

Phoenix Software

Company Handbook

Version 37 - Updated 20th January 2023





How to Use this Handbook

Phoenix Software has a long reputation for providing a friendly working environment with strong management and clear goals. To this end, this handbook has been written not only as a reference point for existing employees, but also to help new employees with their induction so that, during their probationary period, they will familiarise themselves with the policies and procedures which will enable them to become an active part of the Phoenix team as quickly as possible. This Handbook should be read in conjunction with their Contract of Employment and relevant company policies. Any queries should be directed to their Line Manager or to HR.

From time to time there will naturally be changes made to this document and employees should check on SharePoint On-Line or the HR System where the latest edition will be available.

Mission Statement

We empower and inspire our people to fulfil their potential, so they can help our customers make smarter buying decisions and meet their business objectives through technology.

Our values

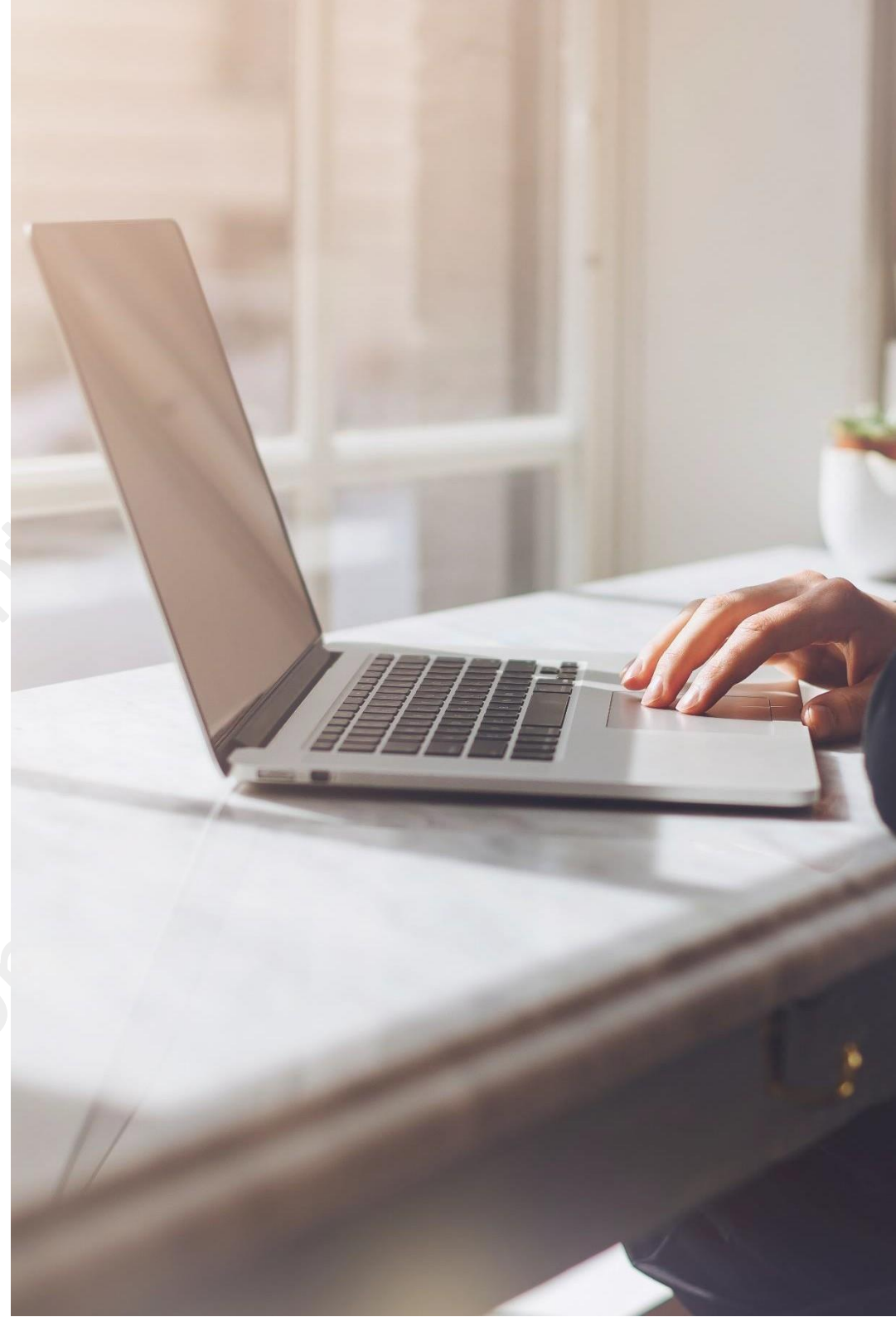
- Let's be **passionate** about employees and our customers
- We act with **integrity at all times**
- We **work together and collaborate** across all teams
- Be **kind and respectful to all** people, all of the time
- Let's get business done and **have fun** doing it

Our mission statement above has been written to ensure that every employee has a clear understanding of the Company's aims and objectives. We value the abilities of our employees in achieving this mission and we encourage your wholehearted support of this Employee Handbook.

The Directors

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Practices/Procedures

Working Practices

Financial Year

Our financial year runs from 1 March to the end of February.

Hours of Work

The Company's normal business hours are 9:00am to 5:30pm and the working week is 37.5 hours, with each full-time employee working 7.5 hours each day, Monday to Friday. Employees, particularly those with special contracted hours, should refer to their Contract of Employment for full details relating to hours of work.

Although the Company has a degree of flexibility to start, finish, lunch times and working location (see Hybrid Working Policy), it is very important that employees abide by the fixed core hours and also be considerate towards their colleagues and the Company in ensuring that adequate departmental cover is maintained at all times.

Core working hours are as follows:

Sales: 9:00am – 12:00pm and 2:00pm – 5:00pm

Other full-time staff: 10:00am – 12:00pm and 2:00pm – 4:00pm

Each full-time employee is entitled to take one 10-minute break, in a rest area or outside in the designated smoking area, between 10:00am and 11:00am and one 10-minute break between 3:00pm and 4:00pm. Staff should take breaks with forward planning and consideration for others.

Lunch may be taken between 12:00pm and 2:00pm, a minimum of 30-minutes must be taken each day. Lunch breaks may be extended up to 2 hours if agreed with your Line Manager.

The Company may restrict or terminate the operation of flexible/hybrid working as and when deemed necessary.

Overtime

The Company would like to highlight that all employees are expected to reasonably complete their daily tasks and it is inevitable that, from time to time, staff may have to work a little later to do this to meet the needs of the business. This is not considered to be overtime. Where paid overtime is required, this must be agreed with the employee's Manager or a Director prior to being worked.

The Company's approach to overtime recognises both the nature of the role and the basic rate of pay applicable to that role. It is anticipated that by their nature, certain roles will involve a reasonable amount of work outside normal working hours, e.g. sales and technical consultants. Time off in lieu and/or pre-agreed payments on each occasion will apply in extraordinary circumstances in these departments. The overtime rates are generally time and a half for any time worked on a Saturday, double time for any time worked on a Sunday or normal rate of pay for a week day. Time off in lieu for any full Saturday or Sunday worked will be given as one day for each day worked.

Lateness

Employees should telephone as soon as possible (before 9:00am) if they are going to be late and speak to their Line Manager. The utilisation of the flexible working rules should negate the concept of lateness however any time lost should be made up.

Sickness

If an employee feels ill while at work including home working they should inform their Manager.

If an employee is taken ill at home and is unable to come to work, they must phone their Manager on the first day of sickness (before 10:00am wherever possible) indicating the nature of absence and the anticipated duration. All shift-based employee's must ring in before their shift is due to start. In the absence of their Manager they should speak to another Manager or a Director. Messages should not be left with Reception or another member of staff. Subsequently employees should ring in as arranged or at least at the beginning of each week thereafter, so that cover can be arranged where necessary.

Return to Work After Illness

The Company reserves the right to undertake Return to Work interviews for all employees taking odd days of sickness absence. HR will meet with each individual in order to determine the reason for the absence, and if appropriate, address the cause(s).

Third Party Liability

If an employee receives or has been awarded damages or compensation by a third party, including payment claimed against Phoenix Software in respect of loss of earnings, then any OSP benefit received from the Company during the period of incapacity will be treated as a loan to be recovered from any damages/compensation awarded to them as part of a Common Law claim.

Personal Health

All employees must provide details of any recurring medical condition, along with both next-of-kin to HR Manager (and to their Line Manager in case of any emergency). A list of First Aiders can be found on Blenheim House plans which are located around the building

Private Healthcare Scheme

The company can provide quotations for private health care via Vitality Health. This is a deduction from your net pay and is a lifestyle choice, where the beneficial cost has been negotiated and passed on to you. It is your choice to join the scheme during your employment. Should you leave the business you may take the scheme on personally but should be aware that the cost will be affected.

Medical Appointments

Employees should inform their Manager when medical/dental appointments have been made. An absence request must be completed with the appointment time and details and forwarded to their Manager via the electronic system for approval. Doctor and dentist appointments should be made for early morning or late afternoon, wherever possible outside core hours to minimise work disruption. The Company understands that hospital appointments are less negotiable.

Eye Sight Testing

As employees of the Company you are entitled to reclaim expenses for eye tests and possibly spectacles. Conditions for expense claims are as follows:

As eyesight-testing charges can vary widely, an average has been taken and a payment of up to £17.50 per test will be refunded by the Company to any employee undergoing an appropriate annual eyesight test carried out by a registered ophthalmic optician. Optician appointments should be made outside normal working hours.

Upon receipt of proof from an optician that deterioration of eyesight has occurred due to use of display screen equipment, the Company will contribute a payment of up to

£50 towards the purchase of special corrective appliances (usually spectacles). A receipt of purchase should also be provided with this documentation.

The Health & Safety (Display Screen Equipment) Regulations 1992 state that “special” corrective appliances are spectacles that are prescribed to correct vision defects that are directly related to the use of display screen equipment. “Normal” corrective appliances are spectacles prescribed for any other purpose.

If an employee wishes to make a claim for an eye test or against the purchase of spectacles they should complete the claim within Concur, attach the relevant documents and submit to the Management Accountant. The Mileage and Expenses Policy can be found on SharePoint. A claim for eye sight testing expenses can only be made once in a financial year.

Holidays

Holiday entitlement is 25 days per year plus Bank Holidays for a full time employee (pro-rata for part-time employees). Holiday requests should be completed in the Absence section of the HR System and approved by your Line Manager. Holidays ideally should be requested at least 7 days in advance where possible, and PRIOR to any holidays being booked externally. Please bear in mind that holiday requests may be refused due to staffing levels or business requirements.

No more than 2 weeks holiday can be taken at any one time without negotiated agreement from your Line Manager.

Employees should refer to their Contract of Employment for full details regarding Holiday Entitlement.

The following rules apply to holiday utilisation for all staff.

- At the end of the holiday year a maximum of 5 days that can be carried over into the following year (or the equivalent of one working week)
- There will be no payment of any kind at the end of the year for untaken holidays
- Requests to borrow holidays from the following year will be declined
- Unpaid holiday at the end of the year if all holidays have been used, must be seen as an extreme circumstance and not as a normal option
- Untaken holiday beyond the 5 days carried forward, will be lost if not utilised
- There will be no exceptions or special cases regarding these guidelines

Notification for Christmas

The Company will notify all employees as soon as reasonably practicable of the dates the offices will be closed for Christmas. This will usually be no more than 3 days which must be utilised from your holiday entitlement.

Bank Holidays

Employees will be entitled to statutory holidays with pay which fall on a normal working day. If Christmas Day, Boxing Day or New Year’s Day fall on a Saturday or Sunday employees will be entitled to a paid compensatory day off.

Restricted Holidays

The business experiences busy periods in different departments at varying times within the financial year; all holiday requests are subject to the Manager’s discretion. Each Manager will assess the situation within their department when a holiday request is made taking into consideration departmental cover, business requirements, etc.

The Directors reserve the right to review this process at any time.

Half Days

If normal working hours are 7.5 hours per day, then a minimum of 3.75 hours must be worked as a half day.

On a half day, staff must cover the core hours i.e. 10:00am – 12:00pm or 2:00pm – 4:00pm.

Or if in Sales, the core hours covered are 9:00 am – 12:00pm or 2:00pm – 5:00pm.

Salary

All employees will be paid monthly in arrears. Payment will be made directly into a bank or building society account of choice on the last day of each month. Employees joining or leaving part way through a month will be paid pro-rata for the days worked, calculated as annual salary divided by 260 (the number of working days in a year) and multiplied by the number of days worked in the part-month.

Salary queries should be raised either with the Line Manager or Payroll.

It is an employee’s responsibility to update the HR system of any bank account changes. If notification of any change is received by the first of the month, changes can be made in time for payday of that same month. This request will be legitimised by HR.

Salaries are reviewed on an annual basis unless otherwise stated. The review date is the beginning of March. Salaries are reviewed for employees with over 6 months service at the beginning of March or if the employee has changed position within the Company.

Employer Pension Scheme

On commencement of employment providing, you meet the auto enrolment criteria, you will be automatically enrolled into the Company Pension Scheme with Aegon. Under this scheme the Company will make a monthly contribution equating to 9% of your basic salary on the condition that you agree to a 5% deduction from your gross pay each month (referred to as a salary sacrifice). This 5% deduction then forms part of the Company's 9% payment into your Aegon pension account. The entire 9% is classed as an Employer contribution.

You have the option to choose a higher salary sacrifice than the 5% statutory minimum, and if so the overall 9% employer contribution will be increased accordingly – this can be done by contacting Payroll. If you do not meet the auto enrolment criteria you still do have the option to opt into the pension scheme, should you wish. You also have the option to opt out of the auto enrolment. This can be discussed once your employment commences.

On set-up of your pension account, the contribution will initially be paid into the Aegon Universal Lifestyle Collection fund. Thereafter you will have access to your account online via the Aegon portal and can make changes to the funds at your personal discretion.

If you have any pension queries please contact the Payroll Manager.

Long Service Award

Phoenix Software appreciates the loyalty and hard work given by their employees over many years of service.

As a show of this appreciation the company will reward long serving members of staff with a special thank-you, at 15, 20, 25 & 30 year's-service.

At the commencement of the calendar year in which the long service anniversary will be reached, the qualifying staff will have the option to choose one of the following long service rewards:

30 Year's-Service

A £2,000 voucher from High Street Vouchers – e.g. Love2Holiday, John Lewis, Next, M&S, Love2Shop, Amazon.

Or

A one-off extra 7 days holiday for that year in which the long service anniversary is reached – this holiday must be utilised within the same year and cannot be carried forward.

25 Year's-Service

A £1,000 voucher from High Street Vouchers – e.g. Love2Holiday, John Lewis, Next, M&S, Love2Shop, Amazon.

Or

A one-off extra 5 days holiday for that year in which the long service anniversary is reached – this holiday must be utilised within the same year and cannot be carried forward.

20 Year's-Service

A £500 voucher from High Street Vouchers – e.g. Love2Holiday, John Lewis, Next, M&S, Love2Shop, Amazon.

Or

A one-off extra 3 days holiday for the year in which the long service anniversary is reached – this holiday must be utilised within the same year and cannot be carried forward.

15 Year's-Service

A £250 voucher from High Street Vouchers – e.g. Love2Holiday, John Lewis, Next, M&S, Love2Shop, Amazon.

Or

A one-off extra 2 days holiday for the year in which the long service anniversary is reached – this holiday must be utilised in the same year and cannot be carried forward.

Staff will be informed at the commencement of the holiday year (January) of their long service anniversary and asked to choose which option they would prefer. If extra days holiday, these will be added to the annual entitlement and if vouchers, these will be ordered for immediate distribution.

Personnel Details

It is each employee's responsibility to update the HR System of any changes relevant to personal details, i.e. name, address, telephone number, next-of-kin, or birth of a dependant.

Dress Code

All employees should attend work dressed in a smart casual style to promote the Company's professional image. If there are any queries speak to your Manager. Dress code may have to be enhanced for customer visits dependant on that customers expectations or their dress code etiquette.

The Company currently operates a casual dress day every Friday for employees who do not interface with customers/visitors. The Company maintains the right to withdraw this concession at any time.

Conduct

When representing the Company or attending any company social event employees are expected to act in a sensible and respectful manner. The Company asks that employees particularly bear this in mind while representing the Company with customers and suppliers, however, this also applies to all company social occasions.

The Company would like to remind you that all employees are still bound by the terms of their Contract of Employment while acting as a representative for the Company and when attending company events both during and outside normal working hours.

The Company reserves the right to enter into disciplinary proceedings for any misconduct during such occasions and events.

Attendance at Team Building/Incentive Events

As the primary business function of the Company is not to organise team building/incentive events it does not proclaim to be expert in this field. In arranging these events for staff enjoyment, however, the Company make all the appropriate enquiries to ensure that the activities are run in a safe and professional manner. Prior to agreeing to attend a particular event, the Company would ask that employees read the information provided about the activities involved.

Employees' participation is entirely voluntary and attendance is not obligatory. If employees do not take part in any event this will not have any negative influence on a future career path.

The Company excludes any liability of contract, tort, negligence, breach of statutory duty or otherwise arising as a result of any employee's participation in any event that it or its suppliers/business partners arrange, except for its liability for fraud, death or personal injury resulting from its own negligence.

In advance of attending any event organised by any of the Company's suppliers or business partners, we advise employees to review their personal insurance requirements to assess whether current insurance policies are adequate and, if appropriate, obtain additional coverage.

The Company always arranges travel insurance on a group basis for all company events. It is, however, each employee's responsibility to ensure that they comply with the medical declaration issued by the Company's insurers. If additional insurance cover is required to meet personal requirements this should be obtained in advance of the event.

If an employee has any pre-existing medical condition which might affect their participation in any particular event, they should seek medical advice before deciding to attend, and it is essential that they notify the Company or the supplier/business partner organising the event. The Company also recommends that they do not consume alcohol or any other intoxicating substance(s) immediately prior to or during any event where it might affect their ability to participate safely.

Finally, please note that any trips, gifts, vouchers etc received from suppliers/business partners as a result of an incentive campaign may be viewed by the Inland Revenue as benefits in kind. Any benefits in kind received from suppliers/business partners must be declared to the Inland Revenue. The benefits in kind resulting from events organised by the Company, however, are paid for by the Company and do not need to be declared.

All employees are expected to have read the above and agree not to hold the Company responsible for any loss or damage that may be incurred as a result of participating in any event that it or its suppliers/business partners arrange.

Car Parking

Car parking is available for all employees at the front and rear of the offices – there is limited parking at the side of the building. Please park within allotted lines and please do not block fire exits.

While driving cars on company property there is a speed limit of 10mph. To exceed this limit puts employees and other pedestrians in danger. Please observe all road markings within the company site.

Car parking spaces immediately in front of the offices are reserved for Directors, disabled persons and visitors.

Do not park in electric car charging bays unless charging as it will impede anyone wishing to utilise the chargers.

Lunch

Lunch must be taken between the hours of 12:00 pm and 2:00 pm.

Lunch may be eaten in the rest area available. Any crockery or cutlery used during lunch should be washed, dried and put away. Eating areas should be left clean and tidy. All employees should take a minimum of 30 minutes break from work at lunchtime.

Household Tidiness

Please ensure that work areas are kept clean and tidy. Always remember that external visitors often move around the building and that untidiness is very noticeable and does not give a professional impression.

All hot desking areas should be kept clear of personal effects.

Telephones

Only emergency personal calls are allowed. Personal calls don't just cost the price of the phone call, they cost the price of your time and result in a dip in productivity, this includes incoming calls also!

Call Management Software is in place on the telephone system that provides reports regarding all incoming and outgoing calls. International calls are restricted to business purposes only and automatic "call barring" is in place on most telephone extensions.

Calls to premium rate numbers, chat lines and any other numbers of a non work-related nature are strictly prohibited.

If an employee is found to have misused a company telephone it will be deemed as misconduct and appropriate disciplinary action will be taken.

Personal Mobile Phones

Please ensure that all personal mobile telephones are on silent while on company premises and usage is kept to an absolute minimum. Continuous conversational texting is not allowed in the workplace. Interruptions from mobile telephones are disruptive to work colleagues. Social media on personal mobile phones should not be utilised while in the workplace.

All of the above are disruptive to your working day.

External Mail

All incoming mail arriving at Phoenix Software is opened and distributed accordingly. External outgoing mail should be handed to Reception. Any private outgoing mail must be paid for by giving cash to the Reception Team.

Message Taking

Should a member of staff not be available to take a call, a message should be taken and passed on immediately by email. Always give the caller the option to leave a message on Voice Mail.

Recruitment Introduction Incentive

If a prospective employee is introduced by a current employee and subsequently employed at Phoenix Software, an introduction incentive of £1,500 is payable by the Company after the successful completion of six month's employment. This will be paid in arrears with the next relevant salary after being sanctioned by a Director.

Promotions and Incentives

Please see company policy Anti-Bribery Gift Register Policy which is available on SharePoint.

Training

Phoenix Software is committed to providing training as and when appropriate. If you believe you need training, speak to your Manager or the Training and Development Manager. Some restrictions apply as detailed in employment contracts.

Phoenix Software upholds an Internal Promotion Policy, which in certain cases enables staff to apply for internal vacancies prior to advertising externally.

Internal applications for vacant positions will be treated in the same way as external applicants. Current employees must officially apply for any position with a CV highlighting their suitability for the vacant post. Interviews will be arranged for those personnel whose applications are considered to be relevant and suitable.

Vacancies will be filled with applicants whose skills and attributes are best matched to the role. There is no guarantee of being interviewed or offered the position purely on the basis of being a current employee or the relative/contact of a current employee.

Grievance Procedure

There may be occasions when you want the opportunity to redress a grievance relating to your employment, such as conditions of employment, working relationships, organisational change or equal opportunities, in which case you should follow the procedure detailed below:

Matters will be dealt with in a sympathetic and non-confrontational manner. There will be no reprisal against anyone raising a grievance.

Informal Discussion

You should start by speaking to your Manager, who may be unaware of the problem, or a member of the Management Team who you feel comfortable to discuss your concerns with.

Formal Complaint

If the grievance is not resolved you should write to your Line Manager (or, if the grievance involves that person, their Manager), setting out your grievance and asking for a meeting at which it can be discussed further.

All grievances will be dealt with as quickly as is reasonably practicable. Depending on the nature of your grievance however, further investigations may have to be made before or after the meeting in order to gain additional information.

The person dealing with your grievance will let you know their decision or the outcome of any investigation and will also remind you that you have the right to appeal.

If you are not satisfied with the outcome of the discussion the matter should then be raised in writing with a Director. After due consideration, and following a meeting with you, a decision will be made by that Director.

Usually that decision will be final. Where the complaint or grievance concerns a particularly serious matter, you will be permitted to refer it to Sam Mudd (MD) if you are dissatisfied with the decision reached.

Representation

You will be entitled to bring a colleague in certain cases, if notified in advance, to attend a meeting regarding a workplace grievance.

Discipline

Non-performance of Sales Staff

The Company rarely has to take issue with non-performance of sales people but in the unlikely event that it has to, then the following will apply:

Full quota bearing sales people who have successfully completed their probation period will enter a PIP (Personal Improvement Plan) automatically should they fail to meet their sales targets.

The objectives they are set thereafter, and the support they are given in meeting them, will accommodate any extenuating circumstances but it is important, when all else fails, that consistently ineffective sales people are not allowed to jeopardise the stability of the Company.

This Policy has been in place for a considerable time at Phoenix Software and the principle is almost universally applied in IT sales forces. For further clarification speak to your Sales Manager.

Disciplinary Procedure

Phoenix Software looks for, and expects, a high standard of performance and behaviour from all employees. Most problems can be dealt with quickly and informally by your Manager/Director making individuals aware of any improvement required.

The following processes and principles apply where a more formal approach is necessary or where an informal approach has been tried but proved unsuccessful.

Processes and Principles

A breach of rules or procedures, unacceptable behaviour either at work or at a work-related social event, or failure to perform to a satisfactory standard may give rise to disciplinary action.

The following principles apply if it appears that formal disciplinary action may be necessary:

Only a Director or a Senior Manager has the authority to take disciplinary action.

Before any decision is taken to discipline an employee, the details are carefully investigated and the employee may be asked to attend an investigatory meeting so that facts can be established. This kind of meeting is not a disciplinary meeting.

Before a disciplinary meeting takes place, the employee will be advised in writing of the nature of the complaint, of any relevant evidence and will be given a reasonable opportunity to consider their response.

The employee may be accompanied by a work colleague during any disciplinary interview or meeting.

The employee may be informed at the end of the meeting verbally and/or after the meeting in writing, of the final decision and any disciplinary action that will be taken and the right to appeal against any disciplinary action imposed.

Disciplinary actions will normally remain on file for twelve months, unless it is confirmed to the employee that the matter is so serious that it should remain 'on the record' for longer or indefinitely.

No employee should be dismissed for a first breach of discipline, except in cases of gross misconduct, when the action will usually be dismissal without notice or payment in lieu of notice.

Every effort will be made to ensure that disciplinary matters are dealt with swiftly and proceedings, witness statements and records are kept confidential. The employee will be allowed to receive a copy of any Disciplinary Meeting records unless there is a good reason for withholding that documentation (e.g. to maintain witness confidentiality).

Misconduct

The lists below, which are not exhaustive, give examples of the sort of conduct which normally constitute Minor, Serious or Gross Misconduct.

- Minor Misconduct (can lead to formal disciplinary proceedings)
- Unsuitable appearance
- Lateness
- Inappropriate clothing
- Time-wasting
- Excessive tea/cigarette/lunch breaks
- Poor attitude
- Inability to meet work standards
- Persistent use of mobile phone / social media

Serious Misconduct (can lead to formal disciplinary proceedings)

- Persistent lateness
- Breakdown of trust
- Persistent time wasting
- Persistent unauthorised absences
- Persistent misuse of the swipe system
- Failing to follow business procedures and working practices
- Failing to report an accident
- Introducing a software virus to the company
- Distribution of non-work related materials by email
- Accessing non work related Web sites on the Internet during working hours
- Inability to meet work standards
- Failing to observe safety rules and procedures
- Installation and playing of games on PCs
- Misuse of company facilities
- Persistent failure to meet set targets
- Misuse of hybrid working system
- Breaches of information security procedures

Gross Misconduct

- Any misrepresentation, falsification or material omissions in employment application information or data, or misleading information provided during interview
- Falsifying of any Company documentation
- Any act or disclosure which may bring the Company into disrepute or threaten its reputation or damage business interests
- Deliberate breach of confidence relating to the Company's affairs or information security procedures
- The use, for personal ends, of confidential information obtained by the employee in the course of his/her employment
- Private trading during working hours or using the Company's facilities for private trading
- Purchasing on behalf of the Company without authorisation
- Fraud or theft
- Wilful disregard of duties, instructions or rules relating to employment
- Refusal to complete a reasonable task
- Incapacity to work as a result of being under the influence of alcohol, solvents or non-prescribed drugs
- Assault or attempted assault

- Indecent acts
- Serious negligence which causes, or could have caused, serious loss, damage or injury
- Serious breach of rules of health and safety or security
- Bullying or harassment
- Acts of incitement to or actual acts of discrimination on the grounds of gender, race, religion, colour, ethnic origin, sexual orientation, disability or medical condition
- Conviction of a criminal charge relevant to the employee's employment
- Using the Company's IT facilities to download, view, display, create, store or transmit material (including messages, jokes, pictures, games etc) of a sexual or racist nature, or which are otherwise offensive, or which could be considered offensive by others
- The use of any social media to bring the Company into disrepute – this includes making derogatory remarks or claims about your employment or the Company
- Any act which is against the law
- Misuse of data

Further examples of Gross Misconduct are given in this Handbook, included in our Computer Use Policy.

Penalties

The following disciplinary penalties apply, and may be invoked at any stage if the employee's misconduct or performance warrants this.

Verbal Warning

If conduct or performance does not meet acceptable standards, the employee will normally be given a formal verbal warning, advised of the reason, the consequences of any further misconduct or failure to improve to satisfactory standards, and the right to appeal. A written record of the verbal warning will be signed by all parties as a true record of the meeting and kept on file for up to twelve months providing there is no further offence. All warnings will be spent after twelve months, subject to satisfactory conduct and performance.

Written Warning

If the offence is more serious, or acceptable standards are not being met after an earlier verbal warning(s), a written warning will be issued. Details of the complaint, the right of appeal, improvement required and the timescale for this will be given, warning that further action will be taken if there is no satisfactory improvement.

A copy of the written warning will be kept on file. Unless the employee is informed otherwise, a written warning will be disregarded for disciplinary purposes after twelve months, subject to an acceptable standard of conduct and performance being maintained.

Final Written Warning

If there is further misconduct or a failure to improve and conduct or performance still does not meet acceptable standards, or if the misconduct is sufficiently serious to warrant only one written warning, but insufficiently serious to justify dismissal, a Final Written Warning will normally be given. This will give details of the complaint, the reason for the warning, and, where appropriate, the improvement required and the timescale in which improvement is required. It will warn that dismissal may result if there is no satisfactory improvement and will advise of the right of appeal. A copy will be kept on file but, unless otherwise advised to the employee, will be disregarded for disciplinary purposes after twelve months, subject to an acceptable standard of conduct and performance being maintained.

Dismissal

If there is failure to improve and acceptable standards are not being met after a final written warning, or in the case of Gross Misconduct, dismissal will normally result. Phoenix Software will provide the employee with written confirmation of the dismissal, detailing the reason, the right of appeal and the date of termination.

Suspension

While any alleged Gross Misconduct is being investigated, where appropriate, the employee may be suspended on full pay. Suspension is not automatic but may occur, for example, if it is necessary for the investigation to be carried out unhindered or where relationships have broken down, or to protect business interests. Suspension is not a disciplinary penalty.

Appeals

An employee who wishes to appeal against a disciplinary decision must do so in writing to the Managing Director within five working days of being advised of the decision. All appeals will be heard as promptly as reasonably practicable. Phoenix Software will notify the employee of the date and time of the Appeal Meeting. If the disciplinary decision is upheld at Appeal, this decision is final. An appeal will not have the effect of delaying or postponing the disciplinary penalty.

Employee Rights

Time Off for Maternity Leave

If you are an employee about to become a mother, you have the statutory right to a minimum amount of maternity leave. As statutory rights change from time to time, up-to-date information can be obtained by either contacting the HR Department, or by checking the Government web site: www.gov.uk.

Maternity Pay

The Company has an enhanced maternity pay scheme as follows:

- 6 weeks at full pay
- 20 weeks at half pay
- 13 weeks Statutory Maternity Pay
- 13 weeks unpaid

The above is also applied to **Shared Maternity Leave**.

Time Off for Adoption Leave

If you adopt a child, you may have the right to 52 weeks of adoption leave. You may also have the right to be paid for up to 39 weeks of the leave. As statutory rights change from time to time, up-to-date information can be obtained by contacting the HR Department, or by checking the Government web site: www.gov.uk

Time Off for Paternity Leave

If you are a father-to-be, or you'll be responsible with a new baby's mother for bringing up the child, you have the right to be paid paternity leave providing you meet certain conditions. As statutory rights change from time to time, up-to-date information can be obtained by contacting the HR Department, or by checking the Government web site: www.gov.uk

Paternity Pay

The Company has an enhanced paternity pay scheme as follows:

- 2 weeks full pay

The leave must be taken in one block of full days of either one or two weeks.

Time Off for Parental Leave

Parental leave is unpaid. Employees are entitled to 18 weeks' leave for each child or adopted child, up to their 18th birthday.

The limit on how much parental leave each parent can take in a year is 4 weeks for each child (unless the employer agrees otherwise).

As statutory rights change from time to time, up-to-date information can be obtained by contacting the HR Department, or by checking the Government Web site: www.gov.uk.

For additional information please see Family Leave Policy.

Time Off for Elective Surgery

Elective surgery is surgery that is a choice as opposed to urgent or emergency medical surgery for prevention, cure or intervention of illness or fatality. Examples include laser eye surgery, dental implants, IVF or any variation of cosmetic surgery. Employees should take this time off as annual leave or unpaid.

Compassionate Leave

Compassionate Leave (Relative) is intended for bereavement of immediate family. The entitlement is for time off and it is at the company's discretion to pay for such time. Immediate family is classed as any of the following members of the employee's family and is generally paid:

- husband, wife or partner
- parent
- child including adoptive or stepchild
- sibling
- grandparent
- grandchild

Time off for Dependants

You have the right to unpaid time off work to deal with emergencies involving a "dependant" – a husband, wife, child or parent, or anyone living in your household as a member of the family. A dependant may also be anyone who reasonably relies on you for assistance. The right is not for long term care arrangements such as childcare or nursing a sick relative. As statutory rights change from time to time, up-to-date information can be obtained by contacting the HR Department, or by checking the Government Web site: www.gov.uk

Unpaid Leave

If an employee is exceptionally allowed to take unpaid leave he/she will not be entitled to benefits in kind, such as lap top computer, mobile phone.

If allowed to keep such items he/she would be expected to pay for all private calls.

Transfer of Staff Arrangements (TUPE)

If the business you work for changes hands, your terms and conditions are protected under the Transfer of Undertakings (Protection of Employment) Regulations (known as "TUPE"). The existing terms and conditions of your contract of employment will transfer automatically to your new employer. This means that you will normally carry on working for the new employer as before. If the new employer refuses to meet the terms of your contract, this will amount to a breach of contract.

As statutory rights change from time to time, up-to-date information can be obtained by contacting the HR Department, or by checking the Government Web site: www.gov.uk

Retirement

You would normally agree with your employer at what date you will retire. For employment rights purposes, your "normal retirement age" is the age when people doing your job normally retire (which equally applies to men and women).

As statutory rights change from time to time, up-to-date information can be obtained by contacting the Administration Department, or by checking the Government Web site: www.gov.uk



Code of Practice

Housekeeping and General Tidiness

- Smoking / vaping is strictly prohibited in the building. It is only allowed in the designated external area in the rear carpark. Please stand away from the building so that smoke does not enter via open windows etc.
- Rubbish, especially paper waste, should be put in the bins provided and cleared away regularly.
- Desk drawers should not be left open. Items should not be stored on top of filing cabinets and cupboards.
- Correct lifting procedures should always be used. There is a 'Brief Guide to Good Manual Handling' on page 18.
- Any liquids spilt on the floor should be wiped up immediately.
- All chemicals, including cleaning and other solutions, should be correctly labelled and only accessible to authorised people.
- Wires and cords must not be allowed to hang or cross areas where they may create hazards. Any wires that do cross a walkway must be held down and protected.
- Running and horseplay are prohibited.
- All areas should be well lit with adequate emergency lighting in case of a power failure.
- All computers and electrical equipment should be switched off before you leave for the evening. If you are the last to leave an office area, please ensure that windows are closed and that lighting and air conditioning is switched off.
- Any potential hazards should be reported to HR.
- Only use steps or other proper climbing equipment. Never use chairs, open drawers, boxes etc. to climb on. Never over stretch when climbing.
- All electrical appliances and mechanical equipment should be treated with care. All electrical appliances are tested annually by competent personnel and appropriate records kept.
- Never improvise, always use the correct equipment. Never use equipment that you have not been trained to use.
- Take care with any heaters, hot liquids or other hot or flammable substances.
- Any defective or damaged equipment of any description must be reported and not used until repaired. This includes floor coverings and wires etc.

Implementing Safe Systems of Work

This document shows local arrangements for implementing Safe Systems of Work to minimise risks arising from the following:

Display Screen Workstations

Due to the working methods employed at Phoenix, most employees use display screen equipment for a significant part of their normal work.

A copy of the Health & Safety Executive publication 'Display Screen Equipment Work' is held in the HR Office. Employees will receive annual training regarding workstations.

'Display Screen Equipment Work' contains details of the minimum legal requirements concerning the factors listed below. All employees should read the publication and report any shortcomings to a Health and Safety Representative or Building Maintenance Manager.

The following have minimum legal requirements set out:

- Display Screen
- Keyboard
- Desk and Work Surface
- Work Chair
- Workstation Size and Space
- Lighting
- Reflection and Glare
- Noise
- Heat
- Radiation
- Humidity
- Operator/Computer Interface
- Employees Eye Care

Electrical Equipment

Due to the nature of Phoenix Software business, a great deal of electrical equipment is used in the office.

- In order to minimise the possibility of electrocution or fire, all electrical installations are installed by a person who is competent to carry out the work. All electrical appliances are checked annually by a competent person and a register maintained as evidence.

- Work of an electrical nature is only undertaken by personnel deemed competent to do so.
- Sockets must not be overloaded. If additional sockets are required, this must be by way of a multi-plug socket block. This is the type that consists of a plug, cable and block of additional outlets. Employees must contact a Health and Safety Representative or Building Maintenance Manager if additional sockets are required.
- All plugs must be of the moulded type or have a clamp to prevent the wires pulling out.
- Flammable liquids (eg correction fluid thinners) must be stored in suitable containers which are kept closed when not in use. Any flammable liquid should not be stored in close proximity to electrical equipment.

Food Preparation

Phoenix Software maintains kitchen facilities available for the use of all employees.

Employees using the kitchen/break out areas do so on the understanding that their waste is cleared and all work surfaces are left clean and tidy.

- The walls, floors and ceilings of the kitchen are kept clean, in good state of repair and free from contamination by dirt, vermin, insect or odour. The company premises are covered by a pest control contract.
- The kitchens are well lit and ventilated.
- Wash basins are provided for personal cleanliness. Hot and cold water is provided along with soap, towels/hand dryers.
- A constant supply of clean, hot and cold water and a suitable sink is supplied for food and equipment washing only.
- All waste, contaminated food or refuse is removed regularly and disposed of.
- Dogs and other animals are not permitted in the kitchen.

General Office Equipment

All employees of Phoenix Software have access to certain office equipment which, if not handled with care, has the potential to cause injury.

- All employees are expected to use their common sense when using such equipment.
- Employees must never use a piece of defective equipment.
- Employees must never improvise with any items and should always use the correct ones.
- Some equipment has sharp edges which may cause injury if not handled with care.

- Employees must also consider the safety of others when handling such equipment.

A list (not complete) of General Office Equipment with potential hazards is as follows:

- Binding Machine
- Scissors
- Sticky Tape Dispenser
- Shredder
- Stapler
- Hole Punch

Phoenix Software also holds several tool kits in the technical areas. These are also available to all employees and great care must be taken when using any tool.

Hazardous Substances

All hazardous substances display proprietary labelling to illustrate their potential danger. All directions must be read before use.

All precautions must be followed according to the label. Reference should be made to the COSHH sheets for any further information required.

Such products must only be used for their intended purpose.

In the event of accident or mishap, follow the First Aid guidance according to the label.

Substances within the office which are considered hazardous are:

- **Correction Fluid** – Obtainable by all employees. Must not be inhaled, swallowed, or allowed to come into contact with eyes. Containers must be kept closed when not in use due to the flammability of the product and must be kept away from sources of ignition.
- **Photocopier Toner** – Obtainable by all employees. Toner must not be inhaled or allowed to come into contact with skin or eyes. Only competent persons must place the toner in the photocopier who must ensure that the used cartridges are disposed of in a responsible manner.
- **Glue** – Obtainable by all employees. Only non-toxic glue is used in the office but this should be used with care for the intended purpose only.
- **Marker Pen** – Obtainable by all employees. Certain pens give off fumes (Xylene) which should not be inhaled.
- **Silica Gel** – Not held by the company although occasionally products (such as certain electrical items) are received which contain envelopes of Silica Gel.

This should be disposed of in a suitable manner as the substance is dangerous if swallowed.

- **All Cleaning Substances (including bleach, washing up liquid, liquid, soap, etc)** – These are obtainable by all employees, although are specifically intended for cleaning staff, for the intended purpose only. Care must be taken if an employee uses such a substance and all warnings, precautions and directions must be read, understood and adhered to before use.

Care must be taken with the use of any type of aerosol – to puncture an aerosol can lead to an explosive situation.

Machinery and Appliances

Phoenix Software utilises a number of machines and appliances which may cause injury if not used with care.

Most equipment is labelled with warnings if a potential risk exists. All employees are expected to read any warnings and use their common sense when using machinery or appliances.

Such equipment includes, but is not to:

- **Photocopiers/Scanners** – Available for the use of all employees. The bright light emitted during copying may cause damage to sight. The light source should not be looked at directly. Take care not to trap fingers under the lid. These machines should only be opened by personnel who are trained in dealing with the internal workings, etc. There are obvious dangers associated with electricity, heat, sharp edges and entrapment.
- **Binder** – This is available for the use of all employees. Generally used several times each day. Keep fingers clear of the compression lever. Operators must be aware that heating elements are included in the machine. Hair, jewellery, ties etc. should be kept clear of the machine.
- **Shredders** – These are available for use by all employees within the business. Keep fingers, clothing, hair and jewellery clear of the cutting blades. Care should be taken to ensure that the machine is switched off before emptying the bin.
- **Fire Extinguishers** – These are available for the use of all employees. In the event of an emergency however it is preferable that trained Fire Wardens deal with any episodes concerning fire. Severe shock can occur if the wrong type of extinguisher is used to deal with a fire involving electricity. All extinguishers are clearly labelled as to what types of fires they can be used on.

Manual Handling

Details of correct manual handling practices are available within Phoenix Software and are contained in the Manual Handling Operations Regulations 1992.

It is understood that the following limits apply if the load is readily grasped with both hands and that the operation takes place in reasonable working conditions with the handler in a stable body position:

'The health and safety executive guidelines show that a maximum weight of 25 kg (55 lbs) can be lifted by a person, without significant risk, this is at waist height and close to the body.'

'This reduces to 10 kg lifting from floor level close to the body and 5 kg at arms length.'

However, this should only be treated as a guide, as each individuals' own capacity for lifting and carrying should be considered. This is dependant upon age, sex, medical condition etc. Each employee is expected to consider their own capacity before commencing any manual handling and summon help if required.

Whilst the majority of manual handling within the company is within the Despatch area, all staff should consider the weight, size and shape of any item, particularly paper and files, before attempting a lifting operation. The body must never be twisted during a manual handling operation.

A Brief Guide to Good Manual Handling

Size up the job

- Can lifting appliances be used?
- Are the floors sloping, slippery or greasy?
- Are there obstructions or stairs?
- If the object is too heavy to lift, get help.

- Take into consideration the size and shape of the object.
- Know where the object is to be put down.

Stand firmly

- Stand close to the load.
- Place your feet about 0.5 m (19.5 ins) apart.
- Place one foot in front of the other in the direction of movement.

Bend your knees

- Keep your back straight.
- Keep your chin well in.

Get a firm grip

- Use the whole of your fingers – not just the tips.
- Keep the load close to your body.
- Grip boxes diagonally.

Lift with your legs

- Lift by straightening your legs.
- Keep your back straight.
- Use the impetus of the lift and start moving off in the required direction.

Putting things down

- Keep your back straight
- Bend your knees.
- Don't trap your fingers.
- Put the load down askew and slide it into place.

Contractors Working at Phoenix Software

Contractors must be made aware by Phoenix Software of any and all hazards which may exist on the site before commencing work.

A statement of works and timescales will be agreed with the contractor before commencement of work, detailing locations, times that work can take place and any unusual hazards that may exist. No work must be started, equipment, materials or other items must not be delivered before the statement of works has been agreed by Phoenix Software.

No Smoking Policy

Since 1 July 2007, it is against the law to smoke inside the Company building and we are legally bound to keep company premises totally smoke free. No smoking signs have been put in place

Those employees who choose to smoke are asked to understand and adhere to our codes of conduct:

Smoking/vaping is only permissible outside in the rear carpark next to the cigarette bin.

Smoking is only allowed in the 10-minute break between 10-11am and 3-4pm and during lunch breaks

Receptacles provided for the safe disposal of cigarette ends and spent matches must be used. These receptacles must be emptied on a regular basis by those who use them

Swipe Card System

All employees are expected to swipe in every time they enter and swipe out every time they leave the premises. The Swipe Card System may prove vital in an emergency situation as a record of attendance. It is your responsibility to remember to swipe in and out. Please remember it may not be just your life that is at risk if you do not use the swipe card system correctly.

Reports can be created to monitor office attendance/hours worked when working from the office.

All visitors must sign-in at Reception. Visitors to the building must be accompanied at all times, wear a visitor badge and be made aware of our ISO27001 information security rules.



How to use the Service Desk

If you require technical support, for example, you are experiencing device or telephone problems or you need special equipment for an event, please contact Service Desk.

You can contact Service Desk by e-mailing support@phoenixs.co.uk or by calling 01904 562207.

Service Desk Core Phoenix Support Hours / e-mail, portal and telephone support

Monday to Friday (excluding Bank Holidays) – 0700 to 1800 hours

Service Desk Extended Phoenix Support Hours / telephone support only – 01904 562207

Monday to Friday 1800 to 2230 hours

Weekends & Bank Holidays 08 00 to 2230 hour

How to Handle Customer Complaints

Customer complaints can be received into the company at various points. It is imperative that all customer complaints are recorded and forwarded to the Quality or Governance Manager to be recorded as part of the Customer Complaint Procedure.

Please bear in mind that a Complaint can take many forms – we must pick up on trends where customers are raising issues!

Travel Policy

The Administration Dept will arrange public transport for any business travel needs.

It may be necessary to use taxis for connecting trips; the Company will pay all reasonable taxi fares on production of receipts.

Employees wishing to use their own cars for business travel may only do so with their Manager's approval and must first provide evidence that they have the correct level of insurance cover. This must be provided in writing either in the form of the original insurance certificate or a letter from the insurance company. Without this the employee will not be permitted to use their car for company business.

Business Appointments

If an employee wishes to attend an appointment with a customer or supplier, at Phoenix Software premises or another location, prior approval must be sought from their Manager.

If accommodation is required for visitors then the Administration Dept will arrange this.

If arrangements have been made for customers or suppliers to visit the Company, Reception must be informed prior to their arrival. This should be done by the person who has made the arrangements.

Accommodation

The Administration Dept will arrange the booking and payment for suitable accommodation, including bed and breakfast for employees who are required to stay overnight for business reasons.

If accommodation has been arranged and, due to unforeseen circumstances, it is no longer required, the Administration Dept must be informed immediately so that a cancellation can be arranged. Alternatively, a member of the Administration Dept will contact a hotel directly to avoid unnecessary expense.

An allowance of £50 is payable if an employee has to stay away overnight on business and arranges to stay with family or friends. Authorisation for these circumstances must be sought from the employee's Manager before the event. The £50 will be paid in the following month's salary and subject to Tax and National Insurance deductions.

Wherever possible it is Company Policy to book into a Premier Travel Inn in order to keep the costs down. Please refer to the Expense Policy for meal allowances.

The cost of dinner can be reclaimed through the Concur system.

Expenses

Please refer to the Company Travel and Expenses policy on SharePoint.

Company Mobile Phone Policy

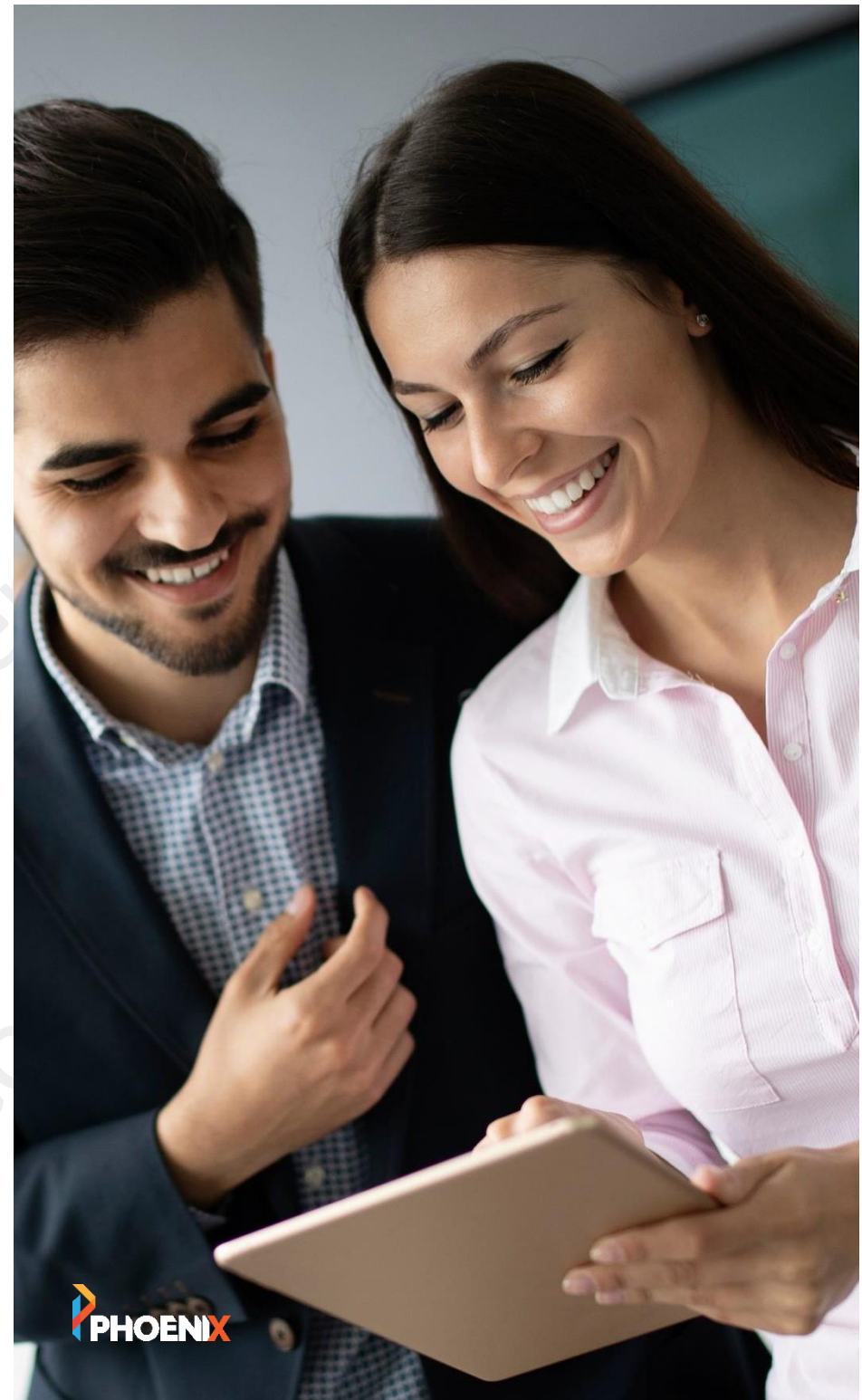
If your Contract of Employment states that the Company will pay for all business calls and all reasonable private calls, the reasonable private calls only include calls made while on company business. These calls are often necessary for you to notify your family of your whereabouts. You may be asked to reimburse calls made on your mobile if they are considered to be excessive. Always bear in mind the cost of calls and data usage when abroad especially in America where rates are very high.

When issued with a company mobile phone, you are responsible to ensure that it is kept safe and secure and that data available on the phone is protected and not made available to third parties. Any negligence relating to the protection of company data will lead to disciplinary action.

Company mobile phones must not be used for outgoing calls whilst in Blenheim House, as it is considerably less expensive to use a landline phone.

If it is necessary to answer telephone calls whilst driving, the conversation should be kept as brief as possible and you should pull over in order to return the call. Please note that company mobiles are provided to assist you in your job and abuse of this provision is not acceptable. Inappropriate use of company mobiles will result in the removal of the phone.

Always ensure that mobile telephones are switched off or on answer service facility when meeting customers as it is rude to accept calls during customer visits. If an employee should lose or have their company mobile phone stolen, it must be reported immediately to one of the following contacts:
During working hours – contact the ServiceDesk on telephone number 01904 562207
Outside working hours contact Cellular Solutions on telephone number 0870 011 8000. The mobile phone number of the Company name and address are also required.
Alternatively, if you are unable to contact Cellular Solutions, then contact 02 Customer Services on 0800 977 7337



Protecting Information: ISO27001 – Data Security & Data Protection

This policy is about two very important issues.

Information Security

As a business, Phoenix Software holds sensitive information, about ourselves and others; if that information is not kept secure the business could suffer. Any breaches in information security must be reported immediately to the Information Security Committee or Service Desk.

Data Protection

Data Protection is not the same as Data Security. Data Protection law outlines the requirements for how information should be fairly and properly used and managed – from its creation through to destruction.

The Data Protection Act 2018 establishes the UK General Data Protection Regulation (UK GDPR) as a result of the UK's exit from the EU in 2021. The UK GDPR and DPA2018 replicates the EU GDPR and establishes the requirements for the protection of Personal Data by entities operating within the UK.

How will Phoenix Software comply with the GDPR?

Our GDPR preparation started in June 2017 and as part of this process we reviewed (and updated where necessary) all our internal processes, procedures, data systems and documentation to ensure that we were ready when GDPR came into force in May 2018. Now that the UK GDPR is in force we are constantly monitoring and improving how we protect personal data

We therefore handle all Personal Data in line with the 7 principles of Data Protection:

- Data is processed fairly and lawfully
- Data is processed only for specified and lawful purposes
- Processed data is adequate, relevant and not excessive
- Processed data is accurate and, where necessary, kept up to date
- Data is not kept longer than necessary
- Data is kept secure
- Data is processed in an accountable manner

Phoenix Software is a BSI ISO 27001:2015 accredited company, Cyber Essentials and Cyber Essentials Plus. This ensures we adhere to stringent processes for keeping our data and our customers' data secure.

Responsibilities

The Governance Manager has day to day responsibility for data security and advising on Data Protection. All employees are responsible for making sure data protection laws are not breached and information is handled and protected appropriately. Everyone who comes into contact with information about individuals must be sure they understand how Data Protection affects the way they deal with that information.

Everyone must read this Policy carefully and make sure that they, and others who work for us, comply with it. If you do not understand anything in this policy, check with the Governance Manager.

Managers have a special responsibility for ensuring their team comply with this Policy.

ISO27001 Security Rules

All employees must read the Phoenix Software Acceptable Use Policy available on SharePoint. Information is received and stored in many forms, e.g. hard copy, notes, computer files and disks, digitally recorded information and in employee's heads. These rules relate to all company and/or client information you may receive, store or use.

1. Do not remove any company or client data from the office without your Manager's permission.
2. If you have authority to remove the above information, then you must not leave it (or the file or device on which it is recorded or stored), unattended in a car or public place.
3. All documents containing sensitive information concerning our business, staff or clients must be stored appropriately when not in use and not left unattended.
4. All devices must be encrypted to protect information. Devices should automatically close down after ten minutes if not in use.
5. All computer users must have a user name and associated password, which should be changed frequently. You must comply with our Acceptable Use Policy at all times.

Special Rules Concerning Information

You are responsible for ensuring that any information about individuals or the business that you or the Company hold is kept secure and is not disclosed, either orally or in writing, to a third party. (Be especially wary of accidentally disclosing secure data.)

Desks should be kept clear of documents containing information about individuals or the business when those documents are not in use. Manual records containing secure data/information should be kept secure. Devices should only be accessed by those with permission. Devices should be password protected and passwords should not be written down or shared with others. Devices should be switched off when left unattended.

Examples of When You Must Consider Data Protection or ISO 27001 Security Principles

Data protection is an area that affects almost every aspect of your work. You must be vigilant and constantly aware of when and how you might come into contact with sensitive data and how you should deal with that data.

Examples of when you must consider your obligations under the UK GDPR or ISO27001 are:

- If you are asked by someone in or outside the Company for information about an individual or the business
- If asked by someone in or outside the Company for a document, report, record, database, spreadsheet etc. which contains information about an individual (e.g. an employee or client) or the business
- Before divulging (or processing) information or creating any letter, memo, email, document, report, record, database, spreadsheet etc. that contains information about another individual or the business
- When preparing or copying letters, memos, emails, documents, reports, records, databases, spreadsheets etc., that may contain information about another individual or the business
- If you receive or hold information about another individual or receive or compile any letter, memo, email, document, report, record, database, spreadsheet etc. which contains information about another individual or the business
- If you keep information about individuals in a structured paper/manual filing record or are about to set up such a record. Make sure the HR Manager is aware of any such records you keep (or plan to keep) and what you intend to use the records for
- Before destroying any record (electronic or hardcopy) containing sensitive information it is important to remember that files deleted from a device can be recovered and bear in mind that paper documents that are not shredded, could be seen by others

- If you are involved in recruitment, you are likely to invite individuals to supply sensitive information about themselves
- If you have management responsibility for others, you may hold or have access to information about individual employees (e.g. performance reviews, absence records, salary information, etc)
- If your job gives you access to information about employees (e.g. the contents of personnel files, payroll records etc)
- If your job gives you access to information about clients (e.g. name and address, account details, other financial information)
- If you are satisfied that you are legally entitled to disclose information to a third party, ensure the way you disclose that information is secure. Fax and email should not normally be used for sending confidential or sensitive information
- If you are at all unsure whether or not to disclose, process or use personal information, or if personal/business data is disclosed or destroyed by mistake, you must tell the HR Manager

Confidentiality and Trust

Any information regarding Phoenix Software, its customers, suppliers and employee's that you are exposed to should be treated with the utmost discretion. It must not, under any circumstances, be discussed outside of the Company. Please read and understand the confidentiality clause in your Contract of Employment.

Dealing With Requests for Disclosure of Information

If you are asked for information about employees, clients or other individuals, you must first speak with our HR Manager.

You must always establish the identity of the person making a request for disclosure before responding. Where possible, get them to put it in writing, to avoid deception.

Dealing With Requests for Subject Access

Any employee requesting to see their personal data must be dealt with only by the HR Department.

All other requests from individuals asking for their personal data must be alerted to the Governance Manager.

Employment Records

Information Held and Where It Comes From

As your employer, Phoenix Software holds and uses personal information relating to you either in electronic records which includes your name and address, age, date of birth, bank details, emergency contact, health records, medical conditions or illnesses, pay records, disciplinary and grievance records, performance appraisals, your children's dates of birth (for parental leave entitlement), details of other employment, details of any offices held (e.g. as a councillor) which may entitle you to time off work, references, details of qualifications and skills and other information that we need to hold about you for employment purposes.

Why We Process Your Personal Data

In compliance with employment law, administration of employment contracts and to ensure and assess whether such contracts are being complied with

- To establish and assess an employee's training and development requirements and to assess an employee's performance in their job
- To assess suitability, qualifications and ability to perform a particular job or task
- To establish if you have a legal right to time off work (e.g. parental leave)
- To gather evidence where there is or appears to be a case for disciplinary action
- To ensure that the Company's rules and procedures are being complied with
- To maintain accurate records of disciplinary action taken and employee grievances
- For remuneration and payroll administration
- As a point of contact in case of emergency
- To ensure the needs of the business are being met
- To give third parties information that they reasonably require where they have an interest, or are proposing to acquire an interest, in our business
- To comply with any court order or request from any official or regulatory body, e.g. Police, Stock Exchange and the Health and Safety Executive
- In connection with legal proceedings or for the purpose of obtaining legal advice
- Where there is a need to verify information provided by an employee

Some of the information we process could be classified as 'sensitive personal data'. This would include information relating to membership of a trade union, your health, any

criminal convictions or offences, and details of your nationality to ensure compliance with the Asylum and Immigration Act 1996.

Sources of Information

Most of the information held comes directly from you, although it may be necessary to collect information from other sources, as follows:-

- Other employers may be contacted for a reference or to verify information provided by you and to establish any parental leave entitlement
- Secondary employers for hours of work (for health and safety reasons) and to ensure that there is no conflict of work with either employer
- Third parties, e.g. schools and colleges to verify qualification information.
- Information about job performance, training requirements, attendance record etc. may be collected from your manager. This includes opinions as well as facts.

Sickness/Medical Records and Medical Reports

Phoenix Software may ask for information about medical or other conditions that may affect your ability to perform your job, or to assess your suitability and ability to perform a particular job, but also to comply with legal obligations (e.g. Health and Safety law, Disability Discrimination Act etc.).

Phoenix Software also need to be aware of medical conditions in case an employee falls ill at work, so that appropriate medical treatment or advice can be sought where required. Other reasons for processing data would be to monitor sickness absence and details of industrial injury.

Occasionally, Phoenix Software may need to obtain a Medical Report e.g. to establish whether and when you might be able to return to work from sick leave, to verify reasons for absence from work, to help us comply with Health and Safety law, to assess your suitability and ability to perform any particular job or task, to help us

determine whether or not changes could be made to working conditions, to assist you if you have a disability or to comply with any requirements imposed by our insurers.

Access and Disclosure

Subject Access

As an employee, you are entitled to know what personal data is kept about you by sending a written request to the HR Department. Phoenix Software Ltd are entitled to withhold certain information in accordance with the provisions of the Data Protection Act 2018.

References

Phoenix Software Ltd reserve the right to withhold references received from a third party – particularly when the third party referee provides that reference in confidence.

Other Disclosures

If you work for another employer, Phoenix Software may supply details of your hours of work and any details of parental leave. Phoenix Software may also disclose any restrictions in your employment contract preventing you carrying out other work in order to avoid, or establish whether there has already been, a breach of contract terms.

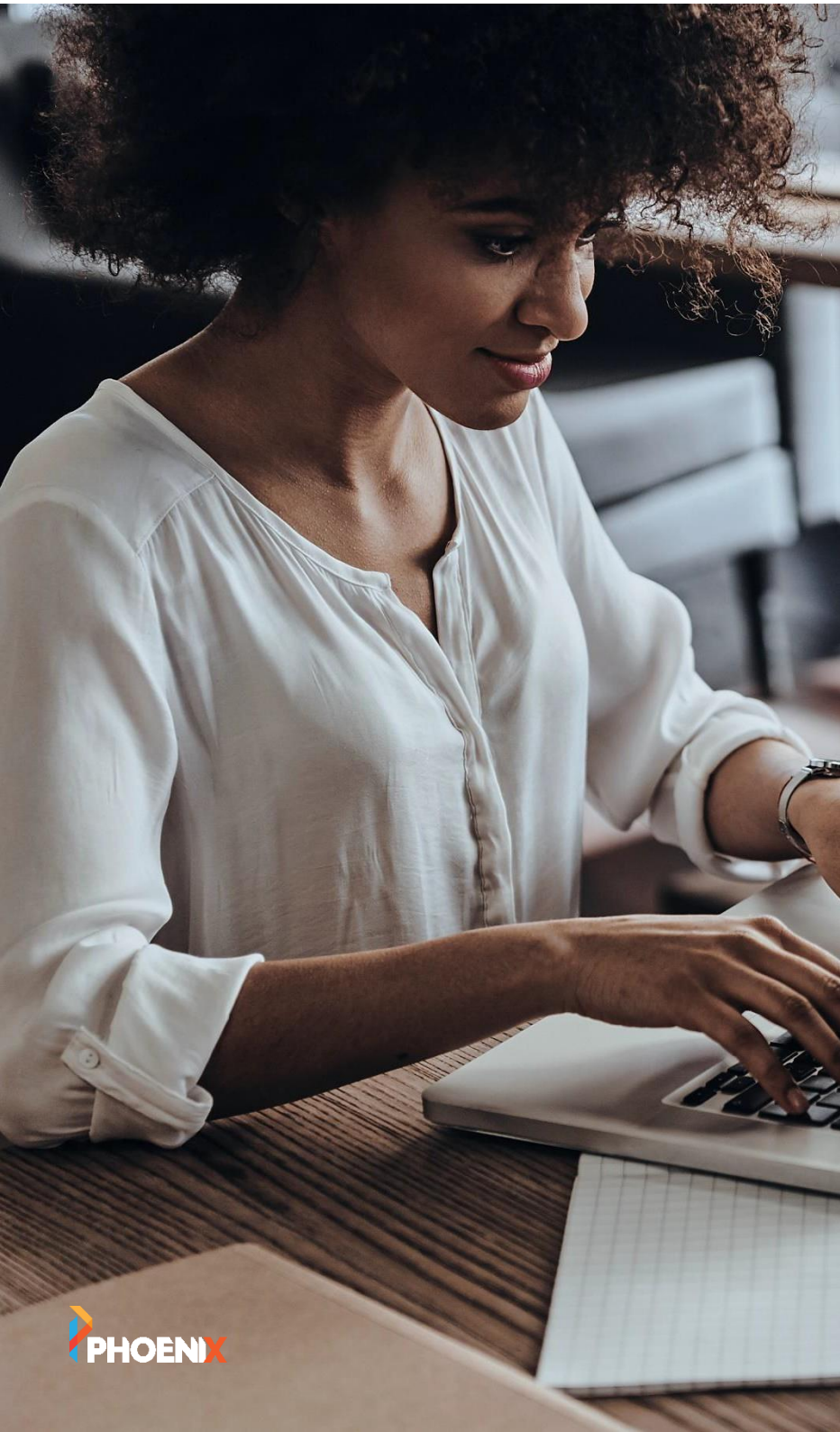
Unauthorised Access

Accessing, disclosing or using employee records without authority is a serious disciplinary offence likely to lead to dismissal. It may also be a criminal offence.

Retention of Records

Personal data about former employees is held for 7 years, depending on the nature of the information.

The principles set out above also apply to contract and agency staff.



Computer Use

There is an Acceptable Use Policy in place to protect the information and data we hold and our investment in our infrastructure. It is also intended to help employees comply with and promote appropriate standards of conduct and usage, operate within the law and avoid problems that could affect your ability to do your job.

This policy must be read together with our Data Protection Policy and other computer security-related circulars and codes of practice, which Phoenix Software (or any client) may issue from time to time.

You must be aware that breach of this policy (either deliberately or carelessly) constitutes misconduct and is likely to result in disciplinary action or, in serious cases, dismissal without notice or payment in lieu. In addition, criminal prosecutions could follow.

Emails

- Think carefully about the wording of any email. Do not write anything that you would not be prepared to put in a letter
- Do not disclose business related information within emails to external parties
- Proof-read emails carefully, check they are correctly addressed before sending, as they cannot be retrieved later
- To cut down on storage, delete any messages not required. These will be stored in a "deleted items" folder, which should be emptied regularly to save server storage space
- No electronic communications may be sent which hides the identity of the sender or representing the sender as someone else. All messages sent must contain your name.
- Familiarise yourself with the mail groups and use them correctly. The spell-checking facility has been set up for all users; please do not remove this tool.
- You must set the 'Out of Office Assistant' message if you are to be absent suggesting an alternative colleague to contact, and the date of your return. Please note, customers and suppliers will also see this message.

Confidentiality

Communications sent by email should not be considered secure. Do not send private and confidential, personal or other sensitive information by email without first obtaining permission from a senior manager. Encryption facilities are available and should be used for the purpose of secure communication of files. Further information is available from our IT Services Manager.

Do not assume any email communications will remain private.

Entering into Contracts

A contract is a legally binding agreement between two or more parties. Contracts can be entered into verbally, or in writing, including by email. You must be extremely careful not to commit Phoenix Software to any contractual obligations by email.

Offensive Emails

It is unacceptable to send any message or attachment via the email facility (internally or externally), which could be considered defamatory, obscene, offensive, abusive or threatening by the recipient or any other person.

Beware that an email sent to one person may, for various reasons, be read by others. In fact, you should always assume that an email will be read by others. Be mindful that others may not share your sense of humour – what may be a joke to you could be considered offensive by someone else.

If you receive an inappropriate email it must be deleted straight away. The sender should be asked not to send you such emails in the future. If you feel uncomfortable telling the sender not to send such emails, or if the sender persists in sending them, you must notify your Manager who will decide how best to deal with the problem.

If you believe you are the victim of harassment, refer to our Harassment Policy. Allegations of harassment are taken very seriously.

Defamation

You must not send any email that denigrates anyone else.

The UK has strict laws of defamation. An email sent to another person that denigrates a third person is potentially defamatory and may expose the Company to being sued for damages. Untrue statements may lead to expensive court actions.

Personal Use

Please note email is provided as an important business tool to be used exclusively for business purposes within working hours. Any emails that are of a personal nature or are not work related must be sent/replied to prior to 9 am or after 5.30 pm. Do not forward chain emails.

Monitoring

Emails which are sent or received are not confidential and will be monitored. Email should not be used to communicate personal details about which there might be any sensitivity.

All email correspondence is automatically logged and retained. Spot checks may take place from time to time involving these records (including the contents of emails sent and received) being read by your Manager, the Network Administrator or any other person given express permission by the Directors. If wrongdoing is suspected, a more detailed audit of email correspondence may be carried out, targeted at individual employees.

Monitoring ensures that our rules and standards are being complied with (including those set out in the Acceptable Use Policy, the terms of employee's contracts of employment, our Equal Opportunities and Harassment policies, our Disciplinary Procedure and our policy on Data Protection and Security of Information), to check that the business is complying with regulations that apply to us, to prevent and detect serious misconduct or criminal activities, to prevent and detect misuse of our IT systems, to prevent and detect computer viruses and other threats to our IT systems and to collect evidence of transactions.

An email filter prevents inappropriate emails coming into Phoenix Software and being transmitted internally. Images and improper language will be detected and notified to the network administrator who may contact your Manager or the Directors.

If you are absent, it may be necessary for others to read your emails as the business needs to respond properly to customers or other contacts. Your Manager can view your inbox and set your 'Out of Office Assistant' during your absence.

So that people outside the Company are aware that monitoring takes place, you are responsible for making sure that all emails sent by you include the following statement:

"Important message regarding monitoring of email communications: -

Phoenix Software monitors all email correspondence sent and received using its IT facilities. All email correspondence is automatically intercepted, logged and retained and may be read by personnel within or outside the Company.

The primary reason for monitoring is to prevent and detect computer viruses and other threats to our IT systems and to prevent and detect misuse of our IT systems. We also monitor emails to ensure the business responds promptly to its customers and other

contacts, to ensure that our quality standards and other standards are being achieved and that our internal rules are being complied with.”

Internet Use

Personal Use

Internet access may be used for purposes other than business at lunchtimes, before 9am and after 5:30pm.

Offensive Material

Accessing, viewing, transmitting, retrieving, downloading or storing material that could be considered by others to be offensive, obscene or indecent is strictly prohibited.

Phoenix Software use special monitoring and control software for network connections to prevent access to undesirable sites, but cannot always prevent access to all sites due to the ever-changing nature of their design. If you do access unsuitable material accidentally, you must exit that site immediately and inform your Manager. No action will be taken for genuine accidental access and Phoenix Software will add these sites to the excluded lists as soon as possible.

Making Purchases over the Internet

Any purchases made for Phoenix Software over the Internet must first be approved by a Director/Manager and must be made from secure sites (shown as a padlock symbol on the screen).

Monitoring

Phoenix Software monitors Internet use. Details are automatically recorded of Websites you visit (or try to visit), pages accessed, files downloaded and graphic images examined.

A report showing which employee has accessed which sites, can be reviewed by the Management Team. If wrongdoing is suspected, a more detailed audit of Internet use may be carried out, targeted at individual employees.

Monitoring ensures that our rules and standards are being complied with (including those set out in this document, the terms of employee's contracts of employment, our equal opportunities and anti-bullying policies, our disciplinary policy and our policy on data protection/security). Monitoring can also prevent and detect serious misconduct or criminal activities, misuse of our IT systems, computer viruses and other threats to our IT systems and to collect evidence of transactions.

Safeguarding Against Viruses

All devices brought into the company must be virus checked by Service Desk before being used, they will then be returned, dated and with a 'checked' label. Failing to have devices checked is a serious disciplinary matter. If you suspect a virus may have been introduced into the system (or a client's system) you must notify Help Desk and your Manager without delay.

Security

- All device users have a login id and a password, (which should be changed frequently). You must not divulge your password to anyone. When choosing a password, avoid easily guessed words. Ideally, use at least six characters, include both letters, numbers, capitals and lower case.
- Any sensitive material stored on a device must be password protected. If you need help with this, contact Service Desk. You must notify your Manager of any password(s), with a description of the contents of the relevant file, document or directory.
- Do not use another person's login id or password to access our IT systems, if you get to know another person's password, email Service Desk Requests, who will prompt a change.
- Only access those facilities or services you have been given authority to access. No attempt must be made to access other facilities or databases without authority.
- Security and confidentiality of client and confidential business information is of prime concern and all confidential, personal or client information must be safeguarded against unauthorised access in line with our ISO27001 procedures. If you suspect there may have been any breach of security (either to our system or that of a client) you must notify a member of the management team without delay.
- To help prevent unauthorised users from gaining access to our infrastructure, your workstation must be locked while left unattended. Always protect laptops with power-on passwords.

Copyright

Do not copy anything from the Internet unless you are sure it is not protected by copyright law.

Software

Software is also likely to be protected by copyright law, do not copy or install any software or change the configuration of existing software on our infrastructure, without the prior written authorisation of a Director.

You must not download any software from the Internet without first getting approval from a Director. Such software must only be for direct business use and arrangements must be made to have such software properly licensed and registered where required. There must be no copyright infringement. Even free of charge software comes with a software licence.

Games

Playing, downloading, uploading or transmitting games is not permitted at Phoenix Software

Confidential
Confidential
Confidential

Customer/Client Policy

As well as complying with Phoenix Software rules, you must also comply with any customers' rules concerning computer use. You have a responsibility to familiarise yourself with customers' policies and rules. If you are unsure, check with your Manager who has a responsibility for ensuring their team are aware and comply with customers' policies, as well as our own policy.

Unacceptable Use of IT Equipment

Breach of this policy, whether deliberate or through carelessness, constitutes misconduct and is likely to result in disciplinary action. In addition, criminal prosecutions could follow.

The following list includes, but is not exhaustive, examples of the sort of behaviour that is likely to be considered gross misconduct, (leading to dismissal without notice and without payment in lieu of notice).

Customers IT equipment/infrastructure must not be used for:

1. Personal use
2. Transmitting, copying, uploading or downloading any material (including software) that infringes copyright
3. Downloading, uploading, copying or distributing pirated software or data
4. Creating, accessing, viewing, downloading, transmitting, storing or retrieving any data, messages, images (including screensavers) or other material which may be considered by others to be offensive, obscene, pornographic or indecent
5. Transmitting a defamatory statement about a third party
6. Sending email messages under a false or forged identity
7. Installing personal software
8. Propagating any virus or introducing any detrimental effect to a customer's infrastructure
9. Disabling, disrupting or intentionally damaging any computer system or network, or attempting to disrupt, disable, defeat or circumvent any system intended to protect privacy or security
10. Accessing or altering databases, files etc without authority
11. Any breach of any of our customers' or clients' computer use policies

The Rights of Search Policy

While trying to promote a friendly, trusting culture there may be occasions when the business needs to follow up deviant behaviour or potential suspicion of theft. Should there be reasonable grounds to do so, Phoenix Software has the right to carry out random searches of employees and their property (including cars) while they are on Company premises. If this should occur, if practicable, employees can be accompanied by a third party who is on the premises at the time the search takes place, or at the time of any further questions. While employees have the right to refuse, this may constitute a Breach of Contract, which could result in dismissal. The Company also reserves the right to call in the Police at any time.

For Managers

For further guidance on any matter relating to employment law or data protection, please refer to www.acas.gov.uk or <http://www.dwp.gov.uk> or <http://www.dataprotection.gov.uk> where you should find the most up-to-date and relevant information.

Please address any query in the first instance to the HR Manager or in the absence of, a Director.

Related Company Policies

The company handbook must be read in conjunction with the employees Contract of Employment and the following policies which can be found on SharePoint:

- Acceptable Use Policy
- Anti-Tax Evasion Policy
- Fraud, Bribery & Money Laundering Policy
- Communications Policy
- Corporate Criminal Offence (CCO) Policy & Procedure
- Corporate Governance
- Data Protection Policy
- Drug & Alcohol Policy
- Equal Opportunities Policy
- Equality Diversity and Inclusion Policy
- Ethics Policy
- Harassment & Bullying Policy
- Health and Safety Policy
- Fire Evacuation Procedure (displayed around the building)
- Hybrid Working Policy
- Modern Slavery Policy
- Quality Policy Statement
- Sanctions Policy
- Social Engineering Fraud Policy & Procedure
- Whistle Blowing Policy
- Anti-bribery Gift Register Policy
- Phoenix Family Leave Policy

Parties

Company	Address
Phoenix Software	Blenheim House, York Road, Pocklington, York, YO42 1NS

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