

# **POLICIES AND PROCEDURES**

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**2020**

LAST UPDATED

# POLICIES AND PROCEDURES

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# 01

# ANTI SLAVERY POLICY

## **Who is covered by this policy?**

This Policy applies to all PL Projects (“The Company”) staff including its directors or officers, contractors, home-workers, part-time and fixed-term employees, secondees, temporary staff, casual staff and agency staff. This Policy does not form part of your contract of employment as detailed in your Written Statement of Employment Particulars and PL Projects reserves the right to amend the Policy at any time (See Policy Review at the end of this document).

## **Policy Statement**

PL Projects has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its contractors, suppliers and other business partners.

## **Company Structure**

PL Projects is a small West Yorkshire-based training and project management office consultancy. All the directors are members of the Association of Project Management (APM) and align to the professionalism of this body, winning the Halifax Courier Employer of the Year Award in 2017. We have a limited supply chain and none of our suppliers are presently subject to the Modern Slavery Act 2015. Nonetheless, in relation to our suppliers and people, we aim to:

- Operate strict procurement processes, ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers;
- Complete an analysis of assurance information from existing suppliers and partners and followed up where relevant;

- Follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct;
- Provide training as required in respect of the Modern Slavery Act to our people and suppliers;
- Include appropriate terms in our contractual documentation, obliging suppliers and contractors to comply with the Modern Slavery Act and reserving the right for PLP to audit suppliers and contractors, where we consider it appropriate;
- Encourage staff to identify and report any potential breaches of PLP's anti-slavery policy statement;
- Whistle blowers are protected through our confidential reporting process;
- In the annual senior management team meeting, the delegated director, who is responsible for remaining vigilant and enforcing the above measures, provides a verbal report on any activity regarding this matter.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide adequate protection for whistle blowers.

This statement is made pursuant to section 54(1) of the modern slavery act 2015 and constitutes Potato Lane Limited's slavery and human trafficking statement for the financial year ending 32.03.20.

### **Policy Review**

The above policy is owned by PL Projects Ltd. Its effectiveness will be monitored and may be reviewed by the Company at any time. Updates will be notified to all users.

# 02

# BRIBERY POLICY

PL Projects will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business. PL Projects seeks to be honest and fair in our relationships with suppliers and subcontractors. It pays suppliers and subcontractors in accordance with agreed terms and has a policy not to offer, pay or accept bribes or substantial favours, this policy is in line with the 2010 Bribery Act, PL Projects has agreed to follow all legislation prescribed in this Act.

## **What is bribery?**

A bribe refers to any inducement, reward, object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

## **Gifts and Hospitality**

PL Projects has prescribed guidelines to differentiate between what constitutes acceptable forms of reciprocity and what does not.

- Must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- Must comply with local law in all relevant countries.
- Must be given in the name of the organisation, not in an individual's name.
- Must not include cash or a cash equivalent.
- Must be appropriate in the circumstances.
- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- Must be given openly, not secretly.

## **What is not acceptable?**

It is not acceptable for any Worker (or someone on their behalf) to:

- Give, promise to give or offer a payment, gift or hospitality with the expectation or hope that they or the Firm will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- Give, promise to give or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- Accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- Accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Firm in return;
- Threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

### **Facilitation Payments and "Kickbacks"**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favor or advantage.

### **Record Keeping**

PL Projects keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

### **Responsibilities and Raising Concerns**

Workers are required to notify PL Projects line management as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future, if they are offered a bribe, are asked to make one, suspect that this may happen in the future or believe that they are a victim of another form of unlawful activity. Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with nonemployee Workers if they breach this policy.

# 03

# CORPORATE SOCIAL RESPONSIBILITY

PL Projects is a relatively new company with a developing reputation in the Project Management profession. Its unique operating culture has at its core the support and empowerment of its staff to provide long term careers and rewards. It is recognised that in the world of business, nothing remains unchanged for very long and the original document created in 2013 needed to be extended. This 2019 statement seeks to provide a fuller view and covers it under the following headings:

## **Employees**

PL Projects was very pleased to win the 2017 Calderdale Employer of the Year award and regard this as a measure of how highly we regard our employees. PL Projects is committed to a policy of equal opportunity and diversity in employment and recognises that this is essential to ensuring the success and growth of the organisation. To this end, PL Projects makes every effort to select, recruit, support, train and promote the best candidates based on suitability for the job; to treat all employees and applicants fairly, regardless of race, sex, marital status, age, nationality, ethnic origin, religious belief, sexual orientation or disability; and to ensure that no employee suffers harassment or intimidation.

With respect to Disabled Employees, it is the policy of PL Projects to provide employment and to make reasonable adjustment to accommodate disabled persons wherever business requirements will allow and if applications for employment are received from suitable individuals. Should an existing employee become disabled, every reasonable effort will be made to ensure that their employment with PL Projects can continue on a worthwhile basis and that career opportunities are available to them.

## **Health and Safety**

The health and safety, welfare and wellbeing of our employees is critical. It is the policy of PL Projects to create and, where possible, improve standards of Health and Safety. This in turn will lead to the reduction of hazards and risks and to a healthier and happier workforce. We ensure that the company complies with all relevant Health and Safety legislation. A detailed Health and Safety Policy Statement is held at the office at EWIC and displayed within our SharePoint site. Health & Safety policies are actively implemented under the aegis of one of the directors, appointed from time to time to take accountability for the role and for ensuring our policies, standards and procedures are followed in all environments in which we operate. As needs arise, external qualified support is drawn upon to guide the director.

The nature of the business means that we operate in many different client organisations. PL Projects makes every reasonable and practical effort to check that safe and healthy working conditions exist in all its offices and client sites. It is the duty of all employees to exercise responsibility and to do everything they can to prevent injury to themselves and to others. The policy standards and procedures are communicated to employees through contracts of employment, operating manuals, bulletins, our SharePoint site and staff training as appropriate.

## **Customers**

PL Projects values each customer regardless of size and is committed to the development of mutually beneficial relationship. In addition, PL Projects seeks to be honest and fair in its relationships with its customers and deliver or exceed the standards of product and service that have been agreed by utilising both well trained staff and the integrated support available from our more experienced professionals.

PL Projects has for a number of years worked with a local university to provide a practitioner perspective for its students. On 25 May 2018 the General Data Protection Regulation (GDPR) became law. This means PL Projects continues to pride itself on ethical and responsible treatment of customers, suppliers and staff and has taken all necessary measures to ensure that we only process Personally Identifiable Information where we have a legitimate purpose to do so; for example, when somebody is employed by us or engages with us in a professional or business capacity.



We are totally transparent about the Personally Identifiable Information we process and provide individuals with the appropriate methods of controlling that information if they are legally allowed to do so.

If we do store and process Personally Identifiable Information, we ask for consent to do this before we obtain it. To comply with the new regulations, we also explain how we collect, use and protect any Personally Identifiable Information that is provided to us. Such information needs to remain secure and confidential. PL Projects is committed to ensuring the integrity and security of its business information. PL Projects' policies and procedures are based on its requirements for a secure operating environment, an assessment of the risks that the Company faces and relevant legal and best-practice requirements. Responsibility for information security sits with the local management teams with appropriate training and support provided.

## **Suppliers**

PL Projects seeks to be honest and fair in our relationships with suppliers and subcontractors. It pays suppliers and subcontractors in accordance with agreed terms and has a policy not to offer, pay or accept bribes or substantial favours. Furthermore, PL Projects encourages suppliers and subcontractors to abide by the same standards and principles. The information security noted in the section on 'customers' above also applies to our suppliers. When dealing with both its customers and suppliers, PL Projects' reputation is one of its key assets. Adhering to the highest standards of integrity, personal conduct, ethics and fairness is deemed to be of vital importance. It is a keen supporter of the ethical dimension of the Association for Project Management.

## **Environment**

Environmental savings make good business sense. Our primary objective is to minimise our carbon footprint and any negative impact we may have on the environment. PL Projects is committed to the following:

- Meeting or exceeding the requirements of relevant legislative, regulatory and environmental codes of practice.
- Identifying, reducing and disposing of waste arising from our operations in a manner that minimises harm to the environment and prevents pollution of land, air and water.

- Reducing the consumption of energy and water and using renewable and/or recyclable resources wherever practical.
- Encouraging our suppliers and subcontractors to implement good environmental practices and procedures which support our own objectives and targets.
- Encouraging staff to use public transport when possible.
- Taking responsibility for the maintenance and revision of our environmental policy, which is reviewed on a regular basis, in order to set environmental objectives and targets for continuous improvement, as we fully recognise the need for sustainable development.

## **Community**

PL Projects aims to make the communities in which we work better places to live and do business. It endeavours to be sensitive to the local community's cultural, social and economic needs and to protect and preserve the environment wherever it operates. Its office is housed within the Elsie Whiteley Innovation Centre which is a subsidiary of the Halifax Opportunities Trust. The income from rental of our office space and meeting rooms goes towards supporting the important charitable work that the Trust does in Calderdale. We look to support this charitable work wherever possible.

# 04

# ENVIRONMENTAL POLICY

At PL Projects, we are committed to minimising the impact of our business activities on the environment. Environmental savings make good business sense. Our primary objective is to minimise our carbon footprint and any negative impact we may have on the environment. PL Projects is committed to the following:

- Meeting or exceeding the requirements of relevant legislative, regulatory and environmental codes of practice.
- Identifying, reducing and disposing of waste arising from our operations in a manner that minimises harm to the environment and prevents pollution of land, air and water.
- Reducing the consumption of energy and water and using renewable and/or recyclable resources wherever practical.
- Encouraging our suppliers and subcontractors to implement good environmental practices and procedures which support our own objectives and targets.
- Encouraging staff to use public transport when possible.
- Taking responsibility for the maintenance and revision of our environmental policy, which is reviewed on a regular basis, in order to set environmental objectives and targets for continuous improvement, as we fully recognise the need for sustainable development.

## **Action Statement**

At PLP, our values are important in guiding us to:

- Create healthy and innovative work environments.
- Reduce waste and operational costs and increase productivity through resource conservation.
- Operate profitably.
- Foster a culture of involvement in sustainability through employee engagement.
- Enable our customers and suppliers to become more sustainable through their engagement with us.

Specifically, PLP will:

- Increase the flexibility with working from home to reduce fuel consumption and staff travelling time.
- Promote greater use of public transport and cycling.
- Continue to procure recycled materials as much as possible.
- Educate employees on sustainability for both home and work through a combination of employee communication, webinars and on-site presentations.
- Challenge our suppliers to operate sustainably and reduce waste.
- Continue to work to reduce our overall carbon footprint.
- Report results of our sustainability initiatives to employees, executive management and other stakeholders at least annually.

### **Our Commitment & Scope**

This policy will apply to all training events hosted by our organisation and all work undertaken for clients where we can control or influence the relevant factors. This is assumed to include events we host and pay for, including sponsorships. Staff and contractors are expected to uphold objectives under this policy to the fullest extent possible within prevailing budgets and to inform management of any barriers to achieving goals.

We acknowledge that we have a limited influence over third parties whose events we may attend but do not organise or whose premises we may work in but not control. While we cannot manage the decisions of these parties, we commit to educating them of our policy and encouraging them to align operating practices with policy objectives.

Our attention to environmental, social and economic responsibility includes working within the law and voluntarily exceeding legal requirements in order to be innovative and demonstrate leadership on the issues that are important to us and our stakeholders. As we design training events, execute client briefs and evaluate our success we are able to choose every day in big and small ways how our actions and words build a better quality of life for our employees, clients, event participants and suppliers.

# 05

# PRIVACY STATEMENT

This Privacy Statement sets out how PL Projects ('The Company') uses and protects any information that you give when you use our services or website. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this Privacy Statement. The Company may change this Privacy Statement from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes that we may have made. This Statement is effective from May 2018.

## **What we collect**

We may collect the following information:

- Name and job title.
- Contact information including email address and telephone number.
- Demographic information such as postcode, preferences, job and/or service interests.
- Resumes or CVs.
- Other information relevant to customer surveys and/or offers.

## **How we use your personal information**

We require this information to understand your needs and to provide you with a better service, in particular for the following reasons:

- Internal record keeping.
- To contact you about job opportunities.
- To improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

## **Data retention**

We retain personal data for as long as necessary for the relevant activity for which it was provided or collected. If you have applied for one of our job opportunities and have given our HR department consent to approach you for future opportunities, your contact details will be kept on our secured database system for two years. After that time, you will be contacted to complete a re-submission form which will ask if you would still like to be informed by our HR department about any new opportunities we may have. If you choose not to remain on our system your data will be expunged from our databases.

## **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by emailing us at [mail@plprojects.co.uk](mailto:mail@plprojects.co.uk).

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting, if you tell us that you wish this to happen.

## **Your rights**

You have the right under Data Protection Law, free of charge, to request:

- Access to your personal data held by us.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability).

You can make a request in relation to any of the above rights by writing to us at [mail@plprojects.co.uk](mailto:mail@plprojects.co.uk). We will respond to such queries within 30 days and deal with the requests we receive from you in accordance with the provisions of Data Protection Law.

You can make a request in relation to any of the above rights by writing to us at [mail@plprojects.co.uk](mailto:mail@plprojects.co.uk). We will respond to such queries within 30 days and deal with the requests we receive from you in accordance with the provisions of Data Protection Law.

## **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## **Your IP address**

We use your IP address to help diagnose problems with our server and to administer the Site. Your IP address is also used to help identify you and to gather broad demographic information about you. Your IP address may also be used to assist in the detection of fraud and we may pass this information to the police.

## **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps to analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us to analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes, and then the data is removed from the system.

Overall, cookies help us to provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and therefore such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.



# 06

## WEBSITE USAGE T&C'S

Welcome to our website. If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy govern PL Projects' relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website.

The term 'PL Projects' or 'Potato Lane Projects Ltd' or 'the Company' or 'us' or 'we' refers to the owner of the website whose registered office is 52 Colders Lane, Meltham, Holmfirth, West Yorkshire HD9 5JL. Our company registration number is 04395129. The term 'you' refers to the user or viewer of our website. The use of this website is subject to the following terms of use:

- The content of the pages of this website is for your general information and use only. It is subject to change without notice.
- This website uses cookies to monitor browsing preferences. If you do allow cookies to be used, personal information may be stored by us for use by third parties in line with our Privacy Statement.
- Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors, and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Your use of any information or materials on this website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through this website meet your specific requirements.
- This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.

- All trademarks reproduced in this website, which are not the property of, or licensed to the operator, are acknowledged on the website.
- Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.
- From time to time, this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s).
- Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland and Wales.