



Policy Handbook

Foreword

Welcome to the School of Facilitation!

Since 2014 we have been welcoming members and supporting facilitators and corporations from around the world. Education is our aim, engaging and developmental content is our strategy.

At the School of Facilitation we strive to deliver with the highest professional standards and industry best practice, both internally and externally. To this end we expect all School of Facilitation team members – which includes direct employees, Associates, freelancers, contractors, temporary staff and any other third parties that work for School of Facilitation – to uphold the same standards and behaviours that are part of our identity and company values.

This Policy Handbook contains the key policies that apply to all team members when conducting business for, or on behalf of, the School of Facilitation.

I look forward to working with you and wish you every success in your time with us.

Kind regards

Kirsty Lewis, CEO

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Health & Safety Policy

Introduction

School of Facilitation is committed to ensuring the health and safety of our team members and clients and anyone affected by our business activities. We will take the necessary measures to ensure a safe working environment for all team members whether they are working at our business premises or working remotely.

All team members have a duty to take reasonable care for their own safety and the safety of anyone else who may be affected by their actions and behaviours. Team members must also co-operate with and support the company in its arrangements to meet statutory health and safety obligations.

In accordance with our health and safety duties we are responsible for:

- a) assessing risks to health and safety and identifying ways to overcome them;
- b) providing and maintaining a healthy and safe place to work and a safe means of entering and leaving our premises, including evacuation procedures for use in case of emergency;
- c) ensuring risk assessments have been carried out for team members who work remotely;
- d) providing information, instruction and training in safe working methods and procedures;
- e) ensuring that equipment is fit for purpose and has suitable safety features, is properly maintained and that appropriate PPE is available where necessary;
- f) promote effective communication and consultation amongst team members to identify and address any health and safety concerns;
- g) monitor and review health and safety arrangements at work and make any necessary changes and updates to mitigate evolving risks and challenges.

The Company Director has overall responsibility for health and safety and the ownership of this policy. Kirsty Lewis is the Principal Health and Safety Officer with day-to-day responsibility for health and safety matters and any health and safety concerns should be reported to her in the first instance.

Equipment

All team members must use equipment issued by the company in accordance with operating instructions and/or instructions provided by management. Any fault with, damage to, or concern about any equipment issued by the company or its use must be immediately reported to the Principal Health and Safety Officer. Team members should not try to repair equipment issued by the company unless trained and authorised to do so.

Team members working remotely will be asked on an annual basis to complete a self risk assessment for both their home working environment and any equipment issued by the company they are using for work. Team members must complete this self risk assessment fully and honestly to help us identify and mitigate any potential risks to their health and safety while working from home or remotely.

External contractors are responsible for their own health and safety matters including any equipment used to carry out work for or on behalf of School of Facilitation.

Accidents and first aid

Any accident at work involving personal injury should be reported to the Principal Health and Safety Officer without delay so that the accident can be recorded in the company's Accident Book.

Any School of Facilitation premises will have a designated person responsible for first aid and a first aid kit available in case of accident or injury at those premises. Details of who this person is can be obtained from the Principal Health and Safety Officer. All team members should check this information when working from School of Facilitation premises.

Team members working at client premises or a shared office / conferencing location should familiarise themselves with the first aid and accident protocols at that location upon arrival.

Team members who work remotely or from home should follow the process in the Lone Worker Policy in the case of accident or injury.

Emergency evacuation and fire procedures

All team members working at any School of Facilitation or client premises should familiarise themselves with the instructions and procedures in place at those premises that will be used in the event of fire or other emergency that requires evacuation of the premises.

Team members should know where fire alarm buttons are located as well as fire extinguishers, the nearest fire exit and alternative ways of exiting the building in an emergency.

If a team member discovers a fire they should not attempt to tackle it unless they have been trained or feel competent to do so. They should activate the nearest fire alarm, follow the evacuation procedures and call 999 when at a safe distance.

Team members working remotely must familiarise themselves with the fire and emergency evacuation procedures in any premises or building where they are working.

Pandemics and infectious diseases

During the Covid-19 pandemic everybody was required to adopt certain measures and practices to mitigate the risk of transmission and stop the spread of the disease. All team members should be aware of any current government guidance in their local area should there be a further outbreak of Covid or another pandemic.

It is the policy of School of facilitation that any measures recommended by the government are mandatory for all team members when attending any location to carry out work on behalf of the Company. This may include, but not be limited to; wearing a face covering in specific areas including commuting on public transport, sanitising hands when entering and moving between work areas, keeping a minimum distance between people, limiting in person meetings to only those that are essential and regularly cleaning and sanitising surfaces.

When attending client premises all team members are required to follow any measures or protocols that the client has in place to protect vulnerable people and to prevent the spread of disease, even if these measures are more stringent than the current government guidance at the time. The only exception to this requirement is if the team member holds a valid exemption for a medical reason. In this case the team member must make the client aware of any such exemption prior to attending the client premises, so that alternative arrangements can be made if necessary.

Risk assessments

General workplace risk assessments will be carried out as required or as reasonably requested by team members or clients, where appropriate. Managers are responsible for ensuring that all team members are aware of any risk assessments in place for any School of Facilitation premises and all team members are responsible for ensuring that the measures and recommendations of those risk assessments are implemented and adhered to.

When visiting client premises or other remote locations team members must adhere to any measures or instructions given by the person responsible for facilities or health and safety at that location.

Direct employees of School of Facilitation will be required to complete a self risk assessment for remote working arrangements on an annual basis.

No Smoking Policy

The company is committed to protecting the health, safety and welfare of all team members by providing a safe place of work and protecting all workers, service users, clients and visitors from exposure to smoke. All of our workplaces (including our vehicles) are smoke-free and all staff and visitors have a right to a smoke-free environment.

Smoking is banned at our workplace. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, pipes, cigars, electronic cigarettes and vaping devices.

Smoking is only permitted outside in designated areas and must team members must ensure that all cigarette butts and other litter is disposed of thoroughly.

Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine.

Lone working Policy

Introduction

For the purposes of this policy, a lone worker is someone who is effectively alone for large parts of their working day, without the direct, in-person company of colleagues, or other people, who would be able to identify a problem, such as illness or injury, and provide immediate assistance.

This policy applies to all team members who are lone working, even if the lone working conditions described above only apply temporarily, such as the occasional day on-site with clients rather than the usual place of work.

The key principle of safe lone working is open and effective communication channels, which include telephone, email and instant messaging platforms. It is the responsibility of team members to ensure that these communication channels are kept open and regularly monitored so that any messages or calls receive a prompt response to avoid any undue concerns about the safety and wellbeing of team members.

Team members must notify management of any medical conditions which might jeopardise their safety or their ability to respond to messages whilst lone working. It is the responsibility of team members to ensure that the company holds the correct emergency contact details so that the company knows who to call in the event of an emergency or a failure to make contact.

Visiting Clients

Before visiting a client, team members must ensure that a manager or colleague is fully briefed on the time, location and anticipated duration of the visit, preferably with a detailed calendar entry on a shared calendar. Team members should inform their manager of how

they will be travelling to the client premises and when they expect to return home. Upon returning home after the client visit team members should call or message their manager to let them know they have arrived home safely.

If at any point during a client visit, or travelling to or from a client visit, a team member becomes unwell or feels that their safety or wellbeing may be at risk, they should call their manager immediately to brief them on the situation and agree the best course of action to return home as quickly and safely as possible. If a team member misses a call or message from their manager or another colleague whilst travelling or on a client visit they must respond at their earliest opportunity.

Working alone at School of facilitation premises

If a team member is working alone on company premises they should message their manager when they arrive at the office to let them know that there are no problems with the office or report if there is anything wrong. If any situation arises in the office which could threaten anyone's safety or wellbeing the team member must call their manager immediately to report the situation.

Upon leaving the Company premises the team member should message their manager to let them know they have left the office and are heading home. If the team member misses a call or message from their manager or another colleague whilst working alone at company premises they must respond at their earliest possible opportunity.

When working alone from company premises team members should not allow access to the premises to any unauthorised or unexpected visitors

In the event of a fire at the company premises whilst working there alone, team members should follow the normal emergency fire procedures; they should not attempt to tackle the fire unless confident to do so safely, they should sound the fire alarm and follow the normal evacuation procedures. They should call 999 and then once at a safe distance call their manager to notify them of the situation.

Lone Worker accident and incident reporting

Any accident involving personal injury when working for School of facilitation alone at the company premises or remotely should be reported to the Principal Health and Safety Officer without delay.

If, whilst working for School of Facilitation alone at the company premises or remotely, any team member feels that their safety or wellbeing may be at risk in any way they should call their manager immediately to notify them of the situation and agree the best course of action to resolve the situation as quickly and safely as possible.

Environmental and Sustainability Policy

Introduction

School of Facilitation is committed to minimising the impact of our business operations on the environment wherever possible, and educating our staff about how they may be able to make changes to their day to day activities in order to reduce our carbon footprint and encourage sustainability. We will continually seek for opportunities to improve our performance with regards to environmental and sustainability principles and monitor new technologies and best practice guidelines to ensure that we are conducting our business operations as efficiently as possible. Responsibility for environmental and sustainability issues does not sit with a named officer, it is the responsibility of each individual person and us as a collective. This policy outlines the key areas where School of Facilitation staff are expected to be mindful and conscientious at all times.

Waste and Resource Management

Team members are expected to understand and follow the principles of the waste hierarchy to prevent, reduce, reuse, recycle and dispose of our waste. In practice this means:

- encourage delegates on training courses to take notes electronically on devices by providing suitable electronic templates and digital assets;
- only use paper and ink supplies to print hard copy paperwork, such as handouts, when this is absolutely necessary for the delivery of our services, and then only the minimum number of copies required;
- strive for paperless business operations wherever possible, and encourage other team members to do the same;
- retain any unused handouts and hard copy assets that could be reused for another service delivery;
- wherever possible use reusable cups for beverages rather than one-use paper or plastic cups;
- ensure that all recyclable material, including card, plastic, aluminium and glass are deposited in recycling bins, both on site and off site;
- follow any location instructions and best practice when disposing of waste.

Water Management

Perhaps the world's most essential resource, water supply and availability is becoming increasingly under strain in many parts of the world. We must all do our bit to try and protect and preserve water supply by only using what is necessary for essential day to day activities.

School of Facilitation will ensure that we have efficient water supply plumbing in any of our business premises and check for, and repair swiftly, any leaks or issues which may be causing water wastage. We expect all team members to be conscientious at all times and use the minimum amount of water required when washing up cups and plates, only running dishwashers when they are fully loaded, using the appropriate dual flush button on toilets where available and running taps for as short a time as necessary to wash hands properly.

Energy Management

School of Facilitation is committed to reducing and minimising operational energy consumption in all of our business activities. We will ensure that any of our business premises have efficient lighting, heating and cooling systems that minimise energy consumption. This includes using energy saving lightbulbs in all fittings and fixtures and using timer functions on heating and cooling systems to ensure efficient energy usage. All devices and equipment with the functionality will have power saving modes activated to minimise energy consumption when idle.

We expect all team members to be conscientious about energy consumption whether working at School of Facilitation premises or remotely at home or at client premises. This means switching off lights when they do not need to be on, switching off devices and equipment when not in use and only using heating and cooling systems when necessary – if it is possible to achieve comfort by adjusting the clothing being worn then choose this option instead of switching on heating or cooling systems as they are one of the largest consumers of energy in the office environment.

Travel Management

School of Facilitation has an 'essential only' travel policy as part of our business model. We advocate and fully support remote working for all non-client facing business activities, which means that team members are not required to travel to a business premises to carry out roles which support internal business operations. Apart from an annual team meeting which we require all team members to attend in person and occasional team building events, all internal meetings are arranged and attended virtually using Zoom or similar video conferencing software. This allows our business operations to be very travel and emission efficient.

When it is necessary to travel to a client premises or other location to deliver services in person we encourage all team members to choose a mode of transport which reduces environmental impact, congestion and air pollution. To support this we will pay for team members to use public transport where possible to attend client premises and other locations necessary for the delivery of services, provided that the team member has used the most efficient and effective transport option.

Sustainable and Ethical Procurement

Our approach to procurement within our business is to consider the economic, social and environmental impacts and whole-life costs of purchasing decisions, and acting appropriately and responsibly when making those decisions. This means that we will opt for energy efficient devices, equipment and hardware for use in the business and take into account the full life cycle, maintenance, reusability, disposal and decommissioning of such equipment. We will also choose suppliers with strong environmental and sustainable credentials wherever possible.

We encourage all team members who provide their own equipment to follow the same principles and to act responsibly and conscientiously when purchasing equipment that will be used for any School of Facilitation business activity.

Equality, Diversity and Inclusion Policy

Introduction

At School of Facilitation we are committed to the principle of equal opportunity, in employment and in wider society, and we believe that embracing and encouraging equality, diversity and inclusion in everything we do is the only responsible way to do business.

To that end we will take steps wherever possible to ensure that our processes and practices enable equal opportunity and inclusion for everyone we work with, internally and externally, regardless of race, religion or belief, age, disability, sex or sexual orientation, gender identity, marital or civil partnership status, pregnancy or maternity status and we will continually seek to improve our practices to encourage these principles further at every opportunity.

Our commitments

School of Facilitation makes the following commitments in respect of equality, diversity and inclusion:

1. To promote and nurture a working environment free from bullying, harassment, victimisation and unlawful discrimination, where dignity and respect are expected for all, and where individual differences and contributions are recognised and valued.

2. Ensure that all team members have read and understood this policy, and what their individual responsibilities are in upholding the standards and principles expected at School of Facilitation.
3. Assessing the impact of our policies, working practices and business operations to identify, remove or mitigate any disadvantage to particular groups of people.
4. To act promptly and robustly in the event of any complaints of bullying, harassment, victimisation and unlawful discrimination by any team members, customers, clients, suppliers and the general public. Any such complaints will be investigated thoroughly and appropriate action taken against any team members found to have acted against our principles which may include disciplinary action and/or termination of contract.

What we do at School of Facilitation

At School of Facilitation we ensure that all job applicants and team members are treated fairly, with respect and dignity, and that no job applicant or team member receives less favourable treatment on grounds that are not relevant to good business practice. We welcome and value diverse backgrounds, thinking, skills and experience as we know that this increases creativity and makes a team stronger and more resilient.

Entry into the team and progression within the team at School of Facilitation is determined only by personal merit and the application of assessment and criteria which are relevant to the position or opportunity in each particular instance. In all cases, ability to perform the role will be the primary consideration in any decision making process.

Wherever possible, safe and appropriate to do so, School of Facilitation will make any reasonable changes to the work environment or work practices that are necessary to ensure that team members with particular needs, including those with a disability, are given the same opportunity as able-bodied individuals in fulfilling their roles effectively.

All School of facilitation team members have a duty to uphold the principles of inclusion and diversity in the workplace and make all reasonable efforts to prevent any harassment or discrimination from taking place. This includes reporting any behaviour that could constitute harassment or discrimination, including that of third parties, or the victimisation of individuals who report such behaviour.

We encourage all School of Facilitation team members to voice their opinions and ideas freely, and actively provide a safe and open environment for them to do so and to be themselves.

Bribery and Corruption Policy

Introduction

School of Facilitation is committed to conducting all business in an honest and ethical manner in line with the principles of responsible corporate behaviour and in compliance with all relevant anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 and the Fraud Act 2006.

This policy applies to all team members and any other associated persons acting for or on behalf of School of Facilitation. Every team member and associated person is responsible for maintaining the highest standards of business conduct and is required to comply with this policy. School of Facilitation will take all reasonable measures to ensure compliance with the relevant legislation.

Bribery and Corruption

Bribery is defined as the act of offering, promising, providing or accepting a reward, financial or otherwise, as an inducement for an action which is illegal, unethical or otherwise corrupt, in anticipation of commercial, contractual, regulatory or personal advantage or interest. This includes facilitation payments, which are typically small payments made to public officials in order to guarantee or expedite the performance of administrative or statutory processes. Bribes may not always involve the giving or receiving of money or material items of value but may also include taking unethical action in order to induce another party to take action which may result in personal advantage.

Fraud is the term used to describe unethical or illegal activity used to deprive, disadvantage or cause loss to another person or party, or to gain personal advantage at the detriment of another party. Fraud may include misappropriation or misuse of funds or other resources, false representation or false accounting in order to deceive or to hide unethical activity, or the supply of false information to statutory authorities or other parties.

Money laundering is the process of illegally concealing the origin of money or other financial assets from law enforcement and financial regulators, so that the money appears to have been legitimately earned or generated. This can involve concealing, disguising, converting or transferring criminal property or entering into arrangements which facilitate the acquisition, retention, use or control of criminal property by or on behalf of another person or party.

Penalties

Bribery is a serious crime which may result in prosecuted individuals receiving up to 10 years imprisonment and organisations involved in any such activity may receive an unlimited fine

as well as serious reputational damage and legal costs. School of Facilitation therefore takes our legal responsibilities very seriously.

A criminal offence may be committed under the Bribery Act 2010 if:

- a) a team member or associated person acting for or on behalf of the business offers, promises, provides, requests, accepts, receives or agrees to receive a bribe; or
- b) a team member or associated person acting for or on behalf of the business offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of his/her duties; or
- c) the business does not have the defence that it has adequate process and procedures in place to prevent bribery by its team members or associated persons.

Any team members or associated persons found to have engaged in illegal or unethical activity may face disciplinary action and/or termination of contract.

Individual Responsibilities

It is the responsibility of all team members and associated persons acting for or on behalf of the business to prevent, detect and report bribery and other forms of corruption. In order to achieve this all team members must:

- a) read, understand and comply with this policy;
- b) exercise due diligence and ensure best practice corporate behaviour at all times when dealing with third parties on behalf of School of Facilitation;
- c) notify a Company Director at the earliest possible opportunity if they believe or suspect that bribery, fraudulent activity, corruption or any other conflict with this policy has occurred, or may occur in the future.

School of Facilitation is committed to ensuring that no individual experiences any detrimental treatment as a result of refusing to take part in bribery or corruption, or as a result of reporting in good faith their suspicion that bribery or other corruption has occurred, or may occur in the future.

Gifts and hospitality

It is not the intention of this policy to prohibit or prevent reasonable and appropriate hospitality which is normal in many business relationships, nor the giving and receiving of gifts, provided that:

- a) any such hospitality or gifts are proportionate, reasonable and made in good faith, without the intention of influencing a third party to take action which may result in business or personal advantage;
- b) any such hospitality or gifts are given openly, not in secret; and
- c) the giving of gifts or hospitality complies with local law.

Any team members who are offered or receive any gifts or hospitality directly from clients, customers, suppliers or other third parties, must declare this to the Company Director so that a record can be kept if necessary.

Whistleblowing Policy

Introduction

School of Facilitation is committed to conducting all business with integrity and in full compliance with all relevant legislation and best practice guidelines. However, it is acknowledged that it is impossible to guarantee that all actions and decisions made by people for or on behalf of School of Facilitation will be without mistake or oversight, and there is a risk that the business may unknowingly harbour illegal or unethical conduct. We understand that we have a duty to take appropriate measures to identify, prevent and address such situations if they do occur and we encourage a culture of honesty, openness and accountability to support this goal. This aim of this policy is to ensure that all team members have the trust and confidence to do the right thing and raise matters of genuine concern so that appropriate action can be taken by School of Facilitation to address such situations.

Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or the endangerment of people, property or the environment resulting from our business activities. Matters that should be reported under this whistleblowing policy include, but are not limited to:

- a) criminal activity;
- b) miscarriages of justice;
- c) dangers to health and safety;
- d) dangers to the environment;
- e) failures to comply with legal obligations or regulatory requirements;
- f) the deliberate concealment of any of the above matters.

We value any concerns raised in good faith under this procedure, and if you are uncertain whether your concerns fall within the scope of this policy we encourage you to report the matters to the Company Director who will determine the appropriate course of action in addressing the situation.

Raising a whistleblowing concern

If you have concerns regarding any business activity of School of Facilitation you should raise the matter directly with the Company Director. If you wish to raise your concern in writing then please provide as much detail as possible and send this marked *Private & Confidential* to the Company Director's own email address. If you wish to discuss the matter directly with the Company Director you should notify the Company Director that you wish to discuss a whistleblowing concern and a meeting will be arranged at the earliest opportunity. Following the initial disclosure the Company Director will review the information that has been provided and ascertain if a subsequent meeting is required to obtain further information as part of a thorough investigation. You may be accompanied by a work colleague or union representative to any meetings arranged under this policy, provided that any such person respects the confidentiality of the process.

Team members who raise whistleblowing concerns under this policy in good faith will not be subject to detrimental treatment by the business and we will take all reasonable measures to ensure that individuals who raise concerns are not subject to reprisals, harassment or other inappropriate behaviour from colleagues or clients.

We do not encourage team members to make whistleblowing disclosures anonymously as this makes it more difficult to investigate the matters effectively, obtain further information from you and establish whether any allegations are credible and have been made in good faith. Every effort will be made to keep the identity of any genuine whistleblower confidential, including in any further investigations that are required to establish the facts of the case, and we will discuss with you directly any circumstances where it might be necessary to disclose your identity to other people involved in the investigation.

We recognise that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator or government authority, and we would not discourage you from doing so when appropriate. However, we strongly encourage you to seek advice before reporting any matters to any external party and wherever possible you should raise your concerns with the Company Director in the first instance.

Information Technology Policy

Introduction

School of Facilitation uses a range of information technology and electronic communications systems to facilitate the effective running of our business operations and working practices. Effective communication and access to information are fundamental to the success of our

business and it is vital that these systems are used appropriately and safely to support and protect our business.

This policy outlines the acceptable use guidelines and expected standards for any team members who use any School of Facilitation information technology and electronic communications systems, whether on company issued or personally owned devices, including email, internet, shared cloud based storage, platforms, software and apps. It also includes guidelines on personal use of social media.

Device Security and Passwords Policy

All team members are expected to protect our information technology and electronic communications systems from unauthorised access, or being compromised, at all times. Team members are responsible for the security of any devices or equipment they use when working for School of Facilitation, whether that equipment is issued by the business or personally owned. If a device that is used for School of Facilitation work is used by anyone other than the team member, such as a family member, this must be through a separate user profile with no access to School of Facilitation systems or data.

Team members must ensure that any devices which contain, or have access to, company data or systems are kept secure at all times, especially when travelling. In the event that such a device is lost or stolen the team member must report this to the Company Director without delay so that access to any systems or accounts linked to the team member can be frozen using administrator access until the device is found, or a new device set up with fresh passwords to all systems and accounts.

Access to all School of Facilitation data, systems or accounts must be password protected with robust alpha-numeric passwords and two factor authentication where possible. Team members should make sure that any password autofill function on your device does not remember any passwords that may give access to any such data or systems. Passwords to company data and systems must be kept confidential and must not be shared with anyone, unless expressly authorised by the Company Director.

All team members must also ensure that any devices or equipment that contain, or have access to, any company data or systems are protected with up to date anti-virus/malware systems and/or software to reduce the risk of a cyber attack or security breach.

Email Policy

School of Facilitation will issue business email addresses to team members where it is necessary or appropriate for them to carry out their role in the business. Business email should always be used with care and respect, keeping in mind that email correspondence may be disclosed in legal proceedings in the same way as paper documents.

All emails sent from School of Facilitation email accounts should be professional, business related and non-offensive. The content of any emails sent should be carefully considered as incorrect or unsubstantiated statements may result in claims of discrimination, victimisation, harassment, defamation, breach of confidentiality or breach of contract. Team members must not send emails that are abusive, derogatory or defamatory, or that disclose personal views (defamatory or otherwise) about other team members, clients, associated persons or any other parties.

Team members should be vigilant and exercise caution when opening emails from unknown sources or if an email looks suspicious for any reason. Team members must not open email attachments from unknown third parties, or from known parties if the email or attachment was not expected, as these may contain malware such as viruses or worms. Team members should avoid opening and notify the Company Director immediately if any suspicious emails are received.

Team members must not use business email for personal matters that are not related to School of Facilitation business or administration. This includes sending or forwarding chain mail or junk mail, selling or advertising (unless it is for official School of Facilitation business and required for your role), sending appeals for charity or sponsorship events, and providing an email address for online purchase confirmation, newsletter sign up or other contact requests via external websites other than for legitimate and necessary business purposes.

Internet Policy

In order to effectively carry out your role with School of Facilitation you may be granted network and Wi-Fi access at company or client premises. You may also have internet access via a SIM card on a company device such as mobile or tablet. We encourage team members to make appropriate use of internet access for business purposes, but to remember that internet use and/or search history may be monitored and recorded by the host network.

Websites also use cookies to identify and monitor visitors to websites and record data such as IP addresses and website navigation. Team members must therefore be mindful that any websites visited while using company or client Wi-Fi may record the IP address of the host network, and your activity on such websites.

When using company or client internet access team members must not visit any websites or content which may be considered inappropriate or offensive. This includes, but is not limited to, content such as pornography, online gambling, or any other content which might be discriminatory, derogatory, illegal, immoral or that may cause embarrassment to others. Team members must also refrain from using the internet to access or share any material that is classed as confidential information, defamatory statements, material in breach of copyright, or any other material which may create a liability for the team member, the company, or our clients.

Social Media Policy

It is recognised that team members may use social media platforms such as Facebook, Instagram, Twitter, blogs etc. both for personal reasons and for other employment or business opportunities not linked to School of Facilitation. Whilst we do not wish to impose upon team members individual rights and freedoms, we do expect all team members to abide by our social media guidelines, which are designed to protect our business integrity, our intellectual property, our reputation, and our public image.

Our social media guidelines apply to both personal and professional accounts and profiles of team members, recognising that our reputation and business integrity may be damaged not only by content published on School of Facilitation accounts, but also by content published by team members and other associated persons through their own accounts or profiles.

When using social media team members are prohibited from:

- a) Disclosing any School of Facilitation confidential or proprietary information, or any personal data for which the company acts as the data controller or data processor;
- b) Breaching any obligations that the team member or the company has relating to confidentiality and data security;
- c) Publishing or sharing content that in any way defames or disparages School of Facilitation, our team members, clients, customers and any other associated parties;
- d) Publishing or sharing content which is in any way harassing, discriminatory, bullying or embarrassing to our team members or any other third parties;
- e) Publishing or sharing any content, including images, which may breach a third party's privacy, copyright, trademark or other intellectual property rights;
- f) Publishing or sharing any content that may damage the reputation or public image of School of Facilitation or any of our team members, clients, customers and any other associated parties.

Enforcement

These policies are in place to protect our business integrity, our team members, our clients and customers as well as our reputation and public image. Breaches of these policies could have serious detrimental impacts on our business and any team members found to have breached any of the above policies may face disciplinary action and/or termination of contract.

Data Security Policy

Introduction

School of Facilitation is committed to ensuring that we maintain compliance with UK GDPR legislation as well as ICO best practice guidelines when handling personal data and confidential information. We take our legal and ethical obligations very seriously with regard to data security and have undertaken appropriate assessment to identify the risks associated with the collection, handling, storage and processing of personal data in our business operations. This policy should be read in conjunction with our business Privacy Notice which can be found on our website and which explains in full to customers, clients, suppliers and other third parties how and why we use their personal data. This policy outlines the standards and measures that all team members will observe in order to help protect the personal data of clients, customers, suppliers and other third parties.

Data Processing Principles

All team members are required to act in accordance with the following principles when processing data whilst working for School of Facilitation:

1. We will only collect data for specific and specified purposes;
2. We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required;
3. We will collect and use your personal information only if we have legitimate business reasons for doing so, such as making available to you our services and products;
4. We will not use your data for purposes other than those for which it was collected, as stated within our Privacy Notice, or with your prior consent;
5. We will seek to verify and/or update your data periodically and we will accept requests from you for amendment of the data held;
6. We will apply high technical standards to make our processing of data secure;
7. Except otherwise stated, we will not store data in identifiable form longer than is necessary to accomplish its purpose or as required by law.

Regulatory Compliance

School of Facilitation has carried out a self-assessment of the type of data we process and the nature of that processing. As a result of this assessment we have registered with the ICO as a Data Controller with Registration Number ZA390358.

Any team members who are not direct employees of School of Facilitation, including freelancers, contractors, sole traders etc., must carry out their own self-assessment to determine if they should be independently registered with the ICO. Full details of this

process and a self-assessment tool can be found on the ICO website: [Registration self-assessment | ICO](#).

We also require team members who are not direct employees of School of Facilitation to sign a Data Processing Agreement outlining the rights and responsibilities of each party in respect of the processing of personal data for which School of Facilitation is the Data Controller.

Technical standards and measures

School of Facilitation is committed to maintaining the confidentiality, integrity and availability of all information and personal data that we collect and process in the course of our business operations. To this end we have carried out a risk assessment to identify the material risks to data security in the business and have identified the following risks:

1. Accidental loss of devices containing or with access to company data;
2. Theft of devices containing or with access to company data;
3. Cyber attack or security breach from external sources;
4. Human error and mistaken sharing of data via electronic communication systems.

We will mitigate these risks by requiring all team members to adhere to the practices and provisions detailed in our Information Technology Policy which includes separate policies for Device Security and Passwords, Email, Internet and Social Media. The technical and organisational measures outlined in this policy will provide reasonable and robust protection against security breaches in respect of any electronic data assets held by the company.

School of Facilitation uses secure Google Docs and Dropbox cloud based storage for any confidential information or personal data used in our business operations. These systems are accessible only to team members who have authorised access and are password protected with two-factor authentication.

From time to time team members may, in the course of carrying out their roles with School of Facilitation, be required to create or use hard copy paperwork and other physical information assets. These information assets must be treated with the same level of care and diligence as electronic data, which means ensuring the confidentiality, integrity and availability of any such data. Team members must ensure that any hard copy paperwork containing confidential information or personal data is kept securely at all times. When not in use, any hard copy paperwork must be kept locked in a secure cabinet, either at School of Facilitation premises or the team members home or other remote working location. When in use, any hard copy paperwork should be kept on the team member's person at all times and never left unattended. When the hard copy paperwork is no longer needed team members must scan and save electronic copies on the company's secure Google Docs or Dropbox system and securely destroy the hard copies by way of shredding or other secure destruction method.

Data Security Breaches

School of Facilitation will respond swiftly and thoroughly to any suspected data security breaches. A data security breach includes any situation or incident where the confidentiality, integrity or availability of any company data has been compromised, or is at risk of being compromised. Any team member who believes that a security breach has occurred, may have occurred, or may occur in the future, must report the situation to the Company Director without delay. The company will then investigate the circumstances and scope of the breach/potential breach to identify what information may have been comprised and how many individual data subjects may be affected.

School of Facilitation will then determine what action needs to be taken in respect of the breach including notifying the ICO and/or any individuals that have been affected by the breach, in line with UK GDPR regulations and ICO guidelines.

Vehicle Policy

Introduction

School of Facilitation acknowledges that our business activities may have an impact on the public where we have team members driving to client premises and other locations to deliver services or carry out other business activities such as attending team meetings or team building events. We take seriously our responsibility to ensure that the risks associated with such activities are minimised and mitigated wherever possible in line with the principles of ethical and responsible corporate behaviour. This policy outlines the obligations of all team members in respect of vehicle use whilst on company business.

Vehicles

School of Facilitation recognises that for some business activities the most efficient and effective mode of transport for team members will be to drive their own personal vehicle, but team members should consider the provisions of our Environmental and Sustainability policy when making travel decisions.

Where team members do travel in personal vehicles the company will pay team members Mileage Allowance Payments at the maximum rate, or 'approved amount' as set by HMRC. This mileage payment is not just to cover the cost of fuel. A proportion of this payment is to

cover 'wear and tear' and vehicle maintenance, to ensure that any vehicle being used for business activity is safe and roadworthy. It is the responsibility of all team members to ensure that, as well as holding a valid driving license, any vehicle being used for business activity has a valid MOT certificate and is fully insured, including for business use. We may ask any team member to provide a copy of their driving license as well as proof that valid MOT certification and an appropriate insurance policy is in place for any vehicle being used for School of Facilitation business activity, and may withhold any mileage allowance payments until such proof is provided.

When driving a personal vehicle for School of Facilitation business activities it is important for all team members to remember that they are representing the company and therefore must behave in a manner that upholds our reputation and our public image. Whenever driving for business all team members are required to observe all laws, regulations and codes, driving sensibly and courteously. This means allowing plenty of time for any business journey and observing all speed limits and traffic enforcement measures.

It is illegal for a driver to use a handheld device such as a mobile phone while driving or otherwise in control of a vehicle with the engine running or on a public highway. Team members will never be asked or expected to use their mobile phone or other electronic device when driving, and this must only ever be done with the use of an approved hands-free device. Breaking the law by using a handheld device while driving may lead to criminal charges against you, up to and including unlimited fines or a prison sentence. Any team member found to have broken this law whilst on company business may be subject to disciplinary action and/or termination of contract.

In the event that a team member is involved in an accident while driving on company business, the team member should notify the Company Director at the earliest opportunity so that an assessment and decision can be made about the appropriate action to be taken, taking into account the health and safety of the team member, business continuity and contingency and the needs of any clients that may be impacted.

This Policy handbook was last reviewed on 20 June 2023.

It will be reviewed again on 20 December 2023.