB who their companion will be. If their companion is not available on the date specified by HBLB for the meeting, the employee may propose an alternative date as long as it is reasonable and within 5 working days of the original date, counting the original date as day one. Meetings will be postponed no more than twice. HBLB can refuse the employee's choice of companion if it believes that a conflict of interest will be created.
- f) The employee will not be dismissed for a first offence, except in the case of gross misconduct.
- g) Disciplinary decisions may only be made by Directors or the Chief Executive.
- h) The employee will be given a written explanation for any disciplinary decision against them. Except where the decision is for the employee to be dismissed, they will be told what improvement is expected of them, any support HBLB will provide to help them achieve the improvement (if appropriate), the timescale within which the improvement is to be achieved (if appropriate), and the likely consequence(s) if there is no improvement or insufficient improvement or the employee repeats the offence, or are guilty of some other offence.
- i) The employee has the right of appeal against any disciplinary decision made against them under this procedure.
- j) Minutes of the disciplinary meeting and records of disciplinary action taken will be kept on the employee's personal file.

Disciplinary Procedure

In less serious cases, prior to invoking this disciplinary procedure, it is expected that the employee's Director would normally give an informal oral warning or warnings. This informal step falls outside of this formal disciplinary procedure. The formal procedure will be commenced where informal discussion has not resolved minor issues satisfactorily, in cases of repeat offences or when the alleged offence is more serious. The disciplinary procedure may be commenced at any stage and stages may be passed over during the process, if the complaint or occurrence is deemed sufficiently serious.

HBLB retains the discretion to issue warnings for a period longer than that set out in Stage 1 and Stage 2 below but only where the circumstances warrant a longer period. However, no warning shall last longer than two years.

Stage 1 – First Written Warning

If there is no improvement in conduct, attendance or performance following an informal warning or warnings, or a minor offence has been committed, the employee will be given a First Written Warning. The warning will remain current for twelve months. The employee will be issued with a First Written Warning and a copy will be placed and will remain in their HR file. However, unless otherwise stated, it will be spent after twelve months providing the required improvement is achieved and sustained during that time, or a further offence is not committed.

If the requirements are met a note to that effect will be placed in the employee's file.

Stage 2 - Final Written Warning

If the employee has not achieved or sustained the required improvement after a Stage 2 warning, or if, within the period of the Stage 1 warning, the employee repeats the same offence or if they commit a further offence or a first offence that is sufficiently serious to warrant a Final Written Warning but not sufficiently serious to justify dismissal, the employee will be given a Final Written Warning.

The employee will be issued with a Final Written Warning and a copy will be placed and will remain in their HR file. However, unless otherwise stated, it will be spent after 12 months providing the required improvement is achieved and sustained during that time, or a further offence is not committed.

If the requirements are met a note to that effect will be placed in the employee's file.

Stage 3 – Dismissal

If the employee has not achieved or sustained the required improvement after a Stage 3 warning, or if the employee repeats the same offence or a different offence equal in seriousness to a previous

offence or if they commit gross misconduct, dismissal with or without notice will normally result. The Chief Executive or a Director may take the decision to dismiss.

The employee will be provided, in writing, with the reasons for the dismissal, the date of termination of employment, and informed of their right of appeal.

Alternatives to Dismissal

In cases not involving gross misconduct, alternatives to dismissal may be considered. Examples of alternatives are demotion, transfer to another type of work or loss of pay but this is not an exhaustive list. If the employee refuses to accept the alternative offered, the dismissal will be effected.

Gross Misconduct

If, on completion of the investigation and the disciplinary meeting, HBLB is satisfied that gross misconduct occurred, the result will normally be summary dismissal without notice or pay in lieu of notice.

The following are examples of what would be considered to be gross misconduct and could lead to summary dismissal. This list is not exhaustive.

- Breaches of the Code of Conduct for Staff.
- Failure to comply with the Anti-Bribery Policy.
- Misappropriation of HBLB's monies or property.
- Wilful damage to HBLB property.
- Theft.
- Fraud, including falsification of records.
- Physical or verbal assault or attempted assault or intimidation of colleagues or other people.
- Discrimination, harassment, bullying, victimisation or abusive behaviour.
- Gross insubordination.
- Incapacity for work due to alcohol or other substance abuse.
- Non-compliance with Health and Safety requirements.
- Actions which are likely to bring the reputation of HBLB into disrepute including any improper conduct in association with Social Media.
- Unauthorised absence.
- Abuse of the absence procedure.
- Abuse of the computer or telephone systems, including but not limited, in the case of the computer system, to abuse of the email or the internet facilities.
- Unauthorised disclosure of confidential information.
- Gross negligence.

Appeals

If the employee wishes to appeal against any disciplinary decision under this procedure, they must do so in writing to HBLB within 10 working days of the date of notification of the decision, making the basis of the appeal clear. While the appeal process is ongoing, the original disciplinary sanction will stand. The appeal will be heard at an appeal meeting. Appeal meetings will be arranged as soon as is reasonably practicable. At the meeting, the employee will have the opportunity to state the grounds of their appeal. The disciplinary penalty imposed on the employee will be reconsidered. The decision resulting from the appeal meeting will be final and will be confirmed to the employee in writing, with reasons for the decision, normally within 5 working days of the meeting.

Appeals will, where reasonably practicable, be considered by a person who is more senior than the original decision maker and who has not been involved in the original investigation or the disciplinary decision which forms the basis of the appeal.

If a decision to dismiss an employee is upheld after an appeal meeting, the date of termination of employment will be as in the original notification of dismissal.

Grievance Policy and Procedure

HBLB has adopted this grievance procedure in order to give employees a fair and consistent mechanism for resolving any grievances they may have regarding their employment without undue delay and to enable employees to appeal, normally to a more senior person, against a decision made by their Director.

The best and quickest way of settling grievances is often by informal discussion and employees should therefore consider discussing their grievance informally before using the formal procedure. The employee should talk to their Director in the first instance, to see if the issue can be resolved. The Director may make notes of what is said. If so, a copy of the notes will be given to the employee and a copy will be placed on their personal file.

If the grievance cannot be settled informally, the formal procedure below should be used. To raise a grievance formally during employment with the HBLB, please refer to the section entitled 'Grievance Procedure'.

The term 'working day(s)' when used in this policy denotes Monday to Friday inclusive.

Grievance Procedure

The aim of this procedure is to settle the grievance at the earliest stage possible. The main stages of the procedure are as follows.

Stage 1 - Formal Hearing

In the case of Managers and Support Staff:

To raise a grievance, an employee must set it out in detail in writing to either their Director or, if the grievance is against their Director or their department, to the Senior Executive Assistant, making the basis of the grievance clear.

In the case of the Chief Executive and Directors:

If an employee wishes to raise a grievance, they must set it out in detail in writing to the Chief Executive, or, if the grievance is against the Chief Executive, to one of the Government-appointed members of HBLB other than the Chairman, making the basis of the grievance clear.

The employee will be invited to a meeting to discuss the grievance. This will take place as soon as possible after the person hearing the grievance has had a reasonable amount of time to consider the employee's written statement. The employee must take all reasonable steps to attend the meeting. The employee will have the right to be accompanied at the meeting by another employee of HBLB or a trade union official who the union has certified in writing has experience or training in acting as a companion at such meetings. At the meeting, the companion may confer with the employee, address the meeting and respond on the employee's behalf to views expressed at the meeting but may not answer questions directed at the employee. If the employee chooses to be accompanied, they should, before the meeting, notify HBLB who their companion will be. If their companion is not available on the date specified by HBLB for the meeting, the employee may propose an alternative date as long as it is reasonable and within 5 working days of the original date, counting the original date as day one. HBLB can refuse the employee's choice of companion if it believes that a conflict of interest will be created.

If the basis of the employee's grievance is not clear in their written statement, they will be asked to clarify it before a meeting can take place.

After the meeting, the person who heard the grievance will give the employee their decision in writing within 5 working days. If it is not possible for them to respond within 5 working days, the employee will be given an explanation for the delay and be told when the response can be expected. In the letter confirming the decision made with regard to the grievance the employee will be informed of their right of appeal against the decision.

Stage 2 – Appeal

In the case of Managers and Support Staff:

If the issue is not resolved at Stage 1, the employee may appeal by putting their case in detail in writing to the Chief Executive within 10 working days of receiving the written decision at Stage 1 and making the basis of the appeal clear.

In the case of the Chief Executive and Directors:

If the issue is not resolved at Stage 1, the employee may appeal by putting their case in detail in writing to the Chairman within 10 working days of receiving the written decision at Stage 1 and making the basis of the appeal clear.

The employee will be invited to an appeal meeting to discuss the grievance. This will take place as soon as possible after the person hearing the grievance has had a reasonable amount of time to consider the employee's written statement. The employee must take all reasonable steps to attend the meeting.

The employee will have the right to be accompanied at the meeting by another employee of HBLB or a trade union official who the union has certified in writing has experience or training in acting as a companion at such meetings. At the meeting, the companion may confer with the employee, address the meeting and respond on the employee's behalf to views expressed at the meeting but may not answer questions directed at the employee. If the employee chooses to be accompanied, they should, before the meeting, notify the person they are due to meet who their companion will be. If the employee's companion is not available on the date specified by HBLB for the meeting, the employee may propose an alternative date as long as it is reasonable and within 5 working days of the original date, counting the original date as day one. HBLB can refuse the employee's choice of companion if it believes that a conflict of interest will be created.

If the basis of the employee's appeal is not clear in their written statement, the employee will be asked to clarify it before an appeal meeting can take place.

After the meeting, the person who heard the appeal will give the employee their decision in writing within 5 working days. If it is not possible for them to respond within 5 working days, the employee will be given an explanation for the delay and be told when the decision can be expected. The decision will be final.

Capability Policy and Procedure

The purpose of the Capability Policy is to encourage and assist employees in performing to a satisfactory level. Where under performance is found to be due to negligence or lack of application on the part of the employee, the Disciplinary Procedure will normally be appropriate. However, issues of an employee's capability may arise from time to time where under performance relates to a lack of the required knowledge, skills or ability rather than misconduct. In this case, the employee should, wherever practicable, be assisted through training or coaching and given reasonable time to achieve the required standard. It is for this reason that HBLB provides a Capability Policy.

This Capability Policy is intended to:

- Secure the required improvement in cases where performance falls short of that expected of an employee in a particular post.
- Help underperforming employees to become more effective.
- Provide a fair and effective means of securing redeployment to a more appropriate position or where this is not practicable, dismissal.

It should be noted from the outset that a capability issue is not necessarily a disciplinary issue (and should not be viewed as such).

As with any meeting that could result in a formal warning or some other action, the employee will have the right to be accompanied by a work colleague or trade union official. Each step and action under the Procedure will be taken without unreasonable delay. At each step the employee will be set clear written performance targets and a realistic timescale for improvement. These will be jointly agreed in writing.

At each review stage, the employee should be advised of the consequences of a failure to reach the required level of performance, or the necessary improvement required, or of not being able to return to work or maintain a satisfactory level of performance through capability.

Procedure:

Stage 1 - Informal Process

When an employee's performance becomes a matter of concern their Director should meet the employee informally and explain how their performance falls short of the standard expected of someone in their position or level.

An employee should be kept informed if their performance falls below acceptable standards and the occasions on which this is noticed. These should be referred to as they will help provide specific reference points for the employee. Any cultural, disability or other equal opportunity issues that might be a factor in managing a capability issue should be considered. Performance should be monitored for up to three months at which stage a decision will be made if further action is required.

Any possible staff development/training opportunities that may enable the employee to meet the required standard of performance should be considered. Consideration may be given to on-the-job training or a formal training course. The employee should be set, in writing, clear performance targets and a realistic timescale for improvement. These should be jointly agreed. The employee's performance should be regularly reviewed until the performance targets are met.

If the requirements are met a note to that effect will be placed in the employee's file.

Where an informal process has been followed and there continues to be a significant performance issue considered to be concerned with capability, the procedure will move on to the next stage.

Stage 2 - Formal Process

The employee and their Director should meet to discuss the employee's performance in the job.

The employee should be given the opportunity to be accompanied by a work colleague or trade union official. The meeting should be structured examining the cause of the problem, the job requirements and the employee's knowledge, skills and ability, and any shortfall.

Employee help to be considered could include further training or development needs, changes in the employee's duties, which might improve performance or assistance from other colleagues.

Ideally the plan for improvement should be agreed at this meeting. However, if it cannot be agreed at the time, the Director and employee should then reconvene to agree the plan for improvement, clarify any questions, and ensure that they are comfortable with the proposed solutions. This should then be documented, detailing the areas and level of improvement required, the timescales and an appropriate review date. A copy of the documentation should be signed by the employee and placed on file. Should the necessary improvements not be achieved, their continued employment may, in due course, be at risk.

Review Meeting with a Director.

On the date set for the review, the employee and Director should meet, review progress and evaluate any improvement in performance.

If the performance is in line with the targets and no further action is required, then this should be acknowledged in writing. If there has been a marked improvement, but the employee's performance has still not reached the required level then the period for improvement may be extended with a new review date set. Then, if no adequate improvement has been made, the Director should progress to the next stage of the process.

Stage 3 - Formal Process

Any meeting should involve a Director, the employee and their work colleague or trade union official, if requested.

The meeting will cover both the employee's viewpoint of the situation and the Director's concerns about the review period and what has taken place.

Following this meeting, if it is deemed appropriate, the current plan for improvements will be maintained with an extended timescale. Alternatively a new plan may be issued taking into account the employee's response; or consideration will be given to redeployment to a suitable position, if possible, where it is felt by the Director that this would be appropriate for the employee. The Director should make it clear to the employee that their job is now seriously at risk if the required level of improvement is not achieved and sustained. The outcome of this review meeting should be documented and a copy of this should be signed by the employee and placed on file.

Stage 4 – Dismissal

This final stage should be conducted as per Stage 3 above, with the additional possible outcome of dismissal on the grounds of capability, advising the employee of their contractual period of notice of termination of employment and of their right to appeal against the decision.

Appeals

All employees have the right of appeal against any capability decision. If an employee wishes to appeal, they should notify the Chief Executive in writing within 10 working days of the date on which they received notification of the decision, setting out the grounds for their appeal. In exceptional circumstances, the HBLB may agree to extend this time limit to allow the employee an opportunity to consider the decision and/or his or her grounds for appeal. Any appeal will not suspend or delay any action taken (including dismissal).

The HBLB will arrange for an appeal hearing to take place. The appeal will normally be heard by the Chief Executive. The hearing will take place at a time and location that is reasonable for both the HBLB and the employee. The decision of the HBLB will be final, and will be confirmed to the employee in writing, with reasons for the decision, normally within 5 working days of the meeting.

The employee must take all reasonable steps to attend the appeal hearing. Where an employee (and/or their companion) cannot attend the appeal hearing, they should inform the person conducting the hearing as soon as practicable. If the employee (and/or their companion) fails to attend for a reason which was unforeseeable at the time the appeal hearing was arranged, another hearing will be arranged. If the employee fails to attend the rearranged hearing without good reason, a decision may be taken in their absence.

The HBLB reserves the right to amend this policy from time to time.

Use of Private Car on Business

In the event of an employee using a private car on HBLB business, expenses will be reimbursed at the appropriate rate, subject to the following conditions:

- Non-Executive staff must obtain permission to use the car from their Director
- The employee is responsible for checking the vehicle in line with the HBLB Road Safety Policy
- The vehicle must be adequately insured and covered against risk whilst being used for the business purpose
- The employee must provide a current copy of their vehicle insurance details annually.
- The employee is responsible for any fines incurred while using any vehicle on business

It is emphasised that it is the responsibility of the employee to ensure that the scope of their insurance is sufficient to provide adequate cover when the car is being used for business purposes (whether this is occasional business use or regular). HBLB cannot accept liability for damage to the

car or property, injury to third parties, or any other claims that might be made as a result of the inadequacy of the insurance cover.

Any employee using a private car on HBLB business must adhere to the Road Safety Policy which can be found in the section entitled Health & Safety.

PUBLIC LIFE STANDARDS AND PROCEDURES

Standards in Public Life

HBLB is a public body, known as a Non-Departmental Public Body (NDPB), and is publicly accountable for all its activity through its sponsoring Government department, the Department for Culture, Media and Sport. As an NDPB, HBLB must observe, and is committed to observing, the high standards of integrity and propriety expected of public bodies by the public and other third parties. It therefore operates a Code of Best Practice on Standards in Public Life and a Code of Conduct for Employees.

Code of Best Practice on Standards in Public Life

All employees' attention is drawn to the seven principles of public life below, taken from the Code of Best Practice on Standards in Public Life. These are guiding principles and must be observed by HBLB members and all employees.

Please refer to: http://www.public-standards.gov.uk/About/Code_of_Practice.html

Selflessness

Board members and employees should take decisions solely in HBLB's and the public interest, and should not do so in order to gain financial or other material benefits for themselves, their families or their friends.

Integrity

Board members and employees should not allow any personal interest, financial or otherwise, to influence them in the performance of their official duties.

Objectivity

In carrying out their responsibilities, Board members and employees should make choices on the merits of the case in question.

Accountability

Board members and employees are accountable to the public for their decisions and actions and must submit themselves to appropriate scrutiny.

Openness

Board members should be as open as possible about decisions that they and the staff take. Board members and employees should be prepared to explain such decisions when reasonably asked to do so.

Honesty

Board members and employees have a duty to declare any private interests relating to their HBLB responsibilities and to take steps to resolve any conflicts arising in an appropriate manner.

Leadership

Board members should promote and support these principles by leadership and example.

Code of Conduct for Employees

This Code of Conduct is based on the Civil Service Code. It gives employees clear guidance on the standards required of them and on the avoidance of misuse of public office to pursue personal interest. Employees are expected to comply with the Code at all times and breaches of the Code may lead to disciplinary action against an employee.

Please refer to: <http://www.civilservice.gov.uk/about/values>.

Queries on the Code of Conduct should be raised with a Director.

All HBLB employees have a duty:

- To familiarise themselves with the contents of this Code and act in accordance with it.
- To discharge public functions reasonably and according to the law.
- To recognise ethical standards governing particular professions with which employees may work in the course of their duties.

Conflicts of Interest

Employees should abide by any rules adopted by HBLB in relation to private interest and possible conflict with public duty, and the disclosure of official information. Employees should not misuse their official position or information acquired in the course of their duties to further their private interests or those of others. The Chief Executive, Directors, Managers and staff are expected to identify possible conflicts of interest at an early stage and to take appropriate action to resolve them. This applies in relation to third parties seeking contracts with HBLB or seeking financial support from HBLB.

Anti-Bribery Policy

HBLB values its reputation for ethical behaviour and full compliance with current legislation and industry good practice.

The Bribery Act 2010 reformed the criminal law to provide a comprehensive scheme of bribery offences: specifically two general offences covering the offering or giving of an advantage and the requesting or accepting of an advantage, the offence of bribery of a foreign public official, and the offence of failure by a commercial organisation of failure to prevent a bribe being paid on its behalf. In order to ensure compliance with the Act HBLB will:

- Have a clear anti-bribery policy.

- Train and inform employees so that they can recognise and avoid the use of bribery by themselves and other.
- Encourage employees to be vigilant and to report any suspicion of bribery.
- Provide employees with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigate instances of alleged bribery and assist the policy any other appropriate authorities in any resultant prosecution.
- Take firm and vigorous action against any individual involved in bribery.

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of HBLB or of the person or body employing them or whom they represent.

This policy is not meant to disallow the following practices providing they are customary in a particular market, are proportionate and are properly recorded and provided the following requirements are met:

- The gift is not made with the intention of influencing a third party to gain business or advantage, or to reward the provision or retention of business or advantage.
- It complies with local laws.
- It is given in HBLB's name, not in the giver's personal name.
- It does not include cash or a cash equivalent (e.g. gift vouchers).
- It is of a suitable and reasonable type and value and given at an appropriate time.
- It is given openly, not furtively.
- It is approved in advance by a Director of HBLB.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

The prevention, detection and reporting of bribery is the responsibility of all employees and therefore you must immediately disclose to a Director, or if the Director is involved, to the Chief Executive any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of HBLB. This includes reporting your own wrongdoing.

In the event that you wish to report an instance or suspected instance of bribery, you should report this as a matter of urgency, to a Director. Alternatively if such action would be inappropriate, you might wish to follow the steps set out in the Whistle-blowing Policy.

Confidentiality will be maintained during the investigation as far as is practical and appropriate in the circumstances. HBLB is committed to taking proper and suitable action against bribery or other unethical conduct which could include either reporting the matter to a regulatory agency, an appropriate government department, or the police. This would also include taking internal

disciplinary action against relevant employees up to and including dismissal, and/or terminating contracts with anyone associated.

All hospitality and gifts to any member of staff and to the three Government Appointed Members must be recorded in the Hospitality and Gifts Register. The Register is kept and updated by the Senior Executive Assistant. All employees must submit details of any gift or hospitality received from any of HBLB's stakeholders to the Senior Executive Assistant for entry into this record.

All gifts and hospitality provided by any member of staff and by the Government Appointed Members must also be entered into a Register held by the Senior Executive Assistant.

Relations with the Public

Employees who deal with the public should do so sympathetically, efficiently and promptly and without bias or maladministration. All employees should offer the public the highest standards of conduct and service.

Use of Resources

All employees should endeavour to ensure the proper, economical, effective and efficient use of resources.

Employee concerns about improper conduct

HBLB is committed to ensuring high standards of integrity and propriety in all its work and activities. Any employee who has any concerns about improper conduct should raise it internally under the whistleblowing procedure. The procedure is written under section entitled Working Together Effectively of this Policies and Procedures Manual.

Confidentiality of Information

Employees owe a general duty of confidentiality to HBLB as their employer at common law and are therefore required to protect official information held in confidence (see also Media Communication and Disclosure of Information on the following page).

Nothing in the Employee Code of Conduct should be taken as overriding existing statutory or common law obligations to keep certain information confidential or, in certain cases, to disclose certain information.

When an employee leaves HBLB, they should continue to observe the duty of confidentiality. An employee should abide by any rules that may be laid down from time to time on the acceptance of business appointments after resignation or retirement from HBLB.

Media Communications

Employees must refer to the Head of Operations or Chief Executive all enquiries from the media asking for information or comments about HBLB.

It is important for HBLB's reputation that media enquiries are dealt with appropriately and that no confidential information is divulged, inadvertently or otherwise. Employees must also bear in mind the risk that comments made to the media can sometimes be open to allegations of slander for which the employee can be held personally accountable.

A breach of this policy, such as disseminating information which is inaccurate or harmful to HBLB, may result in disciplinary action.

Disclosure of Information - Freedom of Information Act

The Freedom of Information Act was adopted by the Government in 2000. It gives the public, as individuals, a statutory right of access to information held by public bodies and places a duty on public bodies to make that information available to the greatest extent possible, consistent with the public interest and the protection of legitimate confidential information. Public bodies, including HBLB, are required to be clear and proactive in publishing information about their business, activities and decisions.

HBLB's compliance with the Act takes two parts - the publication of a Publication Scheme and the operation of a Freedom of Information procedure.

All Freedom of Information Act requests or enquiries must be referred immediately to the Head of Operations or Chief Executive.

Private Trading

HBLB does not allow private trading to take place on its premises. Employees may not attempt to sell goods or otherwise trade with colleagues and should not conduct private business from HBLB's premises. Neither should employees conduct any business in or outside of HBLB's premises that may represent a conflict of interest with their responsibilities for and to HBLB under their contract of employment.

Charitable Fundraising

Employees may not fundraise for a charity among colleagues without the prior permission of a Director.

Betting

The Betting, Gaming and Lotteries Act 1963 (as amended) provides for legal betting. Participation in illegal betting by any employee will usually lead to summary dismissal.

Employees may place bets on horseracing or other sports or events. However, they must do so in such a way or ways as to avoid any compromise to their integrity as an HBLB employee or to HBLB's reputation. HBLB prefers that employees do not hold credit accounts with bookmakers. However, if an employee does so, s/he will manage the account(s) in such a way as to avoid compromise to the employee and/or HBLB as above. Failure to do so may constitute a disciplinary offence.

HBLB reserves the right to raise the question of betting with any employee.

If in the opinion of HBLB, betting activity by any employee is compromising HBLB's interests or integrity or is unduly influencing any aspect of that employee's work for HBLB, then this would be considered a very serious matter, possibly leading to dismissal.

HEALTH, SAFETY AND WELFARE

HBLB has a duty under the Health and Safety at Work Act (1974) and other relevant associated legislation to ensure the health, safety and welfare of its employees, contractors and visitors, as far as is reasonably practicable. To meet its statutory obligations, it needs to maintain safety standards in relation to buildings, machines and equipment, to set up safe systems of work and ensure that they are followed, and ensure articles and substances are moved and used safely. Finally, it also includes giving employees information, development and supervision necessary to ensure their health, safety and welfare.

Employees, contractors and visitors to HBLB should take reasonable care for their own health and safety and that of others who may be affected by what they do.

Employees, contractors and visitors should co-operate with HBLB's management and abide by HBLB's Health and Safety rules, procedures and practices to ensure that everyone's health, safety and welfare is ensured. This will include that all employees will follow instructions or attend training provided to ensure that there are safe systems of work and safe working practices, including the operation of machines and equipment. Employees will immediately report incidents to the Senior Executive Assistant and will assist with the investigation of accidents and aiding the introduction of measures to prevent a recurrence.

Health and safety must be regarded as a mutual objective for management and employees at all levels. Therefore management will:

- Provide and maintain safe and healthy working conditions in accordance with the Health and Safety at Work Act 1974 and all subsequent and relevant statutory requirements.
- Carry out suitable risk assessments of the premises and tasks carried out within them. (This will include risk from fire, noise, workstations, manual handling, exposure to chemicals and substances, pregnancy and stress, etc.)
- Provide and maintain the means of access and exit from the offices.
- Provide safety training, information and instruction required for all employees, visitors and contractors as appropriate.
- Maintain a continuing interest in all aspects of safety including monitoring procedures

The Chief Executive of HBLB is the person responsible for ensuring the implementation and compliance with this policy and procedure and is fully supportive of the policy.

Health and Safety Rules

The rules are:

- Employees must make themselves familiar with the building evacuation procedures which are available on the staff notice board in the storage/photocopier room.

- Employees must not take any action which might endanger the health and safety of themselves, any other employee, visitor or contractor. For example, ensure that corridors and offices are kept free from obstructions.
- Employees must ensure all incidents and accidents are reported by notifying the Senior Executive Assistant who will record these in the Accident Book.
- Employees should switch off all electrical equipment at the end of the working day as appropriate.
- Employees must keep all emergency exits, stairs and corridors free of obstruction.
- Employees must report immediately, any fault or hazardous fixtures, fittings, furniture, or equipment or undesirable work practices to the Senior Executive Assistant.
- Employees must use equipment only for which it was designed.
- Employees must not attempt to repair any faulty electrical equipment.
- Employees should ensure communal areas such as the kitchens are clean and tidy and broken glass or crockery should be left safely on the kitchen surface so that the cleaners can dispose of this correctly.
- Where employees have specific responsibilities for health and safety, e.g. First Aiders or Fire Marshals, these responsibilities must be appropriately delegated in their absence and the name given to the Senior Executive Assistant.
- Smoking is forbidden in any part of 21 Bloomsbury Street.

These Rules are not exhaustive but illustrative of the main rules that apply to HBLB environment.

When an employee joins, the Senior Executive Assistant will inform the employee of the Health and Safety policy and procedures and may arrange to carry out a workstation risk assessment. It is an employee's responsibility to know HBLB's Health and Safety rules and procedures and if an employee is in doubt or unsure, then the employee must ask for more information or instruction. The employee should ensure that the procedures are not misused or interfered with, thus putting themselves and/or others at risk. Failure to comply with Health and Safety rules and instructions may result in disciplinary action against the employee.

Visitors and Contractors

Visitors and contractors should be made aware of the evacuation procedures in the event of a fire and any security measures to ensure they are protected. Visitors and contractors should also be made aware of any other health and safety procedures which ensure that they and others remain safe and well.

Directors' Responsibility

The Executive are accountable for ensuring that health, safety and welfare procedures are carried out to an acceptable standard.

The Executive will ensure that their employees are properly trained, are fit and competent to carry out their duties and visitors are made aware of the Health and Safety rules and procedures.

Office Environment

HBLB's offices must be safe and free of hazards to health or safety and any person must give information concerning any potential hazards to the Senior Executive Assistant, so that they can be investigated and if required, remedied.

Safety in the office means:

- The prevention of all injuries
- The promotion of occupational health and hygiene
- Fire prevention and control
- The control of all situations likely to cause damage to property or equipment including investigating situations which may give cause for concern
- The investigation of 'near miss' situations
- The protection of the general public
- To ensure the points above are achieved the following general requirements are maintained:
 - Offices are kept in a clean state
 - There is sufficient space (11 cubic metres)
 - There is sufficient warmth (16°C)
 - There is sufficient lighting
 - There are sufficient and maintained toilets
 - There is a supply of cold and hot water including drinking water

First Aid

A list of First Aiders is available on the Staff Notice Board. All accidents at work, no matter how minor, must be recorded in the Accident Book. This is held by the Senior Executive Assistant.

Fire Escape Procedures

These procedures have been developed by HBLB's Fire Marshalls in conjunction with those specified for 21 Bloomsbury Street as a whole and are reviewed regularly, they are detailed in a separate document; a copy of which can be found on the staff notice board.

During induction to HBLB, the Senior Executive Assistant will instruct new staff on the fire procedure.

Fire Alarm Test

The Fire Alarm is tested on a weekly basis at 10.00 a.m. on a Wednesday.

Fire Drills

Fire Drills are carried out during working hours at least twice a year.

Bomb and/or Terrorist Threat and Evacuation Procedure

Most bomb threats are made over the phone and the overwhelming majority are hoaxes, often the work of malicious jokers, although terrorists do make hoax calls with the intent of causing alarm and disruption. Any hoax is a crime and, no matter how ridiculous or unconvincing, must be reported to the police.

If you receive notice of a bomb threat:

- Stay calm and listen.
- **Immediately** report the incident to the Executive and to Building Management on 0207 273 1815 or 07834 944060.
- Do not evacuate the building unless ordered to do so by the Building Management, reception team or the police.
- From this point until the all clear is given do not use mobile phones.

Evacuation plan upon receipt of notification of a bomb threat

Unlike a Fire Alarm, it would not be correct procedure to evacuate the building automatically. It will not be known for certain where the bomb, if it exists, will be placed, regardless of what any caller has stated.

The emergency services or Building Management will provide instruction if evacuation is required. Until they have provided instruction, you are to remain in the office. All staff and any visitors should assemble in the central area of the main office to allow the Executive and/or Fire Marshals to take a head count and keep track of all personnel.

The general principle is if the device is thought to be within the building then it is likely that it will be evacuated, if the device is outside the building it may be safer to remain inside. Building Management will liaise with all tenants of 21 Bloomsbury Street and will issue instructions for evacuation if that becomes necessary. . Do not assume you will muster at the Fire Muster Point in Bedford Square, - you will be given specific instructions.

Risk Assessments

The Building Managers for 21 Bloomsbury Street are responsible for conducting regular risk assessments for the building as a whole. HBLB's Executive are responsible for ensuring these assessments are noted and action taken where necessary within HBLB's office space.

Where an employee believes there is a hazard, such as an unsafe system of work or a defective piece of equipment or machine or an obstruction in an office or corridor, the Senior Executive Assistant should be informed immediately.

Accidents or Injury at Work

Should an employee or visitor have an accident or injury at work, even if there is no personal injury or damage, the incident, however trivial, is required by law to be recorded in the Accident Book held by the Senior Executive Assistant. It enables the Senior Executive Assistant to ensure action is taken to eliminate, as far as possible, similar accidents occurring. These actions are also recorded.

Should any accident occur or a person be taken ill in HBLB's offices, a First Aider should be called immediately to ensure that the proper action is taken. The names of the First Aiders can be found on the Staff Notice Board. It will be the First Aider who will decide on whether the individual should either stay at work, go home or be moved to hospital. They will make the necessary arrangements where appropriate and record the incident in the Accident Book, held by the Senior Executive Assistant.

In the event that none of the HBLB First Aider's are present, it has been agreed that the tenants of 21 Bloomsbury Street, will share this resource. You should contact Building Management/reception team (0207 273 1815 or 07834 944060) who will locate a trained First Aider from within the building.

Consultation of Employees regarding Health and Safety Policy

The Senior Executive Assistant will consult with employees when there are significant changes to the Health and Safety Policy and/or Health and Safety procedures.

Eye Sight Tests

The HBLB recognises its duty to comply with the Health & Safety (Display Screen Equipment) Regulations, which includes provision for eye tests and spectacles required specifically for use with Display Screen Equipment (DSE).

The Board operates a VDU Eyecare Scheme with David Clulow Opticians. Their branches can be located using their website at www.davidclulow.com.

Further details about the scheme can be obtained from the Senior Executive Assistant.

Electrical Equipment and Systems

Many injuries are caused through personal contact with guillotines and shredders. In addition, electrical accidents are one of the more frequent types of accidents in an office environment. Therefore the following precautions have been taken to ensure the safety of HBLB employees:

- Sockets and plugs will be standardised to British standards and of a uniform type wherever reasonably practicable
- Connections will invariably be earthed
- All electrical equipment will be periodically checked

It is important for all employees to use electrical equipment safely. Employees should stop using equipment if they believe the equipment including the cabling may be faulty or in disrepair and inform the Senior Executive Assistant immediately.

There are a number of electrical items which are prohibited by the Building Management such as personal heaters. As a guide, you should not use any electrical items which have not been provided by HBLB. If you have any questions, please ask the Senior Executive Assistant.

Road Safety Policy

This policy has been developed to ensure standards are met with the aim of protecting all employees, other road users and the public from driving incidents to as low a risk as is reasonably practicable.

At all times while driving employees shall conduct themselves in accordance with HBLB's policy and shall use their own judgment to ensure that they reduce the risks to themselves and to others to as low a risk as is reasonably practicable.

HBLB will take reasonable steps to:

- Ensure that evidence is provided by all drivers that they hold a full current licence for the class(es) of vehicle(s) that they drive on HBLB business
- Ensure that evidence of suitable insurance is demonstrated for all privately owned vehicles used for HBLB business
- Ensure that all drivers advise their Director in confidence of:
 - all endorsements to their driving licence or disqualification from driving
 - any change of a privately owned vehicle used for HBLB business; and
 - any change to insurance conditions as soon as is practicable after the penalty is imposed or any change occurs

Employees who drive on behalf of HBLB will be requested to provide a current copy of their driving licence and insurance details annually.

Employees will:

- Be responsible for their own safety, for any passengers or loads carried in the vehicle and for ensuring that the vehicle is safe to use (including hired vehicles)
- Ensure that passengers are carried only in accordance with the vehicle manufacturer's design specification, with a seat for everyone and only one person per seat
- Ensure that the driver and all passengers wear seat belts on all journeys
- Take breaks every two hours when driving, especially on long-distance trips, to ensure that they do not suffer fatigue
- Wherever possible, share driving on journeys of over two hours' duration
- Not drive more than a reasonable distance in a normal working day

- Not allow travel plus working time to exceed reasonable hours in any day
- Plan their journeys to avoid such things as travelling in adverse weather, travelling excessive hours, rushing to make appointments
- If necessary, due to adverse weather, journey length or the number of hours worked, make use of overnight accommodation arranged at HBLB's expense (this must be agreed by a Director in advance)
- Report promptly any problems with the condition of hired vehicles to the supplier and also inform a Director
- Not use mobile telephones while driving, instead switching to a message service and picking up messages when taking breaks from driving
- Find a safe place to park to make telephone calls or receive messages
- Not stop on the hard shoulder of a motorway except in an emergency

Non-Compliance

If there is a concern over the amount of travel, condition of vehicle being driven on work-related business or any other aspects relating to this policy it is the responsibility of both employee and Director to raise and address it immediately.

Failure to adhere to this policy may result in disciplinary action being taken.

Further Guidance/Support

HBLB has a duty of care over its employees when driving on work-related business and is committed to offering as much support as possible. Therefore any employee required to drive on work-related business will be:

- Provided with a copy of this policy at induction
- Able to review and discuss work-related driving during their appraisal
- Encouraged to consider alternative forms of transport such as plane or train
- Provided with the opportunity to undertake driver training as required

Mobile Phones

Mobile phones are part of everyday life. It is important to ensure that if personal mobile phones are brought into work that they are used sensibly and personal calls should be kept to a minimum during working hours.

More importantly, employees should be aware that it is illegal to drive a vehicle whilst holding a mobile phone or similar device. Therefore employees are not permitted to use any hand-held mobile telephone while driving any vehicle for work-related purposes, whether or not the mobile telephone is provided by HBLB and whether or not the vehicle is owned or supplied by HBLB. 'Driving' includes having the vehicle stationary with the engine running.

If an employee is driving a vehicle for work-related purposes and s/he needs to make a call on a hand-held mobile telephone and they do not have 'hands free' equipment fitted, the employee must stop the vehicle in a place where it is safe and legal to do so and switch off the engine before using the phone.

If the employee receives a call whilst they are driving a vehicle for work-related purposes and the employee does not have 'hands free' equipment, the employee must not take the call, until they have safely parked the vehicle as detailed above.

HBLB will provide hands-free telephone equipment if the employee's use is sufficiently extensive to justify this. The employee should approach their Director for approval for this.

Given this policy, HBLB will not be responsible for any penalties, fines or other liabilities imposed on employees by any party for using a hand-held mobile telephone whilst driving any motor vehicle. The employee may also be subject to HBLB's disciplinary procedure if found to be using a hand-held mobile telephone whilst driving.

Working Time

Legislation on working time sets limits on the number of hours that employees may work per week, averaged over a period of weeks. The current limit is 48 hours a week, averaged over a 17-week period.

HBLB will take reasonable steps to ensure that employees do not exceed the limit, including overtime, whether paid or unpaid. The legislation enables employees to enter into individual written agreements with HBLB agreeing to work more than the limit if they wish. Such agreements can be indefinite or for specific periods and may be terminated subject to a specified notice period of between seven days and three months. It will only be in very exceptional circumstances, that an employee may be invited to enter into such an agreement.

In order to assist HBLB in monitoring its compliance with the Regulations, an employee may be asked to record any additional hours that they may work above their contractual hours and to make the record available on request.

The following list illustrates what would be considered as 'working time' additional to an employee's normal hours of work; but is not an exhaustive list:

- Time spent working in the office above the employee's normal hours of work as requested by their Director.
- Time spent working at home where the employee's Director has given their permission in advance for them to work at home and these are above their normal contractual hours.
- Time spent travelling to locations other than HBLB in connection with the employee's work, e.g. to a meeting, an outside visit or a training course, and vice versa. Note: normal home to/from work journeys do not count.

- A lunch break spent at leisure is not working time. However, if the employee is required to participate in a working lunch, that is considered as working time, or is required to participate in a business dinner or other evening activity as part of their job, that similarly counts.

If the employee foresees a period when they expect their working hours to exceed 48 hours a week averaged over a 17 week period, they should inform their manager.

Additional Working

To assist HBLB in its monitoring of compliance with the working time legislation, the employee must gain the prior written permission of their Director if they wish to do any work in addition to their job at HBLB. This would include, for example, voluntary work for a charity or a part-time evening job, whether paid or unpaid.

Any employee that has any queries on working time should address them to their Director or the Senior Executive Assistant.

Smoking

The Health and Safety at Work Act 1974, places a duty on employers to protect the health, safety and welfare of their employees. The Control of Substances Hazardous to Health Act 1988 requires HBLB to identify all substances in the workplace which may be a health hazard, and to take appropriate action to ensure that employees are protected.

HBLB takes the view that smoking constitutes a health hazard to all employees, both smokers and non-smokers (as a result of passive smoking), and a fire hazard to people and premises. 21 Bloomsbury Street is a no smoking building.

Employees who ignore smoking restrictions are liable to disciplinary action and may, in cases of repeated offences, be dismissed.

Employees who meet visitors on HBLB premises are expected to explain the rules on smoking to them and to ensure that they comply.

Alcohol and Substance Misuse at Work

HBLB is committed to protecting and promoting its employees' health, safety and welfare at work where reasonably possible, and recognises that their well-being is important to its performance and image. For these reasons, it has a policy on alcohol and substance misuse at work, with the aim of protecting employees' interests as closely as possible.

Alcohol

Alcohol is a drug. It can impair work performance in a number of ways, e.g. lateness, absenteeism, poor work and output, unreliability, poor relationships, impaired concentration, memory or judgement. It can affect health, and can lead to increased risk of accidents and premature death. HBLB will:

- Promote sensible drinking habits.
- Maintain total confidentiality when dealing with individual problems in this area.
- Ensure that other people are not put at risk or adversely affected in any way as a result of consumption of alcohol by employees.
- Ensure that HBLB's reputation is not undermined as a result of alcohol-induced behaviour in employees.
- Encourage employees to seek help with alcohol problems and provide advice on where to obtain specialist help.
- Ensure, through training and information, that all managers are better equipped to recognise an alcohol problem and are competent to deal with it.
- Seek to identify any aspects of the working environment which could lead to substance abuse problems and, if possible, to change them.

The difference between alcohol dependency and inappropriate drinking that adversely affects safety of people, conduct or performance during working hours is recognised. The latter will result in the use of the disciplinary procedures. Incapacity through consumption of drugs or alcohol at work is a gross misconduct offence under the disciplinary procedure and the employee is therefore liable to be summarily dismissed.

Where there appears to be a problem of alcohol dependency or heavy drinking, this will be treated as an addictive illness and support will be provided to anyone seeking or needing help. The normal sick pay policy will apply. Use of the disciplinary procedure will be used if the employee concerned is reluctant to, or refuses to, accept referral, or where misconduct occurs. If the treatment is not completed or fails after fair and reasonable efforts have been made to overcome the problem, consideration will have to be given to dismissing the employee.

Drugs and Other Substances

HBLB will adopt the same approach to the misuse of drugs and other substances as for alcohol misuse.

HBLB cannot condone illegal activities and will take immediate action, as appropriate under the disciplinary procedure, where such offences come to light. Where it is suspected or believed that an illegal activity has taken place, the police will be informed.

There are legal implications relating to drugs and employees should be aware that offences under the Misuse of Drugs Act are serious and include:

- Possession of drugs
- Supply of drugs
- Allowing premises to be used for the production or supply of drugs
- Allowing drugs to be supplied, offered for supply, or produced

Some household and office substances can intoxicate if inhaled. Whilst it is not illegal to possess these substances, a user may be prosecuted for offences committed whilst under the influence of such substances.

The use of some prescribed medications, such as the prolonged use of tranquillisers, can lead to addiction and associated physical and psychological problems, for instance depression, confusion, or nervousness. Support will be given where an employee is trying to deal with this addiction.

Drug and Alcohol Screening

On the grounds of protecting health and safety and only where necessary to achieve a legitimate business aim, the HBLB reserves the right to carry out random drug and/or alcohol screening tests on employees in the workplace whose activities and job duties have a significant impact on the health and safety of others. The guidelines promulgated in HBLB's Equal Opportunities Policy are to be followed in relation to drugs and alcohol screening.

If an employee receives a positive test result, as stated above, this will be viewed as a potential gross misconduct offence and renders the employee liable to summary dismissal. Refusal to submit to a drugs and/or alcohol screening test without reasonable excuse will be dealt with through the disciplinary procedure.

Any employee requiring further information should contact the Senior Executive Assistant and can do so in confidence. Any employee should avoid colluding with or covering for other employees where alcohol or drugs are causing a problem at work, and, if appropriate, encourage them to seek help.

OTHER POLICIES AND PROCEDURES

Systems Use Policy

Completion of HBLB's duties relies heavily upon the proper use and maintenance of the organisation's systems. To protect both its systems and its staff HBLB requires that all system users work according to the rules and guidelines that are set out within HBLB's System Use Policy. This policy establishes HBLB's expectations in areas such as the use of passwords, management of business and personal data, use of the internet, use of email, and maintenance of software.

Failure to comply with the requirements of HBLB's Systems Use Policy may lead to disciplinary action being taken against the employee.

Any queries relating to HBLB's systems should be raised with a Director or the Information Systems Department employees, from whom the Systems Use Policy is available. A copy of this policy is also provided at Induction, which employees are asked to sign.

Social Media Policy

HBLB realises that social media and networking websites have become a regular part of everyday life and that many people enjoy membership of sites such as Facebook or Twitter. However, HBLB is aware that these sites can become a negative forum for complaining, insulting or gossiping and care must be taken by employees not to breach the Systems Use Policy, Media Communications policy or the confidentiality clause in the staff contract of employment.

In order to separate personal and work activity effectively, an employee's personal profiles or accounts which are visible to others should not make any mention of HBLB or its staff members in relation to their role at HBLB.

HBLB operates a small number of official accounts on social media websites for the promotion of its activities and as a communication method. An official account on any social media website may only be set up with written consent from the Chief Executive and only authorised staff may use these accounts to post online.

Data Protection Policy

HBLB needs to hold data, including certain personal data about its employees and some other types of data, which are subject to the Data Protection Act 1998. Overall, HBLB's Chief Executive is responsible for HBLB's registration under the Act. This section of the Policies and Procedures Manual concerns personal data only. Queries about other types of data should be referred to the Chief Executive.

In holding personal data, HBLB adheres to the principles set out in the Act. Accordingly, personal data:

- Will be processed fairly and lawfully
- Will be obtained for a specific lawful purpose or lawful purposes, and will not be processed in any way that is incompatible with those purposes
- Will be adequate, relevant and not excessive in relation to those purposes
- Will be accurate and, wherever possible, kept up to date, and will not be kept for longer than necessary
- Is protected to ensure that it is kept confidential to those who are authorised to use it
- Will not go outside the European Economic Area without ensuring an adequate level of protection of the rights and freedoms of data subjects

HBLB is required to ensure that its entry in the register is correct and up to date.

The Chief Executive should be informed immediately if any change is made to an existing, previously registered file; this requirement comprises changes to the classes of data held, the sources from which the data are obtained, and the disclosures

Employees' Access to Personal Data

An employee has the right to ask, in writing, for a copy of all personal data held about him/herself on computer or in structured manual files, except for confidential references given by an employer.

HBLB has decided not to make an administrative charge for the first request for access to data by an employee, but reserves the right to charge a fee of £10.00 per request for all subsequent requests by the same employee within a year of the first request.

If an employee wishes to access their data they should address their request in writing, stating the specific data required to the Chief Executive. The data will be provided within 40 days of receipt of the request.

Processing of Employee's Personal Data

The processing of an employee's data may be necessary for one or more of the following reasons:

- For the performance of a contract, such as their Contract of Employment, or with a view to establishing a contract
- For compliance with any legal obligations
- To protect employees
- For the administration of justice, or for the exercise of any functions conferred on a person by or under enactment, a Minister of the Crown, or a Government department
- For the exercise of any function of a public nature in the public interest by any person
- Any other reasons specified by the Secretary of State

The following special additional conditions apply to Sensitive Personal Data and employees will be asked for their consent:

- Sensitive personal data may be processed where necessary for the purposes of exercising or performing any rights or obligations which are conferred or imposed by law in connection with employment.
- Sensitive personal data may be processed where necessary to protect an employee's vital interests or to protect those of another person.
- The processing of sensitive personal data is to be carried out with appropriate security and safeguards.
- Disclosure of sensitive personal data to a third party does not take place without the consent of the employee.
- Sensitive personal data may be processed where necessary due to legal proceedings, or to obtain legal advice, or to establish, exercise or defend legal rights.
- Sensitive personal data may be processed where necessary for the administration of justice, or the exercise of any functions conferred on a person by or under enactment, the Crown, a Minister of the Crown, or a Government department.
- Sensitive personal data relating to racial or ethnic origin may be processed in order to review equality of opportunities and to promote such opportunities.

Employees will be asked regularly to check personal data, including sensitive data, relating to themselves, and to amend or sign as accurate, as appropriate.

Personal Property

All employees have a responsibility to look after their personal property at work.

HBLB takes no responsibility or liability for the safekeeping, loss of or damage for employees' personal property, whether in the office, or when they are using such property outside the office in connection with their work.

HBLB's Property

While employees are on HBLB's premises, they are expected to take care of property belonging to the Board, whether or not it is available to them in direct connection with their work. 'Taking care' is largely a matter of common sense but includes, for example, avoiding damage and reporting faults.

HBLB property may not be taken off the premises without permission from an employee's line manager.

Theft of, misappropriation of and wilful damage to HBLB property are considered as gross misconduct resulting in summary dismissal.

Property of Colleagues and Visitors

Theft of, misappropriation of, and wilful damage to property belonging to other employees or visitors to HBLB's premises are considered as gross misconduct resulting in summary dismissal.

Property Lost and Found

If an employee loses any item of HBLB's property, whether on HBLB's premises or elsewhere, the employee must immediately inform their line manager or the Senior Executive Assistant, and they will decide whether it is necessary to call the police.

Any documentation or reference numbers/codes that the police give to the employee in relation to the case should be kept and handed in at the earliest opportunity to their line manager or the Senior Executive Assistant.

If an employee finds any item on HBLB's premises that they suspect or know to be lost or mislaid, it should be returned to the owner or handed to the Senior Executive Assistant.

Security of HBLB's Premises

Employees are expected to take responsibility for the security of HBLB's premises. This is a general requirement calling for vigilance and common sense at all times but the following specific rules apply:

- Any access code is confidential to employees and must not be disclosed to anyone else unless authorised by a Director.
- All staff are issued with a door access card pass and are responsible for the safekeeping of this pass. In the event of loss, they must immediately inform the Senior Executive Assistant who will arrange for it to be cancelled and a new pass issued. If you are expecting a visitor, you should inform the building reception team on the ground floor [details] or the Senior Executive Assistant. If you answer the door, please ensure visitors/delivery people are not allowed access to the main office unaccompanied. They should be asked to wait in the entry/kitchen area whilst you locate the relevant member of staff.
- If an employee sees any person behaving suspiciously on the premises, they should challenge them or report immediately to the Executive or, if necessary, call 21 Bloomsbury reception team or security [number] .
- If the person behaving suspiciously is in one of the shared parts of the building immediately inform the reception team.

Security of Information

In the course of an employee's employment, an employee may have access to information concerning HBLB's business or that of other organisations. The specific rules below are intended to protect the confidentiality of information.

As a general rule, if an employee has any doubt about the use or disclosure of any information, they must consult a Director before using or disclosing it. An employee is responsible for the confidential information that they handle. An employee must use the shredder provided for the disposal of confidential written information.

All sensitive information must be locked away before leaving an office or work station unattended.

The Betting Gaming and Lotteries Act 1963 and the Data Protection Act 1998 impose penalties and potential criminal sanctions for unauthorised disclosure of information.

Publication of Articles and Papers Written by Employees

Articles or publications that are related to HBLB's work or interests must not be published without the prior permission of the Chief Executive.

The rights relating to any document that any employee produces remain with HBLB.

LEAVING HBLB

Resignation

If an employee wishes to resign from their post at HBLB, s/he should notify his/her line manager in writing. Employees who have informed their line manager of their resignation orally should confirm in writing. The letter of resignation should include confirmation of the amount of notice that the employee is giving HBLB. The notice period should be as specified in the employee's contract of employment unless otherwise agreed with a Director. The employee will receive a reply in writing confirming the date of his/her last day of employment, dealing with any other arrangements as necessary.

Leaving HBLB

Where an employee is leaving HBLB for any reason, HBLB will inform the employee about the following:

- His/her final salary payment and deductions that may need to be made from the payment
- When his/her P45 will be issued.
- If the employee is a member of an HBLB pension scheme, who to contact regarding pension arrangements.

All employee benefits cease from the last day of employment.

On leaving HBLB for any reason, employees must:

- Remove all items of personal property from HBLB's premises.
- Give up all items of HBLB's property, including documents, to their line manager.
- Give up their identity badge to the Senior Executive Assistant.
- Give up any keys which they hold to the appropriate person(s).

Exit Interview

Exit interviews are conducted with employees leaving HBLB. The aim is to provide the employee with opportunity to give HBLB feedback on employment with HBLB and his/her reasons for leaving.

Exit interviews are normally conducted during the notice period by a Director.

Retirement

There is no normal retirement date for employees following the abolition of the Default Retirement Age for employees who are aged 65 after 1st October 2011. HBLB recognises that retirement is an important time in an employees' life that requires planning: therefore employees should speak to their manager if they are considering the option of retirement.