



# Company Policies 2026

# Contents

Allergenic Ingredient Policy.....	3
Anti-Corruption and Bribery Policy.....	4
Anti-Slavery and Human Trafficking Policy .....	7
Carbon Reduction Policy .....	11
Charitable Giving and Community Investment policy.....	12
Data protection policy.....	14
Disciplinary Procedure .....	16
Disclosure and Barring Service (DBS) Policy .....	22
Equal Opportunities and Diversity Policy.....	23
Employee Volunteering Policy.....	26
Environmental Policy.....	27
Equal Opportunities Policy .....	28
Food Safety Policy .....	29
Health and Safety Policy .....	30
Quality Policy .....	31
Safeguarding Policy.....	32
Supply Policy.....	35
Training Policy .....	37
Waste Policy.....	38
Whistleblowing Policy .....	39



# Allergenic Ingredient Policy

TNS Catering Management Ltd (TNS) will take all steps to ensure that the requirements of the Food Information Regulations 2013 and any relevant governmental guidance are met in full. TNS recognises the risks that the consumption of allergenic ingredients by our customers may present and will take appropriate steps to ensure that such hazards and associated risks are properly controlled.

TNS will endeavour to ensure that we are fully aware of the allergenic ingredient content of all our foods, both within raw material ingredients and finished products. Furthermore, we will make sure that mechanisms for the identification of allergenic ingredients to our customers are provided at the point of food service.

TNS will provide relevant training to our catering and food service personnel, ensuring that they understand allergenic ingredient hazards, risks and associated controls. We will ensure that our staff take steps to avoid accidental contamination of foods with allergenic ingredients and provide correct and detailed information to our customers upon request.

The procedure that accompanies this Policy details the controls that TNS intend to implement and maintain. These procedures will be made available to all TNS and food service staff.



# Anti-Corruption and Bribery Policy

## INTRODUCTION

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- a. set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b. provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## WHAT IS BRIBERY AND CORRUPTION?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

### Examples:

**Offering a bribe** - you offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

**Receiving a bribe** - a supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

**Corruption** is the abuse of entrusted power or position for private gain.

## GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships, improving or maintaining our image or reputation or marketing or presenting our products and/or services effectively.

You are prohibited from accepting a gift from or giving a gift to a third party.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## **WHAT IS NOT ACCEPTABLE?**

It is not acceptable for you (or someone on your behalf) to:

- a. give, promise to give, or offer; a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b. give, promise to give, or offer; a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- c. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e. threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f. engage in any activity that might lead to a breach of this policy.

## **FACILITATION PAYMENT AND KICKBACKS**

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **POTENTIAL RISK SCENARIOS: “RED FLAGS”**

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your line manager:

- a. you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- b. you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them;
- c. a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us;
- d. a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- e. a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- f. a third party requests an unexpected additional fee or commission to “facilitate” a service;
- g. a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- h. a third party requests that a payment is made to “overlook” potential legal violations;
- i. a third party requests that you provide employment or some other advantage to a friend or relative;
- j. you receive an invoice from a third party that appears to be non-standard or customised;
- k. a third party insists on the use of side letters or refuses to put terms agreed in writing;
- l. you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;

- m. a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- n. you are offered an unusually generous gift or offered lavish hospitality by a third party.

## **YOUR RESPONSIBILITIES**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further “red flags” that may indicate bribery or corruption are set out above.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

## **RECORD KEEPING**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

## **HOW TO RAISE A CONCERN**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

## **WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **PROTECTION**

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.



# Anti-Slavery and Human Trafficking Policy

## POLICY STATEMENT

TNS Catering Management Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chain.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to ensuring transparency in our operations and supply chains. As a UK-based contract catering company employing over 500 colleagues across more than 100 client locations, we take a zero-tolerance approach to slavery, servitude, forced labour, and human trafficking.

We expect the same high standards from all contractors, suppliers, business partners and other stakeholders.

## SCOPE

This policy applies to:

- All employees (permanent, fixed-term, temporary, casual and agency workers)
- Directors and senior management
- Contractors and consultants
- Suppliers and sub-contractors
- Any third parties acting on behalf of TNS

This policy applies to all business operations within the United Kingdom and to all supply chains that support our catering operations.

## OUR BUSINESS AND SUPPLY CHAIN

TNS Catering Management Ltd provides contract catering services across corporate offices, education settings, healthcare environments, and leisure venues throughout the UK.

Our supply chains typically include:

- Food and beverage suppliers
- Fresh produce and meat suppliers
- Packaging providers
- Cleaning and hygiene suppliers
- Facilities and maintenance contractors
- Uniform and workwear suppliers
- Agency labour providers

We recognise that risks of modern slavery can exist within food production, agriculture, manufacturing, cleaning services, logistics, and agency labour markets.

## DEFINITIONS

Modern slavery encompasses:

- Slavery and servitude
- Forced or compulsory labour
- Debt bondage
- Human trafficking
- Exploitative labour practices
- Child labour

Exploitation may involve coercion, threats, deception, abuse of vulnerability, or restriction of movement.

## RESPONSIBILITIES

### Board of Directors

The Board has overall responsibility for ensuring compliance with the Modern Slavery Act 2015 and for approving the annual Modern Slavery Statement.

### Senior Management

Senior leaders are responsible for:

- Implementing effective anti-slavery systems and controls
- Ensuring compliance within their operational areas
- Monitoring high-risk areas
- Reporting concerns appropriately

### Managers

Site managers and operational leaders must:

- Ensure fair recruitment practices
- Monitor agency labour use
- Be vigilant for signs of exploitation
- Escalate concerns immediately

### Employees

All employees must:

- Understand this policy
- Report any suspected breaches
- Cooperate with investigations

## RISK ASSESSMENT AND DUE DILIGENCE

We conduct risk assessments across our business and supply chain, particularly focusing on:

- High-risk product categories (e.g. imported produce, meat processing)
- Agency labour usage
- Low-skilled and migrant workforce areas
- High turnover environments

Our due diligence processes include:

- Supplier onboarding questionnaires
- Supplier Code of Conduct
- Contractual clauses requiring compliance with anti-slavery laws
- Right-to-work verification
- Audit and monitoring processes
- Use of reputable labour providers

Where risks are identified, we will:

- Engage directly with suppliers
- Require corrective action plans
- Terminate contracts where necessary

## RECRUITMENT AND EMPLOYMENT PRACTICES

We are committed to ethical recruitment and:

- Conduct right-to-work checks in accordance with UK law
- Do not charge recruitment fees to workers
- Ensure wages comply with National Minimum Wage legislation
- Provide written contracts of employment
- Monitor working hours and overtime
- Prohibit retention of passports or personal documents

Agency workers must be sourced from reputable providers who adhere to ethical recruitment standards.

## **IDENTIFYING SIGNS OF MODERN SLAVERY**

Managers and employees should be alert to indicators such as:

- Workers appearing fearful, withdrawn or controlled
- Lack of personal identification documents
- Signs of physical abuse or poor living conditions
- Inconsistent payment arrangements
- Individuals not in control of their own finances

## **REPORTING CONCERNS**

Any employee who suspects modern slavery must report concerns immediately to:

- Their line manager
- HR Department
- A Board Director

Reports will be handled sensitively and confidentially. No employee will suffer detriment for raising concerns in good faith.

Where appropriate, concerns may be reported to relevant authorities including:

- Gangmasters and Labour Abuse Authority
- National Crime Agency

## **TRAINING AND AWARENESS**

We provide:

- Modern slavery awareness training for managers
- Induction training covering ethical standards
- Guidance for procurement teams
- Updates where legislation or risk changes

Training is proportionate to role and risk exposure.

## **SUPPLIER EXPECTATIONS**

All suppliers must:

- Comply with the Modern Slavery Act 2015
- Implement their own anti-slavery policies
- Allow audits where reasonably required
- Cascade standards throughout their supply chains

Failure to meet our standards may result in supplier contract termination.

## **MONITORING AND REVIEW**

We measure effectiveness through:

- Supplier compliance rates
- Audit findings
- Reported concerns
- Training completion rates

This policy will be reviewed annually and updated as required.

This policy has been approved by the Board of Directors.

### **What we have already introduced:**

- We reuse, or recycle in accordance with client facilities and waste streams.
- We minimise the use of paper in our offices using email, this has greatly reduced the amount of paper used within the workplace, and previously we would have sent hard copy correspondence in the post, letters in the post. Processing information electronically is also much more energy and carbon efficient than physically sending hard copy correspondence.
- We have installed multi-function devices to handle faxing, printing and photocopying demands in our offices; this greatly helps reduce energy and also reduces paper usage.
- We supply internal recycle bins for our office paper.
- Our consumption of fuel and energy is closely monitored and we take care that it is not wasted through inefficiency or casualness. We use signage to remind staff to turn off lights when leaving a room, and ask staff to use computers responsibly i.e turning them off at night and using standby mode during the daytime when not in use.
- We recycle mobile phones and printer cartridges.
- We recycle the fluorescent light tubes in our offices.
- We ensure that all our work places either in our offices or out on site adhere to current environmental standards and energy conservation requirements.
- Introduced filtered water to minimise consumption of bottled water.

### **What we intend to do for the future:**

- We intend to purchase our electricity from suppliers who re-invest in renewable energy sources.
- Where possible we will source our materials from suppliers who operate in an environmentally friendly manner and who are geologically local to us to reduce road traffic, road traffic costs and carbon emissions.
- We will choose vehicles with fuel efficiency and CO<sub>2</sub> emissions when company vehicles are due for replacement. Fuel efficiency and mileage will be closely monitored.
- We will encourage suppliers to strive for the same level of environmental care as we provide to offset their carbon footprint.
- We will deliver awareness training on green issues and sustainable development to all employees in order to inspire them to reduce their carbon footprint and encourage them to take action to offset their carbon footprint in innovative ways.
- We will strive to reduce our carbon footprint year on year by measuring and calculating current standards in our office.
- We will identify and quantify the sources of carbon emissions.
- We will identify carbon reduction initiatives.



# Carbon Reduction Policy

It is the stated policy of the TNS Catering to reduce its environmental impact where practicable.

Carbon reducing measures form an integral part of the company strategy, helping us to improve both operational performance and a reduction in potentially harmful emissions to land, water, and air.

Our ultimate aim is for a 0% carbon balance to be achieved by 2030.

To help achieve this, TNS will:

- Comply with all current legislation, seeking to meet or better legislative targets.
- Minimize waste, promote recycling and the use of recycled products to help reduce the burden on landfill, and corresponding methane generation.
- Continue to promote and support the objectives of the policy.
- Promote environmental awareness and responsibility amongst employees and others, and seek where practicable to continuously improve our environmental performance.
- Actively promote telephone conferencing as a means of reducing travel requirements.
- Evaluate the potential benefits of carbon in-setting and off-setting.

Current Actions:

- Integration of environmental issues into all aspects of the decision-making processes.
- Sustainable sourcing procurement policies.
- Evaluation of energy efficient and correspondingly carbon reducing equipment and vehicles.
- The assessment and procurement of fuel-efficient vehicles.
- Minimising food miles and sourcing locally
- Reduction of disposables and single use items

This Carbon Footprint Policy Statement underpins the existing Environmental, Procurement, Waste Management, Quality Assurance, Health & Safety, and Corporate Responsibility Policies already implemented throughout TNS.

## CARBON FOOTPRINT POLICY

TNS Catering recognises that our work may have a direct or indirect effect on the local and / or regional environment. We are therefore committed to reducing any harm that this may cause. Our carbon footprint is to constantly look for ways in which we can improve our green credentials, we are achieving this by holding regular meetings to explore ways to achieve our statement promises and to link with other likeminded organisations. Our strategy is aligned with our company environmental policy and company sustainability policy and current codes of practice on waste and environment protection.

**We will focus on:**

- Reducing waste
- Reducing materials at every opportunity
- Repair rather than throw away where we can
- Recycle at any given opportunity.

**As our “Green” culture becomes established and embedded we aim to:**

- Encourage our employees and suppliers to be responsible, corporate green citizens
- Utilise energies and water sparingly
- Consider environmental impacts in our purchasing
- Endeavour to work with partnering organisations that share our ethos on “carbon footprint”
- Reduce the need for transport and its impacts on the environment.

It is our intention to operate our business in an environmentally friendly and sustainable way as possible.



# Charitable Giving and Community Investment policy

We are committed to making a positive impact on our community through charitable giving and community investment. As a business, we believe it's essential to contribute to causes that align with our corporate values and priorities. To guide our philanthropic efforts, we have developed a corporate policy that outlines our approach to charitable giving and community investment.

## **IDENTIFYING CORE VALUES:**

We have identified the core values and principles that matter most to our company. These include food poverty and healthcare.

## **CONTINUAL SUPPORT:**

Long term support provides greater stability for charitable organisations. Therefore, every year we invest in and support our 3 core charities, these are Macmillan Cancer Research, Guide Dogs for the Blind and Midlands Air Ambulance. As with TNS, these companies are based in the West Midlands and are local to our operation.

## **COLLEAGUE VALUES:**

As a people focussed organisation, we support the issues that are important to our colleagues. All colleague requests for charitable support are considered and decisions made on an individual basis. In 2023 these included supporting Mind and the SSAFA.

## **RESEARCH AND DUE DILIGENCE:**

Before making any charitable donations or community investments, we conduct thorough research to identify reputable organisations and projects that are in line with our values. We examine their mission, financial transparency, and effectiveness in achieving their goals.

## **LOCAL AND GLOBAL IMPACT:**

We believe in supporting both local and global initiatives. We allocate a portion of our charitable funds to address local community needs and another portion to tackle broader global issues.

## **LONG-TERM IMPACT:**

We prioritise projects and organisations that focus on sustainable, long-term impact rather than short-term fixes. We believe in empowering individuals and communities to become self-sufficient.

## **DIVERSITY AND INCLUSION:**

We are committed to promoting diversity and inclusion in all our charitable endeavours. We seek out organisations that champion these principles and work to address systemic inequalities.

## **COLLABORATION:**

We actively seek opportunities to collaborate with other businesses, organisations, and philanthropic groups to amplify the impact of our contributions.

## **FINANCIAL PLANNING:**

We ensure that our charitable giving is well-integrated into our overall financial plan, allowing us to give consistently and sustainably without jeopardising our own financial stability.

## **TRANSPARENCY AND REPORTING:**

We value transparency in all our philanthropic endeavours. We keep records of our donations and investments, and we are open to sharing this information with stakeholders who might be interested.

## **RE-EVALUATION AND ADAPTATION:**

Our charitable giving and community investment policy is not static. We regularly re-evaluate and adapt it to stay aligned with changing circumstances, emerging needs, and our corporate growth.

In conclusion, we are deeply committed to making a positive difference in our community and beyond through our charitable giving and community investment efforts. This policy serves as our guiding framework to ensure that we contribute meaningfully to causes that matter to our business and the world at large.



# Data protection policy

Data protection legislation regulates the way in which personal data about employees, both in paper and electronic form, is collected and processed the following will inform you of the type of personal data that TNS Catering Management Ltd (TNS) keeps about you and the purposes for which this is kept.

'Personal data' is any information that relates to a living individual who can be identified from that information. 'Special categories of personal data' is information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and any biometric data.'

Throughout employment and for specified periods only, after the termination of employment, TNS will need to process personal data about you for purposes connected with your employment, including recruitment and termination. Processing includes the collection, usage, storage, retrieval, alteration, disclosure or destruction of data.

The kind of data that TNS will process includes:

- your CV and/or completed application form including education history and employment history
- any references obtained during the recruitment process including information relating to pre-employment checks including your right to work in the UK and any other conditional employment checks i.e. a DBS check;
- details of your terms and conditions of employment;
- payroll details including your personal bank details;
- tax and national insurance information including your national insurance number;
- details of your job duties;
- details of health and sickness absence records;
- details of holiday records;
- information about performance, including training records;
- details of any disciplinary investigations and proceedings and/or grievances raised;
- contact names, addresses, your date of birth, email address and telephone numbers; and
- correspondence with TNS and other information that you have given TNS.

TNS will manage employee personal data, which is collected and processed, in line with the following Data Protection Principals:

- personal data will be processed lawfully, fairly and in a transparent manner
- personal data will only be collected for specified, explicit and legitimate purposes
- personal data will be processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing
- personal data will be kept accurate and all reasonable steps will be taken to ensure that inaccurate personal data is rectified or deleted without delay
- personal data will be kept only for the period necessary for processing
- appropriate measures will be taken to ensure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

The personal data, and in some cases 'special categories of personal data', held by TNS will be collected and processed, with your consent, for managing and administering your contract of employment and/or for a specific legal reason and/or legitimate business reason associated with your contract of employment. Also, in line with managing and administering your contract of employment, TNS may, from time to time, need to disclose some personal data it holds about you to relevant third parties (e.g. where legally obliged to do so by H M Revenue & Customs or where requested to do so by you for the purpose of giving a reference).

You will be notified of this processing in TNS's Employee Privacy Notice and you will be asked to complete a Consent Form when your employment commences.

You have the right to make a subject access request (SAR) either by completing a Subject Access Request Form or by submitting your request in writing. In some cases, we may need to ask for proof of identification before your request can be processed. Upon receipt of such a request, and within a period of one-month TNS will tell you:

- if your personal data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from you;
- to whom your personal data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) (if applicable) and the safeguards that apply to such transfers;
- for how long your personal data is stored (or how that period is decided);
- your rights to rectification, erasure, restriction or objection to processing of your data;
- your right to complain to the Information Commissioner if you think TNS has failed to comply with your data protection rights; and
- whether or not TNS carries out automated decision-making and the logic involved in any such decision-making. You will also receive a copy of your personal data, which will normally be in electronic format unless you specify otherwise.

If you require additional copies then TNS may charge a fee, which will be based upon the administrative cost to the organisation of providing the additional copies. In some cases where large amounts of personal data are processed, TNS may complete your request within three months of the date your request was received, rather than within one month. You will be notified of this extension, should it be necessary to apply it.

If it is considered that a subject access request is manifestly unfounded or excessive, TNS is not obliged to comply with it. Alternatively, TNS can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which TNS has already responded. If an employee submits a request that is unfounded or excessive, TNS will notify him/her that this is the case and whether or not it will respond to it.

If TNS becomes aware of a personal data breach, the Information Commissioner's Office will be notified within 72 hours of the discovery. TNS will also notify the employee or employees involved, where it is considered that the rights and freedoms of individuals will be adversely impacted because of the breach.



# Disciplinary Procedure

## DISCIPLINARY RULES

These Disciplinary Rules should be read in conjunction with our Disciplinary Procedure. The aim of the Disciplinary Rules and Disciplinary Procedure is to set out the standards of conduct expected of all employees and to provide a framework within which managers can work with staff to maintain those standards and encourage improvement where necessary.

It is our policy to ensure that any disciplinary matter is dealt with fairly and in accordance with the Disciplinary Procedure.

If you are in any doubt as to your responsibilities or the standards of conduct expected you should speak to your line manager.

While working for us you should at all times maintain professional and responsible standards of conduct. In particular you should:

- a. observe the terms and conditions of your contract, particularly with regard to:
  - (i) hours of work; and
  - (ii) confidentiality.
- b. observe all our policies, procedures and regulations which are included in this Handbook or notified to you from time to time by means of notice boards, email, the intranet or otherwise;
- c. take reasonable care in respect of the health and safety of colleagues and third parties and comply with our Health and Safety Policy;
- d. comply with all reasonable instructions given by managers; and
- e. act at all times in good faith and in our best interests and those of our customers and employees.

Failure to maintain satisfactory standards of conduct may result in action being taken under our Disciplinary Procedure.

The following are examples of matters that will normally be regarded as misconduct and will be dealt with under our Disciplinary Procedure (this list is intended as a guide and is not exhaustive.):

- a. minor breaches of our policies;
- b. minor breaches of your contract;
- c. damage to, or unauthorised use of, our property;
- d. poor timekeeping;
- e. time wasting;
- f. unauthorised absence from work;
- g. refusal to follow instructions;
- h. excessive use of our telephones for personal calls;
- i. excessive personal email or internet usage;
- j. obscene language or other offensive behaviour;
- k. negligence in the performance of your duties; and
- l. smoking in no-smoking areas.

Gross misconduct is a serious breach of contract and includes misconduct, which, in our opinion, is likely to prejudice our business or reputation or irreparably damage the working relationship and trust between employer and employee. Gross misconduct will be dealt with under our Disciplinary Procedure and will normally lead to dismissal without notice or pay in lieu of notice (summary dismissal).

The following are examples of matters that are normally regarded as gross misconduct (this list is intended as a guide and is not exhaustive):

- theft or fraud;
- physical violence or bullying or actual or threatened violence, or behaviour which provokes violence;
- deliberate and serious damage to property;
- serious misuse of our property or name;
- deliberately accessing internet sites containing pornographic, offensive or obscene material;
- serious insubordination or repeated or serious failure to obey instructions, or any other serious act of insubordination;
- unlawful discrimination or harassment;
- bringing the organisation into serious disrepute;
- being under the influence of alcohol, illegal drugs or other substances during working hours;
- causing loss, damage or injury through serious negligence;
- serious or repeated breach of health and safety rules or serious misuse of safety equipment;
- unauthorised use or disclosure of confidential information or failure to ensure that confidential information in your possession is kept secure;
- acceptance of bribes or other secret payments;
- accepting a gift from a customer, supplier, contractor or other third party in connection with your employment without prior consent from your line manager;
- conviction for a criminal offence that in our opinion may affect our reputation or our relationships with our employees, customers or the public, or otherwise affects your suitability to continue to work for us;
- possession, use, supply or attempted supply of illegal drugs;
- serious neglect of duties, or a serious or deliberate breach of your contract or operating procedures;
- knowingly breaching statutory rules affecting your work;
- unauthorised use, processing or disclosure of personal data contrary to our Data Protection Policy;
- harassment of, or discrimination against, employees, contractors, clients or members of the public, related to gender, marital or civil partner status, sexual orientation, pregnancy and maternity, gender reassignment, race, colour, nationality, ethnic or national origin, disability, religion or belief or age contrary to our Equal Opportunities and Diversity Policy;
- refusal to disclose any of the information required by your employment or any other information that may have a bearing on the performance of your duties;
- giving false information as to qualifications or entitlement to work (including immigration status) in order to gain employment or other benefits;
- knowingly taking parental, paternity or adoption leave when not eligible to do so or for a purpose other than supporting a child;
- making a disclosure of false or misleading information under our Whistleblowing Policy maliciously, for personal gain, or otherwise in bad faith;
- making untrue allegations in bad faith against a colleague;
- victimising a colleague who has raised concerns, made a complaint or given evidence information under our Whistleblowing Policy, Grievance Procedure, Disciplinary Procedure or otherwise;
- serious misuse of our information technology systems (including misuse of developed or licensed software, use of unauthorised software and misuse of email and the internet) contrary to our Computer Usage, Internet and Email Policy;
- undertaking unauthorised paid or unpaid employment during your working hours; or; unauthorised entry into an area of the premises to which access is prohibited.

## **DISCIPLINARY PROCEDURE**

### **Introduction**

The aims of this Disciplinary Procedure and its associated Disciplinary Rules are to set out the standards of conduct and performance expected of all staff and to provide a framework within which managers can work with employees to maintain satisfactory standards of conduct and to encourage improvement where necessary.

It is our policy to ensure that any disciplinary matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action.

### **What is covered by the procedure?**

This procedure is used to deal with misconduct, and/or poor performance and unsatisfactory levels of absence. It does not apply to long-term capability absence or proposed redundancies.

Minor conduct and/or performance issues can often be resolved informally between you and your line manager. These discussions should be held in private and without undue delay whenever there is cause for concern. Where appropriate, a note of any such informal discussions may be placed on your personnel file. In some cases an informal verbal warning may be given, which will not form part of your disciplinary records. Formal steps will be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

You will not normally be dismissed for a first act of poor performance unless you have not yet completed your probationary period. You will not normally be dismissed for a first act of misconduct, unless we decide it amounts to gross misconduct or you have not yet completed your probationary period.

If you have difficulty at any stage of the procedure because of a disability, you should discuss the situation with your line manager as soon as possible.

### **Confidentiality**

Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with an investigation or disciplinary matter.

You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure, unless prior permission has been sought and granted by all parties present.

You will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against you, unless we believe that a witness's identity should remain confidential.

### **Investigations**

The purpose of an investigation is for us to establish a fair and balanced view of the facts relating to any disciplinary allegations against you, before deciding whether to proceed with a disciplinary hearing. The amount of investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents.

Investigative interviews are solely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary hearing has been held.

You do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a companion if it helps you to overcome any disability, or any difficulty in understanding English.

The Company may, when it considers it reasonable to do so in the circumstances, convene an investigation meeting via a video communication platform, e.g. Skype, Zoom or Facetime.

### **Criminal charges**

Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding whether to take formal disciplinary action.

We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.

## **Suspension**

In some circumstances we may need to suspend you from work. The suspension will be for no longer than is necessary to investigate the allegations and we will confirm the arrangements to you in writing. While suspended you should not visit our premises or contact any of our clients, customers, suppliers, contractors or employees, unless you have been authorised to do so by your line manager.

Suspension of this kind is not a disciplinary penalty and does not imply that any decision has already been made about the allegations. You will continue to receive your full basic salary and benefits during the period of suspension.

## **Notification of a hearing**

Following any investigation, if we consider there are grounds for disciplinary action, you will be required to attend a disciplinary hearing. We will inform you in writing of the allegations against you, the basis for those allegations, and what the likely range of consequences will be if we decide after the hearing that the allegations are true. We will also include the following where appropriate:

- a summary of relevant information gathered during the investigation;
- a copy of any relevant documents which will be used at the disciplinary hearing; and
- a copy of any relevant witness statements, except where a witness's identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

We will give you written notice of the date, time and place of the disciplinary hearing. The hearing will be held as soon as reasonably practicable, but you will be given a reasonable amount of time to prepare your case based on the information we have given you.

The Company may, when it considers it reasonable to do so in the circumstances, convene a disciplinary hearing via a video communication platform, e.g. Skype, Zoom or Facetime.

## **The right to be accompanied**

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may be either a trade union representative or a colleague. You must tell your line manager who your chosen companion is, in good time before the hearing.

A companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so.

If your choice of companion is unreasonable we may require you to choose someone else, for example:

- if in our opinion your companion may have a conflict of interest or may prejudice the hearing; or
- if your companion works at another site and someone reasonably suitable is available at the site at which you work; or
- if your companion is unavailable at the time a hearing is scheduled and will not be available for more than five working days.

We may, at our discretion, allow you to bring a companion who is not a colleague or union representative (for example, a member of your family) where this will help overcome a disability, or where you have difficulty understanding English.

## **Procedure at disciplinary hearings**

If you or your companion cannot attend the hearing you should inform us immediately and we will arrange an alternative time. You must make every effort to attend the hearing, and failure to attend without good reason may be treated as misconduct in itself. If you fail to attend without good reason, or are persistently unable to do so (for example for health reasons), we may have to take a decision based on the available evidence, in your absence.

At the disciplinary hearing we will go through the allegations against you and the evidence that has been gathered. You will be able to respond and present any evidence of your own. Your companion may make representations to us and ask questions, but should not answer questions on your behalf. You may confer privately with your companion at any time during the hearing.

You may ask relevant witnesses to appear at the hearing, provided you give us sufficient advance notice to arrange their attendance. You will be given the opportunity to respond to any information given by a witness.

We may adjourn the disciplinary hearing if we need to carry out any further investigations such as re-interviewing witnesses in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

We will inform you in writing of our decision and our reasons for it, usually within one week of the disciplinary hearing. Where possible we will also explain this information to you in person.

### **Disciplinary penalties**

The usual penalties for misconduct and/or poor performance are set out below. No penalty should be imposed without a hearing. We aim to treat all employees fairly and consistently, and a penalty imposed on another employee for similar misconduct or poor performance will usually be taken into account but should not be treated as a precedent. Each case will be assessed on its own merits.

Stage 1 - First written warning. It will usually be appropriate for a first act of misconduct or poor performance where there are no other active written warnings on your disciplinary record.

Stage 2 - Final written warning. It will usually be appropriate for:

- misconduct or poor performance where there is already an active written warning on your record; or
- misconduct or poor performance that we consider sufficiently serious to warrant a final written warning even though there are no other active warnings on your record.

Stage - Dismissal. It will usually only be appropriate for:

- any misconduct or poor performance during your probationary period;
- further misconduct or poor performance where there is an active final written warning on your record; or
- any gross misconduct regardless of whether there are active warnings on your record. Gross misconduct will usually result in immediate dismissal without notice or payment in lieu of notice (summary dismissal). Examples of gross misconduct are set out in our Disciplinary Rules.

In some cases we may at our discretion consider alternatives to dismissal. These will usually be accompanied by a final written warning. Examples include:

- demotion;
- transfer to another department or job;
- a period of suspension without pay;
- loss of seniority;
- reduction in pay;
- loss of future pay increment or bonus; or
- loss of overtime.

### **The effect of a warning**

Written warnings will set out the nature of the misconduct or poor performance, the change in behaviour or improved performance required, the period for which the warning will remain active, and the likely consequences of further misconduct or poor performance in that active period.

A first written warning will usually remain active for six months and a final written warning will usually remain active for 12 months. Your conduct or performance may be reviewed at the end of a warning's active period and if it has not improved sufficiently we may decide to extend the active period.

After the active period, the warning will remain permanently on your personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings, unless there is a pattern of misconduct or an unsatisfactory absence pattern recurring soon after a live warning has expired. In this case the previous warning will be discussed and considered as part of the overall case.

## Appeals against disciplinary action

If you feel that disciplinary action taken against you is wrong or unjust or if you believe that this procedure was not followed correctly then you should appeal in writing, stating your full grounds of appeal within one week of the date on which you were informed of the decision.

If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if your appeal is successful you will be reinstated with no loss of continuity of service or pay.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing.

We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

Where possible, the appeal hearing will be conducted impartially by a more senior manager who has not been previously involved in the case. You may bring a companion with you to the appeal hearing (as detailed above).

The Company may, when it considers it reasonable to do so in the circumstances, convene a disciplinary hearing or appeal hearing via a video communication platform, e.g. Skype, Zoom or Facetime.

Following the appeal hearing we may:

- confirm the original decision;
- revoke the original decision; or
- substitute a different penalty.

32.12.9 We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.



# Disclosure and Barring Service (DBS) Policy

As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, TNS Catering Management Ltd (TNS) complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.

TNS can only ask an individual to provide details of convictions and cautions that TNS are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended) and where appropriate Police Act Regulations (as amended), TNS can only ask an individual about convictions and cautions that are not protected.

TNS is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

TNS actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. TNS select all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

Unless the nature of the position allows TNS to ask questions about your entire criminal record, except for certain spent convictions and cautions which are 'protected' so not subject to disclosure to employers and that cannot be taken into account, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in TNS who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

TNS makes every subject of a criminal record check submitted to DBS aware of the existence of the Code of Practice and makes a copy available on request.

TNS undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.



# Equal Opportunities and Diversity Policy

## POLICY STATEMENT

TNS Catering Management Ltd (TNS) is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination, harassment, victimisation and bullying and in which all decisions are based on merit.

TNS does not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics). It will not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

The principles of non-discrimination and equality of opportunity also apply to the way in which employees treat former employees, current employees, visitors, clients/customers, suppliers and former employees.

TNS also recognises and acknowledges that everyone is different and, in some cases, an equal approach may not consider important factors associated with diversity such as cultural differences. TNS will always seek to balance its approach in dealing with candidates, employees, visitors, clients/customers, suppliers and former employers in order to recognise equality and diversity.

All employees have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other employees, regardless of their status.

## SCOPE AND PURPOSE OF THIS POLICY

This policy applies to all aspects of the Company's relationship with employees and to relations between candidates, employees, visitors, clients/customers, suppliers and former employees at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, terms and conditions of employment; service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

TNS will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

## DEFINITIONS

Equality is about managing differences to eliminate discrimination, so that everyone has equality of opportunity through a fair and consistent approach to the application of rules, policies and procedures. This may, on occasions, result in treating people differently.

Diversity is about acknowledging, understanding, recognising and valuing differences and everyone.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Perceptive discrimination is also direct discrimination, where someone is treated less favourably because it is perceived that they possess a protected characteristic. It applies even if the individual does not actually possess the protected characteristic.

Associative discrimination is also direct discrimination, where someone is treated less favourably because they associate with another individual who possesses a protected characteristic.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment/bullying related to any of the protected characteristics is prohibited.

Victimisation is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint. Victimisation is also prohibited.

## **RESPONSIBILITY**

All employees have a duty to act in accordance with this policy. Behaviour, actions or words that transgress this policy will not be tolerated and will be dealt with in line with the Company's Disciplinary Procedure.

TNS, its Directors and Managers will:

- Address circumstances where unfairness or inconsistency exists;
- Promote considerate and fair behaviour;
- Demonstrate that equality and diversity are key components to the Company's day-to-day business;
- Ensure all HR policies and practices i.e. recruitment and selection, compensation and benefits, induction, training and development, discipline and grievance management, absence management, processing and management of employee information etc., are regularly reviewed and fully complied with in order to ensure the principals of equality and diversity are fully adhered with.
- Ensure complaints can be raised without fear of reprisal;
- Encourage equality and diversity at each site from which the Company operates;
- Treat employees with dignity and respect; and
- Value employees' individual skills and contribution to the business.

## **RECRUITMENT AND SELECTION**

TNS aims to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. We take steps to ensure that our vacancies are advertised to a diverse labour market.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with Company Director approval. For example:

- a. Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- b. Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- c. Positive action to recruit disabled persons.
- d. Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of a Company Director (who should first consider whether such matters are relevant and may lawfully be taken into account).

TNS is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, the Company monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps the Company take appropriate steps to avoid discrimination and improve equality and diversity.

## **EMPLOYEE TRAINING AND PROMOTION**

Employee training needs will be identified through regular staff appraisals. All employees will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

## **TERMINATION OF EMPLOYMENT**

TNS will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

TNS will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## **DISABILITY DISCRIMINATION**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you and your medical adviser(s) about possible adjustments. TNS will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

TNS will monitor the physical features of its premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

## **FIXED-TERM EMPLOYEES AND AGENCY WORKERS**

TNS will monitor its use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

## **PART-TIME WORK**

TNS will monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities.

## **BREACHES OF THIS POLICY**

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations, which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any employee who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.



# Employee Volunteering Policy

At TNS, we believe in fostering a strong sense of corporate social responsibility and a commitment to giving back to the communities in which we operate. Our Employee Volunteering Policy outlines our approach to encouraging and supporting our employees in their volunteering efforts.

## 1. Purpose

Our Employee Volunteering Policy is designed to encourage and support our employees in actively participating in volunteer activities. In turn this strengthens our corporate social responsibility by contributing to the well-being of the communities we serve.

## 2. Eligibility

All full-time and part-time employees are eligible to participate in volunteer activities.

## 3. Volunteer Time Off (VTO)

To maintain flexibility and maximise colleague opportunities we do not have prescribed limits on Volunteer Time Off VTO. Any requests for VTO are assessed on a case by case basis.

## 4. Types of Volunteer Activities

Employees can choose to participate in a wide range of volunteer activities, including, but not limited to, community service, fundraising events, food drives, environmental initiatives, mentoring, and educational programs.

## 5. Reporting and Documentation

Employees engaging in volunteering are required to document their volunteer hours and provide proof of participation.

## 6. Safety and Liability

While participating in volunteer activities, employees must adhere to safety guidelines and instructions provided by the host organisation.

## 7. Non-Discrimination

We do not tolerate any form of discrimination or harassment related to volunteering activities. All employees are encouraged to report any incidents of discrimination or harassment.

## 8. Amendments

This policy may be reviewed and updated periodically to ensure its effectiveness. Employees will be informed of any changes to the policy. We believe that by actively participating in volunteer activities, we can make a positive impact on the communities we serve. This Employee Volunteering Policy reflects our commitment to fostering a culture of giving and corporate social responsibility within our organisation.



# Environmental Policy

The company are committed to a positive and responsible course of action with regard to those aspects of the business which impact upon the environment. It seeks always to act in accordance with good practice, preserving and, where possible, enhancing the quality of the environment.

Commitment to the environment is demonstrated by maintaining an Environmental Management System, which meets the requirements of ISO 14001 and is focused on continuously improving the environmental performance of the business. Key components of the system include the establishment of environmental objectives and targets, which require the company to achieve continual improvement and the establishment of programmes to ensure satisfaction of these improvements, objectives and targets.

The strategy addresses the following key areas to:

- Review and reduce the environmental impacts of our operations
- Increase employee environmental awareness and training
- Protect natural resources, through pollution prevention and emergency response
- Ensuring the company is a good neighbour
- Recycle materials and minimise waste
- Comply to all planning permission and license requirements

Management, staff and employees are encouraged to liaise and work closely with suppliers, sub-contractors, regulators and customers to ensure the services will meet and exceed all regulatory requirements and other applicable requirements.

Questions and enquiries should be directed to the Environmental Lead.

This policy is publicly available.



# Equal Opportunities Policy

## **POLICY STATEMENT**

TNS is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

TNS does not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

The principles of non-discrimination and equality of opportunity also apply to the way in which employees treat visitors, clients, customers, suppliers and former employees.

All employees have a duty to act in accordance with the Company's Equal Opportunities Policy (the 'Policy'), contained in the Company Handbook and treat colleagues with dignity at all times, and not to discriminate against or harass other employees, regardless of their status.

## **SCOPE AND PURPOSE OF THE POLICY**

The Policy applies to all aspects of the Company's relationship with employees and to relations between employees at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures and termination of employment.

TNS will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.



# Food Safety Policy

TNS Catering Management Ltd (TNS) firmly believes in providing its customers with a high-quality service and high quality safe and wholesome food.

TNS wholly accepts its legal duty to comply with the Food Hygiene (England) Regulations 2013 and Regulation (EC) 853/2004 of the European Parliament on the hygiene of food stuffs and all subordinate legislation. It recognises that food production areas must be maintained to a high standard of cleanliness and that food should be handled in such a way as to ensure that it does not become contaminated during its delivery, storage, preparation, service and distribution.

We further recognise the need for effective temperature control of all foods likely to support the growth of micro-organisms.

The emphasis of the food safety Policy is on management control of food safety. The Policy has been produced as a result of a HACCP assessment to provide a framework for control throughout the food operation. All suppliers are also expected to have such a philosophy.

All staff are required to abide by the Policy and all procedures that are laid down by the management. Staff are expected to make every effort to maintain all written procedures.

It is our main aim to operate the business with all due diligence and regards this as a priority, in line with productivity and customer satisfaction.



# Health and Safety Policy

TNS Catering Management Ltd (TNS) will do all in its power to ensure employees' well-being and safety whilst at work. If you become aware of any potential hazard or unsafe working conditions, you should have no hesitation raising them with your line manager or any other member of the management team.

You are required to take all reasonable steps to safeguard your health and safety, and that of any other person who may be affected by your actions, and to observe at all times published safety and fire rules and procedures.

All employees working in production areas **MUST** at all times wear any personal protective equipment (P.P.E.) issued by the Company. A refusal to comply with this rule will result in the individual being invited to attend a disciplinary hearing with the possibility of subsequent disciplinary action being taken.

You must report to management and enter into the Accident Book all accidents, no matter how small.

Failure to comply with health and safety rules and instructions or this policy may be treated as misconduct and dealt with under the Disciplinary Procedure.



# Quality Policy

It is the Policy of TNS Catering Management Ltd (TNS) to provide a professional and customer focused service that meets the needs of our customers.

The following principles are applied throughout the company:

- a. Full commitment of all personnel to deliver a quality of service. It is also our intention to improve customer satisfaction level by inviting comment through our customer questionnaires.
- b. Full commitment of all personnel to have active involvement in making improvements.
- c. Full commitment to using Environmentally Friendly products and promoting wherever possible, the re-cycling or reuse of old materials.
- d. Full commitment to ongoing training and development of our colleagues.
- e. Full understanding by all colleagues of long-term importance of achieving customer satisfaction and their role in ensuring that their failure to meet standards will lead to the company failing to meet customer requirements.
- f. An appreciation that a consistent quality service can only be achieved by ensuring control at each stage of service delivery, with the ultimate aim of achieving efficient service delivery with no problems or complaints.

A company-wide Quality System is in operation which is designed to comply with the requirements of ISO 9001 as well as continually improve and review the effectiveness of these systems.

The ISO system defines the commitments of the company, and the complementary Quality Procedures are employed to support our Customer Satisfaction objectives. Objectives and Targets are set at management meetings.



# Safeguarding Policy

## PURPOSE

The purpose of this policy and the associated procedures is to protect and promote the welfare of the children, young people and adults using or receiving services provided or commissioned by TNS Catering Management Ltd (TNS) and to support TNS, its employees and other workers in fulfilling their responsibilities to vulnerable groups.

All employees and other workers of TNS have a clear responsibility to take action when they suspect or recognise that a child, young person or vulnerable adult may be a victim of significant harm or abuse.

This policy demonstrates how TNS will meet its legal obligations and reassure customers or clients, members of the public, employees, volunteers and others working for TNS.

## LEGAL DUTIES

TNS is committed to complying with The Children Act 1989, which states that the child's welfare, is paramount and that every child has a right to protection from abuse, neglect and exploitation.

TNS also respects the UN Convention on the Rights of the Child.

TNS shall carry out its responsibilities by ensuring that the needs and interests of children, young people and vulnerable adults, are considered by all employees and other workers, when taking decisions, in relation to service provision.

## POLICY STATEMENT

TNS is committed to safeguarding children, young people and vulnerable adults from abuse when they are engaged in services organised and provided by, or on behalf of, TNS.

TNS will endeavour to keep service users safe from abuse. Suspicion of abuse will be responded to promptly and appropriately. We will always act in the best interests of the child, young person or vulnerable adult.

TNS will ensure that unsuitable people are prevented from working with children, young people and vulnerable adults through robust 'safer recruitment' procedures.

TNS will deal with any concern raised by an employee, other worker, customer, client, contracted service provider or member of the public appropriately and sensitively.

Safeguarding referrals cannot be anonymous and should be made in the knowledge that, during the course of enquiries, the referrers may be required as prosecution witnesses.

TNS will not tolerate harassment of any employee, volunteer, contracted service provider or child, young person or vulnerable adult who raises concerns of abuse or neglect.

TNS will work in co-operation with its clients or contractors and will make appropriate changes and amendments to improve TNS's safeguarding policies and procedure.

TNS will prevent abuse by using good practice to create a safe and healthy environment and avoid situations where abuse or allegations of abuse could occur.

## SCOPE

This policy covers all employees and workers of TNS including contracted service providers.

While employees, workers and contracted service providers are likely to have varied levels of contact with children, young people and vulnerable adults as part of their duties and responsibilities for TNS, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns. Responsibilities are limited and it is important to remember the following:

- It is not the responsibility of any employee, worker or contracted service provider to determine whether abuse is actually taking place.

- However, it is the responsibility of all employees and workers or contracted service providers to take the actions set out in the procedure, if they are concerned abuse is taking place.

## **SAFEGUARDING ROLES & RESPONSIBILITIES**

The Directors of TNS are responsible for ensuring that this policy and related procedures are implemented, monitored and consistently reviewed; and

Senior Operations Managers, Operations Managers and Operations Support Managers are responsible for dealing with reports or concerns about the protection of children, young people and vulnerable adults appropriately and in accordance with the procedures that underpin this policy.

Those responsible for recruitment must ensure that appropriate employees are subject to Criminal Records Bureau (CRB) checks and that their employees comply with this policy and the related procedures.

Line managers are responsible for ensuring that employees follow this policy and its related procedures and receive appropriate training and support they need, in line with their responsibilities and level of contact with children, young people and vulnerable adults.

All employees, workers and contracted service providers are responsible for carrying out their duties in a way that actively safeguards and promotes the welfare of children, young people and vulnerable adults. They must also act in a way that protects them from wrongful allegations of abuse as far as possible. They must bring safeguarding concerns to the attention of their Senior Operations Manager, their Operations Manager or their Operations Support Manager.

## **SAFEGUARDING PROCEDURES**

### **Introduction**

Abuse is a form of maltreatment it can take many forms but is usually defined and divided in to the following categories; Physical Abuse, Emotional Abuse, Sexual Abuse and Neglect. In adult safeguarding cases additional categories include financial, institutional and discriminatory abuse.

There are specific situations when employees, workers and contracted service providers may need to respond and report a concern or case of alleged or suspected abuse. These are set out below:

- a. When a child, young person or vulnerable adult makes an allegation of abuse or bullying, you should:
  - Stay calm and try to get another witness, if it does not compromise the situation;
  - If you believe the person is 'at risk' of immediate significant harm, which includes situations which any employee or worker would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify your Senior Operations Manager, your Operations Manager or your Operations Support Manager;
  - Listen carefully to what is said and allow the person to talk at their own pace, being careful not to compromise potential evidence;
  - Find an appropriate opportunity to explain it is likely that information will need to be shared with other responsible people, do not promise to keep secrets;
  - Only ask questions for clarification, the use of open questions e.g. what, where, when, who? is advisable, do not ask leading questions (that suggest certain answers as this could compromise evidence);
  - Reassure the child, young person or vulnerable adult that they have done the right thing in telling you;
  - Tell them what you will do next and who you will inform;
  - Immediately report to and inform your Senior Operations Manager, your Operations Manager or your Operations Support Manager;
  - Remember: You may be the first person that a child, young person or vulnerable adult has trusted and it has probably taken a great deal of courage to tell you that something is wrong.
- b. When allegations or concerns are expressed about any employee, worker or contracted service provider, you should:
  - Take the allegation or concern seriously

- Immediately inform your Senior Operations Manager; your Operations Manager or your Operations Support Manager.
  - If you believe the child, young person or vulnerable adult is 'at risk' of immediate significant harm, which includes situations, which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify your Senior Operations Manager; your Operations Manager or your Operations Support Manager.
- c. When allegations or concerns are expressed about any other person (e.g. parent, carer; other service user), you should:
- Take the allegation or concern seriously;
  - If you believe the child, young person or vulnerable adult is 'at risk' of immediate significant harm, which includes situations, which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify your Senior Operations Manager; Operations Manager or Operations Support Manager.

## **RECORDING CONCERNS**

If any employee, worker or contracted service provider has concerns about the welfare or safety of a child, young person or vulnerable adult, or has concerns about the behaviour of an employee, worker or contracted service provider; it is vitally important to record all relevant details regardless of whether or not the concerns are shared with the Police.

Records may be used for: Evidence for investigations and inquires; Court Proceedings; Monitoring Quality Assurance; and Disciplinary procedures. The Safeguarding Officer will then manage the process.

## **RECRUITMENT**

TNS is committed to safer recruitment procedures involving detailed pre-employment checks. Where it is identified that services or employees have regular or frequent contact with children, young people and vulnerable adults then the Payroll Manager; the Payroll Department and Operations Team will initiate appropriate procedures. Please see our Recruitment and Selection Policy for more information.

## **DBS DISCLOSURES**

DBS disclosures should only be sought where an employee or worker has substantial, regular or unsupervised contact with children, young people or vulnerable adults as part of their duties or responsibilities for, or on behalf of, TNS, or when a current or prospective client requires this to allow an employee or worker to gain access to their site.

DBS disclosures may be sought during the recruitment procedure, depending upon the role the applicant is applying for. DBS checks will only be sought where necessary. Please see our Recruitment and Selection Policy for more information.



# Supply Policy

Our supply policy is not just a policy, it's a commitment to the standards we have signed up to as a business of fantastic food and acting with honesty and integrity. Our sourcing strategy supports our love of fresh and seasonal food that in turn inspires our chefs to create dishes with provenance that are supported by local supplier partnerships.

As an ISO 14001 certified organisation, we have demonstrated that we take our responsibility to carry out our day-to-day business in a way that respects the environment and acts in a socially responsible manner. We ensure that our supply chain has a positive social impact on the millions of lives that it affects, and this is achieved by our commitments outlined below.

## REDUCING FOOD MILES

The concept of buying and using locally produced raw materials has been one of the cornerstones of our company since our inception in 2003. Because it's so important to us all fresh produce is sourced from within 25 miles of each contract location. This is critical for us not only because seasonal food tastes better, but we are committed to reducing the number of miles our food travels.

## STRICT GREEN CREDENTIALS

Sourcing all ingredients from suppliers that meet our strict food sourcing policy is something that is ingrained in our way of working. It is our company policy to work with suppliers who operate a quality assurance system independently assessed by an appropriate UKAS (United Kingdom Accreditation Service) Certification body. As a company, we operate an approved suppliers list, which is controlled by only using suppliers and subcontractors who have been approved by the Company Directors and Purchasing Team and that meet the rigorous standards set by ourselves and UKAS.

## TRACEABILITY AND COMMUNICATION

Ensuring all key ingredients have traceability, to enable us to evidence the supplier and its location is really important to us. Food traceability underpins consumer confidence in food production and their wellbeing. We ensure that we only use suppliers that are able to provide full traceability for all products supplied to us and trace food through harvest, production and distribution to us as detailed in our Purchasing Policy. All ingredients are promoted in each dish to allow our customers to understand the provenance of their food.

## SUPPORTING THE COMMUNITY

At site level, we ensure all ingredients and suppliers are promoted to encourage the use of our local supply partnerships across our menus. We do not hide our suppliers away, we highlight them, giving them the spotlight for our customers. We think this is really important as it encourages our customers to use our suppliers too!

## HONESTY AND INTEGRITY

All supply partners will be treated fairly and with honesty and integrity and will comply with our antislavery policy following the company's ethical standards. We follow our Anti-Slavery and Human Trafficking Policy.

## CHOICE

We give our Managers and Chefs the autonomy to create their own menus and the flexibility to choose between a number of main-stream, artisan and specialist suppliers; this approach means that our menus and the ingredients that go into them are created for each individual site, and the specific needs and desires of our clients and customers. We do not have sole supply arrangements with any supplier; this creates competition resulting in favourable terms, prices and quality standards.

## **SAFETY**

We are committed to ensuring that all food and non-food items provided to our customers and clients are of consistent quality and safe for purpose. Along with our purchasing policy and new supplier audits, it is of utmost importance to us as a company that our procurement complies with the relevant health and safety standards and other related company standards. Audits are performed across the board in our business to ensure that these policies and standards are being met, from supply to distribution and kitchen to service point, this also falls in line with our ISO 14001 accreditation standards.

## **ENVIRONMENT**

We work with all of our suppliers concerning our companies and client's sustainable objectives, which include preventing pollution, minimising waste, preserving natural resources and promoting resource efficiency by eliminating, reducing, reusing and recycling. We place significant emphasis on reducing the use of plastic, encouraging instead, the use of bio-degradable materials. This includes both the delivery of goods to us as well as packaged foods that we sell.



# Training Policy

It is the policy of TNS Catering Management Ltd (TNS) to ensure that all employees are provided with adequate training and the personal career development necessary to perform their duties to the required standard.

Every effort will be made to encourage the individual development of all employees for the mutual benefit of the employee and TNS, and it is Company policy, whenever possible, to fill vacancies internally provided that candidates can be found with the necessary qualifications and experience.

It is a condition your employment that you are prepared to attend appropriate training/education courses, for the benefit of both TNS and yourself.

If you do not complete the training/education course (for whatever reason) or your employment with TNS ceases during the period of the course, you will refund the full amount of the training/education course fee to TNS. (TNS may, at its sole discretion, waive the repayment of some or the entire amount of the course if it is not completed with its consent).

If your employment with TNS terminates after the completion of the course, then the whole or part of the amount paid in respect of training fees shall become due immediately and repayable to TNS by way of deduction from pay, or otherwise, in accordance with any schedule outlined in a training agreement.

If the final salary/payment is insufficient to deduct these costs TNS reserves the right to pursue you for the balance.



# Waste Policy

All of the waste from our core business is recyclable.

- Raw food - Fully recyclable and/or biodegradable
- Cardboard and paper – Fully recyclable and/or biodegradable
- Tins and cans – Fully recyclable
- Plastics – Fully recyclable
- Biodegradable Chemicals – Through our supplier
- Used cooking oil – through our Dry food carrier

We assist all our clients as we would with you to minimise the impact on the environment through our activities. Most of our clients organise waste from site to be lifted using several waste carriers. We assist by only purchasing products (food packaging etc.) that are biodegradable and recyclable making sure back of house (In the kitchen) waste is segregated and assist customers with segregation front of house (in the restaurant Facilities). We can help with suitable waste segregation stations/bins if required.

We also keep our over production of cooked food to a minimum. We batch cook and manage forecasted production numbers to enable us to manage this. We allow our chefs to be inventive with their menus so any over production of foods can be recycled on other days if required.

All waste is monitored on site by our teams. We reduce waste by working with our suppliers – Our veg suppliers for example use ridged reusable plastic crates for deliveries which are used multiple times. Our dry good suppliers decant packaging pre-distribution and manage waste at source. And our teams manage their production carefully. Every member of our team receives environmental training, so they know what waste we create through our activities and how they can reduce energy consumption, even the smallest things like switching lights and gas off when not in use off, form part of our programme.

Whatever your core aim and objective are in relation to waste and the environment we will assist with their delivery.



# Whistleblowing Policy

## GENERAL

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. We encourage staff to report suspected wrongdoing as soon as possible.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the organisation, including senior managers, , directors, employees (including full-time, part-time, fixed-term, casual, trainees and home-workers), consultants, contractors and agency staff (collectively referred to as staff in this policy).

## WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

## HOW TO RAISE A CONCERN

We hope that in many cases you will be able to raise any concerns with your line manager. However, where you prefer not to raise it with your manager for any reason, you should contact a Director:

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

## CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity .....secret and only reveal it where necessary to those involved in investigating your concern.

## EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline.

## PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.



**TNS CATERING MANAGEMENT LTD**

Perseus House, 3 Chapel Court, Holly Walk, Leamington Spa, Warwickshire, CV32 4YS

01926 335444 [info@tnsicatering.co.uk](mailto:info@tnsicatering.co.uk)

[tnsicatering.co.uk](http://tnsicatering.co.uk)