

# Headland Company Policies

2019

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# Headland policies

As an employer we take our commitment to our staff, their working environment and our responsibilities to the broader community very seriously our policies are listed below and laid out in this document:

- 1.1 Health & Safety Policy
- 1.2 Equal Opportunities Policy
- 1.3 Quality Assurance Policy
- 1.4 Environmental Policy
- 1.5 Race Relations
- 1.6 Anti-Slavery & Human Trafficking
- 1.7 Race Relations Policy
- 1.8 Business Continuity Policy
- 1.9 Ethical Policy
- 1.10 Information Security Policy



## 1.1 Health & Safety Policy

All employees have the responsibility to co-operate with H&S policy and take responsibility for their own and others safety including reporting accidents/incidents/faulty equipment etc and being generally sensible and keeping the office tidy and safe.

### Health & Safety Policy

We will ensure, so far as is reasonably practicable, the health and safety of everyone involved in, or affected by, our work activities. In managing health and safety, we will create a culture that ensures that sound health and safety management is afforded the same priority as other business objectives, and becomes an integral part of everything we do.

Whilst every employee has a personal responsibility to control and minimise risks present in their own activities, we recognise that responsibility for the organisation of health and safety issues rests with our management team. We have therefore adopted a risk assessment approach to the management of health and safety issues, ensuring that hazards arising from our work activities are identified and addressed as a part of 'business as usual'.

In generating and maintaining our culture for health and safety, we will enrol the support and commitment of all stakeholders by:

- Allocating formal responsibilities in health and safety to our employees, suppliers and business partners. Providing adequate budget for health and safety management.
- Appointing competent health and safety resource for deployment across Headland.
- Providing appropriate health and safety training, which is supported by guidance and information.
- Monitoring, measuring, auditing and reporting on our health and safety performance.
- Working closely with appropriate external agencies, and within our industry, to ensure our continued adoption of best-practice solutions in health and safety management.

We will publish and maintain a series of supporting policies and procedures detailing our Organisation and Arrangements for health and safety, and setting out our approved safe systems of work. These supporting policies and procedures represent an integral part of our Health and Safety Policy.



## 1.2 Equal Opportunities Policy

Headland intends to uphold the values of equal opportunities for all. In so doing we accept the social responsibility to do so. To this end we will not discriminate on the grounds of race, disability, age, religion, sexual orientation or gender.

This is done to ensure the most efficient use of our people through providing a happy and harmonious atmosphere. Every employee has responsibility for the implementation of this policy.

### Recruitment

- Candidates to all positions will not be discriminated against on the grounds of race, disability, age, religion, sexual orientation or gender
- All job adverts will include the equal opportunities statement above
- In the event of any need to impose any imposition on a job requirement legal advice will first be taken. Such impositions would only be applied if it was felt that any activities were deemed unfair to certain categories of candidates
- Job applicants may be asked for information on their sex, race, religion, disability, or age but only for the purposes of monitoring the effectiveness of this policy and recruitment trends within the industry
- In the event of imbalances in the range of people coming forward, positive action may be considered by way of targeted advertising or training to encourage under-represented groups
- The Company will however, always ensure that appointments are based on the experience, skills, qualifications and potential of individuals

### Training & Promotion

Access to training & development and to promotion opportunities will again be made available to all regardless of race, sex, disability, age, religion or gender. All necessary support will be given to disabled staff to help them access training and work opportunities

### Terms & Conditions

In all aspects of employment, including rates of pay, Headland will not discriminate on the grounds of race, sex, disability, age, religion or gender.



## 1.3 Quality Assurance Policy

Headland Multimedia Ltd specialises in the following activities: Web design, web development, online content generation, e-marketing services, web based software integration, consultancy and managed hosting services.

The management of the company is committed to a policy of Quality Assurance throughout the company activities, ensuring that the professional service quality satisfies the specific requirements of all clients. It is the policy of the company to market and supply only professional services of a quality that are fit for purpose, comply with industry standards and are based on solving the need of the client.

This means:

- We gather information about our clients needs
- We offer solutions that best suit our clients needs
- Every project is thoroughly supervised
- We validate our code to appropriate and agreed technical standards set out at the start of the project
- We are open and honest about deadlines and costs
- Our staff will give a polite, honest and friendly service
- Every client is offered the opportunity to provide feedback at the end of their project
- We promote continuous improvement to refine and improve communication, control procedures and training to further improve our level of quality assurance.

The nature of our activities places particular emphasis and demands on the experience and expertise of the staff employed. High levels of responsibility and reliability are associated with all aspects of our work and a commitment to continued professional development and training exists to ensure that all staff are suitably qualified and equipped to meet these requirements.

The Director of the company has given the senior managers full authority to carry out the Quality Assurance Policy of the company, and all company personnel are required to co-operate in carrying out this task and committing to continuous improvement.

**Ken Heptonstall**

Director



## 1.4 Environmental Policy

Headland recognises that there is an increasing personal, public and commercial awareness of the need to control activities, services and products that impact negatively on the environment. Due to the growing environmental concern, legislation and best practice guidance, Headland recognise that an environmental policy is necessary and should be incorporated into our corporate business strategy.

### Aims & Objectives

- Seek to reduce the levels of direct and indirect pollution associated with Headland's business activities.
- To encourage the spread of greener technologies and services through our designs and development work.
- Educate staff as to the implications of the environmental policy and encourage its development and sustained compliance.
- Pursue continual improvement in Headland's environmental performance by creating measurable objectives and targets for this policy with continuous monitoring and review of progress.

### Policy Statement

Headland Multimedia recognise that its business has an impact on the environment, predominantly through the use of electricity, gas, water, paper, the use of print and production technologies and the recycling of waste. Headland are committed to ensuring that this environmental impact is minimised wherever possible by ensuring that any resources and materials used in the course of business are sustainable and waste is reduced.

Through our creative and grammatical expertise and by developing, promoting and encouraging environmental strategies and the use of best practice schemes, Headland will endeavour to meet the Government targets for Greening Operations.

**Ken Heptonstall**

Director



## 1.5 Race Relations Policy

The purpose of this policy is to ensure equal opportunities for all workers, job applicants, clients and customers, irrespective of race, colour, nationality, ethnic or national origin. We value a diverse customer base and the individuality and creativity that every worker potentially brings to the workforce.

### Operating Principles

- Workers, job applicants, visitors, clients and customers will be treated fairly, openly and honestly, and with dignity and respect.
- No job applicant or worker will receive less favourable treatment on grounds of race, colour, nationality, ethnic or national origin.
- Equality of opportunity is about good employment practice and makes sound business sense. Steps will be taken to make sure all business practices ensure equal opportunities.
- Recruitment, training and promotion opportunities will be made as widely available as possible.
- Selection criteria for employment, training and promotion opportunities will be entirely related to the job.
- Employment decisions on recruitment, promotion and training will be made solely on the basis of merit.

### Racial Equality Policy

Everyone has the right to work and do business in an environment free of unlawful discrimination and harassment. We will not tolerate such behaviour under any circumstances. Disciplinary action, including dismissal, may be taken against any worker found responsible for harassment or discrimination. Any worker or trainee who believes he or she is being discriminated against, victimised or harassed should raise the matter through the company's complaints procedure. This policy is fully supported by Ken Heptonstall and John Hornby, joint directors of Headland Multimedia.

We will ensure that all our workers, customers and clients are aware of the policy, and that they understand that they are responsible for observing it. Our racial equality action plan outlines the steps we will take to give effect to this policy. We will monitor the action plan and review the progress we have made each year, to make sure the policy is achieving its aims.

### Ken Heptonstall

Director



## 1.6 Anti-Slavery and Human Trafficking Statement

### Headlands Commitment

We are committed to conducting business ethically and to ensuring that the risk of slavery and human trafficking taking place within our business or in our supply chains is mitigated and we expect our suppliers to meet the same high standards. This is done through engagement with suppliers and partners where appropriate to ensure they meet the standards set by law.

### Our Initiatives

We have in place a number of initiatives which address issues relevant to slavery and human trafficking, including: encouraging employees to challenge any areas where they feel Headland is not procuring goods and services in accordance with acceptable ethical standards. This ensures that we; - Meet our obligations to customers, colleagues and regulators through ensuring that appropriate systems and controls are in place. - Ensure that our suppliers meet our standards and comply with all applicable laws and regulations. - Take suitable measures to identify, manage and address issues, including those relating to slavery and human trafficking, if they occur.

We require confirmation that prospective suppliers confirm that they comply with the Modern Slavery Act and outlining the measures they have in place to ensure this; and continued use where appropriate of contractual provisions requiring suppliers to comply with the Modern Slavery Act.

### Ongoing commitment

We will continue to take these and other steps during the current financial year, with the aim of ensuring that slavery and human trafficking do not occur in our business or our supply chains.

### Approved by the Director

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Headland 's slavery and human trafficking statement for the financial year ended 28 February 2019. It was approved by the Director on 5<sup>th</sup> April 2018.

### Ken Heptonstall

Director





## 1.7 Business Continuity Policy

Headland is committed to its customers, employees, shareholders and suppliers. To insure the effective availability of essential products and services, Headland provides this Business Continuity Planning policy in support of a comprehensive program for business continuity, disaster prevention and total business recovery.

### **Policy**

Each team is responsible for current and comprehensive Business Continuity Planning (BCP). When implemented, the Plan should include those procedures and support agreements, which insure on-time availability and delivery of required products and services. Each Plan must be certified annually with the management team. Policy Leadership, the senior management team is the point of contact for the BCP program. Resolution of issues in the development of or support for all Plans should first be coordinated with the BCP team and appropriate internal or external organisations.

### **Policy Compliance Certification**

BCP compliance verification is provided by the BCP team. In order to meet compliance requirements, each Plan should include those appropriate procedures, staffing, tools and workplace planning requirements necessary to meet approved deliverable requirements. BCP Plan Compliance Certification is required annually. A waiver for temporary compliance certification may be given if a detailed written waiver request issued by the department manager is approved by the BCP executive management team liaison. Maximum delay for compliance is one year.

### **Policy Compliance Certification Support**

The BCP team is available to support the development and BCP policy compliance certification process. Headland recognises the importance of a comprehensive Business Continuity Planning Program to insure the safety, health and continued availability of employment of its employees and quality goods and services for those we serve. We require the commitment of each employee, department and vendor in support of the objectives required to protect Headland assets, mission and survivability.

**Ken Heptonstall**

Director



## 1.8 Ethical Policy

Headland is a digital marketing agency based in Leeds and Nottingham. Our Board of Directors proactively encourage the use of ethical and environmentally friendly technologies, systems, products and management techniques and promote the extensive credentials of working with Headland to our partners, clients and customers.

Headland will:

- work with partners whom work to a strong ethical framework
- Ensure environmental issues are at the forefront of our management processes and procedures.
- Meet and exceed, where reasonable, the standards of environmental legislation and industry best practice.
- Commit ourselves to the training and supervision of our staff
- Develop and manage a series of objectives to ensure we adopt a culture of continuous improvement in all of our operations and business activities.
- Whenever practicable we will use recycled and recyclable materials and promote a culture of reducing the amount of waste produced by our activities.
- We will adopt policies of equal opportunity and diversity when employing any new member of staff

The Headland Board of Directors have overall responsibility to evaluate compliance with this policy statement. They ensure sufficient resource is provided to meet and maintain the high standards of the Environmental and Ethical objectives of the company as set out in this policy. This Policy Statement will be reviewed and revised to meet any new legal requirements and at regular intervals following the company's own evaluation procedures.

**Ken Heptonstall**

Director



## 1.9 Anti - Bribery and Corruption Policy

This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom. Compliance with the Company'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 the Company'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, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

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 the Director.

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 the Company in the best interests of the Company and do not misuse those resources
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Director immediately
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Director
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Company Secretary
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued



- Do not offer or accept bribes.
- Do not, without express prior written approval from the Director, 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 the Director.

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 the Company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy the Company can demonstrate that it has adequate procedures in place to prevent such activity. You have an independent obligation to prevent bribery and corruption in the Company 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.

**Ken Heptonstall**

Director



## 1.10 Information Security Policy

The Headland Information Security Management System underpins our working processes in relation to data and security. It is a confidential and comprehensive set of policies and documents. Below is our public statement.

### Headland Multimedia Ltd ISMS Public Statement

"We, the management of Headland Multimedia Ltd are committed in protecting the business and sensitive Customer information from threats that could potentially disrupt operations. This will be achieved by ensuring:

- We use state-of-the-art technology to ensure that the personal information and confidential transactions remain safe, secure and private.
- We Identify the Security Risks and treat the risks by implementing appropriate safeguards.
- Regularity, legislative and contractual requirements are met.
- Business Continuity plans shall be created, maintained and tested.
- Staff shall receive appropriate training on Information Security.
- All breaches of information security, actual or suspected shall be reported and investigated."

It is the policy of Headland Multimedia Ltd to ensure that:

- Information is protected from unauthorised access
- Confidentiality of the information is assured
- Integrity of the information is maintained
- Availability of the information is ensured
- A framework is developed for identifying risks and mitigating the risks by implementing controls and monitoring for its effectiveness
- Regulatory, contractual and legislative requirements are met
- Business continuity plans will be produced, maintained and tested
- Information security training will be available to all the staff and third party personnel;
- All breaches of information security, actual or suspected, are reported to, and investigated
- Ensure the continuity of Headland to its customers and business partners
- Minimize the possibility of threat to information security that might cause loss or damage to Headland, its customers and/or business partners
- Minimize the extent of loss or damage from a security breach or exposure
- Adequate resources are deployed to implement an effective information security program



- All Headland personnel, customers and business partners who have access to organisation information are informed of their responsibilities and obligations with respect to security
- The principles of information security are consistently and effectively applied during the plan and development phase of Headland activities

**Ken Heptonstall**

Director

