Documented Management System

Policy Statements

1.02

Issue 7

04 April 2024

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1. Document control

1.1 Control

Control of this document is in accordance with Documentation Control Procedure 2.11. The General Manager shall maintain a history of all amendments on a change register. The latest date and issue of this manual shall appear on the front cover and document reference and revision number is identified at the top of each page. The content and currency of this Policy document is the responsibility of the General Manager.

1.2 Circulation

A hard copy of this Document is held as a master copy back up and all staff can view this document in head office when required. The General Manager shall also upload a pdf copy to the server to ensure that all Policy statements are publicly available.

1.3 Approval

Prior to the implementation of any documented process or operational procedure, the formal document will be subject to review to ensure that the commitments and process steps detailed are achievable and realistic, whilst linked to Policies and Objectives. Once reviewed and approved, the version history at 1.4 will be updated to signify the approval, and requisite authority of the approval.

1.4 Version history

Version	Author	Date released	Approved by	Date approved	Change overview
1	Tony Duff	01.05.2015	Tony Duff	01.05.2015	First Issue
2	Tony Duff	01.03.2016	Tony Duff	01.03.2016	Removal of Marks Policy
3	Tony Duff	07.04.2016	Tony Duff	07.04.2016	Review & amendment of all Policy Statements
4	Tony Duff	21.03.2019	Jonathan Wilson	21.03.2019	Inclusion of Privacy & Health and Safety Statements
5	Tony Duff	10.06.2022	Andrew McClenaghan	10.06.2022	Review of Policies & new IC Chair
6	Tony Duff	01.05.2023	Jim Speirs	23.05.2023	Inclusion of Policy statements 2.6 forward
7	Tony Duff	04.04.2024	William Rankin	04.04.2024	Review of Policies & new IC Chair

2. Policies

This Policy document includes specific commitments and outlines the approach of SCS, its board, committees and management personnel toward the execution of its certification activities and exercising of its relevant duties.

2.1 Service Delivery Policy Statement

Our Mission is to become a sector market leader by devoting our strength and resolve to the unending challenge of continuous improvement. To inspire confidence in the Certification services provided, we are committed to ensuring the following principles are implemented and adhered to:

- impartiality
- competence
- responsibility
- openness
- confidentiality
- responsiveness to complaints
- risk-based approach

System Certification Services, as a company, pledge our efforts and endeavours to securing a level of service beyond the expectations of all our customers and in so doing establish a reputation synonymous with integrity, professionalism and customer care. We take pride in our reputation and are fully committed to the provision of the highest standards of auditing and certification services.

Through the unending development of our people and the implementation of effective systems and operational processes, we shall ensure that the needs and expectations of our customers, supply chain and other interested parties are fully satisfied.

This Policy Statement provides the Framework for setting and integrating Management System Objectives with Strategic Business Planning, under the following improvement aims:

- To provide enhanced Customer Satisfaction
- To provide our services efficiently and effectively
- To protect and safeguard the impartiality of our services.
- To control all risks to stakeholders arising from our certification activities.
- To continually strive for reduced emissions and impacts on the environment.

This policy shall be periodically reviewed and made known to all existing and new personnel, clients, suppliers, and subcontractors, displayed throughout our locations and can be viewed on our website http://www.systemcertification.co.uk by wider stakeholders and the general public.

Signed:

Date: 04.04.2024

Tony Duff
General Manager

2.2 Statement of Impartiality

System Certification Services Ltd is committed to being impartial and being perceived to be impartial, in order to provide confidence in the Certification Services that it provides.

System Certification Services makes its certification decisions based on objective evidence of conformity, and its decision makers are not influenced by other interests or other parties. Due to robust management processes, all Clients can be assured of equal treatment and a high level of service delivery performance.

When purchasing products or services from a certified client of System Certification Services, organisations can rely on this impartiality and objectivity in their decisions, as all threats to impartiality are assessed and mitigated. These threats may include but are not limited to:

- Self-interest
- Self-review
- Familiarity (or trust)
- Intimidation

System Certification Services provides an independent oversight of its certification activities and risk avoidance process through its Impartiality Committee, which consists of experienced professional personnel from a range of technical backgrounds and sectors to represent the interests of Clients and end-users.

The Impartiality Committee meets twice per year to review and approve certification schemes, policies, risk registers, financial governance, certification activities, appeals and complaints, as well as other related matters arising.

This policy shall be periodically reviewed and made known to all existing and new personnel, clients, suppliers, and subcontractors, displayed throughout our locations and can be viewed on our website http://www.systemcertification.co.uk by wider stakeholders and the general public.

Signed:

Date: 05.04.2024

Tony Duff
Director/General Manager

Signed:

Date: 05.04.2024

William Rankin
Chair of Impartiality Committee

2.3 Equal Opportunities Policy

The aim of this policy is to communicate the commitment of the Board of Directors and Senior Management team to the promotion of equality of opportunity in System Certification Services. It is our policy to provide employment equality to all, irrespective of:

- Gender, marital or family status
- Religious belief or political opinion
- Disability
- Race or ethnic origin
- Nationality
- Sexual orientation or Gender bias
- Age

We are opposed to all forms of unlawful and unfair discrimination. All full-time employees and job applicants (actual or potential), as well as associates or sub-contract personnel will be treated fairly and selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

We recognise that the provision of equal opportunities in the workplace is not only good management practice; it also makes sound business sense. Our equal opportunities policy will help all personnel to develop their full potential and the competence and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

We are committed to:

- Preventing any form of direct or indirect Discrimination or victimisation
- Promoting equal opportunities for women and men
- Securing fair participation for personnel of all faiths and religions
- Promoting equal opportunities for people with disabilities
- Promoting equal opportunities for ethnic minorities
- Promoting a good and harmonious working environment where all men and women are treated with respect and dignity and in which no form of intimidation or harassment will be tolerated
- Fulfilling all legal obligations under the relevant legislation and associated Codes of Practices
- Taking any necessary positive/affirmative action, including setting goals and timetables.

Breaches of our equal opportunity policy and practice will be regarded as misconduct and could lead to disciplinary proceedings.

Signed:

Date: 04.04.2024

Tony Duff
General Manager

2.4 Health & Safety Policy Statement

The aim of this policy is to communicate the commitment of the Board of Directors and Senior Management team to ensuring the health, safety and welfare of its staff and other stakeholders, and it will, so far as is reasonably practicable, establish processes and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety.

The Company will provide and maintain a healthy and safe working environment with the objective of the prevention of instances of occupational accidents and illnesses.

The Company will pay particular attention to:

- applying a risk based approach
- maintaining the workplace in a safe condition and providing adequate facilities and arrangements for welfare at work
- providing a safe means of access to and egress from places of work
- the provision and maintenance of equipment and systems of work that are safe, as applicable
- arrangements for ensuring the communication, consultation and participation of the workforce
- the provision of such information, instructions, training and supervision as is necessary to ensure the health and safety at work of its staff and other stakeholders.

The Company recognises its duty to protect the health and safety of all visitors to the Company, including contractors and temporary workers, as well as any members of the public who might be affected by the Company's certification operations.

Through the monitoring of Occupational Health & Safety Performance, the Company will aim to continually improve its systems for managing its operations, by documenting, implementing and periodically reviewing their effectiveness.

Breaches of our H&S policy and practice will be regarded as misconduct and could lead to disciplinary proceedings or cessation of contracts.

Signed:

Date: 04.04.2024

Tony Duff
General Manager

2.5 Data Privacy Policy

Introduction

System Certification Services Ltd ("**SCS**") takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

Our personal data handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and The General Data Protection Regulation (EU 2016/679) and applicable national law.

What personal data do we or may we collect?

We may collect and process personal data about you when you interact with us and our products and when you purchase goods and services from us. The personal data we process may include:

Personal Information

Personal information is any information or opinion about an individual or someone who can be reasonably identified. Personal information is any information or opinion about an individual, regardless of whether it is true or not. It does not have to be in written form. Some examples of personal information include an individual's:

- *name,*
- *address,*
- *phone number,*
- *date of birth,*
- *signature,*
- *email address*, and
- bank account details.

Sensitive Information

Sensitive information is a subset of personal information. It is defined as any information or opinion about an individual's:

- race or ethnic origin;
- political opinions or membership of a political organisation;
- religious beliefs and affiliations;
- philosophical beliefs;
- *membership of a professional association or trade union;*
- sexual preferences and orientation;
- criminal record;
- health information;
- genetic information; or
- biometric information or templates.

Staff and employees

As our business has employees, there are specific examples of information that we may collect that are considered personal information including an employee's:

- *engagement, training, and discipline;*
- *details of termination or resignation;*
- *terms and conditions of employment;*
- *personal and emergency contact details;*
- *performance and conduct;*
- *hours of employment;*
- *salary or wages;*
- *membership of a professional or trade association (which is also sensitive information);*
- membership of a trade union (which is also sensitive information);
- *leave accrual and use; or*
- *taxation, banking or superannuation details.*

Note: Data currently stored is highlighted in italics

How do we use this personal data and what is the legal basis for this use?

We process the personal data listed in the paragraph above for the following purposes:

- to establish and fulfil a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery of services. We require this information in order to enter into a contract with you and are unable to do so without it;
- for purposes of validating or maintaining relevant competency requirements;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting SCS's legitimate business interests, role as the National Standards Body, and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, or to investigate any complaints received from you or from others;
- we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) services for you, in accordance with our legitimate interests;
- to monitor use of our website and online services. We may use your information to help us check, improve and protect our products, content, services and website, both online and offline, in accordance with our legitimate interests;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- we may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to SCS's relevant products and services. Electronic direct marketing will only be sent where you have given consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. We will not send you direct marketing of third party products or services although our own products or services may on occasion include co-operation with third parties. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

With whom and where will we share your personal data?

We may share your personal data with others to process it for the purposes of certification activity administration and to deliver services where elements of these are provided by external resources other than those with which you have directly contracted.

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors or experts;
- committee members;
- market research companies;
- our suppliers, business partners and sub-contractors; and/or
- search engine and web analytics.

Personal data may be shared with government authorities, UKAS and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of SCS for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, call centre operation and identity checking.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

How long will you keep my personal data?

We will not keep your personal data for any purpose longer than necessary to fulfil the original or a compatible purpose. In some instances, we are required to retain certain information by law or due to our role as the National Standards Body, and for as long as reasonably necessary to meet regulatory or accreditation requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions. Where this is the case, your personal data will only be processed for the relevant legitimate purpose and not used for marketing.

Where you are a customer, we will keep your personal data for the length of any contractual relationship you have with us and after that for a period of up to 3 years.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your personal data for this purpose (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 3 years from when you last interacted with us or our content.

In the case of any contact you may have with our customer services team, we will retain your details for as long as is necessary to resolve your query and for two weeks after the query is closed.

We may retain your personal data for a time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. After it is no longer necessary for us to retain your personal data, we dispose of it securely.

Where is my data stored?

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards will be in place.

What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time. If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it. You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you. Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

Your right to be forgotten

Also known as Data Erasure, the right to be forgotten entitles you (the data subject) to have the data controller at SCS erase his/her personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data. The conditions for erasure include the data no longer being relevant to original purposes for processing, or a data subject withdrawing consent. It should also be noted that this right requires SCS to compare the subjects' rights to "the public interest in the availability of the data" when considering such requests.

Where can I find more information about SCS's handling of my data?

Should you have any queries regarding this Privacy Notice, about SCS's processing of your personal data or wish to exercise your rights you can contact SCS using this email address: info@systemcertification.co.uk If you are not happy with our response, you can contact the Information Commissioner's Office: https://ico.org.uk/

Signed: Date: 04.04.2024
Tony Duff
General Manager

2.6 Anti-Bribery Policy

It is the aim of the Board and Senior Management Team to conduct all 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 dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us. A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality, which are to be declared in accordance with our impartiality policy. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the company ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.

We do not make, and will not accept, undeclared facilitation payments or “kickbacks” or unofficial payments made to secure or expedite a routine government action by a government official, or for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage. We keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be 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, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments. Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. Suppliers, who do not have their own Policies/Processes in place will be encouraged to comply with this Anti-Bribery Policy.

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process. Dependent upon the seriousness of the breech the enforcing authority may be called upon to deal with any significant issues.

Signed:

Date: 04.04.2024

Tony Duff
General Manager

2.7 Procurement Policy

This policy encompasses our approach to our supply chain and ethical procurement and should be read in conjunction with our Anti- Bribery Policy.

Our Procurement Policy has been developed to promote procurement of more sustainable solutions, products and materials as well as the development of sustainable business relationships.

Below are some of our supply chain and procurement principles and goals:

- We ensure that all relationships with suppliers and subcontractors are fair, honest and mutually beneficial.
- We will minimise the amount of repetition and duplication within our own prequalification process.
- We will assess suppliers, associates and subconsultants to ensure that they meet the requirements of our safety, quality and environmental standards.
- We will only use suppliers who comply with all UK employment legislation including the Modern Slavery Act.
- We will take steps to ensure that we are fully aware of our responsibilities to support the local economy.
- We will support local labour by working with local subcontractors and suppliers, where feasible.
- We will adhere to fair payment, paying suppliers within the terms of our agreement.
- We will continue to foster collaboration with our supply chain partners to identify best practice and innovative solutions.
- We will ensure that we work with suppliers who respect our Anti-Bribery Policy and ensure that we operate within this guideline, in an open and transparent way.
- At all times we will consider the energy efficiency of plant, equipment and materials.

Signed:

Date: 04.04.2024

Tony Duff
General Manager