

**MINIBUS**  
**CODE OF PRACTICE**  
**&**  
**Live WORKING POLICIES**  
**FOR**  
**DUNCAN PRIVATE HIRE**  
**Edition 001**

**Dated: 14 May 2021**

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## **Statement**

Duncan's is committed to taking all reasonable precautions to ensure, so far as is reasonably practicable, that those employees who are required to drive minibuses as part of their job role are protected from any foreseeable risks to their health and safety.

## **Objectives**

Driving a minibus requires additional skills in order to be able to handle the vehicle safely as the weight and the size of the vehicle are considerably greater than a family car. In addition, the driver takes on the responsibility for the safety of passengers. Although rare, serious, sometimes fatal, accidents have occurred when Private Hire establishments use minibuses. It is in order to minimise the risk of such accidents occurring that this policy has been produced. This policy will enable staff to appreciate the risks associated with driving a minibus and to ensure that they are aware of and understand the safety precautions necessary to reduce those risks to an acceptable level. It will also provide details of the emergency procedures required should something go wrong.

## **Coverage, Scope and Application**

This Policy applies to:

Any use of minibuses owned by Duncan's.

The Policy applies to minibuses/PSV, which are defined as vehicles "constructed or adapted to carry up to, but not more than sixteen passengers, in addition to the driver".

The Policy should be read in conjunction with any other Duncan's policies that relate to the use of vehicles. The requirements of this Policy represent the minimum standard to be adopted. Departments (such as Wiltshire Council) may impose additional requirements if they consider it appropriate.

## **Organisation and Responsibilities**

The manager is responsible for ensuring that drivers are made aware of the Duncan's policy on minibus driving and understand their responsibilities under the policy and its' associated code of practice. The Manager (hereafter referred to as manager) is responsible for following this procedure in respect of any minibus drivers/operations in his areas of control.

### **It is the responsibility of manager to:**

Ensure this policy and code of practice is communicated to, and fully understood by, all Duncan's staff.

Check that all the procedures contained within are adhered to.

### **It is the responsibility of drivers to:**

Comply with the safe working procedures and control measures identified in the minibus code of practice.

Report any problems immediately to the Manager.

Not knowingly place themselves or their passengers in a position of unnecessary risk.

Quality and Monitoring.

This document will be reviewed by Duncan's Director or Manager on an annual basis.

## **Code of Practice for the Safe use of Minibuses**

### **Roadworthiness of the Vehicle:**

All minibuses owned by Duncan's must be regularly maintained and kept in a Roadworthy condition. The driver must check his/her vehicle very carefully on delivery.

Before taking over responsibility for any vehicle, all drivers must carry out the pre-journey checks listed at Appendix 1, or, satisfy themselves that such checks have already been carried out by the previous driver. The pre-journey checks must be carried out daily whilst the vehicle is in use.

### **Provision and Use of Seatbelts/Child seats.**

All minibuses purchased, leased or hired must have seatbelts fitted to all seats. These should, as far as possible, be lap and diagonal belts, but where this is not feasible lap belts should be fitted. Minibuses must not have any sideways facing seats. All passengers, driver and escort(s) must wear seat belts. Where passengers are under 14 years old the driver is legally responsible for this and for passengers 14 and over this legal responsibility passes to the passenger themselves however, Duncan's drivers must remind passengers of this legal requirement.

When carrying children under 3 years old or children aged 3 to 11 who are less than 1.35 metres (approx. 4ft 5ins) in height an appropriate child restraint must be used, and the driver is legally responsible for this. Children aged 12/13 years (and younger children who are 1.5 metres or taller) use the seat belts. N.B. An appropriate child restraint is one which conforms to the United Nations standard, ECE regulation 44-03, is suitable for the child's weight and size and is correctly fitted according to the manufacturer's instructions. N.B. Any luggage, buggies, pushchairs etc. should be properly restrained to prevent them causing injury in the event of an accident but they must not be stored in a way that blocks emergency exits from the minibus.

### **Arrangements for Disabled Passengers**

Disabled passengers will fall into two categories, as far as transportation on minibuses is concerned; those that have to remain in their wheelchairs throughout the journey, and those who are able to use a minibus seat but require their wheelchair before and after the journey.

Those in category a. will require the use of the powered tail-lift to lift them into the bus. They and their wheelchairs then require to be properly restrained using the combined wheelchair restraint and seatbelt system to protect them in the event of an accident.

Those in category b. may be able to access the minibus via the doors or they may require the use of the powered tail-lift to lift them into the bus before they can move to a minibus seat. Their wheelchairs should then be properly restrained to prevent them causing injury in the event of an accident. Drivers or escorts must be trained in the use of Tail Lift mechanism and the fitting of wheelchair restraints before they carry wheelchair passengers.

Requests for training should be made through Line Management. If you are required to transport electrically powered mobility scooters these should be loaded using the powered tail-lift and then be properly restrained, using the mobility scooter restraints, to prevent them causing injury in the event of an accident. N.B. passengers should not be allowed to travel sitting in their mobility scooters. Because of these requirements, it will only be possible to carry wheelchair and mobility scooter users in minibuses equipped with the floor rail system as the restraints are based on this system.

### **Loading of Minibuses**

The number of people and the weight of luggage carried must not exceed the maximum limits specified by the manufacturer or licence of the vehicle. If a large amount of luggage is to be carried it may be necessary to reduce the number of passengers in order to remain within the maximum loading limits. All luggage that may shift due to the movement of the vehicle must be safely secured. The use of roof racks on minibuses used by Duncan's is not permitted.

### **Towing of Trailers**

Duncan's minibuses are not equipped to tow trailers. Drivers must never drive minibuses with trailers fitted unless they have received written permission by Duncan's manager. The manager will ensure that familiarisation training and an assessment on driving the minibus with a trailer attached has been completed prior to any written permission being given. Drivers should refer to Appendix 2 for checks required prior to towing a trailer.

### **Speed limits**

All UK speed limits must be complied with.

Speed limits for minibuses are:

30mph in built up areas (unless otherwise stated).

50mph where the national speed limit is in force (unless otherwise stated).

60mph on dual carriageways (unless otherwise stated).

70mph on motorways (reduced to 60mph when towing a trailer).

N.B. The driver is legally responsible for all fines, etc, resulting from the use of the vehicle

### **Competence of Drivers and the Provision of Information and Training**

The skill and care exercised by the driver is undoubtedly the most important aspect of minibus safety. Driving a minibus, especially a fully laden minibus over long distances, is much more demanding than driving a private car. Duncan's operates an 'Approved Driver Scheme' (MIDAS). Any Duncan's minibus driver may be requested at any time, to undertake a period of instruction or assessment if required.

All Duncan's drivers must be 25 years old or over.

Have held a full car driving licence for at least 2 years.



Have passed the Wiltshire Council health/medical assessment (if applicable).

Achieved Enhanced Disclosure through the Criminal Record Bureau.

Have undertaken application and granted a Private Hire licence (if applicable).

**To maintain their Duncan's Private Hire status drivers must:**

Present their driving licence for inspection when requested to do so (at least once yearly).

Be able to complete a pre- journey vehicle check.

Notify Duncan's of any convictions, and any pending prosecutions.

Inform Duncan's of any medical condition that could affect their ability to drive safely.

Undertake their own continuous development to ensure driving skills and driving knowledge remains current.

All drivers are required to inform Duncan's and the DVLA of any physical or other disability, which might affect their fitness to drive any Group 2 vehicle. Special care must be taken over the use of any medication, prescribed or otherwise, which might affect driving ability.

**Note:**

Drivers must maintain high standards of driving, show courtesy to other road users, and remember that they are representing Duncan's when out driving the minibuses. Minibuses carry the Duncan's name and contact information and all complaints will be investigated.

**Medically Restricted Licences**

Since 01<sup>st</sup> January 1998, those with medically restricted licences are not automatically entitled to drive minibuses with up to 16 passenger seats and vehicles between 3.5 and 7.5 tonnes and to attach a trailer to these vehicles. Drivers do not need to act until their licence is next due for renewal after 1 January 1998. As long as licences remain valid, there will be no changes to existing entitlements. Three months prior to the expiry of the licence, the driver will be contacted about their entitlement by the DVLA.

**Journey and Driving Times**

Tiredness of the driver has often been a significant factor in accidents involving minibuses. There are legal requirements relating to driving times. The maximum number of hours that a driver may drive in any 24-hour period is 9 hours subject to a weekly maximum of 56 hours. Every driver must take a continuous rest period of at least 11 hours in every 24-hour period. Suitable arrangements must be made for this rest period.

The driver must not be tired at the start of a journey so where a person drives and carries out other work, they should reduce their driving hours accordingly. Where the driver is carrying out other work, they should have a break of at least 15 minutes, free of responsibilities, before commencing a journey. It is good practice for the maximum continuous period of driving not to exceed 2.5 hours and for this to be followed by a minimum break of 15 minutes out of the vehicle. Time spent crawling in motorway type hold-

ups should count as part of the driving period, as should any period spent driving to pick up a party.

### **Consumption of Alcohol by any Driver**

It is an absolute rule that any driver does not consume any alcohol during or in the period before any journey. Since blood alcohol level should be zero during all driving activities, care should be exercised if consuming alcohol even on the previous day. Alcohol must not be consumed in the 8-hour period immediately prior to driving. Breaches in this respect will be dealt with through Duncan's Disciplinary Procedure.

### **Mobile Phones**

Before using a mobile phone, drivers must stop at a safe place away from the main carriageway, turn off the engine and apply the hand brake. It is an offence under the road traffic act for a driver to make / take calls or to send a text message whilst driving. Details of the legal restrictions and penalties can be found in Appendix 3.

### **First Aid and Emergency Procedures**

If a vehicle is involved in an accident:

Make sure all passengers are safe and if necessary, summon the emergency services for assistance by dialling 999.

Obtain the registration number(s) and insurance details of any other vehicle(s) involved.

Take the names, addresses and if appropriate vehicle registration number of any witnesses and the number and base station of any Police Officer who attends.

Write down as soon as possible after the accident all relevant details in a precise manner.

Report all the above details to Duncan's as soon as possible.

If you need any immediate or emergency assistance from Duncan's, call 01225 790232 and ask for the Manager.

The legal requirements for providing information after an accident are summarised and can be found in Appendix 4.

It is recommended that in addition to a first aid kit being kept on board, that a personal mobile phone is available for ease of communication from the minibus.

### **Actions on Puncture/Break Down & Vehicle Fire**

No 2 vehicle problems are ever the same and we are not able to cover every form of vehicle breakdown however, the immediate actions that must be taken on Puncture/Break Down & Vehicle fire can be found at Appendix 5.

### **Documentation**

It is law that all drivers always carry their driving licence (both parts if new photocard type) and should also be in possession of their Council Private Hire/PSV Badge (if applicable).

### **Administrative Issues**

Use of Duncan's minibuses for non-contract business is not permitted unless it has been cleared "prior to use" by Duncan's Manager. Any driver, who fails to comply, will have disciplinary action taken against them.

### **Fuel Cards**

Duncan's currently operate a combination of Key Fuels and Sainsbury's fuel cards. Fuel cards are only to be used for Duncan's vehicles. At no time, are drivers to store fuel in any container, other than, that of the vehicle fuel tank they operate. All fuel receipts must be annotated with the current mileage and returned to Duncan's office on the last working day of the month.

### **Vehicle Licence**

All minibuses owned or hired by Duncan's must display a valid Wiltshire Council Vehicle Private Hire licence (if applicable).

### **Spot Checks**

Vehicles operating under Duncan's will, be subject to spot checks by Duncan's Manager, vehicle inspectorate examiners such as Council/VOSA/CQC. All drivers are to fully assist those said inspectors and they must not be prevented from carrying out such inspections.

### **Environmental Policy**

Duncan's are committed to improving the environment, drivers should refer to Appendix 6 for full details regarding Duncan's Transport Environmental Policy.

### **Feedback and Complaints Policy**

Any complaint made to Duncan's, will be fully investigated and at the earliest opportunity, all findings will be made available to both the complainant and the member of staff to which the complaint has been made against. Drivers should refer to Appendix 7 for full details of Duncan's Feedback and Complaints Procedure.

### **Sickness Absence Policy**

Duncan's values the contribution our staff make to our success and we miss that contribution when an employee is unable to work. Drivers should refer to Appendix 8 for Duncan's full Sickness Absence Policy.

### **General Data Protection Policy**

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It addresses the export of personal data outside the EU. The GDPR was brought in, in May 2018 and replaces the current Data Protection Act 1998 (DPA).

It provides a legal basis for the privacy and protection of individuals whose personal information is managed (or processed) by organisations. It places certain obligations on organisations regarding how they process such information and gives individuals certain rights regarding the information held about them. Furthermore, organisations are only permitted to hold and use a specific selection of information for limited purposes of which they must annually inform the government appointed independent watchdog, the Information Commissioner. The Act is very complex and although very clear in some areas is open to interpretation in a great deal of others. Further details can be found on Duncan's website <http://www.Duncan's.co.uk/policy.html>

### **Equal Opportunities Policy**

Duncan's treat all employees and job applicants fairly and equally regardless of their sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, disability or union membership status. All drivers should refer to Appendix 10 for Duncan's Equal Opportunities Policy.

### **Equal Opportunities Monitoring Form**

Duncan's keep a record of this data in order to ensure there is no discrimination with regards to appointment, access to training, and promotion. A copy of Duncan's Equal Opportunity Monitoring Form can be found at Appendix 11.

### **Code of Conduct Policy**

All organisations work to a Code of Conduct for handling patient/client-identifiable information. Working to the same Code of Conduct will help ensure a more unified approach across the way Duncan's handle, store, transfer and work with patient/client information. Further information can be found at Appendix 12.

### **Health and Safety Policy**

It is the Policy of Duncan's to comply with the terms of the Health & Safety at Work Act 1974 and subsequent legislation and to provide and maintain a healthy and safe working environment for all its employees. Further information can be found at Appendix 13.

### **Whistleblowing Policy**

Duncan's is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of Duncan's work to come forward and voice those concerns rather than overlooking a problem or 'blowing the whistle' outside of the business. Duncan's Whistleblowing policy can be found at Appendix 14.

## **Safeguarding Policy**

All vulnerable children/adults, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse. Protection from abuse is an integral part of the policy and practice of all Duncan's workings with, or coming into contact with, vulnerable children/adults and can be found at Appendix 15.

## **Infection Control Policy**

Infection control is the name given to a wide range of policies, procedures and techniques intended to prevent the spread of infectious diseases amongst staff and service users. All staff working at Duncan Private Hire are at risk of infection or of spreading infection, especially if their role brings them into contact with blood or bodily fluids like urine, faeces, vomit or sputum. Such substances may well contain pathogens that can be spread if staff do not take adequate precautions. Any details regarding Duncan Private Hire's Infection Control Policy can be found at Appendix 16.

## **Information/IT Security Policy**

Information in all its forms, written, spoken, recorded electronically or printed--will be protected from accidental or intentional unauthorised modification, destruction or disclosure throughout its life cycle. This protection includes an appropriate level of security over the equipment and software used to process, store, and transmit that information. Further information regarding this policy can be found at Appendix 17.

## **Recruitment Policy**

It's important to us that Duncan's recruitment process is thorough and transparent, so that new staff are able to meet the high performance standards we expect and share our commitments to safeguarding and diversity and strive to provide the best services and a safe environment for vulnerable children/adults and young people. Duncan's recruitment policy can be found at Appendix 18.

## **Internal Communications Policy**

Internal communication refers to the communication within a small business and its employees. As the business grows, the more challenging internal communication becomes. As a result, effective internal communication is essential for ensuring that the right people receive the message at the right time. Duncan's Internal Communication Policy can be found at Appendix 19.

Contacts for Further Advice and Information:

Director- Peter Simpson: 07717 784235.

Manager- Clark Ferguson: 01225 790232.

## **Menopause Policy**

Menopause is the time in a menstruator's life when menstruation periods permanently stop. The purpose of this policy is to help create an open and honest workplace where managers

and employees can discuss any issues associated with the menopause, and to make sure the necessary support is known and offered to employees when they need it. Duncan's internal menopause policy can be found at Appendix 20.

### **Disciplinary Procedure**

The purpose of this disciplinary policy is to provide guidelines for addressing and resolving employee conduct or performance issues in a fair and consistent manner. Duncan's internal disciplinary policy can be found at Appendix 21.

## Duncan Private Hire Document Change Register

### Document Log

Issue	Date	Comment	Author	Sign
001	01 Feb 2013	First Draft	Clark Ferguson	CF
002	09 May 2014	Document Annual Review	Clark Ferguson	CF
003	08 May 2015	Document Annual Review	Clark Ferguson	CF
004	31 May 2016	Document Annual Review	Clark Ferguson	CF
005	09 May 2017	Document Annual Review	Clark Ferguson	CF
006	28 May 2018	Document Annual Review	Clark Ferguson	CF
007	28 May 2019	Document Annual Review	Clark Ferguson	CF
008	25 May 2020	Document Annual Review	Clark Ferguson	CF
009	14 May 2021	Document Annual Review	Clark Ferguson	CF
010	11 May 2022	Document Annual Review	Clark Ferguson	CF
011	13 Apr 2023	Document Annual Review	Clark Ferguson	CF
012	21 May 2024	Document Annual Review	Clark Ferguson	CF

**Pre-Journey Checks to be made by the Driver Daily Whilst the Vehicle is in Use Policy**

Duncan's asks all drivers to perform routine vehicle checks and complete a Weekly Defect Report (as shown). All checks are common and relate to the roadworthiness of the vehicle, for which you are legally responsible.

**Duncan Private Hire**

**Weekly  
DRIVERS' VEHICLE DEFECT REPORT  
(PASSENGER VEHICLES)**

DATE:			DRIVER'S NAME:			
VEHICLE No:			FLEET / SERIAL No:			
ODOMETER READING:		Start	Finish			
DAILY OR SHIFT CHECK (TICK OR CROSS)						
Fluid Level's						
Oil / Water / Washers / Brake / Clutch / Steering		Wipers		Mirrors		
Battery (if easily accessible)		Washers		Steering		
Tyres and Wheel Fixings		Horn		Heating / Ventilation		
Brakes		Glass		Lights		
Doors and Exits		Reflectors		Body Interior		
Indicators		Body Exterior		Excessive Engine Exhaust Smoke		
Fire Extinguisher		First-Aid Kit		Emergency Exit Hammer		
REPORT DEFECTS HERE:-			RECTIFIED:-			
<b>If no defects found tick box</b>						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
					Driver's Signature	
					.....	

Defects rectified by: .....

Signature: ..... Date: .....



### **Checks to be carried out before Towing a Trailer Policy**

Drivers must not tow a trailer over 750kg capacity, without E entitlement on their licence that the vehicle being used is appropriate for this use (seek advice through Duncan's Manager if in any doubt).

That the gross weight of the vehicle is within the vehicle gross weight limit.

That the kerbside weight of the towing vehicle is clearly marked on the front nearside of the vehicle.

That the downward force from the loaded trailer on the towing ball is within the limits imposed by the towing vehicle manufacturer.

That the axle loads of the towing vehicle are not exceeded.

Ensure that a breakaway chain is in use, which will activate the handbrake should the coupling break. Advice on this matter should be sought from the trailer manufacturer or approved dealer.

That the unladen weight of the trailer and trailer tyre pressures are clearly marked on the trailer.

That the total gross weight (trailer weight plus maximum load to be carried) is clearly marked on the front of the trailer.

That the trailer handbrake/overrun brake functions properly.

That the trailer lights and indicators work.

That the load is securely lashed to the trailer body or frame.

That the load is evenly distributed and is mainly over the axle(s).

That there is suitable marking of any rear overhang greater than one metre by using high visibility signage or other approved method (e.g. warning tape) or an approved light in hours of darkness or bad weather.

That the trailer is not wider than the towing vehicle.

That the trailer does not prevent the rear doors of the bus from opening.

### **Penalties for the Use of Handheld Mobile Phones whilst Driving Policy**

The legislation to increase the penalty for using a hand-held phone while driving came into force on 01 March 2017. The change has been made under section 26 of the Road Safety Act 2006. The Act contains other measures to help achieve casualty reduction targets and improve safety on Britain's roads.

The use of a hand-held phone, or similar hand-held devices, while driving has been prohibited since 1 December 2003.

The roadside fixed penalty notice has increased to £200 and six penalty points added to the drivers' licence. If a case goes to court, then in addition to the points, discretionary disqualification is added.

The existing maximum fine of £1,000 (£2,500 in the case of a bus/coach or goods vehicle) remains unchanged.

Provided that a phone can be operated without holding it, then hands-free equipment is not prohibited although D of T advice will remain that drivers should switch to voicemail and not use a mobile in the car at any time.

A hand-held device is something that "is or must be held at some point during the course of making or receiving a call or performing any other interactive communication function"

A device is "similar" to a mobile phone if it performs an interactive communication function by transmitting and receiving data.

Using any mobile phone when driving has been scientifically proven to be distracting. Those who drive poorly as the result of distraction from a conversation on a hands-free phone continue to risk prosecution for not having proper control of a vehicle - this is an offence under Regulation 104 of the Road Vehicles (Construction and Use) Regulations 1986. The penalties are the same as for the hand-held phone offence.

Employers can also be prosecuted if they require their employees to use any phone to take or make calls while driving.

If you require and further information, this can be found on the Department for Transport's road safety website [www.thinkroadsafety.gov.uk](http://www.thinkroadsafety.gov.uk).

### **Actions to be Taken if a Vehicle is Involved in an Accident Policy**

No two accidents are the same and the actions taken will vary, dependent upon the circumstances. As a general guide the procedure should be as follows:

Activate hazard-warning lights.

Try to make sure the accident does not become any worse e.g., get someone to warn other traffic without endangering themselves – use a high visibility jacket.

Telephone 999 and ask for the Ambulance Service or Police if necessary (and remain at the scene). When the situation permits, inform Duncan's Manager who in turn, will inform all other relevant agencies.

Help those trapped or badly injured if you can do so.

Attend to other passengers; get them to a safe place off the road and as far away from the vehicle as possible.

Attend to minor injuries using the First Aid Box mounted in the vehicle.

If you are involved in an accident which causes damage or injury to any other person, or other vehicle, or any animal (horse, cattle, ass, mule, sheep, pig, goat or dog) not in your vehicle, or property you legally must:

“Stop and remain at the scene”.

Give:

Your name and address.

The name and address of owner of the vehicle.

The registration mark of the vehicle.

If it cannot be done at the scene, you must report the accident to the Police as soon as possible, but in any case, within 24 hours.

Produce evidence of insurance to the Police or anyone who has reasonable grounds to ask for it.

Please refer anyone requiring details of Duncan's vehicle insurance to the Manager on 01225 790232.

The following procedure should then be followed:

If you have reported the incident but cannot produce the Insurance Certificate at the time of the incident as then the Certificate must be produced within 7 days after the occurrence of the accident at a named Police station.

Collect details of other drivers and vehicles and any witnesses and provide your details to the third party.

Record details at the scene. This will prove of value when you are asked to complete an insurance accident claim form.

When you return to Duncan's complete an Accident Form once it is received from our Insurers.

All accidents and near misses must be reported to the Manager of Duncan's.

Drivers must not admit responsibility for an accident to the other party or to any witnesses.

Staff should not communicate with the media; they should refer them to Duncan's Manager for comment.

### **Actions to be taken in the Event of a Puncture/Breakdown/Vehicle Fire Policy**

Normal Roads:

Switch on hazard warning lights.

Switch on sidelights if it is dark or visibility is reduced.

Endeavour to position vehicle where it will create least danger – pull onto verge or hard shoulder.

Remove occupants to a position away from the road and nominate someone to take charge and keep the group together (if safer to do so).

Ascertain fault and rectify if possible or call Duncan's manager who if necessary, will task breakdown/rescue service.

Motorways:

If possible either:

Leave Motorway by next exit.

Drive to the next service area and call Duncan's manager who if necessary, will task breakdown/rescue service and organise a replacement vehicle.

If not possible then:

Pull onto the hard shoulder as near as possible to an emergency telephone and as far over to the left as possible (but leave room for the nearside doors to open).

Switch on hazard warning lights.

Switch on sidelights and head lights if it is dark or visibility is reduced.

Get passengers out of vehicle by the nearside door and assemble them well up the grass bank (if possible and is safe to do so).

Do not allow passengers to wander about.

Wait for breakdown/rescue assistance. Do not wait in the vehicle wait over the barrier (with the passengers).

Ensure that passengers remain well away from motorway.

Please Note: Duncan's breakdown/rescue service is Cooke Automotive (Melksham vehicles only).

Office Normal Working Hours: 01225 791000.

When you ring you will require the following information?

Vehicle registration number and mileage.

Vehicle location (as accurately as possible).

Nature of the fault.

The weight of the vehicle (approx. 3.75 tonnes).

The number and type of passengers who may require transportation to safety (wheelchair users/walkers etc).

Breakdown/rescue assistance will either fix the problem so that you can continue your journey or recover the vehicle back to a preferred location.

Flat Tyres:

Most Duncan's minibuses **do not** carry a spare wheel and drivers **should not** attempt to change a wheel if fitted. They should contact Duncan's manager, who, will contact recovery service on your behalf.

## **Duncan Private Hire Transport Environmental Policy**

Duncan's recognise that we have a major role to play in improving the quality of life in the immediate area we work and surrounding areas. Our policies and practices will be guided by the principles of improving the quality of the environment for everybody –now and in the future – and that what we do now should not undermine future generations' quality of life. We will ask individuals and other organisations to follow the same principles. We commit to reasonable continuous improvement in all of our activities that have a significant impact on the environment.

We will:

- Promote sustainable development and we will ensure environmental issues are in all our policies.
- Improve energy and water conservation and management in our buildings and whenever this is environmentally feasible.
- Minimise, land, water, and noise pollution from our own activities.
- Reduce the movement of goods and improve integrated public transport and the best practicable environmental forms of accessible transport.
- Reduce the consumption of goods and materials, avoid waste, conserve, reuse or recycle resources, as appropriate.
- Operate legally, ethically, transparently and with respect for people and communities.
- Comply with all relevant legislation, regulation and policy commitments.
- Use the most environmentally and socially responsible goods and services.
- consistent with good performance and encourage all our contractors and suppliers to do the same; encourage manufacturers and suppliers to service, repair, refurbish and/or remanufacture rather than simply replace.
- Aim to prevent or limit environmental accidents and to have the measures in place to minimise the effects if they do happen.
- Continually try to improve our environmental performance on a year by year basis.
- Encourage all individuals, organisations and agencies over whom we have influence to adopt wherever practicable similar policies and practices.

## **Duncan Private Hire Feedback & Complaints Policy**

Duncan's are committed to providing a high quality and efficient service to our customers and stakeholders.

We aim to:

Address the needs and requirements of all our customers and users through provision of relevant, comprehensive and up-to-date information and advice to modern standards and to appropriate specifications.

Determine customer/client needs and requirements through consultation and provide work of assured quality within the context of an agreed framework of standards against which it can be judged.

Operate at all times to the highest professional standards; emphasise impartiality, confidentiality, reliability and promptness, and value for money.

Treat people at all times with courtesy and respect, and in a professional manner.

These standards demonstrate our commitment to best practice procedures and will be continuously reviewed in line with government recommendations.

We welcome feedback, good or bad, from customers and stakeholders on the quality of the products and services that we offer — Tell us what you Think.

### **Complaints**

If you are dissatisfied with the service you have received, in the first instance contact the person who dealt with your initial requirements as they are best placed to put matters right as quickly as possible. If then you remain dissatisfied with the response or your complaint is about a member of Duncan's staff, you may wish to make a formal complaint in writing by post or e-mail to Manager:

Duncan's Private Hire  
6 Lysander Road  
Melksham  
SN12 6SP

If you make a formal complaint, please provide all relevant information to help us deal with the issue as quickly as possible. We will send you a written acknowledgement of your complaint within five working days and will endeavour to provide a full response as soon as possible. The Director, Peter Simpson, may initiate further investigations and reply to you directly with his findings.

We aim to provide a full response within twenty working days unless we need further information from you.



## **Duncan Private Hire Sickness Absence Policy**

### Policy Statement

Duncan's is committed to maintaining the health, well-being and attendance of all our employees. We value the contribution our staff make to our success and we miss that contribution when any employee is unable to work. The overall aim of the policy is to strike an effective balance between the service needs of the organisation and the need for the employee to be given time to recover from illness.

The policy sets out

- What employees can expect from Duncan's.
- What responsibility employees have in relation to their attendance at work.

### Purpose

The purpose of this policy is to provide a framework and formal guidelines within which Duncan's will address sickness absence, in order to ensure all employees are treated fairly, consistently and constructively. The policy applies to all employees and a copy will be given to all existing employees and to new employees as part of their induction pack. The policy does not apply to accidents at work.

### Principles

The absence policy is based on the following principles:

- Regular, punctual attendance is an implied term of every employee's contract of employment and we ask each employee to take responsibility for maintaining good attendance and reporting absence according to the procedures set out below.
- To ensure that short- and long-term illness is dealt with in accordance with relevant legislation and the Arbitration Conciliation Advisory Service Code (ACAS) of Practice
- To provide reasonable payments to employees who are unable to work due to sickness.
- To monitor levels of sickness absence for all employees.
- To identify any action which can be taken to improve working conditions and promote the health, safety and wellbeing of employees.
- To work with employees to identify any practical solutions in order to reduce absence levels.
- To support employees with genuine grounds for absence for whatever reason.
- To seek consent to access medical reports and advice in order to decide the best way forward.
- To respect the confidentiality of all information relating to an employee's sickness and store information in line with all data protection legislation.

- To be sensitive to the fact that an employee may not feel able to discuss their medical problems with their line manager and make alternative arrangements where appropriate, e.g. arrange for the employee to discuss health problems with a member of the same sex.
- To use the Disciplinary procedure if an explanation for absence is not forthcoming or is not thought to be satisfactory. No employee will be dismissed on the grounds of sickness absence without due warning and the appropriate procedure being followed.
- To treat sickness absence as a result of a disability in line with the Disability Discrimination Act 1995 and the Equality Act 2010.

#### Absence Notification Procedures

Notification of absence from work owing to illness must be given to the line manager by telephone as early as possible, and no later than the normal start of work, on the first day of sickness. When possible notification of absence should be given the previous evening to allow staff cover to be arranged. In the event that the line manager is unavailable, a message should be left with a suitable member of staff.

When giving notification of absence, the employee should give a clear indication of the nature of the illness and the likely date of return to work.

#### Certification

Sickness certificates are required for all absences and should cover all calendar days, including workdays, weekends, public holidays and any days not normally worked by a member of staff.

The following procedure must be followed:

##### Day 1 to 7

- Employees may self-certify for up to 7 days. These days include weekends and non-working days. Employees must complete a Self-Certification Form as soon as possible or immediately on their return to work.

##### Day 8 onwards

- Periods of sickness in excess of seven days must be covered by a Medical Certificate (Fit Note) signed by a doctor, commencing on the eighth day of the illness, irrespective of days which would normally have been worked. This must be received by the Line Manager within 3 working days. Consecutively dated medical certificates must be received for the full sickness period.
- Absence which is not continuously covered by a Self-Certification Form, Medical Certificate or Inpatient Certificate, may be treated as unauthorised absence.

#### Sent Home

Employees who leave work early because they are unwell, must inform their line manager or a suitable member of staff. Where the employee has worked less than 50% of their working hours for that day before going home, the remaining hours will be classed as absence and form part of the absence record. A Self Certification Form must be completed for this absence. Where more than 50% of the working hours for that day have been worked, the remaining hours will not form part of the absence record and as such there is no need to complete a Self-Certification Form.

## Sickness Absence whilst on Annual Leave

In order to reclaim annual leave entitlement, the line manager or suitable member of staff must be notified by telephone on the first day of illness and then all the stages of the absence reporting procedure must be followed. A Medical Certificate will be required even if this is less than 7 days, in order to reclaim annual leave.

## Medical, Dental or Optician Appointments

Where possible all medical appointments should be made outside of working hours. Where this cannot be arranged, they should disrupt the working schedule as little as possible, e.g. made early or late in the day. Satisfactory evidence of appointments such as an appointment card or hospital letter will be requested.

Where attendance for a medical or hospital appointment necessitates a complete day's absence from work, this will be treated as sick leave and the procedure for self-certification should be followed.

## Statutory Sick Pay

All employees will be eligible for Statutory Sick Pay from the date of employment provided that the appropriate certification has been received. Information on Statutory Sick Pay can be obtained from the Inland Revenue website.

## Return to Work

A 'fit for work' certificate is required should an employee wish to return to work before their Medical Certificate runs out. After absences of more than one week the line manager will have an informal discussion with the employee in order to establish:

- The reason for and cause of the absence.
- The employee is fit to return to work.
- Whether the employee needs any support to return to work.
- The purpose of this discussion will be to consider any action required to improve the employee's attendance and well-being.

## Frequent or Short-Term Absences

Frequent absence refers to cases where an employee is frequently absent from work for relatively short periods of time, due to sickness. Most employees have some short-term sickness absence; however, it is essential that frequent absence is dealt with promptly and consistently. Following 3 periods of absence within the preceding 12 months, an informal interview will take place at the earliest opportunity to discuss the reasons for the absences, ways in which the situation might be improved and ways in which Duncan's can support the employee.

A summary of the interview, including any actions required to address the situation, will be given to the employee and will be kept on file. If the employee's attendance does not improve satisfactorily within the specified timescale, the organisation will decide whether it is appropriate to seek a medical report from the employee's GP, Consultant or refer to an Occupational Health Practitioner. Written permission will always be sought from the employee. Employees have the right under the "Access to Medical Reports Act 1988 to see their own reports before it is given to the employer.

Following the receipt of this report, a further meeting will be arranged at which the employee may be accompanied by a work colleague. The employee will be given the opportunity to respond to the report and supply any other relevant information. At this point a decision will be made as to whether it is reasonable to require an improvement in attendance within a reasonable timeframe. The decision will be confirmed in writing, noting that a failure to improve could result in disciplinary action. If attendance does not improve within the time limit set, the matter will be dealt with under the formal Disciplinary Procedure.

### Long Term Sickness Absence

Sickness absence of one month or more is generally considered to be long-term absence. Employees may be absent on long term sick leave for a variety of reasons (e.g. injury, operation, convalescence from illness, diagnosis of a long-term disability, terminal illness etc.) and any action taken will vary according to the circumstances of the particular case.

Where an employee has been absent for more than two months and there is no identified return date in the near future, the line manager will contact the employee to arrange an informal welfare meeting to discuss their current situation and when a return to work can reasonably be expected. The employee will have the right to be accompanied by a work colleague or friend.

The response will determine the next stage in the process, as the options will depend on the individual circumstances. In the event that the employee is too ill to attend the meeting, the manager will seek to obtain the necessary information from them in an appropriate manner, e.g. by home visit or via letter/e-mail.

### Obtaining Medical Reports

A medical report will be obtained from the employee's GP and/or consultant to establish the nature of the illness (including the cause and prognosis), the expected period of absence, and any required adjustments to the employee's work. If a return to work cannot be established employees may be asked to attend a medical examination by an Occupational Health Practitioner to obtain an expert assessment of fitness for work.

On receipt of the appropriate medical reports the employee will be invited to a formal meeting to discuss the findings. The employee will be offered the right to be accompanied by a work colleague or trade union representative.

The outcome of this meeting may include:

- The employee returning to work in the present job, at an agreed date.
- The employee unfit to return to present job and therefore alternative work or adjustments agreed along with a return date.
- The employee unable to return to work in their present job, reasonable adjustments are not feasible, and where suitable alternative employment cannot be offered. In this case the employee will be invited to a further formal meeting to discuss the termination of their contract on the grounds of ill health.

### Terminal Illness

Duncan's will approach cases of terminal illness with as much sensitivity and flexibility as possible. Where a line manager becomes aware that he is dealing with an employee whose absence is due to a terminal illness, they will seek confidential advice from the (Director) and, where appropriate, from the employee's GP, Consultant or an Occupational Health

Unit. Each case will be dealt with separately individually, in particular, on the medical prognosis and the possible effect on the employee of terminating her/his employment.

If the affected employee wishes, Duncan's will make every effort to facilitate her/him in continuing to work for as long as possible, either on a full or part time basis or with periods of absence to take rests from work. In such cases, the Management may use its discretion to extend sick pay, as appropriate.

#### Disability Related Absence

Where an employee experiences sickness absence as a result of a disability it will be recorded separately and treated in line with the Disability Discrimination Act 1995. A disabled employee's absence may be related to their disability rather than illness, e.g. they require a period of absence in order to manage their disability to be fitted for a new wheelchair or for treatment. In such cases where the absence is not related to ill health the employee will be given disability leave to manage their disability.

If an employee becomes disabled or their disability worsens, Duncan's will consider making reasonable adjustments if they become unable to carry out their job. This will include considering whether or not it is reasonable to make adjustments to working conditions or the workplace. It will also include considering whether it is reasonable to transfer the disabled person to another vacant post.

Duncan's will allow a person who has become disabled more time off during work than would be allowed to non-disabled employees to enable them to have rehabilitation training. A similar adjustment would be appropriate if a disability worsens or if a disabled person needs occasional treatment. Pregnancy Related Absence will be treated separately from sickness absence in accordance with the Statutory Maternity Pay regulations.

## Duncan Private Hire General Data Protection Regulation (GDPR) Information Storage, Processing and Sharing Policy

### Document Review/Change Log

Issue	Date	Comment	Author	Sign
001	14 May 2021	Master Document Produced	Clark Ferguson	<i>C Ferguson</i>

### What is the General Data Protection Regulation?

The **General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It addresses the export of personal data outside the EU. The GDPR will be brought in, in May 2018 and replaces the current Data Protection Act 1998 (DPA).

It provides a legal basis for the privacy and protection of individuals whose personal information is managed (or processed) by organisations. It places certain obligations on organisations regarding how they process such information and gives individuals certain rights regarding the information held about them. Furthermore, organisations are only permitted to hold and use a specific selection of information for limited purposes of which they must annually inform the government appointed independent watchdog, the Information Commissioner. The Act is very complex and although very clear in some areas is open to interpretation in a great deal of others.

### The eight principles of good practice

Duncan Private Hire will comply with the eight enforceable principles of good information handling practice, these say that data must be:

- Fairly and lawfully processed:

- In order to comply Duncan Private Hire will provide individuals or customers/staff with the name of our business and details of the purpose for which both staff/customer information will be used. Duncan Private Hire also make it clear that the individual can access and correct any information that we hold about them.
- Processed for limited purposes:
  - Customer/Staff information will only be used for the purpose of completing Private Hire bookings at Duncan Private Hire (Wilts) Ltd.
- Adequate, relevant and not excessive:
  - Duncan Private Hire will only collect the minimum amount of information that is necessary to fulfil their customer booking or staff licencing process (in line with Wiltshire Council requirements).
- Accurate and up to date:
  - The information used will be, as supplied by the customer/staff at the time of booking/hire. In addition to Staff information we will also use information that is held @ gov.uk view-my-driving-licence in order to confirm any driver driving penalties/endorsements imposed by a court of law.
- Not kept longer than necessary:
  - Any electronic data that is recorded in relation to a customer/staff bookings/personal details, will be held for a period not exceeding 3 full calendar months at which point the information held, will be electronically deleted. Any hard copy documentation that is created because of their booking will also be held for a period not exceeding 3 full calendar months and at which point will be shredded/destroyed and in accordance with the rules governing GDRP.
- Processed in accordance with the individual's rights:
  - Data processed will always be processed within the legal rights of the Individual supplying such information.
- Secured:
  - Any customer/staff information that is held electronically can and will, only be used/accessed by those persons authorised to view such information. Access to such information can only be done through password protection. Any hard copy information that is held as a result of, a booking/employment (WCC Licence, Driving Licence, DBS ROD etc) will always be secured in a lockable/secure receptacle that is deemed suitable and secure for holding such information.
- Not transferred outside the European Economic Area (i.e. The EU and states Iceland, Liechtenstein and Norway) unless country has adequate protection for personal data.

**To be “fairly processed”, at least one of the following conditions will be met:**

- The individual has consented to the processing.
- Processing is necessary for the performance of a contract with the individual.
- Processing is required under a legal obligation (other than one imposed by the contract).
- Processing is necessary to protect the vital interests of the individual.

- Processing is necessary to carry out public functions, e.g. administration of Justice.
- Processing is necessary to pursue the legitimate interests of the data controller or third parties (unless it could unjustifiably prejudice the interests of the individual).

Specific provision is made under the Act for processing sensitive personal information. These are information about:

- Racial or ethnic origin; political opinions
- Religious or other beliefs
- Trade union membership
- Physical or mental health condition
- Sexual life; and criminal proceedings or convictions (real or alleged)

For sensitive personal information to be considered 'fairly processed', at least one of these additional conditions will be met:

- Having the explicit consent of the individual.
- Being required by law to process the information for employment purposes.
- Needing to process the information in order to protect the vital interests of the individual or another person; and dealing with the administration of justice or legal proceedings.

### **There are eight rights under the GDPR:**

- The right to be informed:

Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR.

- Duncan Private Hire will provide individuals with information including: our purposes for processing their personal data, our retention periods for that personal data, and who it will be shared with. We call this 'privacy information'.
- Duncan Private Hire will provide privacy information to individuals at the time we collect their personal data from them.
- If Duncan Private Hire obtain personal data from other sources, we will provide individuals with privacy information within a reasonable period of obtaining the data and no later than one month.
- There are a few circumstances when we do not need to provide people with privacy information, such as if an individual already has the information or if it would involve a disproportionate effort to provide it to them.
- The information Duncan Private Hire provide to people will be concise, transparent, intelligible, easily accessible, and it will use clear and plain language.



- Duncan Private Hire will regularly review, and where necessary, update our privacy information. We will bring any new uses of an individual's personal data to their attention before we start the processing.
- The right of access
  - Individuals have the right to access their personal data and supplementary information.
  - The right of access allows individuals to be aware of and verify the lawfulness of the processing.
- The right to rectification
  - Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
  - An individual can make a request for rectification verbally or in writing.
  - Duncan Private Hire have one calendar month to respond to a request. In certain circumstances we can refuse a request for rectification. This right is closely linked to the controller's obligations under the accuracy principle of the GDPR (Article (5)(1)(d)).
- The right to erasure
  - Individuals have the right to have personal data erased.
  - The right to erasure is also known as 'the right to be forgotten'.
  - Individuals can make a request for erasure verbally or in writing.
  - Duncan Private Hire have one month to respond to a request.
  - The right is not absolute and only applies in certain circumstances.
  - The right to erasure does not apply if processing is necessary for one of the following reasons:
    - to exercise the right of freedom of expression and information.
    - to comply with a legal obligation.
    - for the performance of a task carried out in the public interest or in the exercise of official authority.
    - for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
    - for the establishment, exercise or defence of legal claims.
- The right to restrict processing
  - Customers/staff have the right to request the restriction or suppression of their personal data.
  - This is not an absolute right and only applies in certain circumstances.
  - When processing is restricted, Duncan Private Hire are permitted to store the personal data, but not use it.
  - An individual can make a request for restriction verbally or in writing.
  - Duncan Private Hire have one calendar month to respond to a request.
  - This right has close links to the right to rectification (Article 16) and the right to object (Article 21).
- The right to data portability
  - The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
  - It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

- Some organisations in the UK already offer data portability through the midata and similar initiatives which allow individuals to view, access and use their personal consumption and transaction data in a way that is portable and safe.
- It enables consumers to take advantage of applications and services which can use this data to find them a better deal or help them understand their spending habits.
- The right to object
  - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling); and
  - Processing for purposes of scientific/historical research and statistics.
  - Rights in relation to automated decision making and profiling.

The most significant of the above rights is that of subject access. Data Subjects are permitted to be provided with a copy of the information held on them in electronic systems and some paper systems along with the reasons why that information is held. This is known as a Subject Access Request or SAR.

To make an SAR data subjects must make a request in writing to Duncan Private Hire (**see Appendix 1**) along with proof of their identity. There will be no charge unless the request is manifestly unfounded or excessive. In such cases a £10 fee will be charged.

Duncan Private Hire will normally fulfil the SAR within 40 days as prescribed by law unless third parties must be contacted for permission to release information about them if some personal information relates to them as well as the applicant (e.g. in the case of job references).

### **Close Circuit Television (CCTV)**

Closed circuit television (CCTV) is installed at Duncan Private Hire for the purposes of staff, customer and premises security. Cameras are located at various places on the premises, and images from the cameras are recorded.

The use of CCTV falls within the scope of the General Data Protection Regulation (GDPR).

In order to comply with the requirements of the GDPR, data must be:

- Fairly and lawfully processed
- Processed for limited purposes and not in any manner incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept for longer than is necessary
- Processed in accordance with individuals' rights
- Secure

## **Personal data breach**

- Duncan Private Hire has a duty to report certain types of personal data breach to the relevant supervisory authority. Duncan Private Hire will do this within 72 hours of becoming aware of the breach, where feasible.
- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Duncan Private Hire will inform those individuals concerned without undue delay.
- Duncan Private Hire have robust breach detection, investigation and internal reporting procedures in place. This will facilitate our decision-making about whether we need to notify the relevant supervisory authority and the affected individuals.
- Duncan Private Hire will keep a record of any personal data breaches.

## **Document review date**

Duncan Private Hire will carry out a review of our General Data Protection Regulation (GDPR) Information Storage, Processing and Sharing Policy annually and in line with General Data Protection Regulations go live date of 25<sup>th</sup> May 2018.

*Peter Simpson*

[ Electronically Signed]

Peter Simpson  
Director  
Duncan Private Hire

## APPENDIX 1

### Duncan Private Hire Subject Access Request Form

You should complete this form if you want us to supply you with a copy of any personal data, we hold about you. You are currently entitled to receive this information under the Data Protection Act 1998 (DPA) and will continue to be under the EU General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

We will endeavour to respond promptly and in any event within one month of the latest of the following:

Our receipt of your written request; or

Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly

#### Section 1: Details of the person requesting information

<b>Full Name:</b>	
<b>Address:</b>	
<b>Contact telephone number:</b>	
<b>Email address:</b>	

#### Section 2: Are you the data subject?

Please circle the appropriate answer and read the instructions which follow i

**YES:** I am the data subject. I enclose proof of my identity (see below).

**(please go to section 4)**

**NO:** I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity (see below).

**(please go to section 3)**

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one of both of the following:

- Proof of Identity Passport, photo driving licence, national identity card, birth certificate.
- Proof of Address Utility bill, bank statement, credit card statement (no more than 3 months old); current driving licence; current TV licence; local authority tax bill, HMRC tax document (no more than 1 year old).
- If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

**Section 3 Details of the data subject (if different from section 1)**

<b>Full Name:</b>	
<b>Address:</b>	
<b>Contact telephone number:</b>	
<b>Email address:</b>	

• **Section 4: What information are you seeking?**

Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.



Please note that if the information you request reveals details directly or indirectly about another person, we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with section 8(2) of the DPA, not to provide you with copies of information requested if to do so would take “disproportionate effort”, or in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be “manifestly unfounded or excessive”, however we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

### **Section 5: Information about the collection and processing of data**

If you want information about any of the following, please circle the relevant answer:

- Why we are processing your personal data      **Yes/No**
- To whom your personal data are disclosed      **Yes/No**
- The source of your personal data      **Yes/No**

### **Section 6: Disclosure of CCTV images**

If the information you seek is in the form of video images captured by our CCTV security cameras, would you be satisfied with viewing these images? Please circle the relevant answer.

**Yes/No** If no, please complete (Appendix 1 Duncan Self Drive Hire Ltd CCTV Policy and Code of Practice)..

### **Section 7: Declaration**

Please note that any attempt to mislead may result in prosecution. I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application is true. I understand that it is necessary for Duncan Private Hire to confirm my / the data subject’s identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

**Signed**.....

**Dated**.....

### **Duncan Private Hire Equal Opportunities Policy**

It is the policy of Duncan's to treat all employees and job applicants fairly and equally regardless of their sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, disability or union membership status.

Furthermore, Duncan's will ensure that no requirement or condition will be imposed without justification which could disadvantage individuals purely on any of the above grounds.

The policy applies to recruitment and selection, terms and conditions of employment including pay, promotion, training, transfer and every other aspect of employment.

Duncan's will regularly review its procedures and selection criteria to ensure that individuals are selected, promoted and otherwise treated according to their relevant individual abilities and merits.

Duncan's is committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. The overall responsibility for the policy lies with Peter Simpson, Director however, all staff are required to comply with the policy and to act in accordance with its objectives so as to remove and barriers to equal opportunity.

Any act of discrimination by employees or any failure to comply with the terms of the policy will result in disciplinary action.

Signed: Peter Simpson

Position: Director

This revision dated: 14 May 2021



**Duncan Private Hire Equal Opportunities Monitoring Form**

Duncan's aim to be an Equal Opportunities Employer. Duncan's keep a record of this data in order to ensure there is no discrimination with regards to appointment, access to training, and promotion. This is a condition under the Data Protection Act under which processing of sensitive data can take place.

**Please place an x in one box in each section**

---

**Gender**      Female       Male

**Age group**      Under 20       20-29       30-39       40-49       50-60

Over 60

---

**Ethnicity**      White:      British       Irish

Any other White background

.....(please write in)

---

Mixed:      White and Black Caribbean       White and Black African

White and Asian

Any other mixed background

.....(please write in)

---

Asian or Asian British:      Indian       Pakistani       Bangladeshi

Any other Asian background

.....(please write in)

---

Black or Black British: Caribbean  African

Any other Black background

.....(please write in)

---

Chinese or any other ethnic group: Chinese

Any other ethnic group

.....(please write in)

---

**Disability**

I have a disability: Yes  No

Please disclose the nature of your disability (at your discretion):

.....

Data Protection Act:

Duncan Private Hire will process and store all data in compliance with the Data Protection Act 1998. Please tick the box below to give your consent that the information you have given on this form, may be processed and stored in this way.

**I consent to the information I have given being stored and processed as described above**

Name:		Date:	
-------	--	-------	--

***Thank you for completing this questionnaire.***

## **Duncan Private Hire Code of Conduct Policy**

### Background

All NHS organisations work to a Code of Conduct for handling patient/client-identifiable information. Working to the same Code of Conduct will help ensure a more unified approach across the organisations to the way Duncan's handle, store, transfer and work with patient/client information. This also helps ensure compliance with the Data Protection Act 1998.

The Health Service holds large amounts of confidential information about you, members of your family, friends, and colleagues; but the vast majority of this information will be about strangers, most of whom you are unlikely to meet. This information is classed as patient/client-Identifiable information. The information belongs to the patient/clients. Their information should be treated with as much respect and integrity as you would like others to treat your own information. It is your responsibility to protect that information from inappropriate disclosure and to take every measure to ensure that patient/client-identifiable information is not made available to unauthorised persons.

This Code of Conduct on confidentiality, which is mandatory for all organisations, aims to clarify the principles that govern all use of patient/client-identifiable information and to ensure that certain practices are adhered to. None of these practices is onerous and they should already be in everyday use. This document restates them as an expectation of how systems should be maintained.

The Code of Conduct is about promoting best practice and continuing improvement in the use of personal health information as an integral part of patient/client care. Involving patient/clients in decisions about their healthcare information and how it is used is also integral to improving patient/client confidence in their health services. Protection of personal health information is part of good practice and is underpinned by the common law duty of confidentiality, the implementation of the Data Protection Act 1998, Codes of Professional Practice, and the Human Rights Act 1998.

Breaches of confidentiality are a serious matter. Non-compliance with this code may result in disciplinary action being taken. No employee shall knowingly misuse any information or allow others to do so. Careless or deliberate misuse of patient/client-identifiable information may result in that organisation, and in some cases the individual concerned, being prosecuted.

### Aim of The Document

This document seeks to provide a code of conduct for all staff, which will ensure the confidentiality of patient/client-identifiable information at all times.

### Scope

The code relates only to patient/client-identifiable information as defined within the Data Protection Act 1998.

### Disciplinary and Legal Implications

Generally, there are four main areas of law which constrain the use and disclosure of confidential information. These are briefly described below:

#### The Data Protection Act 1998 (DPA)

The DPA is designed to control the use, storage and processing of personal data in whatever format - especially where there is a risk to personal privacy. Patient/clients and staff should be aware that their information will be stored and processed on a computer/PDA.

#### Common Law of Confidentiality

Although not written in statute, the principle of the common law of confidentiality states that information confided should not be used or disclosed further, except as originally understood by the confider or with her/his subsequent permission. In other words, if you are told something in confidence, you are not at liberty to disclose the information without permission.

#### Human Rights Act 1998

The Human Rights Act establishes the right to respect for private and family life. Current understanding is that compliance with the Data Protection Act and the common law of confidentiality should satisfy Human Rights requirements.

#### Administrative Law

Administrative law governs the actions of public authorities to ensure that they operate within their lawful powers. In other words, the authority must possess the power to carry out what it intends to do and is particularly relevant to the issue of patient/client consent.

What do you do if in doubt about handling patient/client-identifiable information?

If you are in doubt regarding the handling of patient/client-identifiable information, ask the advice of your manager.

#### Users' Rights

Patient/clients and families have a right to believe and expect that private and personal information given in confidence will be used for the purposes for which it was originally given, and not released to others without their consent. Everyone in Duncan's must safeguard the integrity and confidentiality of, and access to sensitive information.

#### Definitions

What is Patient/client-identifiable information?

"All items of information which relate to an attribute of an individual should be treated as potentially capable of identifying patient/clients and hence should be appropriately protected to safeguard confidentiality"

These items include:

Surname	Forename
Initials	Address
Date of birth	Other dates (e.g. death, diagnosis)
Postcode	Occupation
Sex	NHS number
National Insurance number	Ethnic group
Local identifier (e.g. hospital or GP practice number)	

or a combination of these pieces of information.

Who is an unauthorised person?

Your job role, or level of access to a computer/PDA system/PDA, provides you with a level of authority to access information. Do not assume that all your work colleagues are authorised to see the same information that you are. Even if they are in a more senior role to you - if they do not need to know the information, they do not need to have it. If you are in doubt as to whether you should share the information with one of your colleagues, seek the advice of your manager.

In certain instances, members of staff may have a statutory responsibility to pass on patient/client information.

We have a statutory obligation to notify the government of certain infectious diseases for public health purposes, e.g. measles, mumps, meningitis, tuberculosis, but not HIV/AIDS.

Births and deaths must also be notified.

Limited information is shared with health authorities and public health departments to assist with the organisation of national public health programmes, e.g. breast screening, cervical smear tests and childhood immunisation.

Do not access patient/client information for anything other than your official duties, as misuse will result in disciplinary action. It is not acceptable for staff to access their own records, or those of relatives, friends, or neighbours on their behalf. Staff and patient/clients have rights of access to their own health and personnel records, but this access should only be allowed in accordance with the guidance of the Data Protection Act 1998. Duncan's manager will be able to provide details.

Patient/client/client-identifiable information must not be used in training, testing systems or demonstrations without explicit consent.

What is meant by the transfer of patient/client/client-identifiable information?

The transfer of patient/client-identifiable information, by whatever means, can be as simple as:

- Taking a document and giving it to a colleague
- Making a telephone call
- Sending a fax
- Passing on information held on computer/PDA/PDA, for example confidential clinical information held on patient/client records

In all cases, however simple or complicated, the following principles below, and must be adhered to in order to ensure that patient/client-identifiable information is not disclosed inappropriately.

Principles:

- Justify the purpose
- Don't use patient/client-identifiable information unless it is absolutely necessary
- Use the minimum necessary patient/client-identifiable information
- Access to patient/client-identifiable information should be on a strict need to know basis
- Everyone should be aware of their responsibilities
- Understand and comply with the law

Ensuring Confidentiality

Physical security

Room access – Patient/client-identifiable information should not be left unattended. However, where this can be justified, consideration should be given to restricting room access.

If the room can be locked without compromising patient/client care (e.g. where the patient/client information is unlikely to be needed by non-key-holders), then it should be locked.

Work areas - Identifiable, confidential information should always be held securely. In any area which is not secure, and which can be accessed by a wide range of people (including possibly the public), such information should be put/locked away immediately after it has been finished with. Where it is impractical for this to be achieved, access to the work area must be restricted. Examples of this are:

- Where work is being undertaken simultaneously on samples from a number of patient/clients in a laboratory or clinical area that only laboratory or clinical staff may enter.
- Where reports are dictated on a number of patient/clients seen within a clinic in a reporting/medical office that only medical staff may enter.
- Where a computer/PDA screen is angled to deny unauthorised viewing of confidential data.

Safeguarding information

Never leave patient/client-identifiable information around for others to find.

Wherever possible, avoid taking confidential information away from your work premises. Where this is necessary in order to carry out your duties (e.g. home visit to a patient/client), you must keep the information secure and make every effort to ensure that it does not get misplaced, lost or stolen.

*Remember - you are bound by the same rules of confidentiality while away from your place of work as when you are at your desk.*

When disposing of paper-based information, ensure that it is shredded. Never put confidential information directly into a general wastepaper bin or recycling bin. If your organisation has a designated confidential waste destruction programme, you must follow the requirements of that programme which can be checked with your head of department. Work diaries can hold a great deal of personal information and should be kept secure when not in use. Precautions should be taken when transporting your work diary to ensure it is in your care at all times.

Do not take personal notes or pocketbooks containing patient/client-identifiable information away from your place of work. If the information is no longer required, it should be disposed of appropriately. If the information is required for an on-going purpose, it should be locked securely away. All personal notes and pocketbooks containing patient/client-identifiable information must be handed back to your manager if you no longer need them for your job.

If documents containing patient/client information come into your possession and you are not the intended recipient, you should either forward these to the named person for action or storage or, if there is no named person, to your manager. If you identify any document containing patient/client information, such as letters or clinical results, you should make every effort to decrease the possibility of these being seen by inappropriate persons by obscuring or turning them over.

Adopt a clear desk policy.

Patient/client-identifiable information left unattended.

Caution should be exercised at all times when working with patient/client-identifiable information.

Only have the minimum information necessary on your desk for you to carry out your work. Any other related information should be put away securely, preferably locked away.

Do not walk away from your work area leaving any documents exposed for unauthorised persons to see.

Information transfer

It is imperative that the utmost care is exercised when transferring patient/client-identifiable information. To this end written documents as well as fax machines and email should be used with care. When internal courier post or public mail is used, it is essential to confirm that the addressee details are correct. The basic rule is that in all circumstances where patient/client-identifiable data is shared, by whatever method, the items transferred should be restricted to a minimum. Only essential items of information should be included. Other items should be omitted or blocked out before transmission.

If transferring paper notes which contain patient/client-identifiable information, make sure "CONFIDENTIAL" is marked in a prominent place on the front of the envelope. Ensure that the address of the recipient is correct and clearly stated, using the following format:

- Name
- designation (job title)
- department
- organisational address

Write a return address on the back of the envelope (if using a plain envelope)

If patient/client-identifiable information is to be sent in carrier (internal) envelopes, the envelope must be sealed and marked "CONFIDENTIAL". Internal mail should still be properly named and addressed, e.g. not just to "Clark from Peter".

Do not pass documents containing patient/client-identifiable information to other colleagues. Always ensure that patient/client-identifiable information is in a sealed envelope addressed to the recipient and clearly marked "CONFIDENTIAL".

Transfer between hospital sites, clinics, community bases etc.

You should always ensure that a secure system for transferring care records (or other personal information that identifies individuals) between sites is used.

Only authorised personnel may assist in the transfer of patient/client records where an office, department or practice is moving premises from one site to another. This must be done under the guidance of an authorised employee/employees of that relevant organisation.

#### Indiscreet conversations

Ensure you cannot be overheard by unauthorised people when making sensitive telephone calls, during meetings, and when you are having informal discussions with colleagues about confidential information. In these situations, if you do not need to identify a patient/client by name, do not do so. Consideration needs to be given to the siting of an answer phone to ensure that recorded conversations cannot be overheard or otherwise inappropriately accessed.

During team meetings/briefings staff should bear in mind that they might be overheard by other people in the same room. While it is appreciated that it is difficult to manage confidentiality in situations like these, staff are expected to be aware of the possible problems and do all they can to respect the patient/client's rights.

It is not appropriate to discuss personal information in hallways, corridors or stairways or any other public place where you might be overheard. When speaking to a patient/client or carer on the telephone, confirm the caller's identity or use ring back. If in doubt, ask.

#### Safeguarding electronic computer/PDA information

The security and confidentiality of information held on computer/PDA must be maintained at all times.

- Never leave a computer/PDA logged on to a system and unprotected. Always protect the system (e.g. log off or use a password-protected screensaver) when you have finished or stop using it for a period. Always log off when you have finished. Failure to do this not only leads to a risk of unauthorised access to patient/client information, but you will be held responsible for any actions associated with your sign-on
- Do not walk away from your work area and leave patient/client-identifiable information on your screen for unauthorised persons to see. If you need to leave your desk, you should protect the system (e.g. log off or use a password-protected screensaver)
- Where it is necessary for patient/client-identifiable information to be stored on your computer/PDA, ensure that it is stored in a secure way with password protection
- Always remove your Smartcard from your computer/PDA (if using one to access systems) when leaving your workstation



- Do not keep any patient/client-identifiable information longer than necessary. Delete personal files you do not need to keep and if the information is stored on diskette, tape or CD, ensure that it is clearly labelled and locked away. When the information held is no longer required, the diskette, tape, or CD must be reformatted, erased or destroyed. Computer/PDA users should remember that when deleting files, they may be moved to a "recycle bin". Therefore, the recycle bin should be emptied on a regular basis. If in doubt, check
- Passwords are the keys that provide access to information; you must not disclose your network password to anyone under any circumstances. Never write your password down as this could be seen by other users, and always change your password when prompted. It is recommended that passwords should be a minimum of 6 characters and be a mixture of letters and numbers, i.e. using 5 instead of S, 1 instead of l, etc
- Turn off your computer/PDA at the end of the working day unless it is needed to work unattended, e.g. for printouts
- Never use anyone else's code and password, even to be helpful. Never, as a manager, ask anyone to use another's password for convenience. If it is absolutely necessary, (e.g. to access information when a patient/client or other person is in danger and the owner of the password cannot be found), contact your manager

Destruction and /or disposal of computer/PDAs, or parts thereof, must be carried out by your manager. This will ensure that all information is stripped from the computer/PDA and disposed of using the correct procedures. You should not remove or relocate computer/PDAs without first checking with your manager.

If you use a portable computer/PDA outside your place of work, ensure that:

- You have the authority to take equipment off-site
- You have permission to transfer patient/client-identifiable information off site
- Your computer/PDA is password-protected to BIOS level which will be set by the IT department which provides the portable
- You store back-ups securely and complete them regularly whilst using portables.
- Databases are encrypted
- Keep anti-virus software up to date – see the IT department or Systems Manager for assistance if necessary
- All equipment is locked away when not in use
- Every effort is taken to prevent loss or theft of your computer/PDA
- You do not leave your computer/PDA in your car

**Duncan Private Hire General Statement of Policy**

It is the Policy of Duncan's to comply with the terms of the Health & Safety at Work Act 1974 and subsequent legislation and to provide and maintain a healthy and safe working environment. Duncan's Health and Safety objective is to minimise the number of instances of occupational accidents and illnesses to achieve an accident free workplace. All employees will be provided with such equipment, information, training and supervision as is necessary to implement the policy and achieve the stated objective.

Duncan Private Hire recognises and accepts their duty to protect the Health and Safety of all visitors to the company, including contractors and temporary workers, as well as any members of the public who might be affected by our operations. Whilst the Management of Duncan Private Hire will do all that is within its powers to ensure the Health and Safety of its employees, it is recognised that Health and Safety at work is the responsibility of each and every individual associated with the company. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation which may pose a threat to the wellbeing of any other person.

The management of Duncan Private Hire will provide every employee with the training necessary to carry out their tasks safely. However, if an employee is unsure how to perform a certain task or feels it would be dangerous to perform a specific job then it is the employee's duty to report this to the Manager. An effective Health and Safety programme requires continuous communication between workers at all levels. It is therefore every worker's responsibility to report immediately any situation which could jeopardise the wellbeing of themselves or any other person.

All injuries, however small, sustained by a person at work must be reported to the Manager or a delegated representative. Accident records are crucial to the monitoring and revision of the policy and must therefore be accurate and comprehensive.

Duncan's Health and Safety policy will be continually monitored and updated, particularly when changes in the scale and nature of operations occur. The policy will be updated at least every 12 months. The specific arrangements for the implantation of the policy and the personnel responsible are detailed below:

**Signed**.....

**Title**.....

**Company** .....

**Date:**.....

**Signed**.....

## Safety Personnel

The person with overall and final responsibility for Health and Safety in Duncan's is the Director, Peter Simpson.

The person responsible for overseeing, implementing and monitoring the policy is the Company Secretary, Katrina Damiral.

The following person will be responsible for the supervision of Health and Safety in particular areas:

<b>Name</b>	<b>Area</b>	<b>Responsibilities</b>
Clark Ferguson	Yard & Office	Management

## Communication

The management of Duncan Private Hire will endeavour to communicate to employees their commitment to safety and to ensure that employees are familiar with the contents of the company Health and Safety policy. Duncan's communicates with its employees orally in the form of directions and statements from supervisors, in writing, in the form of directives and this policy statement, and by example.

## Co-operation & Care

If we are to build and maintain a safe working environment, co-operation between workers at all levels is essential.

All employees are expected to co-operate with safety officers and to accept their duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy.

Employees have a duty to take all reasonable steps to preserve and protect Health and Safety of themselves and all other people affected by the operation of the company.

## Safety Training

Safety training is regarded as an indispensable ingredient of an effective Health and Safety programme. It is essential that every worker in the organisation is trained to perform his or her job effectively and safely. It is the opinion of the management of Duncan's that if a job is not done safely then it is not done effectively.

All workers will be trained in safe working practices and procedures prior to being allocated any new role. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned and the formulation of emergency plans.

Training sessions will be held as often as is deemed necessary and will provide another opportunity for workers to express any fears or concerns they might have about their jobs. The personnel with the responsibility for safety training are detailed below: -

<b>Name</b>	<b>Department</b>	<b>Responsibilities</b>
Clark Ferguson	Yard & office	Manager

## Workplace Inspections

It is the policy of Duncan's to comply with the Workplace (Health, Safety & Welfare) Regulations 1992.

Regular inspections of the workplace will be conducted by Steve Damiral. In addition, inspections will be conducted in the relevant areas whenever there are significant changes in the nature and/or scale of our operations.

Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and to identify areas where revision of the policy may be necessary.

## Work Equipment

It is the policy of Duncan Private Hire to comply with the law as set out in the Provision and Use of Work Equipment Regulations 1992.

Duncan's will endeavour to ensure that all equipment used in the workplace is safe and suitable for the purpose for which is used.

All workers will be provided with adequate information and training to enable them to use work equipment safely.

The use of any work equipment which could pose a risk to the wellbeing of persons in or around the workplace will be restricted to authorised persons.

All work equipment will be maintained in good working order and repair.

All workers will be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment.

All work equipment will be clearly marked with Health and Safety warnings where appropriate.

## Manual Handling Operations

It is the policy of Duncan Private Hire to comply with the law as set out in the Manual Handling Operations Regulations 1992.

Manual handling operations will be avoided as far as is reasonably practicable where there is a risk of injury.

Where it is not possible to avoid manual handling operations an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned. An assessment will be reviewed if there is any reason to suspect that it is no longer valid.

All possible steps will be taken to reduce the risk of injury to the lowest level possible

## Display Screen Equipment

It is the policy of Duncan Private Hire to comply with the law as set out in the Health and Safety (Display Screen Equipment) regulations 1992. Duncan's will conduct Health and Safety assessments of all workstations staffed by employees who use VDU screens as part of their usual work and will ensure that all workstations put into service after January 1993 meet the requirements set out in the Schedule to the Regulations and that all workstations meet these requirements no later than December 1996.

The risks to users of VDU screens will be reduced to the lowest extent reasonably practicable.

VDU screen users will be allowed periodic breaks in their work.

Eyesight tests will be provided for VDU screen users on request.

Where necessary, VDU screen users will be provided with the basic necessary corrective equipment such as glasses or contact lenses.

All VDU screen users will be given appropriate and adequate training on the Health and Safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

#### New or Expectant Mothers

It is the policy of Duncan's to comply with the European Directive on Pregnant Workers

In addition to the general risk assessment, a further assessment of risk to new or expectant mothers will be conducted. Where a risk to new or expectant mothers is identified, working conditions and/or working hours will be adjusted to avoid the risk. Where this is not reasonable the employee(s) concerned will be suspended from work on full pay.

Where a new or expectant mother produces a doctor's certificate stating that she should not work at night, suitable alternative employment daytime work will be found. Where this is not possible, she will be suspended from work on full pay.

#### Fire Safety

The Company with responsibility for the maintenance and testing of firefighting equipment is Safeguard. All workers within the firm have a duty to report immediately any, fire, smoke or potential fire hazard to the fire service (dial 999).

All workers have a duty to conduct their operations in such a way as to minimise the risk of fire.

The Manager is responsible for keeping the operating areas safe from fire, ensuring that staff is trained in proper fire prevention practices and emergency procedures.

#### Fire Fighting Equipment

Fire extinguishers are located at strategic points throughout the workplace. Employees are expected to tackle a fire themselves only if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should evacuate the building immediately.

## Accident Investigation & Reporting

It is the policy of Duncan Private Hire to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR95).

Duncan's see accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury a report will be drawn up by the Director or a person appointed by the Director detailing:

- The circumstances of the accident including photographs and diagrams wherever possible
- The nature and severity of the injury sustained
- The identity of any eyewitnesses
- The time, date and location of the incident
- The date of the report

The completed report will then be submitted to and analysed by the Director who will attempt to discover why the accident occurred and what action should be taken to avoid a recurrence of the problem.

A follow up report will be completed after a reasonable period of time examining the effectiveness of any new measures adopted.

## Accident Procedure

First Aid boxes are located in every vehicle and around the workplace. A first aid station is clearly marked in the office and is easily accessible by all employees during all working hours.

The Manager is responsible for the proper use and maintenance of the first aid station.

A list of emergency telephone numbers of doctors and hospitals available to the work site is posted next to the first aid station.

## Qualified First Aiders are:-

Name	Department
XXXXX	XXXXXXXXX

The Manager is responsible for reporting all cases of accident and disease to the Director. Accident records are compiled and stored by the Manager.

The Manager is responsible for reporting cases of accident and disease to the relevant enforcing authority under the RIDDOR 95 regulations where applicable.

## General

- All employees should be aware of, respect and adhere to the rules and procedures contained in this policy statement
- All employees shall immediately report any unsafe practices or conditions to the relevant authority
- Any person under the influence of alcohol or any other intoxicating drug which might impair motor skills or judgement, whether prescribed or otherwise, shall not be allowed on the job
- Horseplay, practical joking or any other acts which might jeopardise Health and Safety of any other person are forbidden
- Any person whose levels of alertness and /or ability are reduced due to illness will not be allowed on the job if this might jeopardise the Health and Safety of that person or any other person
- Employees shall not adjust, move or otherwise tamper with any electrical equipment, machinery or air or water lines in a manner not within the scope of their duties, unless instructed to do so by a senior member of staff
- All waste materials must be disposed of carefully and in such a way that they do not constitute a hazard to other workers
- No worker should undertake a job which appears to be unsafe
- No worker should undertake a job until he or she has received adequate safety instructions and is authorised to carry out the task
- All injuries must be reported to the Director or Manager
- Employees should take care to ensure that all protective guards and other safety devices are properly fitted and in good working order and shall immediately report any deficiencies to the Manager or the Directors
- Work shall be well planned and supervised to avoid injuries in the handling of heavy materials and while using equipment
- No employees should use chemicals without the knowledge required to work with those chemicals safely
- Suitable clothing and footwear will be worn at all times. Personal protective equipment shall be worn wherever appropriate

## Working Environment

- Work sites must be kept clean and tidy
- Any spillage must be cleaned up immediately
- Waste materials and rubbish must be removed routinely

## Tool and Equipment Maintenance

- Company machinery and tools are only to be used by qualified and authorised personnel. It is the responsibility of the manager to determine who is authorised to use specific tools and equipment
- It is the responsibility of all employees to ensure that any tools or equipment they use are in a good and safe condition. Any tools or equipment which are in any way defective must be repaired or replaced
- All tools must be properly and safely stored when not in use
- No tool should be used without the manufacturers recommended shields, guards or attachments
- Approved personal protective equipment must be properly used where appropriate

## Manual Lifting and Moving

- Lifting and moving of objects should always be done by mechanical devices rather than manual handling wherever reasonably practicable. The equipment used should be appropriate for the task at hand
- The load to be lifted or moved must be inspected for sharp edges, splinters and wet or greasy patches
- When lifting or moving a load with sharp or splintered edges gloves must be worn. Gloves should be free from oil, grease or other agents which might impair grip
- The route over which the load is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage which could cause tripping or spillage
- Employees should not attempt to lift or move a load which is too heavy to manage comfortably
- Where team lifting or moving is necessary one person should act as co-ordinator, giving commands to lift, lower etc
- When lifting an object off the ground employees should assume a squatting position keeping the back straight. The load should be lifted by straightening the knees, not the back. These steps should be reversed for lowering an object to the ground



## **Duncan Private Hire Whistleblowing Policy**

What is Whistleblowing?

Whistleblowing encourages and enables employees to raise serious concerns within Duncan's rather than overlooking a problem or 'blowing the whistle' outside of the business. Employees are often the first to realise that there is something seriously wrong with Duncan's, however, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the business.

Our Commitment

Duncan's is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of Duncan's work to come forward and voice those concerns.

Who does the Policy apply to?

The policy applies to all employees, (including those designated as casual hours, temporary, agency, authorised volunteers or work experience), working/employed by Duncan's.

The Aims of the Policy

To encourage you to feel confident in raising concerns and to question and act upon concerns about practice.

To provide avenues for you to raise concerns in confidence and receive feedback on any action taken.

To ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.

To reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure which is in the public interest.

What Types of Concern are Covered?

Conduct which is an offence or a breach of law.

Failure to comply with a legal obligation.

Disclosures related to miscarriages of justice.

Health and safety risks, including risks to the public as well as other employees.

Damage to the environment.

The unauthorised use of public funds.

Possible fraud and corruption.

Sexual, physical or other abuse of clients.

Other unethical conduct.

Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

### Safeguards and Victimisation

Duncan's recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you provide a service.

Duncan's will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern which is in the public interest.

### Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

This policy encourages you however to put your name to your concern whenever possible. Please note that:

Staff must believe the disclosure of information is in the public interest.

Staff must believe it to be substantially true.

Staff must not act maliciously or make false allegations.

Staff must not seek any personal gain.

### How to Raise a Concern

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach a more senior level of management within the business (such as the Director).

## **Duncan Private Hire Safeguarding Policy**

Protection from abuse is an integral part of the policy and practice of all Duncan's workings with, or coming into contact with, vulnerable children/adults.

The broad definition of a vulnerable adult is:

'A person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation'.

People with learning disabilities, mental health problems, older people and disabled people may fall within this definition.

All vulnerable children/adults have a right to protection from harm.

We must ensure that:

- All vulnerable children/adults, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse.
- All suspicion and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff have a responsibility to report concerns to their appropriate line manager.
- All partner agencies and organisations must co-operate with each other on issues relating to the identification, investigation, treatment and prevention of abuse of vulnerable children/adults.

Our Values, Principles and Beliefs of Duncan's are that:

- All vulnerable children/adults have equal rights to protection from abuse and exploitation
- Abuse of vulnerable children/adults is never acceptable
- We have a commitment to protecting vulnerable children/adults with/for whom we work
- When we work with partners, they have a responsibility to meet minimum standards for protection of vulnerable children/adults in their programmes

Core Values and Principles:

- Vulnerable children/adults have the right to privacy, dignity, independence, self-determination, choice, fulfilment and the maintenance of all the rights and entitlements associated with citizenship

- A person's right to involvement in decision-making is promoted to the fullest capacity
- A person is enabled to protect him/herself from harm
- Involvement of others significant to the person's life is identified and supported
- The response is appropriate and only as intensive as the situation demands
- A vulnerable adult and the alleged abuser have the right to the protection of the law
- A vulnerable adult will have the opportunity and right to comment or complain about the service they receive
- Vulnerable children/adults will have the opportunity and right to independent advice and advocacy when they request it. This will also apply to those vulnerable children/adults who are incapable of making such a request but are deemed in need of such independent advice and advocacy
- The awareness and understanding of other agencies, organisations and the public is raised and with it, a commitment to respond

#### Policy Aims

The aim of Duncan's Policy on the Safeguarding is to promote good practice:

- Providing vulnerable children/adults with appropriate safety and protection
- Allowing all staff to make informed and confident responses to specific issues on the protection of vulnerable children/adults

#### Definitions and Indicators of Abuse

- Physical Abuse – includes hitting, slapping, pushing, and misuse of medication, undue restraint or inappropriate sanctions. Possible indicators include multiple bruising, which is not consistent with the explanation given; cowering and flinching; unusually sleepy or docile
- Sexual Abuse – includes rape and sexual assault or sexual acts to which the vulnerable adult has not, or could not, consent and/or was pressured into consenting. Possible indicators include unexplained and uncharacteristic changes in behaviour; excessive washing; deliberate self-harm
- Psychological Abuse – includes threats of harm or abandonment, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks. Possible indicators include anxiety, confusion or general resignation; loss of confidence; excessive or inappropriate craving for attention
- Financial Abuse – includes theft, fraud, pressure around wills, property or inheritance, misuse or misappropriation of benefits. Possible indicators include unexplained or sudden inability to pay bills; sudden withdrawal of money from accounts; personal possessions going missing.
- Neglect and/or Acts of Omission – includes failure to access medical care or services, failure to give prescribed medication, poor nutrition or lack of heating. Possible indicators include poor hygiene and cleanliness; repeated infections; reluctant contact with health and social care agencies. Whilst not classified as an individual category of abuse, racial and

homo-phobic motivated abuse can take any of the above forms and needs to be noted  
Prevention of Abuse – Good Practice

- Wherever possible, abuse must be prevented. Creating 'safe care' or support for vulnerable people involves a holistic approach, which is centred upon the needs of the cared-for/supported person. It also recognises that this will only be achieved through effective recruitment, induction, support, training and management of staff
- Staff are encouraged to be alert and to feel confident about reporting abuse. Staff, who make confidential disclosures or 'whistle-blow' are supported and protected
- Staff are knowledgeable about signs and causes of abuse in both community and service settings. Detailed knowledge and understanding of procedures are underpinned by appropriate and ongoing training and support
- A good balance is maintained between confidentiality and positive information sharing

Duncan's Code of Conduct for Working with Vulnerable children/adults

Staff must never:

- Hit or otherwise physically assault or abuse vulnerable children/adults
- Develop physical or sexual relationships with vulnerable children/adults
- Develop relationships with vulnerable children/adults, which could in any way be deemed inappropriate or exploitative
- Act in ways that may be abusive or place vulnerable children/adults at risk of abuse
- Use language, make suggestions or offer advice, which is inappropriate, offensive or abusive
- Behave in an inappropriate or sexually provocative manner
- Do things of a personal nature that vulnerable children/adults can do for themselves
- Condone, or participate in the behaviour of vulnerable children/adults, which is illegal, abusive or unsafe
- Intentionally act in ways intended to shame, humiliate or degrade vulnerable children/adults.
- Discriminate against, show differential treatment, or favour particular vulnerable children/adults to the exclusion of others

It is Vital for all Staff in Contact with Vulnerable children/adults to:

- Be aware of situations, which may present risks
- Plan and organise the work and the workplace to minimise risks
- Be visible in working with vulnerable children/adults – as far as is humanly possible
- Ensure that a culture of openness exists to enable any issues of concern to be discussed
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged

What we will do:

Duncan's will meet our commitment to protect vulnerable children/adults from abuse through the following means:

Awareness:

We will ensure that all staff and volunteers are aware of the issues of vulnerable children/adults and the problem of abuse of vulnerable children/adults and the risks

Prevention:

We will ensure, through awareness and good practice, that all staff and volunteers minimise the risk to vulnerable children/adults

Reporting:

We will ensure that all staff are clear about what steps to take where concerns arise regarding the safety of vulnerable children/adults

Responding:

We will ensure that action is taken to support and protect vulnerable children/adults where concerns arise regarding possible abuse

Responding to Allegations or Suspicions:

It is not the responsibility of anyone working in Duncan's, in a paid or unpaid capacity, to decide whether the abuse of vulnerable children/adults has taken place. There is however a responsibility to act on any concerns through contact with the appropriate authorities. Duncan's will assure all staff that it will fully support and protect anyone, who in good faith reports his or her concerns that a colleague is, or may be, abusing a vulnerable adult. Where there is a complaint made, there may be three types of investigation:

- A criminal investigation
- A protection of vulnerable children/adults' investigation
- A disciplinary or misconduct investigation

Confidentiality:

Every effort must be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. Information must be stored in a secure place with limited access to the designated people, in line with data protection.

Direct Barring Services (DBS) Checks

All Duncan's staff will undergo and successful pass "Enhanced" Direct Barring Services (DBS) Checks as standard prior to the commencement of their employment

## **Duncan Private Hire Infection Control Policy**

Infection control is the name given to a wide range of policies, procedures and techniques intended to prevent the spread of infectious diseases amongst staff and service users. All staff working at Duncan Private Hire are at risk of infection or of spreading infection, especially if their role brings them into contact with blood or bodily fluids like urine, faeces, vomit or sputum. Such substances may well contain pathogens that can be spread if staff do not take adequate precautions.

### **Policy Statement**

Duncan Private Hire believes that adherence to strict guidelines on infection control is of paramount importance in ensuring the safety of both service users and staff. It also believes that good, basic hygiene is the most powerful weapon against infection, particularly with respect to hand washing.

Duncan Private Hire adheres fully to Outcome 8: of the Essential standards of quality and safety: Cleanliness and infection control and Regulation 12: of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010, which relates to the effective operation of systems designed to assess the risk of and to prevent, detect and control the spread of a health care associated infection.

### **Aim**

Basic principles of infection control. The aim of Duncan Private Hire is to prevent the spread of infection amongst staff, service users and the local community.

### **Goals**

The goals of Duncan Private Hire are to ensure that:

- (a) Service users, and staff are as safe as possible from acquiring infections through work-based activities.
- (b) All staff at Duncan Private Hire are aware of and put into operation Basic principles of infection control.

Duncan Private Hire will adhere to infection control legislation:

- (a) The Health and Safety at Work Act, etc 1974 and the Public Health Infectious Diseases Regulations 1988, which place a duty on Duncan Private Hire to prevent the spread of infection.
- (b) The Reporting of Incidents, Diseases and Dangerous Occurrences Regulations 1995, which place a duty on Duncan Private Hire to report outbreaks of certain diseases as well as accidents such as needle stick accidents.

(c) The Control of Substances Hazardous to Health Regulations 2002 (COSHH), which place a duty on Premier Care (Plymouth) Limited to ensure that potentially infectious materials within the organisation are identified as hazards and dealt with accordingly.

Infection Control Procedures at Duncan Private Hire (Wilts) Ltd:

All staff are required to make infection control a key priority and to act at all times in a way that is compliant with safe, modern and effective infection control practice. The management of Duncan Private Hire will make every effort to ensure that all staff working in their vehicles have access to sufficient facilities and supplies of appropriate equipment to ensure that they can implement effective infection control procedures and techniques.

Any staff who does not feel that they have access to sufficient facilities and supplies of appropriate equipment to ensure that they can implement effective infection control procedures and techniques have a duty to inform their line manager or supervisor.

Effective Hand Washing

Duncan Private Hire believes that the majority of cross-infection in a care environment is caused by unwashed or poorly washed hands which provide an effective transfer route for micro-organisms.

Duncan Private Hire believes that regular, effective hand washing and drying, when done correctly, is the single most effective way to prevent the spread of communicable diseases. Staff who fail to adequately wash and dry their hands before and after contact with service users may transfer micro-organisms from one service user to another and may expose themselves, service users and the public to infection.

At Duncan Private Hire (Wilts) Ltd:

- All staff should, at all times, observe high standards of hygiene to protect themselves and their service users from the unnecessary spread of infection.
- All staff should ensure that their hands are thoroughly washed and dried:
  - Between seeing each and every service user where direct contact is involved, no matter how minor the contact
  - After handling any body fluids or waste or soiled items
  - After using the toilet
  - Before handling foodstuffs
  - After smoking
  - Before and after any care activity
- Hands should be washed thoroughly — liquid soaps and disposable paper towels should be used rather than bar soaps and fabric towels (whenever possible).
- All cuts or abrasions, particularly on the hands, should be covered with waterproof dressings at all times.
- Ordinary soap is considered to be effective for routine use in removing dirt and reducing levels of transient micro-organisms on the skin to acceptably safe levels.
- The use of antiseptic or antimicrobial preparations is recommended if service users are known to have an infectious disease or are colonised with antibiotic-resistant bacteria, such as Methicillin Resistant Staphylococcus Aureus (MRSA).



- Antiseptic hand washing solutions may also be used in situations where effective hand washing is not possible.
- The use of alcoholic products for hand decontamination is not intended to replace washing hands with soap and water but rather to supplement hand washing where extra decontamination is required or to provide an alternative means of hand decontamination in situations where standard facilities are unavailable or unacceptable (for example, between service users or in unsanitary conditions).
- To be effective hands should be thoroughly washed before the use of an alcoholic rub and again after the procedure or patient contact has ended. Please see the correct hand washing technique attached to this policy.

#### The Handling and Disposal of Clinical and Soiled Waste

- All clinical waste should be disposed of in sealed yellow plastic sacks and each sack should be clearly labelled with the service user's address
- Non-clinical waste should be disposed of in normal black plastic bags.
- When no more than three-quarters full, yellow sacks should be sealed and stored safely to await collection by an authorised collector as arranged.
- Staff should alert their line manager if they are running out of yellow sacks, or any protective equipment.

#### The Use of Protective Clothing

- Adequate and suitable personal protective equipment and clothing should be provided by Duncan Private Hire.
- All staff who are at risk of coming into direct contact with body fluids or who are performing personal care tasks should use disposable gloves and disposable aprons.
- Sterile gloves are provided for clinical procedures such as applying dressings. These should be worn at all times during service user contact and should be changed between service users. On no account should staff attempt to wash and reuse the gloves.
- Non-sterile gloves are provided for non-clinical procedures.
- The responsibility for ordering and ensuring that supplies of gloves and aprons are readily available and accessible lies with the main office.

#### Cleaning and Procedures for the Cleaning of Spillages.

- Staff should treat every spillage of body fluids or body waste as quickly as possible and as potentially infectious.
- When cleaning up a spillage staff should wear protective gloves and aprons provided.

#### Reporting

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) obliges Duncan Private Hire to report the outbreak of notifiable diseases to the HSE. Notifiable diseases include cholera, food poisoning, smallpox, typhus, dysentery,

measles, meningitis, mumps, rabies, rubella, tetanus, typhoid fever, viral haemorrhagic fever, hepatitis, whooping cough, leptospirosis, tuberculosis and yellow fever.

Records of any such outbreak must be kept specifying dates and times and a completed disease report form must be sent to the HSE.

In the event of an incident, The Registered Manager is responsible for informing the HSE.

## Training

All new staff should be encouraged to read the policy on infection control as part of their induction process. Existing staff may be offered training covering basic information about infection control should it be requested.

## Correct Hand Washing Technique

Removing all dirt and contaminants from the skin is extremely important. Hands and other soiled parts of the body should be cleaned at least at the end of each work period, prior to breaks, or when visiting the toilet.

The correct method of cleaning is also important. Developing a good hand washing technique is imperative to ensure hands are thoroughly clean. Particular attention should be paid to the backs of the hands and fingertips as these are frequently missed.

It is usual to wet hands before dispensing a dose of soap into a cupped hand, however for heavily soiled hands it is advisable to apply the appropriate specialist hand cleanser directly to the skin before wetting. In all cases, it is important to follow the manufacturer's recommended instructions.

1. Rub palm to palm
2. Rub palm over back of hand, fingers interlaced
3. Palm to palm, fingers interlaced
4. Fingers interlocked into palms
5. Rotational rubbing of thumb clasped into palm
6. Rotational rubbing of clasped fingers into palm

The skin should always be properly dried to avoid risk of chapping particularly during cold weather

Clean towels should be available at all times - dirty towels mean exposing the skin to more dirt and the risk of infection.

Ideally, 'single issue' disposable towels should be used, as the use of 'communal' towels can lead to contamination.

## Vehicle Cleaning

All Passenger Transport Vehicles must be cleaned by our front-line staff following transfer of a patient. This includes cleaning all equipment used and the chair the patient was transferred on. Within every 35-day period, all front-line Passenger Transport Service vehicles must receive a full deep clean. This ensures that all passengers/patients are cared for in a clean environment. Spot checks around the cleanliness of our vehicles will be carried out each month. The vehicle Audit form used can be found below:

**Duncan Private Hire “Infection Control” Check Sheet**

Date:

ERM:

Driver:

Inspected by:

Signed by:

Standard: These criteria will be maintained to reduce the risk of cross infection and contamination	Yes	No	Comments
All vehicles are clean, dust free and the interior is well maintained, in good condition to ensure the fabric of the environment and equipment smells fresh and pleasant.	<input type="radio"/>	<input type="radio"/>	
The floor including edges and corners are visibly clean with no visible body substances, dust, dirt or debris. Floor coverings are washable and impervious to moisture.	<input type="radio"/>	<input type="radio"/>	
Alcohol hand rub is available on all vehicles at the point of care.	<input type="radio"/>	<input type="radio"/>	
Skin cleansers (Wet wipes) are available for visibly soiled hands prior to using alcohol hand rub.	<input type="radio"/>	<input type="radio"/>	
When used, linen is changed after every patient (Ask Crews).	<input type="radio"/>	<input type="radio"/>	

## **Duncan Private Hire Information/IT Security Policy**

### Policy

It is the policy of Duncan Private Hire that information, as defined hereinafter, in all its forms--written, spoken, recorded electronically or printed--will be protected from accidental or intentional unauthorised modification, destruction or disclosure throughout its life cycle. This protection includes an appropriate level of security over the equipment and software used to process, store, and transmit that information.

All policies and procedures must be documented and made available to individuals responsible for their implementation and compliance. All activities identified by the policies and procedures must also be documented. All the documentation, which may be in electronic form, must be retained for at least 6 (six) years after initial creation, or, pertaining to policies and procedures, after changes are made. All documentation must be periodically reviewed for appropriateness and currency, a period of time to be determined by each entity within Duncan Private Hire.

At each entity and/or department level, additional policies, standards and procedures will be developed detailing the implementation of this policy and set of standards and addressing any additional information systems functionality in such entity and/or department. All departmental policies must be consistent with this policy. All systems implemented after the effective date of these policies are expected to comply with the provisions of this policy where possible. Existing systems are expected to be brought into compliance where possible and as soon as practical.

### Scope

The scope of information security includes the protection of the confidentiality, integrity and availability of information.

The framework for managing information security in this policy applies to all Duncan Private Hire entities and workers, and other Involved Persons and all Involved Systems throughout Duncan Private Hire as defined below in Information Security definitions.

This policy and all standards apply to all protected health information and other classes of protected information in any form as defined below in Information Classification.

### Risk Management

A thorough analysis of all Duncan Private Hire information networks and systems will be conducted on a periodic basis to document the threats and vulnerabilities to stored and transmitted information. The analysis will examine the types of threats – internal or external, natural or manmade, electronic and non-electronic-- that affect the ability to manage the information resource.

The analysis will also document the existing vulnerabilities within each entity which potentially expose the information resource to the threats. Finally, the analysis will also include an evaluation of the information assets and the technology associated with its collection, storage, dissemination and protection.

From the combination of threats, vulnerabilities, and asset values, an estimate of the risks to the confidentiality, integrity and availability of the information will be determined. The frequency of the risk analysis will be determined at the entity level.

Based on the periodic assessment, measures will be implemented that reduce the impact of the threats by reducing the amount and scope of the vulnerabilities.

#### Information Security Definitions

**Affiliated Covered Entities:** Legally separate, but affiliated, covered entities which choose to designate themselves as a single covered entity.

**Availability:** Data or information is accessible and usable upon demand by an authorized person.

**Confidentiality:** Data or information is not made available or disclosed to unauthorised persons or processes.

**Integrity:** Data or information has not been altered or destroyed in an unauthorised manner  
**Involved Persons:** Every worker at Duncan Private Hire, no matter what their status. This includes physicians, residents, students, employees, contractors, consultants, temporaries, volunteers, etc.

**Involved Systems:** All computer equipment and network systems that are operated within the Duncan Private Hire environment. This includes all platforms (operating systems), all computer sizes (personal digital assistants, desktops, mainframes, etc.), and all applications and data (whether developed in-house or licensed from third parties) contained on those systems.

**Protected Health Information (PHI):** PHI is health information, including demographic information, created or received by the Duncan Private Hire entities which relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual and that identifies or can be used to identify the individual.

**Risk:** The probability of a loss of confidentiality, integrity, or availability of information resources.

#### Information Security Responsibilities.

**Information Security Officer:** The Information Security Officer (ISO) for each entity is responsible for working with user management, owners, custodians, and users to develop and implement prudent security policies, procedures, and controls, subject to the approval of:

Ensuring security policies, procedures, and standards are in place and adhered to by entity.

Providing basic security support for all systems and users.

Advising owners in the identification and classification of computer resources. See Information Classification.

Advising systems development and application owners in the implementation of security controls for information on systems, from the point of system design, through testing and production implementation.

Educating custodian and user management with comprehensive information about security controls affecting system users and application systems.

Providing on-going employee security education.

Performing security audits.

Reporting regularly to Duncan Private Hire on status with regard to information security  
Information Owner: The owner of a collection of information is usually the manager responsible for the creation of that information or the primary user of that information. This role often corresponds with the management of an organisational unit. In this context, ownership does not signify proprietary interest, and ownership may be shared. The owner may delegate ownership responsibilities to another individual. The owner of information has the responsibility for:

Knowing the information for which she/he is responsible.

Determining a data retention period for the information, relying on advice from a Legal Department.

Ensuring appropriate procedures are in effect to protect the integrity, confidentiality, and availability of the information used or created within the unit.

Authorizing access and assigning custodianship.

Specifying controls and communicating the control requirements to the custodian and users of the information.

Reporting promptly to the ISO the loss or misuse of Duncan Private Hire information.  
Initiating corrective actions when problems are identified.

Promoting employee education and awareness by utilizing programs approved by the ISO, where appropriate.

Following existing approval processes within the respective organisational unit for the selection, budgeting, purchase, and implementation of any computer system/software to manage information.

Custodian: The custodian of information is generally responsible for the processing and storage of the information. The custodian is responsible for the administration of controls as specified by the owner. Responsibilities may include:

Providing and/or recommending physical safeguards.

Providing and/or recommending procedural safeguards.

Administering access to information.

Releasing information as authorized by the Information Owner and/or the Information Privacy/ Security Officer for use and disclosure using procedures that protect the privacy of the information.

Evaluating the cost effectiveness of controls.

Maintaining information security policies, procedures and standards as appropriate and in consultation with the ISO.

Promoting employee education and awareness by utilizing programs approved by the ISO, where appropriate.

Reporting promptly to the ISO the loss or misuse of Duncan Private Hire information.

Identifying and responding to security incidents and initiating appropriate actions when problems are identified.

User Management:

Duncan Private Hire management who supervise users as defined below.

User management is responsible for overseeing their employees' use of information, including:

Reviewing and approving all requests for their employees' access authorisations.

Initiating security change requests to keep employees' security record current with their positions and job functions.

Promptly informing appropriate parties of employee terminations and transfers, in accordance with local entity termination procedures.

Revoking physical access to terminated employees, i.e., confiscating keys, changing combination locks, etc.

Providing employees with the opportunity for training needed to properly use the computer systems.

Reporting promptly to the ISO the loss or misuse of Duncan Private Hire information.

Initiating corrective actions when problems are identified.

Following existing approval processes within their respective organization for the selection, budgeting, purchase, and implementation of any computer system/software to manage information.

User:

The user is any person who has been authorized to read, enter, or update information. A user of information is expected to:

Access information only in support of their authorized job responsibilities.

Comply with Information Security Policies and Standards and with all controls established by the owner and custodian.

Keep personal authentication devices (e.g. passwords, Secure Cards, PINs, etc.) confidential.

Report promptly to the ISO the loss or misuse of Duncan Private Hire information

Initiate corrective actions when problems are identified.

## Information Classification

Classification is used to promote proper controls for safeguarding the confidentiality of information. Regardless of classification the integrity and accuracy of all classifications of information must be protected. The classification assigned and the related controls applied are dependent on the sensitivity of the information. Information must be classified according to the most sensitive detail it includes. Information recorded in several formats (e.g., source document, electronic record, report) must have the same classification regardless of format.

The following levels are to be used when classifying information:

### Protected Health Information (PHI)

PHI is information, whether oral or recorded in any form or medium, that:  
Is created or received by a healthcare provider, health plan, public health authority, employer, life insurer, school or university or health clearinghouse; and relates to past, present or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past present or future payment for the provision of health care to an individual; and Includes demographic data, that permits identification of the individual or could reasonably be used to identify the individual unauthorised or improper disclosure, modification, or destruction of this information could violate UK laws, result in civil and criminal penalties, and cause serious damage to Duncan Private Hire and its patients or research interests.

### Confidential Information

Confidential Information is very important and highly sensitive material that is not classified as PHI. This information is private or otherwise sensitive in nature and must be restricted to those with a legitimate business need for access.

Examples of Confidential Information may include personnel information, key financial information, proprietary information of commercial research sponsors, system access passwords and information file encryption keys.

Unauthorised disclosure of this information to people without a business need for access may violate laws and regulations, or may cause significant problems for Duncan Private Hire, its customers, or its business partners. Decisions about the provision of access to this information must always be cleared through the information owner.

### Internal Information

Internal Information is intended for unrestricted use within Duncan Private Hire, and in some cases within affiliated organizations such as Duncan Private Hire business partners. This type of information is already widely distributed within Duncan's, or it could be so distributed within the organization without advance permission from the information owner

Examples of Internal Information may include personnel directories, internal policies and procedures, most internal electronic mail messages

Any information not explicitly classified as PHI, Confidential or Public will, by default, be classified as Internal Information



Unauthorised disclosure of this information to outsiders may not be appropriate due to legal or contractual provisions

#### Public Information

Public Information has been specifically approved for public release by a designated authority within each entity of Duncan Private Hire. Examples of Public Information may include marketing brochures and material posted to Duncan Private Hire entity internet web pages.

This information may be disclosed outside of Duncan Private Hire

#### Computer and Information Control

All involved systems and information are assets of Duncan Private Hire and are expected to be protected from misuse, unauthorised manipulation, and destruction. These protection measures may be physical and/or software based.

**Ownership of Software:** All computer software developed Duncan Private Hire employees or contract personnel on behalf of Duncan Private Hire or licensed for Duncan Private Hire use is the property of Duncan Private Hire and must not be copied for use at home or any other location, unless otherwise specified by the license agreement.

**Installed Software:** All software packages that reside on computers and networks within Duncan Private Hire must comply with applicable licensing agreements and restrictions and must comply with Duncan Private Hire acquisition of software policies.

**Virus Protection:** Virus checking systems approved by the Information Security Officer and Information Services must be deployed using a multi-layered approach (desktops, servers, gateways, etc.) that ensures all electronic files are appropriately scanned for viruses. Users are not authorized to turn off or disable virus checking systems.

**Access Controls:** Physical and electronic access to PHI, Confidential and Internal information and computing resources is controlled. To ensure appropriate levels of access by internal workers, a variety of security measures will be instituted as recommended by the Information Security Officer and approved by Duncan Private Hire. Mechanisms to control access to PHI, Confidential and Internal information include (but are not limited to) the following methods:

**Authorisation:** Access will be granted on a "need to know" basis and must be authorized by the immediate supervisor and application owner with the assistance of the ISO. Any of the following methods are acceptable for providing access under this policy:

*Context-based access:* Access control based on the context of a transaction (as opposed to being based on attributes of the initiator or target). The "external" factors might include time of day, location of the user, strength of user authentication, etc.

*Role-based access:* An alternative to traditional access control models (e.g., discretionary or non-discretionary access control policies) that permits the specification and enforcement of enterprise-specific security policies in a way that maps more naturally to an organization's structure and business activities. Each user is assigned to one or more predefined roles, each of which has been assigned the various privileges needed to perform that role.

*User-based access:* A security mechanism used to grant users of a system access based upon the identity of the user

Identification/Authentication: Unique user identification (user id) and authentication is required for all systems that maintain or access PHI, Confidential and/or Internal Information. Users will be held accountable for all actions performed on the system with their user id.

At least one of the following authentication methods must be implemented:

Strictly controlled passwords (Attachment 1 – Password Control Standards),  
Biometric identification, and/or tokens in conjunction with a PIN.

The user must secure his/her authentication control (e.g. password, token) such that it is known only to that user and possibly a designated security manager.

An automatic timeout re-authentication must be required after a certain period of no activity (maximum 15 minutes).

The user must log off or secure the system when leaving it.

Data Integrity: Duncan Private Hire must be able to provide corroboration that PHI, Confidential, and Internal Information has not been altered or destroyed in an unauthorised manner.

Listed below are some methods that support data integrity:

- Transaction audit
- Disk redundancy (RAID)
- ECC (Error Correcting Memory)
- checksums (file integrity)
- Encryption of data in storage
- Digital signatures

Transmission Security: Technical security mechanisms must be put in place to guard against unauthorised access to data that is transmitted over a communications network, including wireless networks. The following features must be implemented:

Integrity controls and encryption, where deemed appropriate.

Remote Access: Access into Duncan Private Hire network from outside will be granted using Duncan Private Hire approved devices and pathways on an individual user and application basis. All other network access options are strictly prohibited. Further, PHI, Confidential and/or Internal Information that is stored or accessed remotely must maintain the same level of protections as information stored and accessed within the Duncan Private Hire network.

Physical Access: Access to areas in which information processing is carried out must be restricted to only appropriately authorized individuals.

The following physical controls must be in place:

Mainframe computer systems must be installed in an access-controlled area. The area in and around the computer facility must afford protection against fire, water damage, and other environmental hazards such as power outages and extreme temperature situations. File servers containing PHI, Confidential and/or Internal Information must be installed in a secure area to prevent theft, destruction, or access by unauthorised individuals. Workstations or personal computers (PC) must be secured against use by unauthorised individuals. Local procedures and standards must be developed on secure and appropriate workstation use and physical safeguards which must include procedures that will:

Position workstations to minimize unauthorised viewing of protected health information  
Grant workstation access only to those who need it in order to perform their job function  
Establish workstation location criteria to eliminate or minimize the possibility of unauthorised access to protected health information.

Employ physical safeguards as determined by risk analysis, such as locating workstations in controlled access areas or installing covers or enclosures to preclude passerby access to PHI.

Use automatic screen savers with passwords to protect unattended machines.

Facility access controls must be implemented to limit physical access to electronic information systems and the facilities in which they are housed, while ensuring that properly authorized access is allowed. Local policies and procedures must be developed to address the following facility access control requirements:

Contingency Operations – Documented procedures that allow facility access in support of restoration of lost data under the disaster recovery plan and emergency mode operations plan in the event of an emergency.

Facility Security Plan – Documented policies and procedures to safeguard the facility and the equipment therein from unauthorised physical access, tampering, and theft.

Access Control and Validation – Documented procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.

Maintenance records – Documented policies and procedures to document repairs and modifications to the physical components of the facility which are related to security (for example, hardware, walls, doors, and locks).

Emergency Access:

Each entity is required to establish a mechanism to provide emergency access to systems and applications in the event that the assigned custodian or owner is unavailable during an emergency.

Procedures must be documented to address:

Authorisation, Implementation, and Revocation.

Equipment and Media Controls: The disposal of information must ensure the continued protection of PHI, Confidential and Internal Information. Each entity must develop and implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain PHI into and out of a facility, and the movement of these items within the facility.

The following specification must be addressed:

Information Disposal / Media Re-Use of:

Hard copy (paper and microfilm/fiche)

Magnetic media (floppy disks, hard drives, zip disks, etc.) and CD ROM Disks

Accountability: Each entity must maintain a record of the movements of hardware and electronic media and any person responsible therefore

Data backup and Storage: When needed, create a retrievable, exact copy of electronic PHI before movement of equipment.

Other Media Controls:

PHI and Confidential Information stored on external media (diskettes, CD-ROMs, portable storage, memory sticks, etc.) must be protected from theft and unauthorised access. Such media must be appropriately labeled to identify it as PHI or Confidential Information. Further, external media containing PHI and Confidential Information must never be left unattended in unsecured areas.

PHI and Confidential Information must never be stored on mobile computing devices (laptops, personal digital assistants (PDA), smart phones, tablet PC's, etc.) unless the devices have the following minimum-security requirements implemented:

Power-on passwords

Auto logoff or screen saver with password

Encryption of stored data or other acceptable safeguards approved by Information Security Officer

Further, mobile computing devices must never be left unattended in unsecured areas

If PHI or Confidential Information is stored on external medium or mobile computing devices and there is a breach of confidentiality as a result, then the owner of the medium/device will be held personally accountable and is subject to the terms and conditions of Duncan Private Hire Information Security Policies and Confidentiality Statement signed as a condition of employment or affiliation with Duncan Private Hire

Data Transfer/Printing:

Electronic Mass Data Transfers: Downloading and uploading PHI, Confidential, and Internal Information between systems must be strictly controlled. Requests for mass downloads of, or individual requests for, information for research purposes that include PHI must be approved and include only the minimum amount of information necessary to fulfill the request.

Other Electronic Data Transfers and Printing: PHI, Confidential and Internal Information must be stored in a manner inaccessible to unauthorised individuals. PHI and Confidential information must not be downloaded, copied or printed indiscriminately or left unattended and open to compromise. PHI that is downloaded for educational purposes where possible should be de-identified before use.

Oral Communications: Duncan Private Hire staff should be aware of their surroundings when discussing PHI and Confidential Information. This includes the use of cellular telephones in public areas. Duncan Private Hire staff should not discuss PHI or Confidential Information in public areas if the information can be overheard. Caution should be used when conducting conversations in semi-private rooms, waiting rooms, corridors, elevators, stairwells, cafeterias, restaurants, or on public transportation.

Audit Controls: Hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use PHI must be implemented. Further, procedures must be implemented to regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports. These reviews must be documented and maintained for six (6) years.

Evaluation: Duncan Private Hire requires that periodic technical and non-technical evaluations be performed in response to environmental or operational changes affecting the security of electronic PHI to ensure its continued protection.

Contingency Plan: Controls must ensure that Duncan Private Hire can recover from any damage to computer equipment or files within a reasonable period. Each entity is required to develop and maintain a plan for responding to a system emergency or other occurrence (for example, fire, vandalism, system failure and natural disaster) that damages systems that contain PHI, Confidential, or Internal Information.

Disaster Recovery Plan: A disaster recovery plan will be developed and documented to contain a process enabling the entity to restore any loss of data in the event of fire, vandalism, natural disaster, or system failure.

Emergency Mode Operation Plan: A plan will be developed and documented which contains a process enabling the entity to continue to operate in the event of fire, vandalism, natural disaster, or system failure.

Testing and Revision Procedures: Procedures should be developed and documented requiring periodic testing of written contingency plans to discover weaknesses and the subsequent process of revising the documentation, if necessary.

Applications and Data Criticality Analysis: The criticality of specific applications and data in support of other contingency plan components must be assessed and documented.

## Compliance

The Information Security Policy applies to all users of Duncan Private Hire information including employees, medical staff, students, volunteers, and outside affiliates. Failure to comply with Information Security Policies and Standards by employees, medical staff, volunteers, and outside affiliates may result in disciplinary action up to and including dismissal in accordance with applicable Duncan Private Hire procedures, or, in the case of outside affiliates, termination of the affiliation. Possible disciplinary/corrective action may be instituted for, but is not limited to, the following:

Unauthorised disclosure of PHI or Confidential Information as specified in Confidentiality Statement.

Unauthorised disclosure of a sign-on code (user id) or password.

Attempting to obtain a sign-on code or password that belongs to another person.

Using or attempting to use another person's sign-on code or password.

Unauthorised use of an authorized password to invade patient privacy by examining records or information for which there has been no request for review.

Installing or using unlicensed software on Duncan Private Hire computers.

The intentional unauthorised destruction of Duncan Private Hire information.

Attempting to get access to sign-on codes for purposes other than official business, including completing fraudulent documentation to gain access.

## **Password Control Standards**

The Duncan Private Hire Information Security Policy requires the use of strictly controlled passwords for accessing Protected Health Information (PHI), Confidential Information (CI) and Internal Information. (See Duncan Private Hire Information Security Policy for definition of these protected classes of information).

Listed below are the minimum standards that must be implemented in order to ensure the effectiveness of password controls.

Standards for accessing PHI, CI,:

Users are responsible for complying with the following password standards:

Passwords must never be shared with another person, unless the person is a designated security manager.

Every password must, where possible, be changed regularly – (between 45 and 90 days depending on the sensitivity of the information being accessed).

Passwords must, where possible, have a minimum length of six characters.

Passwords must never be saved when prompted by any application with the exception of central single sign-on (SSO) systems as approved by the ISO. This feature should be disabled in all applicable systems.

Passwords must not be programmed into a PC or recorded anywhere that someone may find and use them.

When creating a password, it is important not to use words that can be found in dictionaries or words that are easily guessed due to their association with the user (i.e. children's names, pets' names, birthdays, etc...). A combination of alpha and numeric characters is more difficult to guess.

Where possible, system software must enforce the following password standards:

Passwords routed over a network must be encrypted.

Passwords must be entered in a non-display field.

System software must enforce the changing of passwords and the minimum length.

System software must disable the user identification code when more than three consecutive invalid passwords are given within a 15-minute timeframe. Lockout time must be set at a minimum of 30 minutes

System software must maintain a history of previous passwords and prevent their reuse.

## **Duncan Private Hire Recruitment Process**

It's important to us that Duncan's recruitment process is thorough and transparent, so that New recruits are able to meet the high-performance standards we expect and share our commitments to safeguarding and diversity.

We are able to continue to provide the best services and a safe environment for vulnerable children/adults and young people.

All candidates are treated fairly and professionally.

### Applying for a Post

Duncan Private Hire currently use the "directgov" jobs online application process as this site is found to ensure the most suitable candidates applying for roles within Duncan Private Hire receive a positive experience. The application process is quick, simple and will ask you for all the information we need.

Once you have registered, you can quickly apply for positions through the directgov jobs online and take advantage of many useful features the site has to offer.

The online process will enable you to:

- Register your details on a candidate database.
- Set up email alerts to hear directly from them when new opportunities arise.
- Periodically choose whether you would like us to retain your information or delete it from our records.
- Keep a track of how your application is progressing.
- Update your details at any time.
- Receive update emails at key stages of the process.

All candidates are required to register and complete an online application form  
If you require the application form in a different format please call 01225 790232 or e mail [info@duncanprivatehire.com](mailto:info@duncanprivatehire.com) , quoting the vacancy reference number.

### Short Listing Process

The recruiting manager will view each applicant's Curriculum Vitae against the criteria that has been laid down in the online job advert and those person/s deemed suitable candidates will be invited to interview. You will be contacted by email with the outcome of the shortlisting process. Due to the nature of work employed by Duncan's, disabled candidates are unable to apply for any Driver positions.



## My interview

Remember to check your email regularly, as any invitations to interview will be sent to you by email and in most instances, you will be given the opportunity to accept the allotted interview time that is afforded to you. Now you need to make sure you are as prepared as possible for it - which means thinking about some of the questions you are likely to be asked in advance, and getting very clear in your mind why you are right for the job.

It would assist your application a great deal if you:

- Provide all the information asked for in a concise and factual manner.
- Read the vacancy details carefully and let us know how your skills and experience match what we are looking for.
- Use the online facility to check your progress and respond to interview slots when invited to do so.
- Reschedule or cancel your interview if you are unable to attend.
- Attend the interview in a positive frame of mind.
- Demonstrate that you have read the information provided about our company and about the job you are applying for.

## Safeguarding and Safer Recruitment

Duncan Private Hires shares a commitment to safeguarding the welfare of vulnerable children/adults and young people. In terms of our recruitment process, this means that we need to take specific steps to minimise risk by asking specific questions at interview and conducting thorough background checks.

All interviews will have several safeguarding questions, covering your understanding and experience of safeguarding and probing any gaps in employment history. For candidates applying to work in a client facing role, there will be additional safeguarding questions during the interview covering your motivation, attitudes and values relating to vulnerable children/adults and/or young people.

## Assessment Process

Duncan Private Hire uses structured competency-based interviews and you will be interviewed by a panel of two or more managers. During the interview you will be asked to provide specific examples to demonstrate your skills and you will also have the opportunity to find out more about the role its very much a two-way process.

As part of the selection process, you may be required to complete additional assessments. If you have any special requirements because of a disability, please let us know in advance and we will make any reasonable adjustments to enable you to participate in the assessment process.

Eligibility to work in UK and identity checks.

Appointment to all positions is subject to verification of eligibility to work in the UK, as per the Asylum, Immigration and Nationality Act 2006.

You are required to bring specific original documents to interview as specified by the UK Borders Agency as many of our roles require DBS Checks (formerly known as CRB). Further details on the identity checks can be found at the end of this document.

## References

After a job offer has been made, Duncan Private Hire will approach your previous employers and places of education for references. We require references from all places of work and full-time study from the past three years. If you have been out of work, a professional reference will be used to cover gaps of six months or more. Any offer of employment will be conditional subject to receipt of satisfactory references.

## Direct Barring Service (DBS) Checks (formerly known as CRB).

For positions where you will be in contact with young people or vulnerable children/adults, any appointment is subject to an Enhanced Disclosure. Appointments to other roles where you will have access to Government property, systems or information will be subject to a DBS check.

## Qualification Checks

Checks will be made on professional qualifications or memberships where they are specified as essential in the person specification. Please bring with you to interview any relevant certificates or membership cards and a photocopy of them.

## Information for Recruitment Agencies

We do not accept speculative applications or calls from recruitment agencies and do not share candidate details.

**IDENTIFICATION CHECKLIST - CRB**

This checklist allows Duncan Private Hire to meet our obligations under Asylum and Immigration (A&I), Baseline Personnel Security Standard (BPSS) and Criminal Records Bureau

Please complete this form and bring it to the interview together with the original documents as outlined in the table below. You must also bring a photocopy of each document for the interviewer to retain.

Name:

Date of Birth:

List 1	List 2	List 3
Please provide ONE document from this list	Please provide ONE documents from this list	Please provide ONE document from this list
Current Valid Passport	Drivers Licence (paper counterpart required with new Photo licence)	
Full Birth/Adoption Certificate (UK & Channel Islands)	HM Forces ID Card	
Biometric Residence Permit (UK)	Valid Firearms Licence	
	Visa/Work Permit (UK)	
	<b>Document must be less than 3 months old</b>	
	Utility Bill (not mobile telephone)	HMRC tax notification
	Benefits Statement e.g. Child Allowance	
	Bank/Building Society Statement (not a statement printed from the internet)	Letter from Job Centre Plus confirming entitlement to benefits
	<b>Document must be less than 6 months old</b>	
	Mortgage Statement	
	<b>Document must be less than 12 months old</b>	
	Council Tax Statement (current year only)	P45
	Financial Statement such as: Pension Endowment ISA (document must show proof of current address)	P60

Your documents must cover the following criteria: (please tick)

- One document showing proof of signature
- One document showing current address
- All documents are valid, original and current
- No documents are printed from the internet (as these cannot be accepted)
- A document is provided from each list

**Have you changed your name?** If your current surname differs from the name on the documents provided please include your original Marriage/Civil Partnership Certificate or Deed Poll Certificate as verification of this name change.

Failure to produce the correct documentation could prevent any offer of employment being made.

**Declaration - to be completed by the Applicant at the interview**

I give consent for Duncan Private Hire or their 3<sup>rd</sup> party supplier (acting on behalf of Duncan Private Hire) to use my personal data for the purpose of obtaining references and a Criminal records Bureau (CRB) disclosure which is in line with current HMG Baseline Security. I understand that references will be obtained from all employers/self-employment/education establishments/benefit offices in the last 3 years.

**Please sign in the presence of the Duncan Private Hire Interviewer.**

Signed:  Date:   
Print Name:

**Declaration - to be completed by the Interviewer**

I confirm that I have seen all the original documents as outlined on this form (copies are attached) and the candidate has signed the above box in my presence.

I am aware that no offer of employment will be made without the correct documentation being provided. Any false declarations may lead to disciplinary action which may result in dismissal, and in some cases criminal prosecution.

Signed:  Date:   
Print Name:

## **Duncan Private Hire Staff Communications Policy**

### Introduction

To support Duncan Private Hire as a successful business we must communicate effectively with each other, partners and with our customers. Staff must have the information they need to carry out their daily business and be successful in their role.

Overall, we need to take a more tailored approach to communication with the business identifying responsibilities for staff at all levels. This policy has therefore been developed to meet those needs.

### Vision for Communications

In all our communications to demonstrate understanding and respect, ensuring that we communicate in a way that is open, timely, clear and appropriate to the recipient.

### Definition of Communication

Good communication is much more than the exchange of information. It involves the management of relationships and the need for staff involvement. Communication is as much about attitude and behaviour as it is about message. Every member of staff has a role and a responsibility to support effective communication.

For the purpose of this policy, communication includes not only the message but also how that message is communicated. Not only the responsibility for communication but also how effectively that responsibility is carried out.

### Methods of Communication

The methods of communication covered by this policy include:

Verbal Communication, face-to-face communication, one to one meetings, and discussions.

Written Communications, letters, emails, reports, memos, minutes, and any other written documentation that is necessary.

Vertical Communication up and down the organisation usually via the line management structure.

Lateral Communication across the business covering different services.

### Standards for Communications

All communications at Duncan Private Hire should be Open, Honest, Professional and Transparent.

The reasons for decisions are available. Decision makers are accessible and ready to engage in dialogue. When information cannot be communicated the reasons for non-disclosure are articulated:

Questions are expected and answered.

Factually Accurate and Timely.

Information arrives at a time when it is needed, is relevant and able to be interpreted in the correct context.

Clear.

Messages are communicated in plain English. They are easy to understand and are not open to misinterpretation.

Two way.

Systems exist to support communication up and down the business as well as across the sites.

Efficient.

The communication and the way it is delivered is “fit for purpose”, cost effective and appropriate to the recipient.

Responsibilities

All employees have a responsibility to demonstrate the business standards in communication. Specifically:

All Staff,

These are the core responsibilities for effective communication for all staff at Duncan Private Hire

- Staff should be aware of the Communications Policy and demonstrate the principles of good practice
- Staff are responsible for ensuring that they communicate effectively and appropriately in line with the standards for communication
- Staff should be aware of the various methods of communication and utilise them appropriately in their work
- Staff should tackle incidents of poor communication in a proactive and constructive way
- Information should be shared openly and appropriately in a timely fashion
- Where a colleague constructively raises an issue relating to poor, or inappropriate communication, the individual should consider carefully this feedback and reflect on their communication style

Line Managers

Those who have direct responsibility for the line management of other staff have the following additional responsibilities:

- Ensure effective two-way communication operates to and from the Senior Manager and the team
- Ensure effective and appropriate feedback is provided to staff
- Reflect on communication standards and practices within the team and identify opportunities for improvement
- Where staff raise issues of poor communication to take action to ensure they are resolved
- Where communication issues are raised that cannot be dealt with successfully to ensure that they are taken to the Senior Manager for action and support
- Update the team communication skills as required
- Ensure effective lateral communication between the team and its' staff and other customers
- Support and promote a culture that encourages staff inclusion and involvement and challenges non-engagement

## Director

In addition to the core responsibilities identified above those operating at Director level have the following additional responsibilities:

- Demonstrate leadership and proactivity in line with the vision for Communications
- Encourage involvement and inclusion from all staff throughout the business
- Ensure non-engagement is challenged and proactively and constructively resolve issues of poor communication
- Ensure that communication systems and processes actively support the vision for Duncan Private Hire
- Regularly review and seek to enhance the business approach to communications
- To ensure there is equity and priority of application of good practice in communications across the institution

## Principles of Good Practice

The following examples of good practice are provided as a guide to staff and managers. It is recognised that it may be appropriate to adapt these models to suit the working environment.

## Team Meetings

- Should take place on a regular and planned basis
- Should be attended by all members of the team
- Opportunities should be provided for all staff to contribute equally
- The agenda should be open to input from the whole team
- Meetings should be held at a time and in a venue, which allows and encourages input
- Agenda items for team meetings should include
- Strategic and longer-term planning
- Team or service development
- Opportunities to share good practice
- Opportunities to understand the work and contribution of team members
- Operational objectives and progress
- Health and Safety
- Staff, partner or customer feedback
- Feedback to Senior Managers

## One to One Meetings

Managers should have one to one meetings with staff who report directly to them on a regular basis. This provides the opportunity for the manager to maintain an understanding of the role and obtain progress on objectives and identify any support that is required.

## Open Door Policy

Managers should strive to develop a system that enables them to be easily accessible to staff. To allow this to happen Duncan's have adopted an "Open Door Policy" to allow drivers to chat on an informal/formal basis to discuss any current work issues they may feel need raised.

All the above will help to build mutual understanding and improve overall communication and decision-making within departments.

## Feedback

Where staff have raised issues, made suggestions or put forward ideas for change, they should receive feedback on the outcome. It is also important that all staff are kept informed and provided with feedback from managers and Directors. The line manager therefore has a role in ensuring feedback is provided on business issues.

## Use of Internet

Duncan's will provide details of their Policy and Procedures within their business web page on the internet so that colleagues in other areas can be informed about how we operate. This will benefit lateral communication across the institution. Duncan's website can be found at [www.duncanselfdrive.com](http://www.duncanselfdrive.com)

## Email

E-mail communication should be effective, professional and succinct. Staff should consider if e-mail is always the best way to communicate or if face to face communication would work more effectively. All staff should respond to incoming e-mail and telephone messages directed for their attention at the earliest opportunity.

## Policy Review

Duncan's Management staff will review and update (if necessary) the Staff Communication Policy annually.



## **Duncan Private Hire Menopause Policy**

### **Introduction**

Menopause is the time in a menstruator's life when menstruation periods permanently stop. The purpose of this policy is to help create an open and honest workplace where managers and employees can discuss any issues associated with the menopause, and to make sure the necessary support is known and offered to employees when they need it.

### **Effects of Menopause**

Physical symptoms of the menopause can include:

- hot flushes
- insomnia
- fatigue
- poor concentration
- headaches
- skin irritation
- urinary problems

As a result of the above, or as an extension of the hormone imbalance, individuals going through menopause can also experience psychological difficulties, including:

- depression
- anxiety
- panic attacks
- mood swings
- irritability
- problems with memory
- loss of confidence

It's also commonly acknowledged that Hormone Replacement Therapy, medication which is often prescribed for menopause, can have side effects which can cause problems at work. These include nausea, headaches, and leg cramps.

### **Communication**

It's important that, as an employee, you prioritise your personal health and wellbeing. If you're struggling with any aspect of your role because of symptoms associated with the menopause, you should report any concerns you may have to your manager, who will treat the matter with complete confidence. To make sure we can give you the best support possible we encourage you to be open and honest in these conversations.

## **Menopause Policy**

Alternatively, your manager may start a discussion with you if they notice a change in your behaviour or performance. We understand that you may feel uncomfortable talking about personal information with your manager. If this is the case you're encouraged to [discuss your situation with another office member of staff] who you would feel more comfortable with. During any discussions, your manager/member of staff will consider your individual situation and evaluate if any adjustments can be made. Your individual needs will be addressed sensitively, and everything will remain confidential unless the preferred nominated member of staff needs to seek clearance from the manager to allow for any adjustments. Managers will also arrange follow up sessions to evaluate the effectiveness of any adjustments put in place.

## **Making Adjustments to your Role**

In order to assist you in your daily duties, your manager will explore making adjustments to your role or working environment with the aim of reducing the effect that the menopause is having on you. Risk assessments will be consulted to identify potential issues, but we acknowledge that menopause affects individuals in different ways, so no adjustment will be made without fully discussing it with you first.

Examples of adjustments include:

- changing your working location so you are closer to toilet facilities, away from hot and cold spots around the office or to ensure greater access to natural light
- allowing changes to our normal rules on work wear
- implementing further temperature control, such as access to a fan
- assessing how work is allocated and whether you're affected at particular points of the day
- allowing additional rest breaks
- considering flexible working hours or allowing you to work from home

Once the adjustments are agreed, they will be reviewed on an ongoing basis to ensure they're having the required effect.

The Company is legally obliged by the Equality Act 2010 to make reasonable adjustments to an employee's role or working conditions if they have a disability that puts them at a disadvantage when performing their role, and we will ensure compliance with our obligations in this regard.

## **Training**

We will look to ensure that all levels of management are trained on the effects of menopause, how to hold discussions with employees who are experiencing menopause, and adjustments that can be made to an employee's role in order to remove or lessen any effects the employee is experiencing.

## **Behaviour of Others**

There is an expectation on all employees to conduct themselves in a helpful and open-minded manner towards colleagues.

We maintain a zero-tolerance approach to bullying and harassment and will treat any and all complaints seriously. If you feel that you've been mistreated in any way by a colleague because of matters related to the menopause, please make your concerns known to your Director/Manager etc.

## **Disciplinary Policy**

### **Purpose:**

The purpose of this disciplinary policy is to provide guidelines for addressing and resolving employee conduct or performance issues in a fair and consistent manner.

### **Scope:**

This policy applies to all employees of Duncan Hire Ltd including full-time, part-time, temporary, and contract workers.

### **Principles:**

**Fairness:** All disciplinary actions will be administered fairly and without bias.

**Consistency:** Disciplinary actions will be applied consistently across all employees and situations.

**Communication:** Employees will be informed of company policies, expectations, and potential consequences.

**Due Process:** Employees will be given an opportunity to respond to allegations and provide their perspective before disciplinary action is taken.

**Progressive Discipline:** Discipline will generally follow a progressive approach, starting with minor interventions and escalating as necessary.

### **Types of Misconduct:**

- Attendance and Punctuality
- Performance Issues
- Violation of Company Policies
- Misconduct (e.g., insubordination, harassment, theft)
- Safety Violations

### **Disciplinary Procedure:**

#### **Informal Counselling:**

Minor infractions may be addressed through informal discussions between the employee and their supervisor. The goal is to provide feedback and guidance to correct behaviour.

#### **Verbal Warning:**

If informal counselling does not resolve the issue, a verbal warning may be issued. The warning will be documented and communicated to the employee, outlining the specific concern and expectations for improvement.

**Written Warning:**

If the issue persists, a written warning may be issued. This formal document will detail the misconduct, previous verbal warnings, and consequences of further violations. The employee will be required to sign the written warning as acknowledgment.

**Suspension:**

In cases of serious misconduct or repeated violations, suspension without pay may be necessary. The duration of the suspension will be determined based on the severity of the offense.

**Termination:**

If the employee fails to improve despite previous interventions, termination of employment may be necessary. This decision will be made following a thorough review of the situation and consideration of all relevant factors.

**Appeals Process:** Employees have the right to appeal disciplinary actions. Appeals should be submitted in writing to [Designated Authority] within [specified timeframe]. The appeal will be reviewed impartially, and a decision will be communicated to the employee in a timely manner.

**Confidentiality:** All disciplinary matters will be handled with sensitivity and confidentiality to the extent possible, respecting the privacy of the individuals involved.

**Review and Update:** This disciplinary policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations.