



ANTI - BRIBERY AND CORRUPTION POLICY

This document sets out the rules of the Keith Peattie Associates (KPA) in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with KPA's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of KPA's business.

Corruption is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation October 2010, you could face up to 10 years in prison and/or an unlimited fine, and KPA could also be liable to an unlimited fine.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from Keith Peattie.

You should at all times act in accordance with the following provisions:-

Behave honestly, be trustworthy and set a good example;

Use the resources of KPA in the best interests of KPA and do not misuse those resources;

Make a clear distinction between the interests of KPA and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Keith Peattie immediately;

Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult with Keith Peattie;

Confidentially report all incidents, risks and issues which are contrary to this policy document to Keith Peattie;

Raise any issues regarding anti-bribery and corruption laws and KPA's policies. Queries will be dealt with anonymously and a written response will be issued;

Do not offer or accept bribes.

KPA will not conduct business with any person or practice or their employees that do not support KPA's anti-bribery and corruption policy, and will indeed terminate any contract should any of the policy not be adhered to.

Signed:

Date: 01.10.2018

Keith Peattie

Position: Partner

Office Address:
Keith Peattie Associates
Studio 1,
38 Bank Street
Ashford, Kent TN231BA



Phone: 01233-646222
Mobile: 07734 - 055706
keith@keithpeattieassociates.co.uk
<http://www.keithpeattieassociates.co.uk>

Anti Bribery Policy October 2018

Do not, without express prior written approval from Keith Peattie, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:

1. Actively resist the payment;
2. Inform Keith Peattie.

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document we aim to ensure that you and KPA will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy KPA can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in KPA and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Please confirm you have read and understood this policy document by signing and dating below.

.....
Signature

.....
Date

.....
Print Name

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COMPLAINTS PROCEDURE

Complaints:

KPA aims to provide an excellent service to all its customers. However, we acknowledge that occasionally things go wrong and you may wish to make a complaint. Our aim is to resolve all complaints as soon as possible and to use the information supplied to assist us to improve our service standards.

What is a Complaint?

A complaint is usually dissatisfaction with a service, a failure to carry out an agreed service, failure to meet agreed timescales or failure to meet the standards promised.

How to Make a Complaint:

If you are unhappy with the service you receive from us you can make a complaint in writing to:

Keith Peattie
Keith Peattie Associates,

Studio 1, 38 Bank Street, Ashford Kent TN23 1BA.

Alternatively, you can tell us about your complaint in person, over the 'phone by calling 01233-646222,

or by contacting Keith Peattie by email at keith@keithpeattieassociates.co.uk

Whichever method a complaint is received, a letter of acknowledgement will be sent to the complainant within 2 calendar days, outlining when a full response will be received and naming the member of staff dealing with the complaint.

Complaint Process:

Our aim is to resolve all complaints satisfactorily without proceeding to our formal complaints process. However, if you are still not satisfied and wish to take the matter further we have a two stage complaints process.

Stage 1: Where we aim to resolve as many complaints as possible. We respond within 14 calendar days.

Stage 2: If unresolved at stage 1, the complaint will be considered by a KPA management who will respond within 14 calendar days. We will endeavour to resolve your complaint both fairly and effectively at each stage of the process.

All complaints will be considered, except: -

Where a complaint is already going through a court or tribunal.

Where the complaint is being pursued in an unreasonable manner.

This list is not exhaustive and there may be other exceptions. If your complaint falls within this category and we are unable to investigate it, we will write to you and explain why.

Signed:

A handwritten signature in black ink that reads "K. Peattie".

Date: 01.10.2018

Keith Peattie

Position: Partner

Keith Peattie Associates

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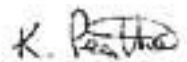
ENVIRONMENTAL POLICY

- We believe that businesses are responsible achieving good environmental practices and operating in a sustainable manner.
- We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.
- It is our priority to encourage our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all, it is also a matter of delivering on our duty of care towards future generations.

Our policy is to:-

- wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice;
- minimise our waste and then reuse or recycle as much of it as possible;
- minimise energy and water usage in our buildings, vehicles and processes in order to conserve suppliers, and minimise our consumption of
- natural resources, especially where they are non-renewable;
- operate and maintain company vehicles with due regard to environmental issues as far as reasonably practical and encourage the use of alternative means of transport as appropriate; including public amenities
- apply for principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community;
- as far as possible purchase products and services that do the least damage to the environment and encourage others to do the same;
- assess the environmental impact of any new processes or products we intend to introduce in advance;
- ensure that all employees understand our environmental policy and confirm to the high standards if required; and address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned.

Signed:



Date: 01.10.2018

Keith Peattie

Position: Partner

Keith Peattie Associates

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EQUALITY AND DIVERSITY POLICY

Keith Peattie Associates is committed to providing services which embrace diversity and that promote equality of opportunity.

As an employer, Keith Peattie Associates is committed to equality and diversity within its workforce. Our goal is to ensure that these commitments, reinforced by our values, are embedded in our day-to-day working practices with all our clients and colleagues.

We will provide equality of opportunity and will not tolerate discrimination on grounds of gender, gender identity, marital status, sexual orientation, race, colour, nationality, religion, age, disability, HIV positivity, working pattern, caring responsibilities, trade union activity or political beliefs – or any other grounds.

We will demonstrate our commitment by:

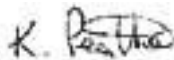
- promoting equality of opportunity and diversity within the practice in which we work and with all our clients and workforce
- encouraging recruitment from groups currently under-represented within Keith Peattie Associates and their career progression once employed.
- treating our clients, colleagues and other contacts during our work fairly and with respect
- promoting an environment free from discrimination, bullying and harassment, and tackling behaviour which breaches this
- recognising and valuing the differences and individual contribution that people make
- providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities
- building in legislative requirements and best practice to all our service delivery and employee policies and procedures, and supporting these with appropriate training and guidance

Every person working for Keith Peattie Associates has a personal responsibility for implementing and promoting these principles in their day-to-day dealings with everyone – including members of the public, other staff and employers. Inappropriate behaviour is not acceptable.

Staff learning and development

Keith Peattie Associates think it is important that all our staff can contribute to the achievement of the practices objectives. Staff are made fully aware of this policy and Keith Peattie Associates provide training to them to ensure implementation of this policy.

Signed:



Date: 01.10.2018

Keith Peattie

Position: Partner

Keith Peattie Associates

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HEALTH & SAFETY GENERAL POLICY

We at Keith Peattie Associates recognise our duties under the Health and Safety at Work etc Act 1974 and the accompanying protective legislation. We will endeavour to meet the requirements of this legislation so as to ensure that we maintain a safe and healthy working environment. Our managers and supervisory staff are informed of their responsibilities to ensure they take all reasonable precautions, to ensure the safety, health and welfare of those that are likely to be affected by our undertaking.

Keith Peattie Associates recognises so far as is reasonably practicable the duty to ensure the following:

- 1) To provide adequate resources to maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment.
 - 2) To ensure that hazards are identified and regular assessments of risks are undertaken.
 - 3) To provide information, instruction, training and supervision as is necessary to ensure employees and others are assured of a safe and healthy working environment.
 - 4) To promote the awareness of health and safety and encourage health and safety best practice throughout our organisation.
 - 5) To ensure we are taking the appropriate protective and preventative measures.
 - 6) To ensure that we have access to competent advice and are able to secure compliance with our statutory duties.
- In order that we can achieve our objectives, and ensure our employees recognise their duties under health and safety legislation whilst at work, we must ensure that we inform them of their duty to take reasonable care of themselves and others that may be affected by their activities. We ensure our employees are informed of their obligations to ensure they co-operate with management and adhere with Keith Peattie Associates safety rules which are provided within the Employee Safety Handbook.

Signed: 

Date: 01.10.2018

Keith Peattie

Position: Partner

Keith Peattie Associates



Data protection policy

n.b. Throughout this policy document. KPA is used to denote Keith Peattie Associates.

Policy prepared by: **John Kirk (Admin/Quality Manager).**

Approved by: **Keith Peattie (Proprietor).**

Policy became operational on: **25th May 2018. (Updated 01.10.2018)**

Next review date: **30th September 2019**

As KPA has no supply chains; the relevant information was that gleaned from its clients, its employees and others with which KPA has a relationship, or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the This data protection policy ensures that KPA:

- * Complies with data protection law (including GDPR) and follows good practice
- * Protects the rights of staff, clients and partners
- * Is open about how it stores and processes individuals' data
- * Protects itself from the risks of a data breach

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Data protection law:

The Data Protection Act 1998 (and the subsequent GDPR act of May 2018) describe how organisations, including KPA must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, any personal information utilised by KPA is collected/used fairly/ stored safely and not disclosed unlawfully.



The Data Protection Act is underpinned by eight important principles. These state that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

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This policy applies to:

- KPA's head office.
- All staff and volunteers of KPA.
- Anyone working on behalf of KPA.

- It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:
 - ❖ Names of individuals.
 - ❖ Postal addresses.
 - ❖ E mail addresses.
 - ❖ Telephone numbers.
 - ❖ Plus, any other information relating to individuals.

Data protection risks:

This policy helps to protect KPA data security risks, including:

- * Breaches of confidentiality.
(e.g. information being given out inappropriately.)
- * Failing to offer choice.
(e.g. all individuals should be free to choose how the company uses data relating to them.)
- * Reputational damage. (e.g. as a result of others gained access to sensitive data.)



Responsibilities:

Everyone who works for or with KPA has some responsibility for ensuring data is collected, stored and handled appropriately.

Any KPA employee handling personal data must ensure that it is handled and processed in line with this policy and data protection principles.

In addition to collective /individual responsibilities; certain KPA employees have key areas of responsibility:

* The senior Manager/ Proprietor (**Keith Peattie**) is ultimately responsible for ensuring that KPA meets its legal obligations.

* As Data Protection Officer, **Keith Peattie** is also responsible for:

- Keeping the board updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data KPA holds about them. (Also referred to as 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

* As IT Manager, **John Kirk** is responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party services the company is considering using to store or process data. (.g. cloud computing services.)

General staff guidelines:

* The only people able to access data covered by this policy should be those who need it for their work.

* Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.

* KPA will provide training to all employees to help them understand their responsibilities when handling data.

* Employees should keep all data secure, by taking sensible precautions and following the guidelines below.

* In particular, strong passwords must be used and they should never be shared.



General staff guidelines (Contd.):

- * Personal data should not be disclosed to unauthorised people, either within the company or externally.
- * Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- * Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data storage:

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- * When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- * Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- * Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- * Data should be protected by strong passwords that are changed regularly and never shared between employees.
- * If data is stored on removable media (such as a CD or DVD), these should be kept locked away securely when not being used.
- * Data should only be stored on designated drives and servers, and should only be uploaded to approved cloud computing services.
- * Servers containing personal data should be sited in a secure location, away from general office space.
- * Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.



* Data should never be saved directly to laptops or other mobile devices such as tablets or smart 'phones.

Data storage(Contd.):

* KPA's network servers are an intranet (as opposed to an 'Internet' -type configuration); and are therefore not externally accessible. However, as a precaution. The KPA Network and any KPA computers containing data are protected by approved security software and a firewall.

Data use:

Personal data is of no value to KPA unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

* When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.

* Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.

* Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorised external contacts.

* Personal data should never be transferred outside of the European Economic Area.

* Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

Data accuracy:

The law requires KPA take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort KPA puts into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

* Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.

* Staff should take every opportunity to ensure data is updated. For instance, by confirming client's details at relevant intervals.

* KPA will make it easy for data subjects to update the information KPA holds about them.

* Data will be updated as inaccuracies are discovered. For instance, when a client can no longer be reached on their stored telephone number; this will be removed from the database.



Data accuracy (Contd.):

* It is the Marketing Manager's responsibility to ensure marketing databases are checked against industry suppression files every six months.

Subject access requests:

All individuals who are the subject of personal data held by KPA are entitled to:

- * Ask what information KPA holds about them and why.
- * Ask how to gain access to it.
- * Be informed how to keep it up to date.
- * Be informed how KPA is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the Data Protection Officer / Data Controller at keith@keithpeattieassociates.co.uk. The Data Controller can supply a standard request form, although individuals do not have to use this.

Individuals can be charged £10 per subject access request. The Data Controller will aim to provide the relevant data within 14 days.

The Data Controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons:

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, KPA will disclose requested data. However, the Data Controller will ensure the request is legitimate, seeking assistance from the company's legal advisers where necessary.

Providing information:

KPA aims to ensure that individuals are aware that their data is being processed, and that they understand:

- * How the data is being used
- * How to exercise their rights

To these ends, KPA has a privacy statement, setting out how data relating to individuals is used by the company.

[This is available on request. A version of this statement is also available on the company's website.]

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KPA WEBSITE PRIVACY POLICY:

This privacy policy is for the website www.keithpeattieassociates.co.uk, served by Keith Peattie Associates, Studio 1, 38 Bank Street, Ashford, Kent TN23 1BA, and governs the privacy of the users who choose to use it. It explains how we comply with the GDPR (General Data Protection Regulation), the DPA (Data Protection Act) [pre GDPR enforcement] and the PECR (Privacy and Electronic Communications Regulations).

This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR, DPA & PECR are adhere to. Additionally it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on this website. Further explanations may be provided for specific pages or features of this website in order to help you understand how we, this website and its third parties (if any) interact with you and your computer / device in order to serve it to you. Our contact information is provided if you have any questions.

The DPA & GDPR May 2018: We and the KPA web site comply with the DPA (Data Protection Act 1998) and also comply with the GDPR (General Data Protection Regulation) which came into effect on May 2018. We will update this policy accordingly after the completion of the UK's exit from the European Union.

Use of Cookies: KPA's website does not use cookies. As required by legislation, should KPA's website decide to use a cookie control system, then we would build in facilities allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

What are cookies? Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website.

Website Visitor Tracking: KPA's web site does not uses tracking software to monitor its visitors. KPA's web site does not store, save or collect personal information.

Adverts and Sponsored Links: KPA's web site does not contain sponsored links or adverts.

Downloads & Media Files: Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications. KPA accepts no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

Contact & Communication With us: Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

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<http://www.keithpeattieassociates.co.uk>

Email Mailing List & Marketing Messages: KPA does not operate an email mailing list programme.

External Website Links & Third Parties: KPA's web site does not currently include external links. Should this policy change, then KPA's Web site Privacy Policy will be duly amended to reflect this.

Social Media Policy & Usage: KPA adopts a Social Media Policy which ensures our business and our staff conduct themselves accordingly online. While, at some point in the future, KPA may have official profiles on social media platforms; users are advised to verify authenticity of such profiles before engaging with, or sharing information with such profiles. KPA will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

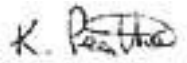
Office Details:

Phone: 01233-646222

Keith Peattie Associates Studio 1, 38 Bank Street, Ashford, Kent TN23 1BA

Mobile: 07740-472250 keith@keithpeattieassociates.co.uk <http://www.keithpeattieassociates.co.uk>

Signed:



Date: 01.10.2018

Keith Peattie

Position: Partner Keith Peattie Associates