



Environmental  
Management  
Services

## **ALCOHOL AND DRUGS POLICY**

### **Purpose and scope**

*In this policy:*

1. 'staff' refers to all individuals working for us at every level or grade, whether they are they are directors, officers, partners, employees, workers, contractors, consultants, agency workers, volunteers, trainees or on work experience.
2. 'drugs' refers to controlled substances, and prescribed or over-the-counter medication and legal highs which are being, or are intended to be, misused or used contrary to medical instructions or advice.
3. 'controlled substances' refers to drugs that are unlawful under criminal law.

*The consumption of alcohol or drugs can be the cause of serious problems within the workplace. Staff who drink or take drugs are more likely to work inefficiently, be late to or absent from work, suffer from impaired concentration, coordination, judgment or decision making, have work-related accidents and endanger their colleagues and members of the public.*

*In addition, the use of alcohol or drugs by staff increases the likelihood of acts of misconduct or criminal behaviour that may have an adverse effect on the morale of other members of staff or relationships with co-workers or damage our reputation and/or business.*

*Taking even small amounts of alcohol or drugs before or whilst working will affect work performance, and there could be serious health and safety consequences. Staff driving to work after a night's heavy drinking may have blood alcohol levels in excess of the legal limit and may be unfit to drive or perform their duties and may pose a risk to the health and safety of others.*

*We have an overriding duty to protect the health, safety and welfare of all members of staff and any visitors to the workplace and anyone who may be affected by our activities.*

*This policy aims to deal with alcohol or drug use (whether continuous or irregular and including the proper and lawful use of over-the-counter medicine and prescribed medication) by individual members of staff which affects their conduct, attendance, performance or productivity.*

### **Prescribed medication**

*Use of prescribed or over-the-counter medicines (even when used correctly in accordance with instructions or advice) might have a detrimental effect on staff performance, conduct or the ability to undertake certain duties.*

*Staff taking prescribed or over-the-counter medicines should seek advice or information from their GP or a pharmacist regarding the possible side effects and whether they should avoid performing any of their duties, such as using machinery or driving*

*Where appropriate, staff should immediately inform their line manager of any possible side effects of their medication, and/or discuss any problems they may have with performing their duties. We reserve the right to require the member of staff to provide us with a medical report from their GP in circumstances where they have been told not to continue to undertake all or part of their duties.*

## **Providing advice and support**

*We recognise that, for a number of reasons, members of staff could develop alcohol or drug-related problems.*

*It is our intention to deal constructively and sympathetically with staff who have alcohol or drug-related problems, such as alcohol or drug dependency.*

*When it is known that a member of staff has an alcohol or drug problem, the primary objective of any discussions will be to assist them with the problem in as compassionate and constructive a way as possible.*

*If a member of staff admits to having alcohol or drug-related problems they should be encouraged by their line manager to seek treatment or rehabilitation. If the member of staff agrees to this, they should be informed of what support can be provided.*

*Depending on the circumstances, consideration should be given to:*

- 1. Referral to an occupational health therapist or other appropriate treatment provider in conjunction with their GP.*
- 2. Time off work to attend any recommended treatment by their GP or a medical/rehabilitation specialist and whether it should be treated as sick leave.*
- 3. Temporary re-allocation to other duties before, during and/or after rehabilitation.*
- 4. Suspension of any on-going disciplinary action in accordance with our disciplinary or capability procedures pending the outcome of the treatment or rehabilitation.*

*If after receiving help and support, the situation has not improved, the member of staff should be advised of the implications of any continuing problems with their performance, conduct or absence and should be given an indication of how the situation will be monitored and for how long.*

*Staff who unreasonably deny having alcohol or drug-related problems should be informed of the required improvements to their performance, behaviour or absence record (as appropriate), how the situation will be monitored and for how long.*

*If there is no improvement within the timescales given, the line manager must contact the head of Human resources, who may proceed to take action in accordance with our disciplinary or capability procedures.*

*If the member of staff refuses to seek help or discontinues a programme of treatment, this should not in itself provide grounds for disciplinary action. However, any unacceptable conduct, performance, absences or any conduct (whether due to actions or inactions by the member of staff) that poses a risk to the health and safety of other staff or members of the public, will be dealt with using our normal disciplinary or capability procedures.*

## **Confidentiality**

*Any discussions with a member of staff concerning their alcohol or drug-related problems and the record of any treatment or other action taken to resolve their problem will be treated as being strictly confidential, unless the member of staff agrees otherwise.*

*However, there may be times when we will need to disclose some confidential information in order to protect the health and safety of other staff or the general public. If we need to disclose any confidential information we shall take all reasonable steps to provide the member of staff with advance warning of this and to let him/her know what information will be disclosed, to whom and the reasons why.*

## **Prohibition of alcohol and drug consumption in the workplace**

*During working hours*

*All members of staff should be fit and capable of performing all their duties and responsibilities on arrival at work.*

*Staff must not:*

- 1. Bring alcohol or controlled substances onto, or consume alcohol or drugs on, our premises or our clients premises at any time.*

- 2. Drink alcohol or take drugs that may affect their ability to drive if they are required to drive in the course of performing their duties.*
- 3. Drink alcohol or take drugs that may affect their ability to carry out their duties during their working day, whilst on breaks or at lunchtime, without obtaining the prior authority of his/her line manager.*
- 4. Drink alcohol or take drugs that may affect their ability to carry out their duties whilst they are on operational standby or when undertaking on-call duties.*
- 5. Drink alcohol or take drugs that may affect their ability to carry out their duties at meetings, conferences, exhibitions or media or social events taking place during the working day whether on our premises or at another site without obtaining the prior authority of his/her line manager.*

#### *Representing the business after working hours*

*Staff representing us at business/client functions, conferences, exhibitions, or at media or social events outside normal working hours:*

- 1. Will be deemed to still be at work.*
- 2. May only drink moderately if drinking alcohol, and are expressly prohibited from possessing controlled substances or using drugs. that may affect their ability to carry out their duties*
- 3. Must ensure they are well within the legal limits if they are driving.*
- 4. Must ensure that they remain professional at all times and must not, by their conduct, actions or inactions, detrimentally affect our business or reputation.*

#### *After work*

*Staff activities after normal working hours and away from our premises are, of course, generally a personal matter and do not directly concern us.*

*Concern will arise if, because of the pattern or amount of drink or drugs involved, a staff member's attendance, work performance or conduct at work deteriorates or if their conduct damages the reputation of our business.*

#### **Disciplinary action**

*Disciplinary action will be taken in the following circumstances:*

- 1. If a member of staff is found to have breached any of the above mentioned restrictions regarding the consumption of alcohol or use of drugs.*
- 2. If misconduct takes place at work as a result of drinking alcohol or taking drugs.*
- 3. If a member of staff is found, in the reasonable opinion of his/her line manager, to be under the influence of alcohol or drugs whilst at work. This could, for example, include circumstances where the member of staff has not committed an act of misconduct but is incapable of properly performing all or some of their duties to our required standards.*
- 4. If a member of staff is believed to be buying or selling drugs on our premises.*
- 5. If a member of staff is found to be in possession of controlled substances on our premises.*
- 6. If the consumption of alcohol, use of drugs or possession of controlled substances by a member of staff damages the reputation of our business.*

*A breach of any of the above mentioned restrictions is a disciplinary offence and depending on the seriousness of the offence, it may amount to gross misconduct and could result in summary dismissal.*

*Any disciplinary action will be dealt with in accordance with our disciplinary procedures.*

*Staff found to be in possession of or selling controlled substances at work will be immediately reported to the Police.*

*We reserve the right to arrange for the member of staff to be escorted from our premises immediately, and sent home without pay for the rest of the day or shift if we believe that they have breached this policy.*

### **Alcohol and drug testing**

*We reserve the right to carry out random alcohol and drug screening tests on those members of staff whose activities and job duties may have a significant impact on the health and safety of our workforce, our clients work force or members of the public*

*If a member of staff receives a positive test result this will be viewed as a gross misconduct offence, and potentially render them liable to summary dismissal in accordance with our disciplinary procedures.*

*Unreasonable refusal to submit to an alcohol or drug screening test will also be dealt with through our disciplinary procedures.*

### **Searches**

*We reserve the right to search our premises for evidence of any breach of this policy, which includes, without limitation, staff lockers, cabinets, desks.*



*Signed*

*Ian McDonald – Managing Director*

*Date: 04/2019*

*Next Review Date: 04/2020*

***GEO Pollution Technologies (UK) Ltd***



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## **ANTI-BRIBERY POLICY**

*At Geo Pollution Technologies, we recognise that bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.*

*To clarify:-*

*A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.*

*It is our policy to conduct all of our business in an honest and ethical manner.*

*We take a zero tolerance approach to bribery and corruption.*

*We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.*

*We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.*

*However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both within the UK and abroad.*

*Bribery and corruption are punishable for individuals by up to ten years imprisonment and a fine.*

*Any employee that is approached by a third party to undertake any kind of activity involving bribery, must report it immediately, failure to do so will be subject to disciplinary action.*

*If we are found to have taken part in corruption, we understand that we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.*

*We therefore take our legal responsibilities very seriously.*

Signed 

**Date: 04/2019**

**Ian McDonald – Managing Director**

**Next Review Date: 04/2020**

**Geo Pollution Technologies (UK) Limited**

## **ANTI-CHILD LABOUR POLICY**

### ***1. Introduction***

#### ***Defining Child Labour***

*Child Labour represents hazardous forms of work that disrupt the healthy development of a child. Child labour can limit or damage the physical, mental, social or psychological development of children and undermine a child's right to childhood, development and education. The company recognizes its responsibility to take an effective role in reducing child labour.*

#### ***Hazardous work***

*Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18 or (16 under strict conditions)*

#### ***Basic Minimum Age***

*The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 16.*

#### ***Light work***

*Children between the ages of 13 and 16 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.*

***Geo Pollution Technologies (UK) Ltd*** is firmly committed to creating strong business growth, which is not achieved at the expense of the environment, quality of life or social equity. The Company will comply with all relevant and applicable local and international labour regulations, treaties, conventions and principles relating to the protection, welfare and health & safety of children. Furthermore, the Company will not employ any person deemed by local or international laws, conventions or regulations to be a child in any capacity in any industrial operation under its control.

***Geo Pollution Technologies (UK) Ltd*** acknowledges that in the course of carrying out its basic duties; without the knowledge of management; employers may indulge their children; it is sometimes customary for children to play a part in the day-to-day work for the fun of it due to the fact that children have an affinity for work and activity. Nevertheless, the Company aims to apply this anti-child labour policy through education and strict supervision seeking to ensure that:

- a) The welfare and health & safety of children are paramount at all times.*
- b) Any forms of practice undertaken by children for the development of craft skills and for the purposes of play do not conflict with or impede their proper educational development including school attendance.*

*The objective of the policy is to set out the ways in which the company will:*

- *Prevent child labour within its operations and supply chain*
- *Approach incidences where child labour is identified*

## **2. Implementation**

### ***Efforts to Reduce the Engagement of Child Labour in the Taskforce***

- *Comply with national law on child labour and minimum age.*
- *Comply with the Convention on the Rights of the Child.*
- *Not use or support the use of child labour*
- *Prohibit and seek to eliminate the worst forms of child labour*
- *Not work with those who use child labour – unless an elimination plan is in place.*
- *Base decisions about child labour on expert advice about the options available to children in the local context, and the best interests of the children affected*
- *Educate employees and all staff on child labour and its negative impacts in the work environment and on society as a whole.*

### ***Education and vocational work for children***

*Promote education for children of school age via the use and promotion of work experience among other initiatives.*

Signed



*Ian McDonald – Managing Director*

*Date: 04/2019*

*Next Review Date: 04/2020*

***GEO Pollution Technologies (UK) Ltd***



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## **ANTI-SLAVERY AND HUMAN TRAFFICING POLICY**

### ***Definition***

*Modern slavery is a crime and a violation of fundamental human rights in both law (Modern Slavery Act 2015) and moral obligation. It can take various forms, such as slavery, servitude, forced & compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or financial gain.*

### ***Policy Statement***

*Geo Pollution Technologies (UK) Ltd (GPT) have a zero tolerance attitude to modern slavery and we are committed to acting ethically & with integrity in all our business activities and relationships. While implementing effective systems and control measures to ensure modern slavery is not taking place anywhere within our own business or in any of our supply chains.*

*GPT are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our directly employed staff, contractors, suppliers and other business partners.*

### ***Implementation***

*This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.*

*The managing director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Manager has the day today responsibility for implementation and effectiveness of the policy.*

Signed

Ian McDonald – Managing Director

Date: 04/2019

Next Review Date: 04/2020

**GEO Pollution Technologies (UK) Ltd**



## **Corporate Social Responsibility (CSR) – Supply Chain Monitoring**

*Geo Pollution Technologies (UK) Ltd [GPT], must ensure that we operate in such a way that protects the environment; creates a safe place to work for all our people (employees, contractors, customers and the general public); and operates in a sustainable and ethical manner at all times. Therefore, it is imperative that we monitor our supply chain; to make sure suppliers and contractors share the same ethical values, ideology and principles as our own.*

### **Pre-Qualification Questionnaire**

*The Pre-Qualification Questionnaire (PQQ) contains a list of evidence based questions where the supplier or contractor will need to complete and subsequently attach the evidence in order to support their statement and position. For example, the PQQ may ask the supplier: ‘Do you have a policy and procedure in place, complying with Modern Slavery Act 2015?’ The supplier can choose to answer ‘yes’ or ‘no’ and must provide evidence if it is the former.*

*Below is a list of topics, the PQQ asks the supplier or contractor prior to a contract being enacted between them:*

- **Management Systems:**
  - *Does the supplier/contractor have a quality, environmental or health & safety system in place? Please provide further details.*
- **Ethical Supply Chain:**
  - *Anti-Bribery*
  - *Anti-Slavery*
  - *Modern Slavery Act 2015*
- **Health & Safety Questions:**
  - *Systems*
  - *Accident/Incident investigations and data*
  - *RAMS & SSoW*
  - *Equipment, Plant (PUWER, LOLER)*
  - *Subcontractor Use*
- **Evidence of Relevant Experience:**
  - *References*

## **Supply Chain Review**

*The data provided by the potential supplier or contractor is used to assess the likelihood that GPT will form a suitable contract with the supplier/contractor. The data is requested annually and the assessment is conducted at Management Review Meetings (MRM). If a supplier/contractor fails to update their information, or if they have not met the requirements of the contract, GPT will inform them and cease to use/renew the service provided.*

*The supply chain is expected to comply with the CSR policy, roughly equal between contractual and voluntary requirements.*



*Signed*

*Ian McDonald – Managing Director*

*Date: 06/2018*

*Next Review Date: 06/2019*

***GEO Pollution Technologies (UK) Ltd***



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## **Diversity and Equality Policy**

*The purpose of this policy is to provide diversity and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.*

*All employees, whether part time, full time or temporary, will be treated fairly and equally.*

*Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.*

*All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.*

### ***Our commitment:***

- *Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.*
- *The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.*
- *Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.*
- *This policy is fully supported by all staff and including the management and the managing director.*
- *The policy will be monitored and reviewed annually.*
- *The policy is implemented by making all employees aware of our policy and ensuring they abide by it. On the policies enactment all employees were given a copy and a copy is clearly presented in our foyer.*
- *If any employee feels that they or any other member of staff has been treated in a way which breaches this policy complaints should be made to a member of the management team.*

### ***The law***

*This policy will be implemented within the framework of the Equalities Act (2010)*

Signed  
Ian McDonald – Managing Director

Date: **04/2019**  
Next Review Date: **04/2020**

**GEO Pollution Technologies (UK) Ltd**



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## **Sustainable Procurement Policy**

*It is the stated policy of Geo Pollution Technologies to reduce its environmental impact where practicable.*

*Sustainable Procurement form an integral part of the overall Company strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air, while supporting local businesses.*

### ***To help achieve this, the company will;***

- *Promote the use of local businesses for the purchasing of goods where practical, ideally sourcing goods within a 10mile radius of a job site.*
- *Aim to always source wood products from Forest Stewardship Council (FSC) accredited sources.*
- *Promote good logistical planning for the delivery of goods and services.*
- *Aim to purchase Fairly Traded goods in line with the Fair Trade Policy.*
- *Set up a file of approved suppliers who have been rigorously checked for Environmental, Health and Safety and Quality standards.*

*This Sustainable Procurement policy statement underpins the existing Environmental, Carbon Footprint and Fair Trade policy.*

Signed

*Ian McDonald – Managing Director*

*Date: 04/2019*

*Next Review Date: 04/2020*

***GEO Pollution Technologies (UK) Ltd***



## **Waste & Recycling Policy Statement**

*Our Statement of Policy for Waste & Recycling is as follows:*

***Geo Pollution Technologies (UK) Ltd** understands the importance of waste management and its effect on the environment. The Company is therefore committed to minimizing waste production by employing Reduction, Re-use, and Recycling techniques at every stage of its operations. The Company is further committed to ensuring that all operations and activities are fully compliant with all current waste management legislation and best practice guidance.*

***To help achieve this, the company will;***

- *Employ effective waste management practices to identify the most efficient methods to reduce the production of waste, to maximize the re-use or recycling of waste material and to divert waste from landfill.*
- *Sort and store waste safely and securely.*
- *Provide adequate recycling infrastructure at all locations where work is conducted.*
- *Purchase recycled and reusable materials where possible and appropriate.*
- *Through training and support, ensure that all employees are aware of their waste management and recycling responsibilities.*
- *Through the Company notice boards employees will be informed of applicable changes to waste legislation and best practice guidance and the impact and effect of any changes will be explained through tool box talks or formal training where necessary.*
- *Make available on request copies of this policy to all employees and any interested parties.*

*This Waste & Recycling policy statement underpins the existing carbon footprint, environmental, sustainable procurement policies.*

Signed:

A handwritten signature in blue ink, appearing to read 'Ian McDonald'.

*Ian McDonald - Managing Director*

*Date: 01/2019*

*Next Review Date: 01/2020*

***Geo Pollution Technologies (UK) Ltd***