

AURA VENT LTD

ANTI BRIBERY & CORRUPTION POLICY

Introduction

This anti-bribery policy exists to set out the responsibilities of the organisation and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for the organisation. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy Aim

- The organisation is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented.
- The organisation has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.
- The organisation will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

The organisation recognises that bribery and corruption are punishable by imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Who is covered by the Policy?

This anti-bribery policy applies to all employees whether temporary, permanent, Sub-contractors, agency staff, suppliers or any other person or persons associated with us.

Any arrangements our organisation makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

This policy does not form part of an employee's contract of employment and may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Definition of Bribery

Bribery refers to the act of:

- Offering
- Giving
- Promising
- Asking
- Agreeing
- Receiving
- Accepting
- Or soliciting

Something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any:

- Inducement
- Reward
- Or object/item of value

Offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal, Employees must not engage in any form of bribery, whether it be directly, passively or through a third party such as an agent or distributor. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's director.

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What is and what is NOT Acceptable

This section of the policy refers to 4 areas below:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and Hospitality

The company accepts normal and appropriate gestures of hospitality and goodwill whether given to/received from third parties so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's director (usually in excess of £100).
- It is not an offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the director, who will assess the circumstances.

The organisation recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. As good practice, gifts given and received should always be disclosed to the director. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the director should be sought.

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Facilitation Payments and Kickbacks

The organisation does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery.

The organisation does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

The organisation recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your manager.

Political Contributions

The organisation will not make donations, whether in cash, kind, or by any other means to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

The organisation accepts and encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions cash or otherwise – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the director.

Competition Law

In order for the organisation to follow competition law, it will ensure that all employees whether temporary, permanent, Sub-contractors, agency staff, suppliers or any other person or persons associated with us, will not partake in any of the following anti-competitive behaviours.

Price Fixing

The organisation will not agree to fix prices with competitors, this includes offers of discounts and price increasing at the same time.

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Bid Rigging

The organisation will not agree prices nor share bid information with a competitor when bidding on the same contract. The organisation will not ask other companies to bid for work it does not want "cover bidding". The organisation will not pay or make an agreement with others to withdraw or not bid on contracts the organisation wishes to win.

Market or Customer Sharing

The organisation will not agree with others to not approach possible future clients.

Information Sharing

The company will not share any sensitive information with others that has been given in confidentiality. This information could be financial, personal, future product development or future business plans.

Product / Service Reduction

The organisation will not agree with others to reduce or withdraw products or services to cause an increase in cost

Employee Responsibilities

The organisation will ensure that all employees read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the director immediately.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The organisation has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

Training and Communication

The organisation will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular training on how to adhere to this policy, and will be asked to formally accept that they will comply with this policy.

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The organisations anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors and any third-parties at the outset of business relations, and as appropriate thereafter.

The organisation will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

Record Keeping

The organisation will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and Reviewing

The organisations Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the director.

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CORPORATE SOCIAL RESPONSIBILITY POLICY

Introduction

The reputation of our organisation is built on the trust and confidence of those with whom we deal. We aim to maintain high ethical standards in the conduct of our business and will not tolerate any behaviour or practice that compromises our organisation's integrity. We are committed to continuously improve our performance.

Policy Aim

We aim to maintain high ethical standards in carrying out our business activities. Practices of any sort that are incompatible with our principles and policies will not be tolerated. Strict adherence to these principles and supporting policies is a condition of employment.

We recognise that lessons can be learned from other organisations, as well as from the many examples of good practice within our own organisation.

Employees are to:

- Behave ethically when doing business for the company, in accordance with the specific objectives set out below
- Confirm their compliance with the following objectives and supporting policies and procedures on an annual basis

Signed:	
Position:	DIRECTOR
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Responsibilities

Our Director will:

Be responsible for initiating and supervising the investigation of all reports of breaches of these principles and policies and ensuring that appropriate disciplinary action is taken when required. We aim to create the climate and opportunities for employees to voice genuinely held concerns about behaviour or decisions that they perceive to be unethical. Therefore, any employee who needs guidance or advice on business ethics issues is to speak to a Director.

Clients and their Customers

We are committed to being honest and straightforward in our dealings with our clients and their customers and believe that integrity in dealings with clients and their customers is a pre-requisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long-term relationships.

Therefore, the organisation will:

- Understand meet and strive to exceed the needs of our clients and their customers.
- Operate within the best practices of the industries in which it competes and in a manner that makes the organisation easy to do business with.
- Respect the confidentiality of information that we might obtain and retain in relation to clients and their customers.
- Take all reasonable care to avoid untruths, concealment and overstatement in all advertising and other public communications.

Company Shareholders

We are committed to maintaining the highest standards in the best interests of our employees and shareholders.

We will:

- Protect the interests of shareholders and treat them all fairly
- Provide timely and truthful financial information in accordance with statutory requirements
- Communicate our business principles, policies and achievements

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Employees

We are committed to high standards of employment practice and wish to be recognised as a good employer.

We will:

- Actively engage with employees through an open communication process
- Pay a fair wage for a fair day's work, recognising the contributions made by individuals to the organisation's success
- Support employees in their own efforts in community work
- Not tolerate any sexual, physical or mental harassment of our employees

In addition, all employees will:

- Not use any information that they receive in the course of their business dealings for personal gain or any purpose except that for which it is given.
- Not receive gifts on behalf of or give money or any gift of significant value to a client, nor may they accept any gift or service that could be construed as being intended as a bribe.
- Be alert to and report any fraudulent activities and maintain accurate company records to help prevent their occurrence.

Suppliers, Advisors and Agents.

We will aim to develop relationships with our suppliers, advisors and agents based on mutual trust and shared values. Therefore:

- All employees will conduct business with suppliers, advisors and agents in a professional manner
- We will endeavour to pay our suppliers, advisers and agents on time and according to agreed terms

Competitors.

We will:

- Compete in a lawful manner
- Not seek to damage the reputation of competitors, either directly or by implication.
- Avoid discussing proprietary or confidential information in any contacts with competitors.
- Not attempt to acquire information regarding a competitor's business by unlawful means, including industrial espionage, hiring competitors' employees to obtain confidential information, urging competitors' employees and clients to disclose confidential information, or any other approach that is not above board.

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Government, Legislators and Regulators.

We will:

- Seek to comply with all legislation affecting our operations.
- Not make any financial contribution to political parties
- Not knowingly evade tax obligations

Community and Non-Government Organisations.

We will seek to serve and support the community in which we operate by providing services efficiently and profitably, and by providing good employment opportunities and conditions.

Therefore, we will:

- Make charitable donations, and educational and cultural contributions.

Protecting the Environment

We are committed to reducing our impact on the environment. We will:

- Show a commitment to monitoring the level of waste produced
- Where possible re-use or recycle waste
- Encourage staff to car/van share when travelling to work

Monitoring measures

This policy will be reviewed by the Directors annually. We carry out toolbox talks regularly throughout the year that will cover topics raised within this policy. We also give the staff the opportunity to raise any points they feel are relevant to this policy.

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DRUGS AND ALCOHOL POLICY

Policy Aim

Our company is concerned to provide a safe and healthy working environment. It recognises that this can be put at risk by those who misuse alcohol or drugs to such an extent that it may affect their health, performance, conduct and relationships at work. The policy, which applies to all employees, aims to:

- Promote the health and well-being of employees and to minimise problems at work arising from the effects of alcohol or drugs.
- Identify employees with possible problems relating to the effects of alcohol or drugs at an early stage.
- Offer employees known to have alcohol or drug-related problems affecting their work referral to an appropriate source for diagnosis and treatment if necessary.

The policy does not apply to an employee who commits a clear breach of company rules due to overindulgence of alcohol on one or more occasions. In these cases, action will be taken under the disciplinary procedure as appropriate. The person responsible for implementing this policy is the Managing Director.

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Arrangements for Securing the Health and Safety of Workers

Our Company will, in consultation with workers and their representatives:

- Advise all existing employees and all persons starting work of the risks to health arising from the effects of alcohol or drugs (including some legitimately prescribed medications)
- Encourage employees, who may have alcohol or drug-related problems which affect their work, to take advantage of the company referral procedure for diagnosis and treatment.
- Enable supervisors and managers to identify job performance problems that may be attributable to the effects of alcohol or drugs and to consult with the company Health and Safety Advisor to determine whether there is sufficient concern to warrant a medical evaluation.
- In cases where the effects on work of misuse of alcohol or drugs is confirmed or admitted, agree upon a programme of treatment in consultation with a medical advisor selected by the employee.

The company will establish policy rules relating to an employee who is found to have misused alcohol or drugs or admits to the same.

The Policy Rules May Cover

- Disciplinary action for refusal to accept help
- Conditions for accepting treatment
- Future employment if treatment proves to be successful
- Observation of medical confidentiality
- Effects upon pensions, benefits and employment rights.

Information and Training

The company will provide sufficient information, instruction and training as is necessary to ensure that all employees have the knowledge required:

- To understand the dangers associated with the effects of alcohol or drugs at work and the company policy regarding this.
- To understand the company procedures that will be adopted where there is found to be a deterioration in work performance from these effects.
- To understand the legal consequences of their actions.

Managers and supervisors will be given additional training, as necessary, to enable them to deal with any physiological problems that may arise as a result of the effects of alcohol or drugs upon work performance.

Testing

The company reserves the right to require individuals to undergo testing for the abuse of drugs. These tests may be done in-house or by specialist companies. In the first instance of a positive result the incident will be treated as a personal problem and confidential access to help and advice will be offered.

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However, if help is refused and/or impaired performance continues disciplinary action is likely. In cases of gross misconduct, dismissal may result.

Safe System of Work

The effects of alcohol or drugs at work can create serious health and safety risks. Therefore, the following rules should be adhered to.

- Do not come to work under the influence of alcohol or drugs.
- Do not bring alcohol or non-prescribed drugs on to company premises.
- Check with your doctor or pharmacist about the side-effects of prescribed medications.
- Never drive or operate machinery if you are affected by alcohol or drugs.
- Ask your general practitioner or the company for guidance and advice on sensible limits of alcohol consumption.
- Offer support and advice to colleagues who you suspect of suffering from alcohol or drug abuse: do not "protect" them by keeping silent.
- Ask for assistance if you feel that matters are beyond your own control.

Summary Policy Statement

The use of alcohol is not appropriate in the workplace and drug abuse can be a criminal offence as well as a serious risk to health and safety.

The three most important steps are to:

- Look after your own health and safety by developing a responsible attitude towards alcohol and drugs.
- Be aware of colleagues or others who may put safety at risk by their actions.
- Recognise when and how to ask for help.

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ENVIRONMENTAL MANAGEMENT POLICY

Environmental Management Policy Aim

Our Policy is to continually improve our environmental management procedures. We recognise that our activities have an impact on the environment. In all our activities, working practices and business relationships we are committed to protecting, conserving and enhancing all aspects of the environment over which we have control or can influence.

To deliver our Environmental Management Policy, we will:

- Ensure that all our activities comply fully with environmental legislation and best practice
- Set practical objectives for continuous improvement
- Reduce resource use and re-use or re-cycle materials wherever possible
- Use information and communication technology to avoid paper waste
- Encourage the use of environmentally friendly materials when advising clients
- Maintain information about the environmental impact of the goods and services we supply and make this available to enable our customers to make informed choices
- Understand the sensitivities of our customers, including the pressures of growing and changing statutory and public concern about environmental issues, and assist them in complying with environmental best practice
- Identify opportunities to reduce the environmental impact of our activities at an early stage and adopt these changes where appropriate
- Communicate our environmental performance within our organisation and outside
- Raise staff awareness of environmental issues and promote individual good practice
- Require our suppliers to provide goods and services with the lowest environmental impact, and give preference to environmentally aware suppliers whenever possible
- Ensure our purchases of goods and materials comply fully with UK government and EU legislation and recognised environmental best practice
- Take all reasonable steps to prevent pollution of both our local and wider environments
- Employ sound waste management practices, including compliance with the requirements of the Site Waste Management Plans Regulations
- Continue to review our environmental performance, and respond to issues as they arise
- Support our local authority's green travel objectives.

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Section 2 Organisation and Responsibilities

The Managing Director will

- Ensure adequate resources are available for meeting statutory requirements relating to environmental issues
- Monitor the effective operation of our Environmental Management Policy and procedures.
- Ensure adequate arrangements to ensure that employees receive relevant training in environmental matters.
- Ensure environmental standards of work undertaken by site based staff are monitored and any deficiencies reported and corrected

The Directors will

- Report any deficiencies which cannot be corrected to the HS&E manager.
- Ensure our Environmental Management Policy is part of the induction of new or temporary employees
- Ensure the environmental responsibilities of our organisation and of our clients, relating to products, systems or equipment supplied by us, are clearly shared and agreed with the client in writing, before supply or installation
- Ensure site staff are competent and adequately trained for the type of work
- Ensure adequate arrangements to report environmental incidents or situations whilst working on client's premises or sites
- Review reports relating to environmental issues and ensure appropriate action is taken

All Employees and Labour Only Sub-Contractors Will

- Act with due regard to environmental issues whilst they are at work
- Report any serious environmental issues they become aware of
- Co-operate with management to prevent environmental incidents with risks to themselves, other employees and members of the public or visitors
- Wear PPE whenever instructed to do so or in circumstances that require its use.

Any employee who fails to comply with the Environmental Management Policy, will be subject to disciplinary action.

Our Environmental Management Advisor Will

- Advise on and generally co-ordinate all aspects of the Company's environmental effort
- Advise on the introduction and maintenance of systems of work to minimise the environmental impact of our activities
- Carry out inspections of workplaces with the person immediately responsible for that section and advise on all aspects of environmental management
- Submit reports of his findings to management
- Advise on environmental management training and assist in identifying environmental training need
- Investigate all environmental incidents, and recommend action to prevent a recurrence
- Act as liaison officer with official bodies such as the Local Authority and Environmental Agency.

Although our Environmental Management Advisor's duties are in the main of an advisory and administrative nature, he has executive authority to order the cessation of any method of working

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with an adverse environmental impact of which he becomes aware and to require the provision of all information necessary to carry out his duties effectively.

Section 3 Arrangements for Implementation

Environmental Management Programmes and Procedures

- We will carry out environmental impact assessments of all work activities, locations and situations to identify significant risks within our operations
- Assessments will consider risks to the environment which may be affected by our activities.
- We will keep A central record of assessments
- Where significant risks are identified suitable control measures will be implemented to eliminate or reduce those risks.
- Employees will be supervised to ensure that they follow the safe methods of work identified in risk assessments
- Where an employee or sub-contractor considers that there are uncontrolled risks within our activities they should report the matter to management

Environmental Emergency Preparedness and Response

To check our working conditions, and ensure that our good environmental working practices are being followed we will:

- Carry out regular inspections and report on the findings;
- Review environmental impact assessments at least annually;
- Investigate environmental management issues or incidents reported by anyone;
- Keep up to date with relevant information on environmental management within our industry;
- Review the Environmental Management Policy annually and update it as necessary
- Where a serious environmental incident occurs contact our HSE support for advice.

Environmental Responsibilities and Training

- All new employees will receive environmental induction training. We will keep a record of this training
- We will review the training need of existing employees annually and any necessary training arranged through a suitable training organisation.
- Only suitably qualified and competent sub-contractors will be appointed
- All sub-contractors will be required to produce evidence of their environmental management competence, and training provisions before being approved to work for the Company. The decision to employ a sub-contractor will be taken by management
- Sub-contractors will be required to work in accordance with our environmental management rules.
- Sub-contractors found to be breaking these rules will be asked to leave site immediately.

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Communicating Environmental Issues

- We will consult with employees about environmental matters, changes to working methods and changes to substances or equipment.
- Consultation will be informal but the items discussed, the date of the discussion and any comment will be recorded
- Additionally management operate an “open door” policy and employees are encouraged to discuss environmental concerns at any reasonable time.

Waste Management

- We will consider our production of waste and develop a waste management plan. The plan will be written to follow our Policy to reduce, re-use and recycle where possible.
- Where the plan identifies disposal of waste, and where appropriate, we will provide suitable containers close to where the waste is produced. Waste will be taken away by a licensed carrier.
- Alternatively, we will carry our own waste from site to a transfer station to be disposed of in accordance with local waste authority rules. We will maintain a Waste Carrier’s Licence for this purpose
- Records of waste collection will be kept and monitored to ensure its proper disposal.
- When working under the control of others we will adopt any Site Waste Management Plan provided by them.

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Environmental Complaints Procedure

Oral Complaints

- All oral complaints, no matter how minor, will be taken seriously
- Employees receiving a complaint will try to solve the problem immediately (where possible) with the complainant
- If this is not possible they will offer to get management involved
- All contact with the complainant will be polite, courteous and empathetic
- Staff should not accept blame or make excuses on behalf of management
- If the complaint is being made on behalf of an employee or a customer, it must first be verified that the person has permission to speak on their behalf
- After discussing the problem, the employee or management dealing with the complaint should suggest a course of action to remedy the situation. If this course of action is acceptable then the member of staff should clarify the agreement with the complainant and agree a way in which the results of the complaint will be communicated (i.e. through another meeting or by letter)
- If the suggested plan of action is not acceptable to the complainant then the member of staff or Director should ask the complainant to put their complaint in writing to the establishment and give them a copy of the complaints procedure
- In both cases details of the complaints should be recorded & the Director informed

Written Complaints

- When a complaint is received in writing it should be passed on to the Director responsible for Health & Safety who will send an acknowledgment letter within two working days
- If necessary, further details will be obtained from the complainant, preferably in writing
- A copy of the Complaints Handling Procedure will be forwarded to the complainant
- If the complaint raises potentially serious environmental matters, advice should be sought from a legal advisor or the Company's Health & Safety Advisor
- Immediately on receipt of the complaint the Company will launch an investigation and within 28 days should be in a position to provide a full explanation to the complainant, either in writing or by arranging a meeting with the individual or customer concerned
- If the issues are too complex to complete the investigation within 28 days, the complainant will be informed of any delays in writing
- At the meeting a detailed explanation of the results of the investigation will be given as well as an apology (if deemed appropriate)
- Such a meeting gives the Company an opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated
- After the meeting, or if the complainant does not want a meeting, a written account of the investigation should be sent to the complainant within 28 days
- The outcomes of the investigation and the meeting should be recorded on appropriate documentation and any shortcomings in the establishment's procedures should be identified and acted upon

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EQUAL OPPORTUNITY AND DIVERSITY POLICY

Policy Aim

The Company is fully committed to providing equality in the workplace and all opportunities for, and during employment, will be afforded to individuals fairly and irrespective of:

- Age
- Disability
- Gender
- Gender reassignment
- Marital or civil partnership status
- Pregnancy or maternity
- Race including colour
- Ethnic or national origins and nationality
- Religion or belief
- Or sexual orientation.

We aim to create a working environment that is free from discrimination and harassment in any form, in which all staff, customers and suppliers are treated with dignity and respect.

The Company will not unlawfully discriminate in the arrangements we make for recruitment and selection or in the opportunities afforded for employment, training or any other benefit.

All decisions will be made fairly and objectively.

We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Purpose and Scope

The purpose of this Equal Opportunities Policy is to communicate our commitment to equality of opportunity in employment, with the aims of ensuring that all employees and job applicants are treated fairly and equally, and supporting the Company's objective of providing a working environment that is free from all forms of discrimination.

The policy applies to all staff within the Company, including employees and other workers, such as agency workers, temporary workers and contractors. All staff are expected to put this policy into practice.

A copy of this policy will be distributed to all employees it will be made available to other workers on their engagement. Job seekers and applicants will be sent a copy of the policy on request. In addition, all employees will receive a briefing on this policy and the induction process for new employees includes a briefing on this policy.

Any questions about the policy should be directed to the Director.

This policy does not form part of an employees' contracts of employment and the Company may amend it at any time.

The policy is regularly reviewed at least annually and may be amended at any time.

Specific Responsibilities

The Company has overall responsibility for the effective operation of this policy and for ensuring compliance with the Equality Act 2010 and associated legislation and for observing relevant Codes of Practice.

The director is responsible for monitoring and reviewing the policy and for ensuring that all employment related policies, procedures and practices adhere to this policy.

All staff have a responsibility not to discriminate or harass other staff, clients, customers and suppliers and to report any such behaviour of which they become aware to their Supervisor or the director.

The directors are responsible for implementing the Equal Opportunities Policy and must apply the policy as part of their day-to-day management of the Company.

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Forms of discrimination

The following are forms of discrimination that this policy aims to avoid:

Direct Discrimination

Occurs when a person is treated less favourably because of a protected characteristic that they either have or are thought to have. Direct discrimination can also occur by way of association, which is when a person is treated less favourably because, for example, their spouse or partner or other relative has the protected characteristic.

Indirect Discrimination

Occurs when a provision, criterion or practice is applied equally to everyone, but has a disproportionately adverse effect on people who share a particular protected characteristic. A person with the protected characteristic who is disadvantaged in that way has the right to complain.

To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.

Victimisation

Occurs where someone is treated unfavourably because he/she has raised a complaint under this policy or taken legal action, in relation to any alleged act of unlawful discrimination, against the Company or because he/she has supported someone else in doing this.

Harassment

Is unwanted conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment? Harassment can take many different forms and may involve inappropriate actions, behaviour, comments, emails or physical contact that causes offence or are objectionable.

Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also means that a person can be subjected to harassment by behaviour that is not aimed at them directly but which they nonetheless find unpleasant.

Harassment is always unacceptable and where it relates to a protected characteristic it will amount to an unlawful act of discrimination.

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Discrimination arising from Disability

In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants, employees or other workers are not substantially disadvantaged.

Creating Equal Opportunities in the Workplace

There are a number of ways in which the Company aims to ensure equal opportunities in the workplace, including:

Recruitment, Selection and Job Advertisement

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable job-related criteria. Decisions regarding an individual's suitability for a particular role will be based on:

- Skills
- Knowledge
- Attitude
- Training
- Experience

Advertisements will aim to encourage applications from all suitably qualified and experienced persons. In order to attract applications from all sections of the community the company will as far as reasonably practical:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the number of applicants with a protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a protected characteristic

We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not substantially disadvantaged.

Career Development and Training

All staff will be given an appropriate induction to enable them to fulfil the responsibilities of their role.

All employees will be encouraged to develop their full potential and we will not unreasonably deny an employee access to training or other career development opportunities. These will be identified as part of an ongoing performance management process and will be determined objectively, taking into account the needs of the business and available resources.

Selection for promotion will be based on objective criteria and decisions will be made on the basis of merit.

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Terms and Conditions

Our terms and conditions of service will be applied fairly and benefits and facilities will be made available to all staff who should have access to them, as appropriate.

The Company operates a pay system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution.

Employment Policies and Practices

The Company aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. In particular we will ensure that all disciplinary decisions are fair and consistent and that selection for redundancy is based on objective criteria.

The Company will consider making appropriate reasonable adjustments to the working environment or any work arrangements that would alleviate any substantial disadvantage these cause disabled staff.

We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures and will consider requests from employees to vary or change their working hours to enable them to care for a dependant.

Working Environment

All individuals have a right to be treated with dignity and respect and the Company takes reasonable steps to protect staff from

- Discrimination
- Bullying
- Or harassment

And, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence.

All staff are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during the course of employment, on or off premises, including at work social events (whether organised by the Company or not) or at formal or informal events involving staff, customers or other work-related contacts.

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Equal Opportunities Monitoring

The Company will monitor the effectiveness of this policy to ensure it is achieving its objectives.

As part of this process we monitor:

- The composition of job applicants and decisions in recruitment
- The composition of our workforce
- Access to training, promotion and other opportunities and benefits
- The impact of our employment policies, including use of the disciplinary and grievance procedure
- Dismissals and other terminations

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

Raising a Complaint of Discrimination

If you believe you have been discriminated against, you should raise the matter immediately with your supervisor or director.

Any employee who is found to have committed an act of discrimination, or breached this policy in any other way, will be subject to action under the Disciplinary Procedure, up to and including dismissal. Non-employees will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement.

The Company will also take seriously any malicious or, in its opinion, unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary.

How this policy has made a difference and had a positive effect

Knowing that their employer stands firm on fairness in the workplace can be very effective at curbing incidences of conflict in the workplace, particularly in instances where the conflict arises due to lack of understanding of fair employment practices. Training in these areas can be an effective proactive measure for preventing workplace conflict.

Unfair treatment and conflicts can taint the workplace in the absence of a written equal opportunities policy. This can result in persisting worker dissatisfaction and a higher turnover resulting from voluntary resignations from employees who are disillusioned by unfair employment policies. Knowing that the company is an advocate of fair treatment can boost employee morale and decrease (employee) turnover, resulting in a win-win for you and your workers. When employee morale is high and turnover is low, organisations often see measurable positive differences in productivity and profitability.

Companies that do not have an equal opportunities policy in place run a higher risk of getting embroiled in legal disputes filed by disgruntled workers alleging discriminatory treatment in hiring or employment practices. The benefits of having a written policy include lesser likelihood of legal action, reduced fees for legal expenses and less time spent trying to defend employment actions.

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GDPR POLICY

Policy Aim

This policy sets out the obligations of the company regarding data protection and the rights of data subjects in respect of their personal data under Data Protection Law (all legislation and regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to:

- EU Regulation 2016/679 General Data Protection Regulation (“GDPR”)
- The Data Protection Act 2018
- And any successor legislation or other directly applicable EU regulation relating to data protection and privacy for as long as, and to the extent that, EU law has legal effect in the UK).

This Policy sets out the Company’s obligations regarding to the:

- Collection
- Processing
- Transfer
- Storage
- Disposal of personal data

The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Scope

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

The company is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.

All management are responsible for ensuring that all employees, agents, contractors, or other parties working on behalf of the company comply with this policy and, where applicable, must implement such practices, processes, controls, and training as are reasonably necessary to ensure such compliance.

Any questions relating to this Policy or to Data Protection Law should be referred to senior management. They should always be consulted in the following cases:

- If there is any uncertainty relating to the lawful basis on which personal data is to be collected, held, and/or processed.
- If consent is being relied upon to collect, hold, and/or process personal data.
- If there is any uncertainty relating to the retention period for any type(s) of personal data.
- If any new or amended privacy notices or similar privacy-related documentation are required.
- If any assistance is required in dealing with the exercise of a data subject's rights (including, but not limited to, the handling of subject access requests)
- If a personal data breach (suspected or actual) has occurred.
- If there is any uncertainty relating to security measures (whether technical or organisational) required to protect personal data.
- If personal data is to be shared with third parties (whether such third parties are acting as data controllers or data processors)
- If personal data is to be transferred outside of the EEA and there are questions relating to the legal basis on which to do so
- When any significant new processing activity is to be carried out, or significant changes are to be made to existing processing activities, which will require a Data Protection Impact Assessment
- When personal data is to be used for purposes different to those for which it was originally collected
- If any automated processing, including profiling or automated decision-making, is to be carried out; or
- If any assistance is required in complying with the law applicable to direct marketing.

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The Data Protection Principles

This Policy aims to ensure compliance with Data Protection Law. The GDPR sets out the following principles with which any party handling personal data must comply. Data controllers are responsible for, and must be able to demonstrate, such compliance.

All personal data must be:

Processed lawfully, fairly, and in a transparent manner in relation to the data subject collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes; adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed; accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay; kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject;

processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

The Rights of Data Subjects

The GDPR sets out the following key rights applicable to data subjects:

The right to be informed

The right of access

The right to rectification

The right to erasure (also known as the 'right to be forgotten')

The right to restrict processing

The right to data portability

The right to object; and

Rights with respect to automated decision-making and profiling.

Lawful, Fair, and Transparent Data Processing

Data Protection Law seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. Specifically, the GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- The data subject has given consent to the processing of their personal data for one or more specific purposes
- The processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract

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- The processing is necessary for compliance with a legal obligation to which the data controller is subject
- The processing is necessary to protect the vital interests of the data subject or of another natural person
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
- The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

If the personal data in question is special category personal data at least one of the following conditions must be met:

- The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so)
- The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
- The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
- The processing relates to personal data which is manifestly made public by the data subject
- The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity
- The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
- The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
- The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU

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Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or

- The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Consent

If consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, the following shall apply:

- Consent is a clear indication by the data subject that they agree to the processing of their personal data. Such a clear indication may take the form of a statement or a positive action. Silence, pre-ticked boxes, or inactivity are unlikely to amount to consent.
- Where consent is given in a document which includes other matters, the section dealing with consent must be kept clearly separate from such other matters.
- Data subjects are free to withdraw consent at any time and it must be made easy for them to do so. If a data subject withdraws consent, their request must be honoured promptly.
- If personal data is to be processed for a different purpose that is incompatible with the purpose or purposes for which that personal data was originally collected that was not disclosed to the data subject when they first provided their consent, consent to the new purpose or purposes may need to be obtained from the data subject.
- If special category personal data is processed, the Company shall normally rely on a lawful basis other than explicit consent. If explicit consent is relied upon, the data subject in question must be issued with a suitable privacy notice to capture their consent.
- In all cases where consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, records must be kept of all consents obtained in order to ensure that the Company can demonstrate its compliance with consent requirements.

Specified, Explicit, and Legitimate Purposes

The Company collects and processes the personal data set out in this Policy. This includes:

- personal data collected directly from data subjects

The Company only collects, processes, and holds personal data for the specific purposes set out in this Policy (or for other purposes expressly permitted by the GDPR).

Data subjects must be kept informed always of the purpose or purposes for which the Company uses their personal data.

Adequate, Relevant, and Limited Data Processing

The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed).

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Employees, agents, contractors, or other parties working on behalf of the Company may collect personal data only to the extent required for the performance of their job duties and only in accordance with this Policy. Excessive personal data must not be collected.

Employees, agents, contractors, or other parties working on behalf of the Company may process personal data only when the performance of their job duties requires it. Personal data held by the Company cannot be processed for any unrelated reasons.

Accuracy of Data and Keeping Data Up to Date

The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up to date.

The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

Data Retention

The Company shall not keep personal data for any longer than is necessary considering the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

Secure Processing

The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

All technical and organisational measures taken to protect personal data shall be regularly reviewed and evaluated to ensure their ongoing effectiveness and the continued security of personal data.

Data security must always be maintained by protecting the confidentiality, integrity, and availability of all personal data as follows:

- Only those with a genuine need to access and use personal data and who are authorised to do so may access and use it
- Personal data must be accurate and suitable for the purpose or purposes for which it is collected, held, and processed; and
- Authorised users must always be able to access the personal data as required for the authorised purpose or purposes.

Accountability and Record-Keeping

The Data Protection Officer is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.

The Company shall always follow a privacy by design approach when collecting, holding, and processing personal data. Data Protection Impact Assessments shall be conducted if any processing presents a significant risk to the rights and freedoms of data subjects.

All employees, agents, contractors, or other parties working on behalf of the Company shall be given appropriate training in data protection and privacy, addressing the relevant aspects of Data Protection Law, this Policy, and all other applicable Company policies.

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The Company's data protection compliance shall be regularly reviewed and evaluated.

The Company shall keep internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- The name and details of the Company, its Data Protection Officer, and any applicable third-party data transfers (including data processors and other data controllers with whom personal data is shared)
- The purposes for which the Company collects, holds, and processes personal data
- The Company's legal basis or bases (including, but not limited to, consent, the mechanism(s) for obtaining such consent, and records of such consent) for collecting, holding, and processing personal data
- Details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates
- Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards
- Details of how long personal data will be retained by the Company (please refer to the Company's Data Retention Policy)
- Details of personal data storage, including location(s)
- Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

Data Subject Access

Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.

Employees wishing to make a SAR should do using a Request Form, sending the form to the Company's Data Protection Officer

Responses to SARs must normally be made within one month of receipt, however, this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

All SARs received shall be handled by the Company's Data Protection Officer.

The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

Rectification of Personal Data

Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.

The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

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If any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

Erasure of Personal Data

Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:

- It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed.
- The data subject wishes to withdraw their consent to the Company holding and processing their personal data.
- The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so)
- The personal data has been processed unlawfully.
- The personal data needs to be erased for the Company to comply with a legal obligation

Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by the Company (for details of data retention, please refer to the Company's Data Retention Policy):

- Name
- Address
- Telephone number
- Email address
- Other data collected that could directly or indirectly identify you

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Data Security - Transferring Personal Data and Communications

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- All emails containing personal data must be encrypted
- All emails containing personal data must be marked “confidential”
- Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.
- Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable.
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email, and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.
- Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data.
- Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient
- All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”

Data Security - Storage

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

- All electronic copies of personal data should be stored securely using passwords and data encryption.
- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar.
- All personal data stored electronically should be backed up with backups stored onsite. All backups should be encrypted
- No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise
- No personal data should be transferred to any device personally belonging to an employee, agent, contractor, or other party working on behalf of the Company and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken);

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Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data.

Data Security - Use of Personal Data

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- No personal data may be shared informally and if an employee, agent, contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested
- No personal data may be transferred to any employee, agent, contractor, or other party, whether such parties are working on behalf of the Company or not, without authorisation
- Personal data must always be handled with care and should not be left unattended or on view to unauthorised employees, agents, contractors, or other parties at any time.
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period, the user must lock the computer and screen before leaving it.
- Where personal data held by the Company is used for marketing purposes, it shall be the responsibility to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS;

Data Security - IT Security

The Company shall ensure that the following measures are taken with respect to IT and information security:

- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
- Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords.
- All software (including, but not limited to, applications and operating systems) shall be kept up to date. The Company's IT staff shall be responsible for installing all security-related updates as soon as reasonably and practically possible unless there are valid technical reasons not to do so
- No software may be installed on any Company-owned computer or device without the prior approval of the

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Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under Data Protection Law and under this Policy, and shall be provided with a copy of this Policy;
- Only employees, agents, contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- All sharing of personal data shall comply with the information provided to the relevant data subjects and, if required, the consent of such data subjects shall be obtained prior to the sharing of their personal data.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.
- All personal data held by the Company shall be reviewed periodically.
- The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of Data Protection Law and this Policy by contract.
- All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and Data Protection Law;
- Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure;

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Data Breach Notification

All personal data breaches must be reported immediately to the Company's Data Protection Officer.

If an employee, agent, contractor, or other party working on behalf of the Company becomes aware of or suspects that a personal data breach has occurred, they must not attempt to investigate it themselves. All evidence relating to the personal data breach in question should be carefully retained.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

- The categories and approximate number of data subjects concerned.
- The categories and approximate number of personal data records concerned.
- The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained)
- The likely consequences of the breach.
- Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

Implementation of Policy

This Policy shall be deemed effective immediately. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

Definitions

Consent:

means the consent of the data subject which must be a freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify their agreement to the processing of personal data relating to them;

Data Controller:

means the natural or legal person or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the purposes of this Policy, the Company is the data controller of all personal data relating to use in our business for our commercial purposes

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Data Processor:

means a natural or legal person or organisation which processes personal data on behalf of a data controller

Data Subject:

means a living, identified, or identifiable natural person about whom the Company holds personal data

EEA:

means the European Economic Area, consisting of all EU Member States, Iceland, Liechtenstein, and Norway

Personal Data:

means any information relating to a data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that data subject;

Personal Data Breach:

means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed

Processing:

means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Pseudonymisation:

means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person; and

Special Category Personal Data:

means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life, sexual orientation, biometric, or genetic data.

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HARASSMENT AND BULLYING POLICY

Introduction

Harassment and bullying detract from a productive working environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

Policy Aim

This policy is part of the organisation's overall commitment to equality of opportunity. It is fully committed to promoting a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated.

The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties you encounter while doing your job.

Harassment or bullying at work in any form is unacceptable behaviour and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice.

The organisation will ensure that all adequate resources are made available to promote respect and dignity in the workplace and to deal effectively with complaints of harassment and bullying.

This policy and procedure will be communicated effectively to all employees, and the organisation will ensure that all employees are aware of their responsibilities. Appropriate training, where necessary, will be provided.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Responsibilities

Our Director will:

The director is responsible for monitoring and reviewing the policy and for ensuring that all related policies, procedures and practices adhere to this policy.

The director will ensure that adequate resources are made available to promote respect and dignity in the workplace and to deal effectively with complaints of harassment and bullying. This policy and procedure will be communicated effectively to all employees.

The director is responsible for implementing the harassment and bullying policy and must apply the policy as part of their day-to-day management of the organisation.

Our Employees and Labour Only Sub-Contractors (LOSC's) will:

Not harass or bully other staff, clients, customers and suppliers and will report any such behaviour of which they become aware to their supervisor or the director.

All employees and/or LOSC's have a responsibility to help ensure a working environment in which the dignity of everyone is respected.

Employees will comply with this policy and will ensure that your behaviour to colleagues and anyone connected to the organisation, does not cause offence that can be considered to be harassment or bullying.

Employees will discourage harassment and bullying by making it clear that such behaviour is unacceptable. Employees will support colleagues who suffer such treatment and are considering making a complaint. All employees or LOSC's will alert a senior member of staff immediately to any incident of harassment or bullying to enable the organisation to deal with the matter promptly and effectively.

Employee Rights

All staff have the right to work in an environment which is free from any form of harassment or bullying. The organisation recognises the right to complain about harassment or bullying should it occur. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that, when you make a complaint, you will be protected from further acts of bullying and harassment. If others also give evidence or information in connection with the complaint, they equally will be protected. Perpetrators of these acts will be subject to disciplinary action which may warrant dismissal.

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Definition of Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct based on sex, sexual orientation, marital or civil partnership status, gender reassignment, religion or belief, age,

race or disability which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below but there are many forms of behaviour can constitute harassment:

- Physical conduct, ranging from touching, pushing or grabbing to punching or serious assault
- Verbal or written harassment through jokes, offensive language, defamatory remarks, gossip, threats or letters
- Unwelcome sexual behaviour, including unwanted suggestions, propositions or advances
- The sending or displaying of material that is pornographic or obscene, including e-mails, text messages, video clips, photographs, posters, emblems or any other offensive material
- Inappropriate posts or comments on or via social media commonly known as "cyber bullying"
- Isolation, non-co-operation at work or exclusion from social activities
- Coercion, including pressure for sexual favours
- Inappropriate personal contact, including intrusion by pestering or spying

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

Definition of Bullying

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.

Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.

Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- Shouting at or humiliating others
- High-handed or oppressive levels of supervision
- Unjustified, offensive and/or insulting remarks about performance
- Excluding employees from meetings, events or communications without good cause
- Physical or emotional threats

Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips. The organisation will ensure that the workforce is aware of their responsibilities. Appropriate training, where necessary, will be provided.

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MODERN DAY SLAVERY POLICY

Policy Aim

We recognise that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain.

Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Management Systems, compliant with the requirements of ISO 9001:2015 and ISO 14001.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Application

The implementation and operation of this management system underlines our Commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities the Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers Safety managers and Safety Advisors
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Our policy on Child Labour

We require all our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- Children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- Those under 18 must not be required to perform hazardous duties.

We will ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of inspections by Directors or senior management.
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

QUALITY MANAGEMENT POLICY

Policy Aim

Our Quality Policy is directed to fulfilling the following:

- To ensure that we offer the appropriate level of technical competence delivered by skilled personnel, planned and well managed projects and efficient use of resources to fully meet our clients' requirements from receipt of an enquiry through to the completion of work.
- To offer products and services that will satisfy the needs of our customer by conforming to or exceeding specifications for the work, endeavouring to ensure customer satisfaction at all times.
- To endeavour to complete all orders systematically in accordance with the specification, on time, on budget and in compliance with our customers' requirements by employing the most appropriate techniques, equipment and personnel.
- To support, train and develop all members of staff to enable them to attain and or retain the required level of competence.
- To ensure that this Policy is understood, implemented and maintained and that all members of staff are made aware of the policy and their role in implementing it training, regular communications with staff and full access to our Quality Management Manual will be made available.
- Employees are expected to report any changes to working practices to the Managing Director so that our manuals can be reviewed and updated if necessary. It is also the responsibility of employees to return documents to the Managing Director when they become superseded.
- Compliance with our Quality Policy is mandatory for all members of staff, and forms part of staff Terms and Conditions of Employment. Any variation can only be authorised in writing by the Managing Director in line with current document change procedures.

Signed:	
Position:	Director
Date Signed:	05/09/2022
Review Date:	04/09/2023

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Company Values

Our core values have been developed in conjunction with our staff and outline our commitment to our employees, our clients and the communities that we serve.

Our values include:

- Supplying to our clients Value for Money, which embraces quality of service and products as defined by our customers to achieve their objectives.
- Promoting and maintaining a safe and healthy working environment.
- Respect for people through employment, skills development, training and service delivery.
- Developing a robust local supply chain.
- Operating in an environmentally responsible manner, creating minimum pollution to the environment and where possible enhance the built environment and cause no adverse effect to human health.
- Implementing procurement management to reduce waste.
- Implementing continuous improvement.

Quality Objectives

Our prime objective is to provide a professional quality service that meets and satisfies the needs of our customers and thereby ensure the success and sustainability of the business. We also strive to develop, maintain and enhance our reputation for the quality of the work carried out and the service provided. Additional objectives are to provide a service with a range of key specialist areas supplying clients with a total solution to their requirements.

Supplier Assessment

The Organisation will ensure that the quality of purchased products and materials that have a bearing, or in any way contribute to the quality of the output is strictly controlled. Suppliers of all such products and materials will undergo an approval process and their performance must be regularly monitored. Evidence of these activities will be kept.

A process will be put in place to ensure that inspections of all purchased products are carried out, recorded and filed. These checks will ensure that all products are fit for purpose and comply to the job's specifications.

We will also require all suppliers to provide and renew on a regular basis the following information in order to stay on our approved supplier list.

- Suppliers Name
- Type of Goods Supplied
- Contact Details
- Quality Management Accreditations (ISO9001)
- Historical Financial Information
- Additional Information
- References

Failure to supply these details will result in automatic removal from the list.

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Supplier Selection

After collecting the above information, we will then use the following areas to enable us to choose the best supplier to use.

- Works Specification
- Location
- Past Customer Reviews / References
- Qualifications / Training held
- Availability

After completion of the works we will carry out a post works appraisal looking at all aspects of the project. This will include looking at the performance of the suppliers and highlighting and discussing any areas of improvement with them to ensure continuous improvement.

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RIGHT TO WORK IN THE UK POLICY

Policy Aim

All employers have a legal obligation to ensure that their employees have the right to work in the United Kingdom. This is controlled by the Immigration, Asylum and Nationality Act 2006 (“the Act”) and subsequent secondary legislation. It is an offence to employ a person who is not entitled to work in the UK and the company has a duty to check that all new employees are entitled to work here. This check gives the company an excuse against payment of a civil penalty and/or a defense against conviction if it is later found to have employed an illegal migrant worker.

Under the Act, employers are liable to payment of a civil financial penalty if they employ a person aged 16 or over who is subject to immigration control and who has no permission to work in the United Kingdom, or who is in breach of their conditions of stay in the United Kingdom. If it is proved that an employer has knowingly employed an illegal migrant worker there is the possibility of prosecution, an unlimited fine and a maximum two year prison sentence.

All external job applicants will be required to produce the necessary original documents (photocopies are not acceptable) which employers must check in accordance with the Act. The onus remains on the potential employee to demonstrate that they are permitted to do the job the company is offering and are eligible to work in the UK.

To ensure we do not breach immigration legislation, the company will check and record certain specified documents belonging to potential and existing employees. The required documents are set out in List A and List B of the home office right to work checklist (appendix 1); this form will be provided to all potential employees and will be available for inspection by all employees. These checks will be made before the applicant is hired by the company and every twelve months during employment, records will be kept of file for at least 2 years.

In complying with our obligations under immigration rules, care will be taken to ensure the company does not unlawfully discriminate against individuals on racial or ethnic grounds or in respect of any other protected characteristic under equality legislation. This policy will be used in conjunction with our equal opportunity and diversity policy and the company’s recruitment procedures.

Any employee of the company who fails to comply with the correct procedures as set out by the company will be subject to disciplinary charges. Any employee who is subsequently found not to have the right to work in the UK is liable for dismissal.

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
Review Date:	04/09/2023

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WHISTLEBLOWING POLICY

Introduction

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct. The organisation is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the complaints procedure, bullying policy and other specifically laid down statutory reporting procedures.

Policy Aim

This procedure applies to all the organisations' employees and contractors. This procedure does not replace other policies or procedures. For example, if an employee has a grievance about their working conditions, they should use the organisations Grievance Procedure or, if they felt that their manager or a colleague was treating them unfavourably, they should use the organisations Bullying Procedure.

If an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their manager, or if that is not possible, speak with the director.

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Serious Health and Safety risks
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, suppliers or clients
- Abuse of authority
- Other unethical conduct

Signed:	
Position:	DIRECTOR
Date Signed:	05/09/2022
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Responsibilities

Our Director will:

Have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Reporting

The organisation recognises that the decision to make an allegation can be a difficult one to make. However, whistle-blowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty.

The organisation will take appropriate action to protect a whistle-blower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Confidentiality

The organisation will not disclose the whistle-blower's identity without consent to anyone other than a person involved in the investigation/allegation.

Anonymous Allegations

This procedure encourages whistle-blowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the directors.

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue Allegations

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation.

However, disciplinary action may be taken against a whistle-blower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

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Procedure for Making an Allegation

It is preferable for allegations to be made to an employee's manager to whom they report. This may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in the position to have contributed to the allegation);
- The specific reason for the allegation.

Someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Processing an Allegation

The manager will record details of the allegation gathering as much information as possible, including:

- The record of the allegation;
- The acknowledgement of the allegation;
- Any documents supplied by the whistle-blower

The investigator will ask the whistle-blower for his/her preferred means of communication and contact details and use these for all communications with the whistle-blower in order to preserve confidentiality.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the Directors and a decision will be made as to whether to inform the Police.

If the allegation concerns suspected harm to children, the appropriate authorities will be informed immediately.

This is not limited to the above and each case will be assessed on a case by case basis.

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Timeframe

The organisation will acknowledge the allegation in writing within 10 working days with:

- An indication of how the organisation propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistle-blower support mechanisms
- Indication whether further investigations will take place and if not, why not

Where the allegation has been made internally and anonymously, obviously the organisations will be unable to communicate what action has been taken.

Support

The organisation will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings the organisation will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

The organisation accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistle-blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Directors.

The Directors will monitor the operation of the procedure and on the whistleblowing, allegations made during the period covered by the report. The report will be in a form which does not identify whistle-blowers.

Independent advice

Independent advice and support can be obtained from Protect (formerly known as 'Public Concern at Work') (Independent Whistleblowing Charity).

Email address: whistle@protect-advice.org.uk

Tel: 0203 117 2520

Website: www.protect-advice.org.uk