

21st Jan 2017

WBM
GROUNDWORKS
LIMITED

APPENDIX B –
QUENSH SCOPE & POLICIES





Appendix B - QUENSH Scope & Policies

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Outline and Scope

Company Profile

WBM Groundworks Ltd is in business to create wealth and aims to do this by the systematic programming and planning of its operations in order to: -

- please its Clients
- make profits to ensure that there is enough money available to maintain modern equipment and to enable it to grow and improve its market position
- provide good satisfying employment for all its staff

WBM Groundworks Ltd is committed to: -

- being a well established and secure Company
- working in Partnership with all Clients to demonstrate Best Value
- establish strong links with Clients based on the highest ethical standards derived from its open and honest approach to business.

To achieve this, the Company will aim to provide a first class quality service to its customers that they require, at the most cost effective and competitive prices, which makes the Company profit.

Overall management of the Company, the Quality, Environmental and Health & Safety Systems and Operations are carried out by the Directors from their office in Pensilva, Cornwall.

The company is structured around the four distinct parts of the business which are:

- Civil Engineering Construction
- Renewable Energy Construction
- Building Works
- Renovations

The Company shall make all of its policies available to the general public. They can be downloaded through the Company web site www.wbmgroundworksltd.co.uk.

Scope

The QUENSH Manual ensures our business practice conforms to:

- ISO 9001:2015 Quality Systems
- ISO 14001:2015 Environmental Systems
- OHSAS 18001:2007 Health & Safety Systems

Signature:



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1.1. COMPANY POLICY

It is the Company's Policy that all of its work will be carried out in accordance with this manual.

It covers the most fundamental aspects of quality, safety, health and environmental issues and is intended to provide practical guidance to those responsible for the aforementioned items.

The Directors, Project Manager and Foreman are designated the responsibility for implementing this Policy throughout the Company and must ensure that Quality, Health, Safety, Welfare and Environment considerations are always given priority in planning and the day-to-day supervision of work.

WBM Groundworks Ltd is committed to: -

- Being a well established and secure Company.
- Working in Partnership with all clients to demonstrate best value.
- Pleasing its customers.
- Make profits to ensure that there is enough money available to train its staff and maintain modern equipment to enable it to grow and improve its market position.
- Provide good satisfying employment for all of the staff.
- Delivering projects on time and within budget.
- Protecting the health, safety and welfare of our employees and others who may be affected by our activities.
- Helping our customers to achieve high standards in relation to health and safety.
- Providing a qualified, skilled and highly motivated workforce.
- Protecting the Environment

By committing to the above the Company will be able to provide its Customers with a first class quality service, at the most cost effective and competitive prices.

The overall management of the Company's Quality, Health & Safety and Environmental (QUENSH) Systems and Operations is carried out by the Directors and Projects Manager situated at the Head Office in Liskeard.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature:



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1.2. QUALITY POLICY

We aim as a civil engineering and building contractor to deliver our service effectively and efficiently in accordance with the specified needs and to meet the expectations of all interested parties.

The policy commitment of the Company is to strive in the execution of its operations to attain:-

- Achievement of stated objectives by aiming to be amongst the best in our field of business through delivering our projects on time and within budget
- Delivering a high quality product is a prime responsibility of all our employees, and the Company will provide training and support to suit the experience and abilities of each employee such that they are competent to fulfil their responsibilities
- The Company will continue to add value to the whole construction life process through Value Engineering and management of the Supply Chain.
- Effective monitoring of quality performance.
- Continual improvement based on objective measurement.

This intent is supported by our QUENSH Management Systems, which incorporates Quality Management compliant to ISO 9001:2015 as a mainstream business issue.

The policy and associated documentation is made known to all persons working for and on behalf of the organisation, and will be subject to periodic review to ensure it continues to meet the Companies environmental requirements.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

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1.3. HEALTH & SAFETY POLICY

It is our intention that the Health and Safety Policy is implemented throughout our sphere of operations.

We are committed to fulfilling our social responsibility including the provision and maintenance of a safe and healthy working and living environment by:

- Recognises that Occupational Health and Safety is an integral part of the Company's business performance and is incorporated into all aspects, including feasibility, design, initial planning to final completion and where appropriate operation of projects, ensuring effective control through proportionate risk management.
- Aims to be amongst the best in our field, with compliance to current, applicable legal requirements as a minimum. We have clear objectives, monitor performance, set targets and establish initiatives as part of our commitment to continual improvement.
- Places the management of Occupational Health and Safety as a prime responsibility of all our employees, and provide training and support to suit the experience and abilities of each employee such that they are competent to fulfil their responsibilities.
- Recognises that our people are one of the most important assets of the Company. We will actively seek involvement and consultation with our employees and others, to gain commitment to implement this policy.
- Will provide adequate and appropriate resources to implement this policy and H&S shall never be compromised for other objectives.

This policy and associated documentation will be publicised to all employees and will be reviewed on a regular basis, to be updated or revalidated as appropriate.

This intent is supported by our QUENSH Management Systems, which incorporates Occupational Health & Management Systems, compliant to BS OHSAS 18001:2007 as a mainstream business issue.

for and on behalf of WBM Groundworks Ltd

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Director responsible for QUENSH

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1.4. ENVIRONMENTAL POLICY

We recognise as a civil engineering and building contractor the need for sustainable development and the responsibility shared with everyone to protect the environment for future generations.

The policy commitment of the Company is to strive in the execution of its operations to attain:-

- Compliance with relevant legislation and regulation and other requirements to which the Company subscribes
- Compliance with environmental legislation and regulation and other requirements to which the Company subscribes
- Prevention of pollution
- Efficient use of natural resources and recycling on and off site wherever possible.
- The minimisation of waste and of emissions to air and water
- Proper awareness of all stakeholders
- Effective monitoring & continual improvement of environmental performance
- Life cycle perspective
- Will provide adequate and appropriate resources to implement this policy.

The Company will set targets and objectives for the improvement of environmental management and will record and review details of its environmental performance. This intent is supported by our QUENSH Management Systems, which incorporates Environmental management compliant to ISO 14001: 2015 as a mainstream business issue.

The policy and associated documentation is made known to all persons working for and on behalf of the organisation, and will be subject to periodic review to ensure it continues to meet the Companies environmental requirements.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
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1.5. TRAINING POLICY

We aim to recruit and retain the correct number and calibre of employees, to provide them with adequate training and continuing personal development, thus helping them to grow and develop whilst enabling us to fulfil our needs now and in the future.

The policy commitment of the Company is to:-

- Places the management of Occupational Health and Safety as a prime responsibility of all our employees, and provide training and support to suit the experience
- Ensure all current employment law requirements are fulfilled.
- Ensure all employees are paid appropriately at either weekly or monthly intervals, in line with the Inland Revenue and other requirements.
- Ensure all employees are paid appropriately at either weekly or monthly intervals, in line with the Inland Revenue and other requirements.
- Provide an environment where all can work in the most effective and efficient manner and thereby achieve job satisfaction.
- Identify potential future managers and supervisors and devise appropriate career development opportunities to meet these longer-term requirements.

This intent is supported by our documented QUENSH Management System and also supplemented by specific statements on Equal Opportunity and Industrial Relations.

The policy and associated documentation is made known to all employees and will be reviewed on a regular basis.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

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1.6. COMPANY VEHICLE POLICY

In the event that you are provided with a Company vehicle the following shall apply:-

- You shall ensure that at all times when the vehicle is driven on the road it is in the state and condition required by law, including inspection of the tyres.
- Company vehicles may only be used for private use upon authorisation by a Company Director.
- Defects shall be reported to the Office Manager immediately, advising the Company of any defects and servicing the vehicle requires.
- You shall be required to ensure that the utmost care is taken of the vehicle at all times. You have a responsibility to maintain the condition and levels of tyres, oil and water etc.
- Road accidents and any damage to the Company vehicle must be promptly reported to a Manager or Director of the Company. Drivers of Company vehicles may be liable for own fault accidents/damage depending on the circumstances of the incident and in accordance with our Company vehicle insurance policy (terms of which are available from the Office Manager).
- You shall at all times be the holder of a current driving license entitling you to drive private cars in the United Kingdom and abroad and shall produce such license to the Company upon request. **You must** notify the Company in the event of any change to the status of your driver's license.
- If at any time you are disqualified from driving for any reason at all then the Company may have to consider whether your disqualification affects your ability to carry out your duties under your employment and if, in its opinion, having regard to the extent of use of the Company vehicle for performance of duties, the extent of those duties and the appropriateness and suitability of any modifications or changes to your duties, it may have to consider alternative positions from within the Company. If there are no suitable alternative positions available then the Company may have to terminate your employment because of your disqualification from driving.
- Upon the termination of your employment you shall promptly, whenever requested to do so by the Company, deliver to the Company the vehicle and vehicle keys belonging to the Company.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

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1.7. COMPANY DRINK & DRUGS POLICY

The consumption of alcohol and drugs can present Health and Safety risks and their consumption whilst you are at work is strictly prohibited.

The consumption of alcohol and drugs is also prohibited during your lunch break even when you are away from your place of work.

Should we have reasonable grounds to believe that you are under the influence of drink and drugs, or in possession of drugs, when you attend for work then you may be suspended for an appropriate period whilst a full investigation into the incident is undertaken.

If disciplinary action is undertaken at this time, then the Company reserves the right to class the period of suspension as nil pay.

If you believe prescribed drugs may affect your ability to do your job then you should immediately bring this to the attention of your manager.

A number of our Clients operate either a random or with cause Drink & Drugs policy. The Company is fully supportive of our Clients and you will be required to undertake any tests the Clients deems appropriate.

If you create a serious hazard on the Company's premises or place of work due to the effects of drink or non prescribed drugs you will normally be regarded as having committed an act of gross misconduct. The Disciplinary and Grievance Procedure will then be invoked.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

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1.8. EQUAL OPPORTUNITIES STATEMENT & POLICY

WBM Groundworks Ltd is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

WBM Groundworks Ltd will follow the recommendations and guidance of the Equality and Human Rights Commission in accordance with the Equality Act 2010, in all our employment policies, procedures and practices, and in dealing with customers and members of the public.

Equal Opportunity Policy

The aims of this policy are to ensure that:

No-one receives less favourable treatment, on grounds of any protected characteristic (including age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation); or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds.

No-one is victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.

The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.

Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.

Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

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We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

- The policy will be a priority for the organisation.
- Mr Michael Follett (Director Responsible for QUENSH) will be responsible for the day to day operation of the policy.
- The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet and website.
- Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.
- All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation. Unacceptable conduct includes discrimination and harassment at work-related social functions.
- Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
- Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The grievance procedure will be published in a form that is easily accessible.
- Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability, age, religion or belief.
- All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation. All employees carrying out work of 'equal value' will receive equal pay, regardless of their sex, race or any other protected characteristic, and equal pay audits will be carried out as necessary.
- Selection criteria will be entirely related to the job or training opportunity.

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- We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
- We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or employees.
- Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored. Monitoring may include promotion and training if necessary.
- If the data shows that people from particular groups are under-represented in particular areas of work, lawful positive action training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.
- Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, may also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation if necessary.
- Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds. We will also regularly review advertising, recruitment and application materials and processes, and this policy.
- All contracts between WBM Groundworks Ltd and contractors to supply goods, materials or services will include a clause prohibiting unlawful discrimination or harassment by contractors and their staff, and by any sub-contractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
- The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the website, the staff newsletter, notice boards, and the annual report.
- Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.

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- Fair and equal treatment will be given to customers and members of the public by all staff. The business will investigate any complaints from staff that they are being harassed by a customer for reasons linked to protected characteristics, and take suitable action to prevent further incidents.
- The business will take all necessary steps to ensure that employees are legally entitled to work in the UK, making sure that employees from outside the EU have permission to work here by checking the validity of documents and keeping copies of them for two years after the employment has come to an end.
- The company will draw up an Action Plan detailing how this policy will be implemented in practice.

Overall responsibility for the effectiveness of the policy lies with Mr Michael Follett. For more information, please contact this person on 01579 363528 or e-mail wbmgroundworksltd@googlemail.com

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature:



1.9. CORPORATE SOCIAL RESPONSIBILITY POLICY

Introduction

Corporate social responsibility means that we take account of the impacts of our activities on the environment, society and the economy.

Aims:

This policy is structured around four aims:

1. To maintain strong business ethics.
2. To manage our environmental impacts.
3. To promote sustainable development through our procurement practices.
4. To encourage our staff to be active citizens, committed to high performance and continuous improvement.

Implementation:

1. To maintain strong business ethics.
2. Our culture is based on our open, ethical and honest approach to our business which has helped enable us to quickly expand our portfolio of Clients covering the whole of the South West.
3. To manage our environmental impacts.
Our operations are managed in accordance with ISO 14001:2004 Environmental Management System. To promote sustainable development through our procurement practices.
Government targets mean that, by 2012, at least 25% of products used in construction projects must be from schemes recognised for responsible sourcing. The UK Contractors Group is putting even greater demands on its members' supply chain, requiring that 70% of products be responsibly sourced by 2015.
WBM Groundworks Ltd are proactive in resourcing materials from ethical and sustainable sources and we source our timber products from sustainable sources.
4. To encourage our staff to be active citizens, committed to high performance and continuous improvement. The Company's strength comes from our staff and we believe passionately in investing in their future.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature:



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1.10 FRAUD, BRIBERY & CORRUPTION POLICY

Introduction

This document sets out the non-tolerance position held by WBM Groundworks Ltd on fraud, corruption and bribery.

The objectives of an Anti Fraud, Corruption and Bribery Policy and Strategy are to:

- Provide a clear statement of the WBM Groundworks Ltd's position on fraud, corruption and bribery;
- Minimise the risk to the WBM Groundworks Ltd's good name and loss of its assets;
- Promote a culture of integrity and accountability, two of the fundamental principles of good governance, in members, staff and all those the WBM Groundworks Ltd does business with;
- Enhance existing procedures aimed at preventing, discouraging and detecting fraud, corruption and bribery; and
- Raise awareness of the risk of fraud, corruption and bribery being perpetrated against the WBM Groundworks Ltd.

In managing its responsibilities the WBM Groundworks Ltd is determined to protect itself against fraud and corruption both from within and from outside the Company. WBM Groundworks Ltd is committed to an effective Policy and Strategy which is designed to:

- Encourage prevention;
- Promote detection; and
- Identify a clear pathway for investigation.

To combat fraud, corruption and bribery the WBM Groundworks Ltd's Policy and Strategy is based on a series of comprehensive procedures. These cover:

- Risk Management (paragraph 3);
- Policy Statements (paragraph 5);
- Deterrence and Prevention (paragraph 6);
- Detection, Investigation, Sanctions and Redress (paragraph 7); and
- Publicity and Training (paragraph 8)

There is an inter-relationship between the Strategy and other existing WBM Groundworks Ltd policy documents including the Disciplinary Procedures.

All references to 'staff' should be taken to include full and part- time staff and permanent, temporary and agency staff.

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DEFINITION OF FRAUD, CORRUPTION AND BRIBERY

Fraud

Fraud has been defined as: the intentional and dishonest distortion of financial statements and other records by persons internal or external to the WBM Groundworks Ltd which is carried out to conceal the misappropriation of assets or otherwise for gain. (Source: CIPFA)

The Fraud Act created a new general offence of fraud with three ways of committing it:

- Fraud by false representation (dishonest representation) to gain or cause loss or risk of loss;
- Fraud by failing to disclose information (where there is a legal duty, e.g. under written or oral contracts);
- Fraud by abuse of position.

It also created new offences:

- Obtaining services dishonestly
- Possessing, making and supplying articles for use in frauds
- Fraudulent trading applicable to non-corporate traders. (extends Companies Acts to sole traders etc)

Corruption

Corruption has been defined as: the offering, giving, soliciting or acceptance of an inducement or reward, which may influence a person to act against the interests of the organisation. (Source: Audit Commission)

Bribery

Bribery is defined as: The offering, giving or soliciting of an inducement or reward which may influence a person to perform a function or activity improperly.

The 2010 Bribery Act says that a person is guilty of an offence if either of the following cases applies:

- Person A offers, promises or gives a financial or other advantage to another person, and intends the advantage to induce Person B to perform improperly a relevant function or activity, or to reward a person for the improper performance of such a function or activity, or knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity

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Person B is guilty of an offence if any of the following cases applies.

- Where Person B requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly (whether by Person B or another person); or where the request, agreement or acceptance itself constitutes the improper performance by Person B of a relevant function or activity under the Bribery Act and organisation can be prosecuted if it has failed to prevent bribery.

Staff must note that this Policy and Strategy reflects the WBM Groundworks Ltd's zero tolerance of both the offering and receipt of bribes.

RISK MANAGEMENT

Areas most commonly at risk from fraud are both internal and external and include those involving the handling of any asset of an attractive and portable nature. Among typical high risk areas are cash, cheques, credit cards, contracts, income, payments, expense claims and payroll.

Areas where corrupt practices or bribery may be found may include, but are not limited to the secondary employment of staff which may influence their work for the Company, pressure selling, tendering and award of contracts, settlement of contractors' final accounts and claims and the disposal of assets.

The risk of fraud, corruption and bribery requires the Directors of the Company to identify the key risks to achieving their service objectives and the controls to mitigate these risks, which may include fraud or corruption.

EXTERNAL SCRUTINY

The WBM Groundworks Ltd is aware of the high level of external scrutiny of its affairs by a variety of bodies and individuals including:

- The WBM Groundworks Ltd's external auditors
- Government Departments and Agencies
- HM Revenue and Customs

The adoption of a formal anti fraud, corruption and bribery strategy will provide a degree of assurance to those external bodies and individuals interested in the WBM Groundworks Ltd's activities.

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POLICY STATEMENTS

Culture

The WBM Groundworks Ltd is determined that the culture and tone of the organisation will be, and is seen to be, one of openness, honesty and opposition to fraud, corruption or bribery.

The WBM Groundworks Ltd is committed to discouraging, preventing and detecting fraud, corruption and bribery where attempted on, or from within, the WBM Groundworks Ltd's organisation.

The WBM Groundworks Ltd expects staff at all levels to be aware of the standards of conduct expected of them and the procedures designed to reduce the risk of fraud, corruption and bribery occurring.

Staff are responsible for their own conduct and compliance with this strategy and are required to comply with their respective codes of conduct.

There is an expectation and requirement that individuals, suppliers and organisations associated in whatever way with the WBM Groundworks Ltd will act with integrity, and that members and WBM Groundworks Ltd staff will lead by example in these matters.

Members and Staff

Staff are positively encouraged to raise any concerns on fraud, corruption and bribery matters normally, but not exclusively, through the Directors or their line manager. This they can do in the knowledge that such concerns will be treated in confidence and properly investigated.

The WBM Groundworks Ltd has drawn up a separate policy and procedure to deal with any area of concern that an employee may wish to bring to the attention of the management; the 'Whistle Blowing Policy'.

WBM Groundworks Ltd's Directors need to be informed of any actual or suspected breaches of the law or codes of practice (See section 7 of this document relating to investigation).

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The primary responsibility for maintaining sound arrangements to prevent and detect fraud, corruption and bribery rests with the management. Any manager made aware of suspected fraud, corruption and bribery will adopt defined procedures by:

- Dealing promptly with the matter;
- Recording all evidence received;
- Ensuring that evidence is sound and adequately supported;
- Ensuring security of evidence collected;
- Notifying the Company Directors; &
- Implementing WBM Groundworks Ltd disciplinary procedures were appropriate.

Any abuse of this process by knowingly raising unfounded and/or malicious allegations may be dealt with as a disciplinary matter.

The WBM Groundworks Ltd can be expected to deal swiftly and thoroughly with any member or member of staff who defrauds or attempts to defraud the WBM Groundworks Ltd or who is corrupt. The WBM Groundworks Ltd will be robust in dealing with financial malpractice.

Monitoring

The Directors will monitor the effectiveness of all aspects of the arrangements for the anti fraud, corruption and bribery culture including the approach to investigations, success of sanctions and processes for recovering loss.

DETERRENCE AND PREVENTION

The effectiveness of the WBM Groundworks Ltd's financial arrangements will have a major bearing on its ability to minimise fraud, corruption and bribery. To actively prevent fraud the WBM Groundworks Ltd must identify and remove the opportunity to commit crime from new policies and systems and to revise existing ones to remove apparent weaknesses.

The WBM Groundworks Ltd will endeavour to act robustly and decisively when fraud, bribery or corruption is suspected and proven. This will be demonstrated through disciplinary action or prosecution. The WBM Groundworks Ltd will take action to help ensure the maximum recoveries for the WBM Groundworks Ltd.

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Prevention – Internal Controls

The Directors are responsible for making arrangements for the proper administration of the WBM Groundworks Ltd's financial affairs and are required to:

- Maintain an effective accounting system;
- Comply with statutory financial reporting deadlines; and
- Maintain an adequate and effective internal audit.

The Accounts and Audit Regulations 2011 require the WBM Groundworks Ltd to ensure that it has adequate and effective financial management and a sound system of internal control. It must review the system annually and publish a statement with the accounts.

The adequacy and appropriateness of the WBM Groundworks Ltd's financial systems is reviewed on a periodic basis.

Prevention – Staff

The WBM Groundworks Ltd recognises that a key preventative measure in the fight against fraud, corruption and bribery is to take effective steps at the recruitment stage to establish, as far as possible, the previous record of potential staff in terms of their propriety and integrity. Staff recruitment is therefore undertaken by a Company Director before employment offers are made.

In the case of agency staff, references will have been taken by the agency to establish the honesty and integrity of the employee.

WBM Groundworks Ltd staff are expected to follow any Code of Conduct related to their employment or to their professional bodies or qualifications. This will be emphasised in staff induction procedures.

Employees who hold professional, trade or other appropriate qualifications are expected to comply with codes of conduct issued by the organisations of which they are members.

WBM Groundworks Ltd staff are required to notify the WBM Groundworks Ltd's Directors of offers of gifts or hospitality in any way related to their employment.

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DETECTION, INVESTIGATION, SANCTIONS AND REDRESS

Prevention systems, particularly internal control systems, within the WBM Groundworks Ltd have been designed to provide indicators of any fraudulent activity.

It is often the alertness of staff and the public to such indicators that enables detection to occur and the appropriate action to take place when there is evidence that fraud or corruption may be in progress.

Despite the best efforts of the Directors, many frauds are discovered by chance or 'tip off', and the WBM Groundworks Ltd has in place arrangements to enable such information to be properly dealt in the form of a Whistle Blowing Policy which is available by personal request to the Directors.

Investigation

An investigation will be undertaken by a Director.

The Reporting, Investigation and Action stages will be covered under the following headings:

- Notifying Suspected Fraud
- Director or Line Management
- Confidential Reporting
- Investigating Suspected Fraud
- Steps to be taken
- Responsibilities of the Investigating Officer
- Liaison with External Audit and the Police
- Interim Report/Final Report (including findings)
- Potential Outcomes
- Disciplinary
- Prosecution
- Exoneration
- Confidentiality
- Postscript – Defamation

Depending on the nature and anticipated extent of the allegations, the Directors will normally work closely with management and other agencies such as the Police to ensure that all allegations and evidence are properly investigated and reported upon.

Any control weaknesses identified by an investigation must be reported to the fellow Directors to allow improvements to be made that will ensure that there is no opportunity for further fraud or corruption.

Signature:



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Sanctions and Redress

The WBM Groundworks Ltd's Disciplinary Procedures will be used where the outcome of the Investigation indicates improper behaviour of staff.

Where financial impropriety is discovered, the WBM Groundworks Ltd will normally wish the Police and Crown Prosecution Service to assess evidence and make the decision to prosecute or not.

The WBM Groundworks Ltd will always seek to recover any losses incurred as a result of fraud, corruption or bribery, wherever this is practical, including the use of the civil law if appropriate. Losses will be calculated using a professional statistical methodology for making accurate estimates, building in a proper level of independent valuation as required.

Investigations Not Involving Fraud or Corruption

The investigation process related to the WBM Groundworks Ltd's Disciplinary Procedures will only be used to for those enquiries where no fraud, corruption or bribery is suspected.

Should a disciplinary investigation subsequently be found to involve fraud, corruption or bribery the Directors will suspend that investigation and ensure this Policy is followed.

TRAINING AND PUBLICITY

The WBM Groundworks Ltd recognises that the continuing success of its Anti Fraud, Corruption and Bribery Policy and Strategy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of staff throughout the organisation through publication.

Training

It is, therefore, apparent that all staff involved in fraud work should be properly and regularly trained in all aspects of it. External advisors will be sought whom specialise in this area of investigation should the need arise.

Publicity

- Upon request made to the Directors of the Company
- Occasional reminder e-mails to all staff and members.

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POLICY REVIEW

The WBM Groundworks Ltd has in place a clear network of systems and procedures to assist in the fight against fraud, corruption and bribery. It is determined that these arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation.

To this end, the WBM Groundworks Ltd maintains a continuous overview of such arrangements and shall be formally updated at least every 3 years.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature:



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1.11 WHISTLEBLOWING POLICY

Introduction

The Public Interest Disclosure Act 1998 was enacted to ensure a climate of greater frankness between employers and workers so that irregularities can be identified and addressed quickly and to strengthen employment rights by protecting responsible workers who blow the whistle about wrongdoing or failures in the workplace. The policy set out in this document applies those statutory provisions to the administration of the WBM Groundworks Ltd.

Employees are often the first to realise that something seriously wrong may be happening within the Company. However, they may not express their concerns either because they feel that speaking up would be disloyal to their colleagues or to the Company or because they fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern than to report what may just be a suspicion of malpractice.

The Company is committed to maintaining the highest possible standards of openness, honesty and ethical standards. In line with that commitment it encourages employees and others with serious concerns about any aspect of the Company's work to come forward and voice those concerns. It recognises that certain cases will have to proceed on a confidential basis.

This policy makes it clear that staff can do so without fear of reprisals and is intended to encourage and enable staff to raise serious concerns within the Company rather than overlooking a problem or publicly disclosing the matter.

Aims and Scope of this Policy

This policy aims to provide avenues for you to raise concerns and receive feedback on any action taken. This policy covers concerns that fall outside the scope of other procedures nor is it an alternative to the Company disciplinary or grievance procedures.

Concerns raised under this Whistleblowing Policy should be about something that is or may be:

- unlawful or a criminal offence
- a breach of a legal obligation
- a miscarriage of justice
- mistreatment or abuse of a client or a member of the public for whom the Company has responsibility
- in disregard of legislation governing health and safety at work
- seeking undue favour over a contractual matter or a job application
- amounts to improper conduct or unauthorised use of Company funds
- has led to or could lead to damage to the environment
- deliberately covers up information tending to show any of the above.

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Safeguards

Harassment or Victimisation

The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will take action to protect you when you raise a concern in good faith. It will not tolerate any resulting harassment or victimisation (including informal or indirect pressures) and will treat this as a serious disciplinary offence which will be dealt with under the appropriate procedures.

Any investigation into an allegation of malpractice will not influence or be influenced by any disciplinary or redundancy procedures which already affect you.

Confidentiality

All concerns will be treated in confidence and the Company will do its best to protect your identity if you do not want your name to be disclosed. If investigation of a concern discloses a situation which is sufficiently serious to warrant disciplinary action or police involvement then your evidence may be important. Your name will not however be released as a possible witness until the reasons for its disclosure at this stage have been fully discussed with you.

Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful but they will be considered at the discretion of the Company against the following criteria.

- the seriousness of the issues raised;
- the likelihood of confirming the allegation from attributable sources;
- the Company's best interests;
- the protection of the Company's assets.

You should also bear in mind that if you do choose to raise a concern anonymously it will be more difficult for the matter to be investigated and for you to be provided with feedback.

For this reason, where you wish to raise your concern anonymously, this may best be done through your trade union.

Untrue Allegations

If you make an allegation in good faith but it is not confirmed by the investigation, no reprisals will be taken against you. If, however, you make malicious or vexatious allegations, disciplinary action may be taken against you.

Signature:



How to Raise a Concern

As a first step, you should normally raise concerns with your immediate manager. However, if for some reason this first step is inappropriate then the concern should be raised at Director level.

Concerns can be raised orally but it is good practice for the concern to be recorded in writing at an early stage to ensure that all the details are correctly understood. A written allegation should set out the background and history of the concern (giving names, dates and places where possible) and the reason why you are particularly concerned about the situation. It is preferable for you to record this in writing yourself. However, where the person to whom you voice your concerns writes these down a copy will be sent to your home address to give you an opportunity to agree this as a correct record.

The earlier you express the concern, the easier it is to take action.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

How the Company Will Respond

The action taken by the Company will depend on the nature of the concern.

After initial enquiries to assess the seriousness of the matter it may be investigated by a Company Director.

If urgent action is required in response to a concern this may well be taken before a full investigation is conducted.

Some concerns may be resolved by action agreed with you without the need for investigation or it may be that an investigation can be completed without the person or persons under investigation being aware of the process.

In any event within ten working days of a concern being received, the Company will write to you at your home address:

- acknowledging that the concern has been received
- indicating how it proposes to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling you whether any initial enquiries have been made, and
- telling you whether further investigations will take place, and if not, why not.

If you wish to retain your anonymity you will need to nominate a representative to whom correspondence may be directed in order to keep you informed.

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The amount of contact between the investigation team and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

When any meeting is arranged, you have the right, if you so wish, to be accompanied by a Union or professional association representative or a friend (who need not be associated with the Company).

The Company accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcome of any investigations and/or proceedings.

Detriment

The Company is committed to ensuring that an employee who makes an allegation in good faith suffers no detriment from doing so.

How the Matter Can Be Taken Further

This policy is intended to provide you with a way to raise concerns within the Company. The Company hopes you will be satisfied by its response. If you are not you may feel it is right to take the matter outside the Company and, if so, the following are possible contact points:

- relevant professional bodies or regulatory organisations
- your Trades Union
- your solicitor or legal adviser
- the Police
- the Local Government Ombudsman
- the Health and Safety Executive
- 'Public Concern at Work' – a Registered Charity

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature:



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1.12 FOREIGN LANGUAGE POLICY

The Directors of the Company will ensure this policy statement is satisfied.

WBM Groundworks Ltd is committed to employing a policy for employees and sub-contractors whose first language is not English.

It is critical that everyone realises that the success of the company depends on maximising the potential of every employee for mutual benefit. It is therefore essential that we attract the most suitable people to work with us regardless of language, race, colour, creed or sexual orientation.

If an employee or sub-contractor is having difficulties understanding English, or employees have low literacy levels, there are a number of ways you can communicate with them to encourage their involvement. The aim is to achieve the same standard of understanding and involvement as for an English speaker.

The following can help to involve and consult such employees:

- Ensure adequate time to consult with employees where language and/or literacy may be issues so they can absorb the information and respond to you.
- Encourage employees to express their views in their preferred language by using interpreters.
- Ask a work colleague to interpret, although these employees may need training if they are asked to undertake this role.
- Get information translated and check that this has been done clearly and accurately by testing it with native speakers.
- Use pictorial information and internationally understood pictorial signs where appropriate
- Consider ESOL courses (English for Speakers of Other Languages) as an improved grasp of English will help communication in the workplace and on health and safety.
- Be aware of cultural differences and take these into account when consulting employees - there may be some employees who do not feel able to speak up about health and safety matters.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

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1.12 SLAVERY POLICY

WBM Groundworks Ltd is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and suppliers.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the Company and with suppliers of goods and services to the organisation.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values

The Company Directors shall take responsibility for implementing this policy.

The Company shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

This policy and associated documentation is made known to all employees and will be reviewed on a regular basis.

A copy of this policy and a copy of the Modern Slavery Act 2015 will be available to all employees upon request.

for and on behalf of WBM Groundworks Ltd

Michael Follett
BEng (Hons) CEng M.I.C.E
Director responsible for QUENSH

Signature: