



# DOUGH

---

WORKER HANDBOOK

---

## TABLE OF CONTENTS

|                                                       |    |
|-------------------------------------------------------|----|
| INTRODUCTION                                          | 2  |
| 1. EQUAL OPPORTUNITIES / BULLYING & HARASSMENT POLICY | 3  |
| 2. DRUGS AND ALCOHOL POLICY                           | 7  |
| 3. SOCIAL MEDIA POLICY                                | 9  |
| 4. WHISTLEBLOWING POLICY                              | 14 |
| 5. DATA PROTECTION POLICY                             | 17 |
| 6. HEALTH AND SAFETY POLICY                           | 24 |



## INTRODUCTION

### 1. Welcome

- 1.1. The Directors, Dominic Matcham and Albert Slade, would like to welcome you as a new team member of DOUGH. We hope that your employment with us is rewarding, and that you find the challenges satisfying.
- 1.2. We are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.
- 1.3. Our ethos is to respect and value people's differences, and to help everyone achieve more at work so that they feel proud of the part that they play in our success. Our Grievance Procedure aims to ensure sympathetic handling, and hopefully the satisfactory resolution, of any concern or dissatisfaction experienced by our staff.

### 2. Using the Staff Handbook

- 2.1. This Staff Handbook sets out the main policies and procedures that you will need to be aware of while working for us. Please take the time to read it and ensure that you understand its contents, as you will be expected to comply with it, and act in accordance with its aims and objectives, at all times. Any questions you may have with regard to its contents or application may be referred to your line manager and/or a Company director.
- 2.2. The policies and procedures set out in this handbook apply to all staff unless otherwise indicated. They therefore apply to directors, managers, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff. They do not form part of your contractual terms of with us, which are provided to you separately.

### 3. Responsibility for the Staff Handbook

- 3.1. Our board of directors ('the Board') has overall responsibility for the operation of this Staff Handbook and for ensuring that its policies and procedures comply with our legal obligations.
- 3.2. The Staff Handbook will be reviewed annually by the Board to ensure that its provisions continue to meet our legal obligations and reflect best practice. You will be advised in writing, and with reasonable notice, of any changes to the Handbook. The practical implications of any material changes will also be fully explained to you.
- 3.3. All managers have a specific responsibility to operate in accordance with the provisions set out in this Staff Handbook, to ensure that all staff understand the standards of behaviour expected of them, and to take action when behaviour falls below those requirements. Managers may be given appropriate training in order that they may do so.
- 3.4. Those working at a management level also have a specific responsibility to set an appropriate standard of behaviour, to lead by example, and to ensure that those they manage adhere to the policies and procedures.



## **EQUAL OPPORTUNITIES / BULLYING & HARASSMENT POLICY**

### **1. General Principles**

- 1.1. It is the policy of DOUGH not to discriminate against its workers on the basis of their gender, pregnancy, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age (known as 'Protected Characteristics').
- 1.2. DOUGH is also committed to ensuring that discrimination, in any form, is prevented and eliminated from the workplace and that any complaints are quickly resolved.
- 1.3. Situations where discrimination can occur are when an individual, because of a Protected Characteristic;
  - 1.3.1. receives less favourable treatment;
  - 1.3.2. is placed at a disadvantage, when compared to others who don't share the Protected Characteristic, by reason of a particular policy or practice, (unless that policy or practice can be justified as being a proportionate means of achieving a genuine business need);
  - 1.3.3. is subjected to harassment i.e. unwanted conduct, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment;
  - 1.3.4. is subject to any unfavourable treatment as a result of having made a discrimination-related complaint or allegation, or given evidence in relation to a complaint of discrimination; or
  - 1.3.5. is denied reasonable adjustments in circumstances where a policy or practice has placed disabled persons at a substantial disadvantage in the workplace.

### **2. Equal Opportunities**

- 2.1. DOUGH is committed to providing equal opportunities to prospective, current and former employees, including in the following areas: advertising, recruitment, training and development, promotion, remuneration and benefits. It is the policy of DOUGH to ensure that access to employment, training and career progression is determined solely by the application of objective, legitimate and proportionate criteria and individual merit.

### **3. Harassment and Bullying**

- 3.1. DOUGH is committed to eliminating all forms of harassment, bullying and victimisation at work whether by an employee, director, visitor, contractor or supplier. Harassment may not be confined to the workplace – this policy will also apply to conduct undertaken at times and places associated with work e.g. leaving drinks, training courses, conferences etc.
- 3.2. Harassment can take many forms. It can range from extreme forms such as violence and bullying to less obvious actions such as ignoring someone at work. The behaviour does not have to be undertaken with malicious intent, it is enough that the recipient (or an observer) finds the conduct to be offensive, frightening or distressing. Harassment can occur even though comments or behaviour may not be targeted at an individual, for example, a general culture which appears to tolerate the



telling of sexist jokes. Single or continued acts may constitute harassment and will be treated as a serious disciplinary matter.

- 3.3. Harassment can occur even through the recipient does not have a Protected Characteristic. It can occur through an individual's association with others, for example, having friends of a particular religion, or if the subject matter is based upon a Protected Characteristic e.g. derogatory comments about an individual's sexual orientation (regardless of what the recipient's sexual orientation actually is, or is believed to be).
- 3.4. Harassment can take the form of physical, verbal or non-verbal conduct or behaviour and, in some circumstances, can amount to a criminal offence. Examples of harassment include, but are not limited to: unwanted physical contact; insulting or abusive behaviour or gestures; offensive language; derogatory or demeaning remarks; repeated unwelcome invitations; discussing an individual's sexual orientation or "outing" an individual; pictures or pin-ups that may cause distress or offence and, abusive or offensive gestures or messages sent via email or social media.
- 3.5. Bullying is a serious form of harassment and can be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate or belittle an employee. Examples of bullying could include: spreading malicious rumours; copying emails that are critical about someone to others who do not need to know; ridiculing or demeaning an individual; making threats about job security without foundation and setting unachievable deadlines.

#### **4. Harassment and Electronic Communication Systems**

- 4.1. The policy must be read in conjunction with our Policy on the use of Communication Systems and Social Media.
- 4.2. The distribution of offensive statements or on-line bullying will not be tolerated. DOUGH has a zero-tolerance policy on such actions and any employee who uses DOUGH's equipment or communication systems to harass another individual may be dismissed for gross misconduct.

#### **5. Responsibilities of Line Managers**

- 5.1. If you have line management or supervisory responsibilities for other employees you will have particular responsibility for ensuring a harassment-free working environment. For example, you must ensure that:
  - 5.1.1. You fully understand DOUGH's Equal Opportunities Policy and are able to offer advice on it and on the use of DOUGH's grievance and disciplinary procedures as they may relate to a complaint of harassment;
  - 5.1.2. You remind staff of the Equal Opportunities Policy as necessary to increase awareness and understanding of harassment, and the importance of complying with the Policy;
  - 5.1.3. You lead by example and set the highest standards in ensuring that harassment does not take place;
  - 5.1.4. Your work environment is free of any offensive material;
  - 5.1.5. You are alert to physical and verbal harassment in your area and deal with it promptly, whether or not it is directly brought to your attention or the subject of a formal complaint;



- 5.1.6. You are supportive of any individual who states that they have been harassed and handle any complaint in a sensitive manner;
- 5.1.7. You maintain complete confidentiality relating to all aspects of cases of harassment at all times and do not mention or discuss the case unnecessarily or with any person not involved with its investigation; and
- 5.1.8. Following any allegation of harassment, you ensure that there is no further harassment or victimisation.

## **6. Responsibilities of Employees**

- 6.1. As a member of DOUGH staff, you create and are responsible for the working environment at DOUGH. It is therefore your responsibility to ensure that:
  - 6.1.1. You have read and understand DOUGH's Equal Opportunities Policy;
  - 6.1.2. You conduct yourself at all times in a professional manner;
  - 6.1.3. You respect the dignity of all individuals that you come into contact with in the course of your employment;
  - 6.1.4. Wherever possible, you create an inclusive environment that is open and free from harassment;
  - 6.1.5. You report any possible issue of discrimination, harassment or victimisation, whether you are individually involved, a witness or become aware of the issue through others, to your line manager or an HR representative immediately; and
  - 6.1.6. You fully assist and cooperate with any investigation into any complaint made in relation to DOUGH's Equal Opportunities Policy.

## **7. If You Have Been Harassed**

- 7.1. Any complaint of harassment will be taken extremely seriously and will be dealt with immediately. Whilst DOUGH realises that individual employees may respond differently to various forms of harassment, and may not always wish to pursue a formal complaint, DOUGH may still investigate any issues that have been brought to the attention of your line manager or an HR representative in the interests of other employees and in line with our policy aims to eliminate harassment.
- 7.2. If you believe that you have been harassed by an employee, director or any other individual connected with your employment, you should take the following action: you should consider, as a first stage, speaking to the person responsible for making you feel uncomfortable or offended if you feel able to, though you do not have to. It is important that the person knows that his or her behaviour has caused you to feel the way you do and is unwelcome. It is possible that they did not intend to cause offence and need to have the effects of their behaviour drawn to their attention. If you feel you cannot do this, then you should request help from DOUGH directors via; [albert@invades.co.uk](mailto:albert@invades.co.uk) or [dom@invades.co.uk](mailto:dom@invades.co.uk).



- 7.3. To assist DOUGH in determining the appropriate action, you should include, where applicable, full written details of any allegations, your perception of them, any witnesses, and any other information that you feel is relevant to help DOUGH to investigate your complaint.
- 7.4. If the alleged harasser is your immediate manager you should notify a more senior manager, an HR representative, or another manager in your area who will ensure that the matter is dealt with effectively and appropriately.
- 7.5. All complaints of discrimination, harassment and victimisation will be dealt with in strictest confidence and, as far as possible, with regard to an employee's wishes. However, once DOUGH has been notified of a complaint, it may decide to conduct a full investigation and take appropriate action where necessary, with or without an employee's agreement in the interests of the other Company employees and in line with our policy aims.

## **8. Investigation of a Complaint**

- 8.1. Any complaints under DOUGH's Equal Opportunities Policy will be fully investigated in a fair and sensitive manner by DOUGH directors. The investigation will commence as soon as reasonably practicable following receipt of a complaint and affected individuals will be notified of the duration of the investigation and the next steps.
- 8.2. In cases of serious alleged misconduct, the alleged bully or harasser may be suspended for the course of the investigation.
- 8.3. Following any investigation, the line manager will decide whether further action is necessary which may include, but is not limited to:
  - 8.3.1. Formal disciplinary action against an employee or director;
  - 8.3.2. A formal complaint to another company whose employee(s) are involved in the alleged harassment;
  - 8.3.3. Amending reporting lines/team structures in line with an employee's ability to continue to work closely with particular individuals; and/or
  - 8.3.4. Heightening awareness/running further training sessions to prevent similar acts of harassment occurring again.
- 8.4. If DOUGH decides to proceed with disciplinary action, DOUGH's formal Disciplinary Procedures will apply as set out in the Staff Handbook.
- 8.5. If DOUGH decides not to proceed with disciplinary action or decides to take other steps, those involved will be advised accordingly. Appeals against any decision taken under this Policy may be made through DOUGH's Grievance Procedure, as set out in the Staff Handbook.



## **DRUGS AND ALCOHOL POLICY**

### **1. General Principles**

- 1.1. This is our policy about the use and misuse of drugs and alcohol while working for or representing us.
- 1.2. All employees are covered by our policy. This policy does not form part of your employment contract, and we may update it at any time.
- 1.3. This policy also applies to self-employed contractors, workers and agency workers.
- 1.4. We have a legal duty to protect the health and safety of our workforce and any external individuals who come into contact with us. It is very important that those working for us can carry out their duties safely and free from the influence of drugs or alcohol.
- 1.5. The use and misuse of drugs or alcohol can also have a detrimental effect on DOUGH. It can lead to absence from work, and poor employee behaviour or performance. It can also reflect badly on our organisation.

### **2. Using drugs or alcohol**

- 2.1. We expect you to be able to fully and safely carry out your duties under your contract when you are working for or representing us.
- 2.2. It is critically important that you do not drive or operate machinery if your performance or judgment might be impaired through the use or misuse of drugs or alcohol. This includes any drugs prescribed for you.
- 2.3. If your performance is impaired, or your behaviour or attendance is negatively affected because of drugs or alcohol, or our reputation is damaged as a result, then we may take action under our Performance Improvement Policy, Absence Management Policy, or Disciplinary Policy. This could lead to you being dismissed.
- 2.4. If you think you may have a drug or alcohol dependence or addiction, we encourage you to seek medical help. If you raise this with us, we will do our best to put you in touch people and organisations specialising in drug and alcohol issues, and we will support you as much, and as confidentially, as we can in your recovery process. If you seek treatment, we may decide to suspend or stop any disciplinary or other process that has been started, until the outcome of that treatment is known.
- 2.5. If you know or suspect that a colleague is or has been misusing drugs or alcohol, you should raise this in confidence with your manager or a member of HR. It's important that we find out about any issues so that we can help as best we can. We will also want to make sure we're meeting our health and safety responsibilities, and protecting our business.

### **3. Drugs**

- 3.1. When we talk about 'drugs' under this policy, we mean illegal drugs, psychoactive substances ('legal highs'), and prescription or non-prescription drugs which may affect your ability to carry out your duties fully and safely.
- 3.2. You must not be in possession of illegal drugs or psychoactive substances (except for legitimate and commonly used substances such as nicotine and caffeine) at any time while working for or representing us.
- 3.3. If you need medication for a genuine medical condition while working, you should only bring in enough for your own use. It should be kept safely, in accordance with instructions and out of the view



of other people. If your medication needs to be stored in a fridge, you must use a clearly labelled, sealed container.

- 3.4. Medication can have side-effects that affect performance. If this applies to you, please raise it with your manager so that we can take medical advice if necessary and consider any reasonable adjustments that we might need to make.
- 3.5. It is your responsibility to seek advice from a doctor or pharmacist about the possible effects of your medication on your fitness to do your job.
- 3.6. We want to protect your health and safety, as well as that of your colleagues and our customers, so if you have any drug-related impairment you must tell us straightaway.

#### **4. Alcohol**

- 4.1. You should not bring alcohol into work. If there is some reason why you might need to, you should get your manager's permission beforehand.
- 4.2. You must not be, nor must your appearance suggest you are, under the influence of alcohol while you are working for or otherwise representing us. This applies equally to a situation where you may have drunk alcohol before coming to work, or the day before, if you are still affected by it.
- 4.3. Work-related events like client dinners or staff parties that involve alcohol are an exception. We may allow moderate drinking on those occasions, but we will still expect you to behave professionally, with integrity and in line with our reasonable standards. You are representing DOUGH, and we will take disciplinary action against you if you breach our rules or policies, for example in relation to Health and Safety or Bullying and Harassment, or if your conduct otherwise falls below our expected standards.
- 4.4. If a customer, supplier or other third party gives, or offers to give, you alcohol as a gift, you should promptly inform your Manager of this. You will generally be permitted to keep such a gift, providing that we are satisfied that the acceptance of the gift will not be in the breach of DOUGH's anti-bribery rules and regulations.

#### **5. Screening**

- 5.1. If we suspect that you are under the influence of drugs or alcohol, and/or if your role is critical to health and safety, we may ask you to be screened for drugs or alcohol by an external provider. If you refuse, that could lead to disciplinary action, and potentially dismissal.

#### **6. Searches**

- 6.1. We shall have the right to search employees, together with their bags, possessions and vehicles, if we have reasonable grounds to believe that they are in possession of drugs or alcohol. We may confiscate or destroy any drugs or alcohol found as a result of such a search.
- 6.2. You will have the right to be accompanied by a work colleague during a search. Refusal to cooperate in a search may result in disciplinary action, and potentially dismissal.



## **SOCIAL MEDIA POLICY**

### **1. Scope of This Policy**

- 1.1. The internet provides limitless opportunities to participate in interactive discussions and share information using a wide variety of social networking platforms. We embrace the use of new technology and encourage our employees and clients to join us on social media sites. However, the use of the social media can pose risks to our confidential information, our proprietary rights and our reputation, and can jeopardise our compliance with legal obligations owed to staff and third parties.
- 1.2. In order to minimise these risks, avoid loss of productivity and ensure that our IT resources and communications systems are used only for authorised business purposes, you are required to adhere to this policy.
- 1.3. This policy relates to all employees of DOUGH who use to Social Media sites, either on behalf of DOUGH or personally.
- 1.4. For the purpose of this Policy, the term "Social Media" shall include all apps and all social and business networking websites on which an individual may maintain a profile, share information, add content, post, blog, comment or review (including, but not limited to, Facebook, LinkedIn, Instagram, YouTube, Tumblr, Google+ and Twitter).
- 1.5. This policy applies to the use of Social Media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the Social Media is accessed using DOUGH's IT resources, networks, communication systems and equipment or those belonging to the employee.

### **2. Compliance with Related Policies**

- 2.1. Social Media should never be used in a way that breaches any term of your contract of employment or any other Company policy relating to staff behaviour. For example, conduct that would breach any obligations under our:
  - 2.1.1. Confidentiality restrictions;
  - 2.1.2. Disciplinary Rules;
  - 2.1.3. IT and Communication Systems Policy;
  - 2.1.4. Equal Opportunities Policy
  - 2.1.5. Data Protection Policy; or
  - 2.1.6. Rules of our Regulatory Body.
- 2.2. Employees who breach any of the above policies may be subject to disciplinary action up to and including dismissal.



### **3. Inappropriate Use of Social Media**

- 3.1. You are personally responsible for the content that you publish online. Be mindful that what you publish may be in the public domain for a long time and may be shared with a much wider audience than you had originally intended; protect your privacy and exercise good judgement and common sense. Once information is on the Internet, you may no longer have control of it.
- 3.2. You should apply the same standards with respect to the content, quality and tone of information sent or published on line that you would apply to communications sent or made available in any other format. Consider how you would feel if the communication was read by your manager or read out in court.
- 3.3. Whilst employed by DOUGH, you must not, whether inside or outside of work, use Social Media to:
  - 3.3.1. publish any confidential or commercial sensitive information belonging to DOUGH, our clients, business partners or stakeholders;
  - 3.3.2. publish any personal or sensitive information about Company employees;
  - 3.3.3. publish any material that is threatening, offensive, obscene, pornographic, indecent, or which would cause embarrassment to DOUGH or our clients;
  - 3.3.4. bully, harass or discriminate against any individual;
  - 3.3.5. circulate malicious gossip or rumours;
  - 3.3.6. use, exploit or publish any material that might infringe the copyright or other intellectual property rights of DOUGH or any third party (including company logos, tag lines, images, designs, trademarks, music or video files);
  - 3.3.7. publish any material that would damage the reputation of DOUGH or adversely affect the relationship between DOUGH and its clients;
  - 3.3.8. publish any defamatory, derogatory or disparaging statements about DOUGH, our clients, business partners, stakeholders or employees;
  - 3.3.9. give the impression or express that you represent the views or opinion of DOUGH, unless specifically authorised or instructed to do so by DOUGH, (see also paragraph 5 below).
  - 3.3.10. breach any other laws or ethical standards (for example, using Social Media in a false or misleading way, such as by claiming to be someone other than yourself).
- 3.4. If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from making the communication until you discuss it with a Director of DOUGH.
- 3.5. If you see content in Social Media that breaches any of the principles set out in this Policy, you must immediately report this matter to a Director of DOUGH. All employees are responsible for protecting our business from the improper use of Social Media.



#### **4. Use of Social Media At Work**

- 4.1. We recognise that employees may work long hours and occasionally may desire to use the Social Media for personal activities whilst at work. We are happy to authorise such occasional use, during designated break times, providing it does not involve the use of DOUGH's IT resources, networks, communications systems and equipment. Such use must also adhere to the rules set out in this Policy, and your contract of employment, and not interfere with your employment responsibilities or productivity.

#### **5. Personal Use of Social Media**

- 5.1. The details of clients and business contacts made during the course of your employment are regarded as confidential information belonging to DOUGH and, as such, you may be required to delete all such details from any personal Social Media or networking account, or any other account, database or contacts library that is operated or controlled by you, on the termination of your employment.
- 5.2. If you disclose your affiliation as an employee of DOUGH on any internet page or Social Media site, you must also state that your views do not represent those of your employer. For example, you could state: *"The views in this posting do not represent the views of my employer"*. You should also ensure that your profile and any content that you publish are consistent with the professional image you present to clients and colleagues. Upon termination of your employment for any reason, you must promptly update any relevant profile or internet page to make it clear that you are no longer an employee of DOUGH.

#### **6. Operation and Ownership of Company Social Media Accounts**

- 6.1. If part of your role is to develop DOUGH's Social Media presence then, during the course of your employment, you will have non-exclusive control and management of DOUGH Social Media accounts, including but not limited to the Twitter accounts.
- 6.2. DOUGH Social Media accounts and the content of those accounts, including but not limited to our profile, contact lists or details of followers, postings, messages and articles, shall remain the property of DOUGH at all times (to the maximum extent permitted by law) notwithstanding that such accounts or content is created or developed by you during the course of your employment. Accordingly, you shall not have any right to copy, extract, summarise or reproduce such content without the express authorisation of DOUGH.
- 6.3. Details of all Social Media contacts or followers of DOUGH will constitute a database within the meaning of 3A(1) of the Copyright, Designs and Patents Act 1988 and we will be the owner of any such database to the maximum extent permitted by law. Save as expressly authorised by DOUGH, you will not be entitled to extract or utilise any parts of such database for your personal use or for the benefit of another party at any time either during your employment or after its termination.
- 6.4. On termination of your employment (or at any other time as requested by us) you shall immediately transfer full operational use and control of our Social Media accounts to us including, but not limited to, the details of user/log in names and passwords, without retaining copies of those details, and must do nothing that would in any way interfere with or disrupt our proper use of such accounts.



## **7. Monitoring**

- 7.1. You should have no expectation of privacy in relation to any message, post, blog, document, file or any other kind of information or communication transmitted using our IT equipment or communications systems, which includes all content on DOUGH's Social Media accounts.
- 7.2. Whilst DOUGH does routinely monitor the content of communications sent via its IT systems, we do reserve the right to monitor, record, intercept, access, retrieve and review - as reasonably necessary and without further notice - all employee activities using our IT resources and communications systems in order to:
  - 7.2.1. establish the existence of any facts which may be relevant to our legitimate business interests;
  - 7.2.2. prevent unauthorised use in breach of this policy;
  - 7.2.3. assist in the investigation of alleged wrongdoing;
  - 7.2.4. find lost messages or to retrieve messages lost due to computer failure; or
  - 7.2.5. comply with any legal obligation.
- 7.3. In addition, we reserve the right to monitor your personal Social Media accounts in order to ensure compliance with this policy.

## **8. Post-Termination Restrictions**

- 8.1. For the purposes of paragraph 8.2,
  - 8.1.1. "Social Media Contacts" includes any individual, firm, company or business organisation who or which is connected to, subscribes to, registered with, or follows DOUGH via any Company Social Media Account.
  - 8.1.2. "Company Social Media Account" means any internet-based blog or social networking account that is registered to, operated or controlled by DOUGH.
- 8.2. In addition to any restrictions set out in your Contract of Employment, and in order to protect our legitimate business interests and reputation in Social Media forums and generally, you agree that you shall not at any time following termination of your employment:
  - 8.2.1. directly or indirectly represent yourself or any business or service with which you are connected, as being associated with or in any way connected to DOUGH or any Company Social Media Account;
  - 8.2.2. interfere with, or attempt to disrupt, or adversely affect the relationship between DOUGH and any Social Media Contact;
  - 8.2.3. directly or indirectly encourage or entice any Social Media Contact to leave, terminate or unregister from, any Company Social Media Account or otherwise disconnect, remove, 'unfollow' or 'de-friend' DOUGH in respect of any Company Social Media Account;



- 8.2.4. operate any Social Media account which: (i) attempts to replicate, rework or summarise the content of any Company Social Media Account; (ii) adversely affects the reputation or goodwill associated with any Company Social Media Account; or (iii) may mislead or confuse any Social Media Contact about the provenance of that account or its content (specifically, whether or not it originated from DOUGH);

## **9. Enforcement of This Policy**

- 9.1. Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether or not the breach is committed during working hours, and regardless of whether or not DOUGH resources and equipment are used for the purpose of committing the breach.
- 9.2. Any employee suspected of committing a breach of this policy may be suspended pending further investigation and will be required to co-operate in any investigation procedure, which may involve handing over relevant passwords and login details.
- 9.3. Employees may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may, of itself, result in disciplinary action.
- 9.4. You hereby agree that you consider the rules and restrictions contained in this policy to be reasonable and understand that they are entered into for the purpose of protecting the goodwill and the legitimate business interests of DOUGH, its staff, clients and business relationships.
- 9.5. Each of the above provisions are intended to be separate and severable. Should any provision of this Policy be adjudged by a competent court or tribunal to be completely or partially invalid or unenforceable the validity and enforceability of the remaining provisions of this Agreement will not be affected.



## WHISTLEBLOWING POLICY

### 1. General Principles

- 1.1. This policy outlines what you should do if you suspect something at work is putting you or others in danger, or is illegal or unethical.
- 1.2. This policy applies to all employees, contractors, consultants, officers, interns, casual and agency workers.
- 1.3. This policy covers not only the actions of DOUGH, but also the conduct of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else.

### 2. What is whistleblowing?

- 2.1. We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have any such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. We will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 2.2. The types of concerns you may want to raise with us by whistleblowing might include:
  - any activity you suspect is a criminal offence;
  - any activity you suspect puts health and safety at risk;
  - any activity you suspect may damage the environment;
  - any failure to comply with legal or regulatory obligations; and/or
  - any attempt to conceal one or more of these activities.
- 2.3. Speak to your manager if you are not sure whether something you have become aware of is covered by this policy. If your complaint is about the way people are behaving towards you, or something that affects you personally, then you should refer to our Grievance Policy for guidance on how to proceed.

### 3. Raising a whistleblowing concern

- 3.1. In most cases, you should start by raising your concerns with your manager, either face-to-face or in writing.
- 3.2. If you would prefer not to go to your manager, you should write to one of DOUGH’s directors. You should also do this if your concerns are of a very serious nature.
- 3.3. Your letter should say that you are raising your concerns under this policy and explain the nature of your concerns. You should include all the key facts, such as dates, locations, events and the names of the people involved.



- 3.4. You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- 3.5. After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.
- 3.6. We will keep you informed (in general terms) about how our investigation is progressing and how long is it likely to take. We may not be able to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating, and so we will do our best to reassure you that things are in hand and to explain the course of action that we are taking.
- 3.7. Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our board directors for further consideration.
- 3.8. Most concerns are raised with good intentions, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy and is at risk of being dismissed for gross misconduct.

#### **4. Anonymity**

- 4.1. Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we discourage anonymous whistleblowing,
- 4.2. If you do not feel comfortable in reporting your concern openly, please tell us and we will do all we can protect your identity. We may want to disclose your identity to people involved in the investigation, but we will always discuss this with you first.
- 4.3. You are protected from reprisals under this policy (see paragraph 5), but if you are still concerned about the implications of making a disclosure please talk to us. We can then explore with you how far we can go in keeping your concerns confidential.

#### **5. Protection for whistleblowers**

- 5.1. If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of any legal obligation. However, if you feel you have been treated badly as a result of raising a concern, you must tell us straightaway. First inform your manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.
- 5.2. All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, you may face disciplinary action which



could include dismissal for gross misconduct. The whistleblower may also be able to bring legal action against you.

- 5.3. You can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals at: [www.protect-advice.org.uk](http://www.protect-advice.org.uk) Protect is an independent charity that also offers a free, confidential advice line on 020 3117 2520.

## **6. External Disclosures**

- 6.1. This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary for anyone outside DOUGH to become involved when a whistleblowing allegation is made.
- 6.2. In some exceptional circumstances, you may need to go to an external body — an industry regulator, for example. The independent charity Protect (details above) can direct you towards the appropriate regulator for the type of issue you want to raise.
- 6.3. Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or from Protect before considering it necessary or appropriate to approach the media.
- 6.4. Similarly, disclosures made to the general public - such as through social media - will almost never be justified or appropriate in any situation and will likely be treated as a serious disciplinary issue justifying dismissal.



## DATA PROTECTION POLICY

### for Employees, Workers and Consultants

#### 1. Overview

- 1.1. DOUGH takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the **Data Protection Act 2018** (the 'DPA') and the **EU General Data Protection Regulation** ('GDPR') in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
- 1.2. This policy applies to current and former employees, workers, volunteers, apprentices and consultants. If you fall into one of these categories, then you are a '**data subject**' for the purposes of this policy.
- 1.3. DOUGH is a '**data controller**' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.
- 1.4. This policy explains how DOUGH will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, DOUGH.
- 1.5. This policy is non-contractual, but should be read in conjunction with your contract of employment (or contract for services) and DOUGH's Policies on IT and Communication Systems, Social Media and Confidential Information.
- 1.6. If you have any questions in relation to this policy or the handling of data protection, or you are aware of a data breach, you should contact DOUGH's Data Protection Lead, Dominic Matcham via email, dom@invades.co.uk.

#### 2. How we define personal data

- 2.1. '**Personal data**' means information which relates to a living person who can be **identified** from that data (a '**data subject**') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.
- 2.2. This policy applies to all personal data whether it is stored electronically, on paper or on other materials.
- 2.3. This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of your employment (or engagement) or after its termination. It could be created by your manager or other colleagues.
- 2.4. We will collect and use the following types of personal data about you:
  - 2.4.1. recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments;



- 2.4.2. your contact details and date of birth;
- 2.4.3. the contact details for your emergency contacts;
- 2.4.4. your gender;
- 2.4.5. your marital status and family details;
- 2.4.6. information about your contract of employment (or services) including start and end dates of employment, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement;
- 2.4.7. your bank details and information in relation to your tax status including your national insurance number;
- 2.4.8. your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us;
- 2.4.9. information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- 2.4.10. information relating to your performance and behaviour at work;
- 2.4.11. training records;
- 2.4.12. electronic information in relation to your use of IT systems/swipe cards/telephone systems;
- 2.4.13. your images (whether captured on CCTV, by photograph or video); and
- 2.4.14. any other category of personal data which we may notify you of from time to time.

### **3. How we define special categories of personal data**

#### **3.1. 'Special categories of personal data' are types of personal data consisting of information as to:**

- 3.1.1. your racial or ethnic origin;
- 3.1.2. your political opinions;
- 3.1.3. your religious or philosophical beliefs;
- 3.1.4. your trade union membership;
- 3.1.5. your genetic or biometric data;
- 3.1.6. your health;
- 3.1.7. your sex life and sexual orientation; and



3.1.8. any criminal convictions and offences.

3.1.9. We may hold and use any of these special categories of your personal data in accordance with the law.

#### **4. Why we need to process your personal data**

4.1. We may need to process your personal data for:

4.1.1. performing the contract of employment (or services) between us;

4.1.2. complying with our legal obligations; or

4.1.3. if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs).

4.2. Our legitimate interests may include us wanting to process personal data in connection with a possible sale of the business, outsourcing of services, or some form of joint enterprise with a third party. You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section 13 below.

4.3. We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

4.4. If you choose not to provide us with certain personal data you should be aware that we may not be able to carry out certain parts of the contract between us. For example, if you do not provide us with your bank account details we may not be able to pay you. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

#### **5. The situations in which we might to process your personal data**

5.1. We have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement). For example:

5.1.1. to decide whether to employ (or engage) you;

5.1.2. to decide how much to pay you, and the other terms of your contract with us;

5.1.3. to check you have the legal right to work for us;

5.1.4. to carry out the contract between us including where relevant, its termination;

5.1.5. training you and reviewing your performance;

5.1.6. to decide whether to promote you;

5.1.7. to decide whether and how to manage your performance, absence or conduct;



- 5.1.8. to carry out a disciplinary or grievance investigation or procedure in relation to you or someone else;
  - 5.1.9. to determine whether we need to make reasonable adjustments to your workplace or role because of a disability;
  - 5.1.10. to monitor diversity and equal opportunities;
  - 5.1.11. to monitor and protect the security (including network security) of DOUGH, of you, our other staff, customers and third parties;
  - 5.1.12. to monitor and protect the health and safety of you, our other staff, customers and third parties;
  - 5.1.13. to pay you and provide pension and other benefits in accordance with the contract between us;
  - 5.1.14. paying tax and national insurance;
  - 5.1.15. to provide a reference upon request from another employer;
  - 5.1.16. to comply with our legal obligations in respect of trade union members, including the payment of trade union subscriptions;
  - 5.1.17. monitoring compliance by you, us and others with our policies and our contractual obligations;
  - 5.1.18. to comply with employment law, immigration law, health and safety law, tax law and other laws which affect us;
  - 5.1.19. to answer questions from insurers in respect of any insurance policies which relate to you;
  - 5.1.20. running our business and planning for the future;
  - 5.1.21. the prevention and detection of fraud or other criminal offences;
  - 5.1.22. to defend DOUGH in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure; and
  - 5.1.23. for any other reason which we may notify you of from time to time.
- 5.2. We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting the Data Protection Lead.



- 5.3. We do not need your consent to process special categories of your personal data when we are processing it for the following purposes:
- 5.3.1. where it is necessary for carrying out rights and obligations under employment law;
  - 5.3.2. where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
  - 5.3.3. where you have made the data public;
  - 5.3.4. where processing is necessary for the establishment, exercise or defence of legal claims; and
  - 5.3.5. where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.
- 5.4. We do not take automated decisions about you using your personal data or use profiling in relation to you.

## **6. Sharing your personal data**

- 6.1. Sometimes we might need to share your personal data group companies, consultants, service providers, sub-contractors or agents in order to carry out our obligations under our contract with you or for our legitimate interests.
- 6.2. This may include transferring your personal data to pension providers, payroll companies, providers of staff benefits, insurance companies, legal or financial advisers, regulatory bodies, training providers, occupational health consultants or medical professionals, or any organisation with whom we are negotiating regarding a possible sale of the business, outsourcing of services, or some form of joint enterprise.
- 6.3. We require those external third parties to have implemented appropriate systems and procedures to keep your personal data confidential and secure, and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.
- 6.4. We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

## **7. Security and Retention**

- 7.1. We will ensure that personal data is processed securely, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 7.2. We will maintain the integrity and confidentiality of the personal data by ensuring that it is accurate and suitable for the purpose for which it is processed, and that only people who are authorised to use the data can access it.



- 7.3. Your personal data will be retained for the duration of your employment with DOUGH and for a period of 6 years from the termination date. This period is deemed necessary in order for DOUGH to defend any legal claims which may arise as a result of your employment (some of which carry a limitation period of 6 years). Thereafter, the data will be securely erased or destroyed as described above.

**8. How should you process personal data for DOUGH?**

- 8.1. Everyone who works for, or on behalf of, DOUGH has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy.
- 8.2. You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of, DOUGH and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.
- 8.3. You should not share personal data informally.
- 8.4. You should keep personal data secure and not share it with unauthorised people.
- 8.5. You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
- 8.6. You should not make unnecessary copies of personal data.
- 8.7. You should use strong passwords.
- 8.8. You should lock your computer screens when not at your desk.
- 8.9. Consider anonymising data or using separate codes so that the data subject cannot be identified.
- 8.10. Do not save personal data to your own personal computers or other devices.
- 8.11. Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the Data Protection Lead.
- 8.12. You should lock drawers and filing cabinets. Do not leave paper with personal data lying about.
- 8.13. You should not take personal data away from Company's premises without authorisation from your line manager or Data Protection Lead.
- 8.14. Personal data should be shredded and disposed of securely when you have finished with it.
- 8.15. Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you in accordance with our disciplinary procedure.
- 8.16. It is a criminal offence to knowingly or recklessly obtain, disclose or retain personal data without the consent of the data controller. This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.



- 8.17. It is also a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.

## **9. Subject access requests**

- 9.1. Data subjects can make a '**subject access request**' ('SAR') to find out the information we hold about them. This request must be made in writing. If you receive such a request you should forward it immediately to the Data Protection Lead who will coordinate a response.
- 9.2. If you would like to make a SAR in relation to your own personal data you should make this in writing to the Data Protection Lead. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.
- 9.3. There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

## **10. Your data subject rights**

- 10.1. You have a right to ask us to correct any inaccuracies in your personal data;
- 10.2. You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to retain it for the purpose it was collected;
- 10.3. You have the right to object to our processing of your personal data if you believe that your rights and freedoms outweigh our legitimate interests as described in this policy;
- 10.4. While you are requesting that your personal data is corrected or erased, or are contesting the lawfulness of our processing, you have the right to apply for its use to be restricted;
- 10.5. You have the right to ask us not to process your personal data for direct marketing purposes and to remove your contact details from our marketing distribution list;
- 10.6. You have the right to receive a copy of your personal data and to request the transfer of your personal data to a third party;
- 10.7. In most situations, we do not rely on your consent to provide a lawful basis for us to process your data. If we do, however, request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later; and
- 10.8. You have the right to be notified of a security breach concerning your personal data if this is likely to result in a high risk to your rights and freedoms.
11. If you wish to exercise any of these rights, please contact the Data Protection Lead in writing.

## **12. Complaints**



- 12.1. If you have any complaint relating to the processing of your personal data or the exercise of your data subject rights, you should raise this promptly with your line manager or the Data Protection Lead.
- 12.2. You also have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.



## HEALTH AND SAFETY POLICY

### 1. General Principles

- 1.1. We are committed to ensuring the health, safety and welfare of our staff, and anyone affected by our business activities, and to providing a safe environment for all those attending our premises.
- 1.2. Both employers and employees have a legal obligation to ensure, so far as is reasonably practicable, that standards of health and safety are maintained, and that safety procedures are followed.
- 1.3. This policy covers all directors, managers, employees, consultants, contractors, volunteers, casual workers and agency workers.
- 1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time. We will continue to review this policy to ensure it is achieving its aims.

### 2. Our Responsibilities

- 2.1. DOUGH will take all reasonable steps to:
  - 2.1.1. assess and control health and safety risks arising from work activities;
  - 2.1.2. prevent accidents and work-related ill health;
  - 2.1.3. provide and maintain safe access to a healthy and risk-free workplace;
  - 2.1.4. ensure that safe systems of work are set and followed;
  - 2.1.5. ensure that plant, machinery and equipment are safe to operate, and that suitable 'personal protective equipment' (PPE) is provided where necessary;
  - 2.1.6. ensure that the use hazardous substances is avoided wherever possible and, where this is not possible, that they are stored, moved and used safely;
  - 2.1.7. provide sufficient information, instruction, training and supervision in relation to safe working methods and procedures;
  - 2.1.8. fully comply with the requirement for any health and safety training.
- 2.2. Our board of directors ('the Board') has overall responsibility for health and safety and the operation of this policy. Albert Slade is the Health and Safety Officer with day-to-day responsibility for health and safety matters.

### 3. Your Responsibilities

- 3.1. As an employee you are required to help us to maintain standards by:
  - 3.1.1. taking reasonable care of your own health and safety and that of others who may be affected by what you do or do not do;
  - 3.1.2. observing all health and safety policies and procedures;
  - 3.1.3. correctly using any protective equipment and clothing that are provided in accordance with training and instruction;
  - 3.1.4. co-operating with us on health and safety matters, including the investigation of any incident;
  - 3.1.5. not interfering with or misusing anything provided for your health, safety or welfare;
  - 3.1.6. adhering to any procedures intended to reduce the spread of coronavirus; and
  - 3.1.7. reporting any health and safety concerns immediately to your line manager (e.g. loose wires, faulty equipment or blocked exits).



3.2. You should also ensure that you are aware of all fire exits and the actions that should be taken in the event of an emergency evacuation (see section 8 below).

3.3. Please be aware that any breach of Health and Safety Policies may lead to disciplinary action being taken.

#### **4. Training**

4.1. All staff will be given a health and safety induction and, where appropriate, will be provided with more specific safety training relevant to their role, by the client on venue. This may include manual handling, control of substances hazardous to health (COSHH), working at height, gas safety, electrical safety and the use of PPE.

4.2. Certain individuals will be designated as health and safety representatives, and will receive training in specific areas of health and safety (e.g. first aid; use of fire extinguishers). A list of these individuals is displayed on the notice board.

4.3. You will be advised where the first aid box is located at your place of work.

#### **5. Accidents**

5.1. All accidents, no matter how minor, must be reported immediately to Dominic Matcham or Albert Slade and logged on the accident book linked here: <https://forms.gle/EeVZFkLWovf47nTp7>.

These records are reviewed regularly to prevent similar accidents happening in the future.

5.2. The Health and Safety Officer is responsible for investigating any injuries or work-related disease, preparing and keeping accident records, and for submitting reports to the relevant authorities if required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

#### **6. Protective Clothing & Equipment**

6.1. If you are provided with protective clothing for your work, it is a condition of your employment that you must wear these items when you are working.

6.2. You must use equipment in accordance with any instructions given to you. Any equipment fault or damage must immediately be reported to your line manager.

6.3. No member of staff should attempt to repair equipment unless trained to do so.

#### **7. Manual Handling**

7.1. Many injuries that happen at work are caused by a failure to move or handle objects safely. You can protect yourself and minimise the risks by following these guidelines:

7.1.1. Assess how heavy or awkward the item is and, if appropriate, ask for help;

7.1.2. Plan how to hold the object and get a good grip (wear gloves if necessary);

7.1.3. Stand close to the object with your feet apart and spread your weight evenly, bend your knees and lift with your legs keeping your back in a natural line;



- 7.1.4. Lift smoothly and keep the load close to your body; avoid twisting your body;
- 7.1.5. When carrying an object keep your arms tucked in and make sure you can see where you are going;
- 7.1.6. If equipment is provided make sure you use it correctly.

## **8. First Safety & Evacuation Procedures**

- 8.1. All staff should familiarise themselves with the fire safety instructions, which are displayed on notice boards and near fire exits in the workplace. It is important that you know the location of fire extinguishers and emergency exits. You must not block or obstruct a fire exit at any time.
- 8.2. If you hear a fire alarm, do not run or panic, but leave the building as quickly as possible by the nearest fire exit and go to the fire assembly point (as shown on the fire safety notices). Do not stop to collect belongings and do not use a lift. Do not re-enter the building until told it is safe to do so.
- 8.3. Should you discover a fire, raise the alarm and, if safe to do so, close the doors and windows around the fire and keep other individuals clear of the area. Do not attempt to tackle it unless it and you have been trained and feel competent to do so. You should operate the nearest fire alarm and, if you have sufficient time, call reception and report the location of the fire.
- 8.4. You should notify your manager if there is anything that might impede your evacuation in the event of a fire (for example, impaired mobility). A personal evacuation plan will be drawn up and brought to the attention of colleagues working in your vicinity.
- 8.5. The fire alarm will be tested regularly and a fire drill will be held at least once a year.
- 8.6. The Health and Safety Officer is responsible for ensuring fire risk assessments are undertaken and implemented, and for ensuring regular checks of fire extinguishers, fire alarms, escape routes and emergency lighting.

## **9. Smoking Policy**

- 9.1. You are not permitted to smoke cigarettes or e-cigarettes (vaping) on Client premises , or within the immediate vicinity of our premises at any time (whether during or outside of your normal hours of work).
- 9.2. DOUGH does not allow any services users, customers or visitors to smoke on our premises either. It is your responsibility, as an employee of DOUGH, to inform any visitor, (whether or not you are responsible for them personally), that they are not permitted to smoke on the premises. You should speak to any manager immediately if any visitor smokes on the premises and refuses to stop when requested.
- 9.3. A breach of this policy will be addressed under DOUGH's Disciplinary Procedure, but you may also be subject to criminal prosecution and a fixed penalty fine.

## **10. Stress Policy**

- 10.1. DOUGH recognises that staff may suffer from stress brought on by work or external factors. An appropriate level of stress or pressure can be stimulating, healthy and desirable, but excessive stress can have a debilitating effect on individuals, as well as a detrimental effect on the efficient running of



DOUGH. DOUGH will therefore support staff to seek help and advice in coping with stress, and will ensure that there is no stigma associated with an admission of suffering from stress.

- 10.2. DOUGH believes that effective management of stress requires a cooperative approach as well as the promotion of individual coping strategies. If you believe that your stress is caused by work-related factors, you should discuss this with your line manager, or may utilise DOUGH's Grievance Procedure.
- 10.3. Even if your stress is not work-related, you may discuss this in confidence with your line manager, as there may still be action or advice that could help to alleviate your stress.
- 10.4. There are various ways in which DOUGH may be able to assist in reducing stress levels, especially where the stress is deemed to be work-related. This may include:
  - 10.4.1. assessment of workload and time management;
  - 10.4.2. role clarification and evaluation of responsibilities;
  - 10.4.3. clarification of reporting lines and supervisory processes;
  - 10.4.4. evaluating communication channels and clarity of instructions;
  - 10.4.5. evaluation of the physical working environment;
  - 10.4.6. tackling causes of friction between co-workers;
  - 10.4.7. providing training and development opportunities to enhance job skills;
  - 10.4.8. assessment of support mechanisms and appointment of a mentor;
  - 10.4.9. educating managers and directors to recognise and respond to stress;
  - 10.4.10. promptly addressing any formal grievances in line with our Grievance Procedure; and
  - 10.4.11. providing information on counselling services.



## MODERN SLAVERY POLICY STATEMENT

This is the modern slavery statement of DOUGH. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act"). This is our modern slavery statement for the financial year ending 31 December 2026.

This statement sets out the steps taken by DOUGH to prevent modern slavery in its business and supply chains.

### 1. Introduction

At DOUGH, we are committed to preventing slavery and human trafficking in our operations and supply chain. We believe in acting ethically and with integrity in all our business dealings and relationships, and we have a zero-tolerance approach to modern slavery in all its forms.

This policy applies to all individuals working for DOUGH or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

### 2. Purpose

The purpose of this policy is to:

- Comply with the Modern Slavery Act 2015.
- Outline our approach to ensuring that modern slavery or human trafficking is not taking place within our business or our supply chains.
- Set out the responsibilities for implementing this policy and the steps DOUGH will take to address modern slavery.

### 3. Our Commitment

DOUGH is committed to:

- Acting ethically and with integrity in all our business relationships.
- Implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our business or supply chains.
- Being transparent in our approach to tackling modern slavery in line with our disclosure obligations under the Modern Slavery Act 2015.
- Ensuring that our suppliers, contractors, and business partners uphold the same high standards.

### 4. Risk Assessment and Due Diligence

DOUGH will:

- Conduct risk assessments to identify and mitigate the risks of modern slavery within our operations and supply chains.
- Engage with suppliers to ensure they are aware of our zero-tolerance approach to modern slavery and human trafficking.
- Include modern slavery and human trafficking considerations in our supplier selection and management processes.
- Monitor potential risk areas in our supply chains and address any issues that may arise.

### 5. Training and Awareness

DOUGH will:

- Provide training to all employees on the risks of modern slavery and human trafficking in our business and supply chains.



- Ensure that employees understand how to identify and report any potential concerns relating to modern slavery.
- Maintain awareness of modern slavery issues through regular communication and updates.

#### 6. Reporting and Accountability

Employees and others working in our supply chain are encouraged to report any concerns or suspicions of modern slavery in accordance with our Whistleblowing Policy. Reports will be treated in confidence, and there will be no retaliation against anyone making a report in good faith.

DOUGH will take immediate and appropriate action if any instances of modern slavery are identified, including working with law enforcement as necessary.

#### 7. Continuous Improvement

We will regularly review the effectiveness of this policy and our approach to addressing the risks of modern slavery. We are committed to continually improving our processes to prevent and address modern slavery in our operations and supply chains.

#### 8. Responsibility for this Policy

The [Compliance Manager/HR Director/Other Role] has overall responsibility for ensuring this policy complies with our legal and ethical obligations. All managers and supervisors are responsible for ensuring that those reporting to them understand and comply with this policy.

#### 9. Review

This policy will be reviewed annually and may be amended as necessary to ensure it remains relevant and effective.

Approved by  
*Albert Slade*  
 Co-Founder & Director  
 22.07.2026

