

DUNCAN **Private Hire**

DUNCAN's

door to door with care

**MINIBUS
CODE OF PRACTICE
&
LIVE WORKING POLICIES
FOR
DUNCAN PRIVATE HIRE**

**Edition 001
Dated: 14 May 2021**

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Duncan Private Hire Document Change Register

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Duncan's Minibus Safety & Operational Policy

Policy Statement

At Duncan Private Hire, we are committed to ensuring the highest standards of safety for all staff operating minibuses as part of their role. We take all reasonable steps to protect our drivers and passengers from foreseeable risks, in accordance with our legal and moral obligations.

Purpose & Objectives

Operating a minibus requires enhanced driving skills and an elevated sense of responsibility due to the vehicle's size and passenger load. The purpose of this policy is to:

- Ensure all drivers understand the specific risks associated with minibus operation.
- Outline safety procedures to mitigate these risks effectively.
- Provide clear guidance on emergency protocols.

This policy supports our commitment to passenger safety and regulatory compliance.

Scope

This policy applies to:

- All minibuses owned, leased, or operated by Duncan's.
- Vehicles designed or adapted to carry up to 16 passengers plus the driver (PSVs).
- All Duncan's employees who operate or are responsible for these vehicles.

It should be read in conjunction with other Duncan's operational and transport-related policies, referenced in Appendices 6 to 24, including safeguarding, health and safety, infection control, and data protection. Departments such as Wiltshire Council may apply additional standards.

Roles & Responsibilities

The Manager is responsible for ensuring that drivers and passenger assistants are made aware of Duncan's policy and understand their responsibilities under this policy and associated Code of Practice.

Managers

- Ensure all drivers are briefed on this policy and related procedures.
- Enforce compliance and oversee operational safety.
- Authorise minibus use and monitor driver performance.

Drivers

- Adhere to all safe driving practices and checklists.
- Report issues promptly.
- Avoid actions that could endanger passengers or themselves.

Operational Code of Practice

Vehicle Roadworthiness

All minibuses operated by Duncan's must be regularly maintained and kept in a roadworthy condition.

Before taking responsibility for any vehicle, drivers must carry out pre-journey checks listed in **Appendix 1**, or confirm that such checks have already been completed by the previous driver.

These checks must be carried out daily while the vehicle is in use.

Seatbelt & Child Restraints

- All seats must be fitted with seatbelts—preferably lap and diagonal.
- Side-facing seats are prohibited.
- Child restraints are required by law for passengers under 135 cm or under 12 years old.

Transporting Disabled Passengers

Passengers with disabilities generally fall into two categories:

Category A — Passengers Remaining in Wheelchairs

Passengers who remain seated in their wheelchair during transport must:

- Be loaded using a ramp or powered tail lift
- Have their wheelchair secured using an approved restraint system
- Wear a passenger safety belt

Drivers and passenger assistants must be trained in:

- Safe operation of ramps and lifts
- Wheelchair securing procedures
- Passenger handling techniques

Training requirements are detailed in **Appendix 2**.

Category B — Passengers Transferring to Vehicle Seats

Passengers transferring to vehicle seats must:

- Be assisted safely where required
- Have wheelchairs secured during transport
- Be fitted with appropriate seatbelts

Wheelchairs and mobility equipment must be secured according to procedures detailed in **Appendix 2**.

Loading

Passenger numbers and luggage weight must not exceed manufacturer limits. All loose items must be safely secured to prevent movement during transport. Loading limits and securing procedures are detailed in **Appendix 2**.

Trailer Use

Minibuses may not tow trailers without prior written consent and successful completion of a towing assessment (see Appendix 2).

Speed Limits

- 30 mph in built-up areas
 - 50 mph on single carriageways
 - 60 mph on dual carriageways
 - 70 mph on motorways (60 mph if towing)
- Drivers are responsible for any penalties incurred.

Driver Competency & Requirements

All Duncan's drivers must:

- Be aged 25 or older with 2+ years of full UK licence.
- Hold a Private Hire licence (where required).
- Pass an enhanced DBS check and, if applicable, a medical exam.
- Participate in ongoing assessments through our Approved Driver Scheme (MiDAS).

Drivers must report:

- Any convictions or pending prosecutions.
- Health conditions affecting safe driving.
- Any changes in licence status.

Driver Conduct Expectations

- Maintain high driving standards and courtesy at all times.
- Represent the Duncan's brand positively.
- Never consume alcohol within 8 hours prior to or during a journey.
- Never use a mobile phone while driving unless the vehicle is safely parked with the engine off.

Journey Planning & Driving Hours

To reduce fatigue-related incidents:

- Max driving time per day: 9 hours (56 hours/week)
- Minimum rest: 11 hours within every 24-hour period
- Recommended break: 15 minutes every 2.5 hours of continuous driving

In Case of Accident or Breakdown

Drivers must:

- Prioritise passenger safety and contact emergency services if needed.
- Collect and record accident details.
- Notify Duncan's immediately (01225 790232).
See Appendices 4 & 5 for detailed procedures.

Administrative Compliance

- All drivers must carry valid licences and badges at all times.
- Only approved business use of Duncan's vehicles is permitted.
- Fuel cards may only be used for Duncan's vehicles; receipts must be submitted monthly.
- Minibuses must display valid Private Hire licences (where applicable).

Driver and Passenger Assistant Cooperation

Safe transport relies on teamwork between drivers and passenger assistants. Operational responsibilities are detailed in **Appendix 24**.

Monitoring & Review

This policy is reviewed annually by Duncan's Management to ensure ongoing compliance, relevance, and effectiveness.

Linked Policies & Appendices

Please refer to the following for full policy detail and procedural guidance:

- Appendix 1: Vehicle Pre-Check List
- Appendix 2: Towing Requirements
- Appendix 3: Mobile Phone Use & Legal Penalties
- Appendix 4: Post-Accident Legal Requirements
- Appendix 5: Emergency Breakdown/Fire Procedure
- Appendices 6–21: Environmental, GDPR, Safeguarding, Equal Opportunities, Whistleblowing, Menopause, Sickness, and more.
- Appendix 22-24: Illegal Drugs & Alcohol Policy, Modern Slavery and Human Trafficking Statement, Driver and Passenger Assistant Cooperation

Key Contacts

- **Director:** Peter Simpson – 07717 784235
- **Manager/Document Author:** Clark Ferguson – 01225 790232

Daily Pre-Journey Vehicle Checks Policy

To ensure the safety of all passengers and the legal roadworthiness of each vehicle, **Duncan's requires all minibus drivers to carry out daily pre-journey checks** whenever the vehicle is in use.

Drivers must inspect essential safety and operational components before setting off and record any issues in the **Weekly Defect Report** (template provided).

These routine checks are straightforward but critical, and they help prevent breakdowns, ensure compliance with the law, and maintain the high safety standards expected by Duncan's.

Daily Pre-Journey Checklist

(To be completed by the driver before each journey)

Exterior Checks

- Tyres: Proper inflation, no visible damage, sufficient tread
- Lights: Headlights, brake lights, indicators, and hazard lights working
- Mirrors: Clean, secure, and correctly adjusted
- Windscreen & Windows: Clean and free from damage
- Wipers & Washers: Operational with sufficient fluid
- Doors: Open and close securely
- Bodywork: No obvious damage or loose panels

Interior Checks

- Seatbelts: Present, working, and undamaged for all seats
- Horn: Operational
- Heating/Demisting: Working correctly
- Emergency Exits: Clearly marked and accessible
- First Aid Kit: Present and stocked
- Fire Extinguisher: Secure and in working order
- Floor Area: Clear of obstructions

Operational Checks

- Brakes: Functioning normally (including handbrake)
- Steering: Responsive and smooth
- Fuel Level: Adequate for the journey
- Oil Level: Within recommended range
- Coolant Level: Adequate
- Dashboard Warning Lights: None illuminated improperly

Weekly Defect Report Form

| Week Beginning: _____ | Vehicle Reg. No.: _____ |

Driver Name: _____ |

Date	Defect Noted (if any)	Action Taken	Signed
Monday			
Tuesday			
Wednesday			
Thursday			
Friday			
Saturday			
Sunday			

Note: Any defect affecting safety must be reported immediately to your supervisor and the vehicle must not be used until repaired.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Towing a Trailer – Driver Safety & Compliance Policy

To ensure safe and legal trailer towing operations, Duncan's requires all drivers to follow the checks below before towing any trailer with a minibus.

Failure to comply may result in unsafe operation and breach of legal requirements.

Key Driver Responsibilities

✔ Licence Eligibility

- Drivers must not tow a trailer exceeding 750kg unless they hold the correct Category E (BE) entitlement on their driving licence.

✔ Vehicle Suitability

- Confirm that the vehicle is approved for towing. If unsure, consult your Duncan's Manager before proceeding.

✔ Weight Compliance

- Ensure the gross weight of the vehicle and trailer combination does not exceed the legal maximum.
- The kerbside weight of the towing vehicle should be clearly displayed on the front nearside.
- Check that the downward force from the loaded trailer on the tow ball is within the manufacturer's approved limits.
- Ensure the axle load limits for the towing vehicle are not exceeded.

✔ Trailer Safety Checks

- A breakaway chain must be fitted, capable of activating the trailer handbrake in the event of coupling failure. For guidance, consult the trailer manufacturer or authorised dealer.
- The trailer must have its unladen weight and tyre pressures clearly marked.
- The maximum gross trailer weight (trailer + full load) must be displayed prominently on the front of the trailer.

✔ Brake & Lighting Systems

- Test that the handbrake/overrun brake system operates correctly.
- Confirm all trailer lights and indicators are working properly.

✔ Load Safety & Distribution

- Loads must be securely lashed to the trailer frame or body.
- Ensure the load is evenly distributed, with weight primarily over the axles.

✔ Visibility & Dimensions

- Any rear overhang greater than 1 metre must be marked with high-visibility signage, warning tape, or an approved rear light during darkness or poor weather.
- The trailer must not be wider than the towing vehicle.
- Ensure the trailer does not obstruct access to the rear doors of the minibus.

Stay safe, stay compliant — when in doubt, ask.

For clarification on any point in this policy, please speak with your Duncan's Manager before towing.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Policy on the Use of Handheld Mobile Phones While Driving

At Duncan's, safety comes first — and that includes strict adherence to national laws regarding mobile phone use while driving. Using a handheld mobile phone behind the wheel is illegal, dangerous, and subject to serious penalties.

Legal Background

Since 1 December 2003, it has been a legal offence to use a handheld mobile device while driving.

On 1 March 2017, legislation under Section 26 of the Road Safety Act 2006 increased the severity of penalties.

Current Penalties

- On-the-spot fine: £200
- Licence penalty: 6 points
- If prosecuted in court:
 - Possible disqualification from driving
 - Maximum fine of:
 - £1,000 for car drivers
 - £2,500 for minibus, coach, or goods vehicle drivers

These penalties apply even if the vehicle is stationary in traffic.

What Is Prohibited?

It is illegal to use any handheld mobile device while driving — including making calls, texting, browsing, or using apps.

A handheld device is defined as any device that must be held at any time during its use. This also includes devices similar to mobile phones that send and receive data, such as tablets or satellite communicators.

What About Hands-Free?

Hands-free use is not banned — but it can still be distracting. Department for Transport guidance strongly advises:

- Let calls go to voicemail
- Do not engage with your mobile phone at all while driving

Even with hands-free kits, if your driving is affected, you may still be prosecuted under Regulation 104 of the Road Vehicles (Construction and Use) Regulations 1986 for failing to have proper control of the vehicle. Penalties are the same as those for handheld phone use.

Employer Responsibility

At Duncan's, we are committed to driver safety. Therefore:

- Employees must not use handheld phones while driving any company vehicle.
- Managers must not instruct or encourage drivers to make or take calls while driving.
- Failure to comply may lead to disciplinary action and/or legal consequences for both employee and employer.

Further Information

More details can be found at the Department for Transport's official site:

 www.thinkroadsafety.gov.uk

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Accident Procedure Policy: What to Do If a Vehicle is Involved in an Incident

At Duncan's, the safety of passengers and drivers is our top priority. While every accident is different, all staff must be prepared to act calmly, legally, and responsibly.

This policy outlines the standard procedure to be followed if a minibus is involved in an accident, regardless of severity.

Immediate Actions at the Scene

1. **Activate Hazard Warning Lights**
Signal to other road users immediately.
2. **Prevent Further Danger**
If safe, deploy a high-visibility jacket and alert other traffic to avoid additional accidents.
3. **Call Emergency Services (999)**
 - Request Ambulance or Police if injuries or serious hazards are involved.
 - Remain at the scene.
 - Notify Duncan's Manager as soon as it is safe to do so. They will coordinate with other relevant parties.
4. **Help the Injured**
 - Assist anyone who is trapped or seriously hurt, if safe to do so.
 - Use the vehicle's First Aid kit to treat minor injuries.
5. **Ensure Passenger Safety**
 - Move all passengers to a safe location, off the road and away from the vehicle.

Legal Requirements After a Collision

If the accident results in injury, damage to another vehicle or property, or involves certain animals (e.g., horse, cattle, dog, sheep):


You are legally required to:

- Stop and remain at the scene
- Provide:
 - Your name and address
 - Name and address of the vehicle owner
 - Vehicle registration number

If unable to provide these details at the scene:

- You must report the incident to Police within 24 hours
- If you cannot produce proof of insurance at the scene, it must be shown at a nominated Police station within 7 days

Refer any requests for Duncan's insurance information to the Manager:

 01225 790232

Information to Collect at the Scene

- Names, addresses, and contact details of:
 - Other driver(s)
 - Any passengers involved
 - Witnesses
- Vehicle details (make, model, registration)
- Photos of the scene, damage, and surroundings (if safe)
- Road, weather, and traffic conditions
- Time and location of the incident

After the Incident

1. **Do NOT** admit fault to anyone at the scene—including witnesses or other drivers.
2. **Do NOT** speak to the media. Refer all press inquiries to Duncan's Manager.
3. Report the incident to the Manager immediately, even in the case of a near miss.
4. Upon returning to base:
 - Complete Duncan's Accident Report Form
 - Submit any collected information and await further instructions

Remember:

Your safety, legal compliance, and professional response reflect Duncan's commitment to responsible transport operations.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Policy: Actions in the Event of a Puncture, Breakdown, or Vehicle Fire

At Duncan's, your safety and the safety of your passengers is paramount. In the event of a puncture, mechanical failure, or fire, it is essential that all drivers follow the correct emergency procedures to protect life, minimize risk, and enable swift recovery.

If an Incident Occurs on Normal Roads

1. Immediately switch on hazard warning lights
2. Turn on sidelights if it is dark or visibility is poor
3. Position the vehicle in the safest location possible
 - Ideally pull onto the verge or away from live traffic
4. Evacuate all passengers
 - Move the group away from the road
 - Nominate a responsible adult to supervise and keep the group together
5. Assess the fault
 - If it can be safely resolved, proceed with caution
 - If not, contact Duncan's Manager, who will arrange breakdown support via our rescue service

If an Incident Occurs on a Motorway

If the vehicle is still driveable:

- Exit the motorway at the next junction or
- Drive to the nearest service station, then:
 - Contact Duncan's Manager for recovery and/or a replacement vehicle

If the vehicle cannot be moved safely:

1. Pull onto the hard shoulder, near an emergency phone if possible
 - Position the vehicle as far left as possible while ensuring nearside doors can still open
2. Switch on:
 - Hazard warning lights
 - Sidelights and headlights if visibility is poor or it's dark
3. Evacuate passengers through the nearside door
 - Move them well up the embankment or to a safe area, away from the carriageway
4. Do not allow anyone to return to or wander near the vehicle
5. Wait outside the vehicle, behind the safety barrier with all passengers
6. Contact Duncan's Manager to arrange assistance

In Case of Vehicle Fire

- Stop the vehicle immediately
- Turn off the engine
- Evacuate all passengers immediately, using the nearside door
- Move passengers to a safe distance—well away from the vehicle

- Do NOT open the bonnet if fire is under the hood
- Contact emergency services (999) and then notify Duncan's Manager

Flat Tyres

- Most Duncan's minibuses do not carry spare wheels
- Drivers must not attempt to change a tyre, even if a spare is available
- Instead, contact Duncan's Manager, who will call the recovery service

Breakdown/Rescue Contact Details

Service Provider: Cooke Automotive (for Melksham-based vehicles)
Normal Office Hours: **01225 791000**

When reporting a breakdown, please have the following details ready:

- Vehicle registration number
- Vehicle mileage
- Exact location of the vehicle
- Nature of the problem
- Approximate weight of the vehicle: 3.75 tonnes
- Passenger details, including number and any mobility requirements (e.g. wheelchair users)

Recovery teams will either:

- Repair the fault on-site so you can continue the journey, or
- Arrange for safe recovery of the vehicle and passengers

Stay calm. Act safely. Contact support immediately.

When in doubt, always prioritise safety and follow this policy.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire Transport – Environmental Policy Statement

At Duncan Private Hire Transport, we acknowledge our responsibility to contribute positively to the environmental sustainability of the communities we serve. Our commitment is to operate in a way that protects and enhances the environment today, without compromising the needs of future generations.

We aim to lead by example and promote environmental responsibility across our operations, partnerships, and supply chains. Continuous improvement in our environmental performance is a core part of our mission.

Our Environmental Commitments

We will:

- Embed sustainability across all business operations and ensure that environmental considerations inform our policy decisions and practices.
- Improve energy and water efficiency across our premises and wherever operationally viable, reducing resource consumption.
- Minimise pollution, including emissions to air, land, and water, and reduce noise where possible in the delivery of our services.
- Promote low-impact transport solutions, including reducing unnecessary transport of goods and encouraging use of integrated and accessible public transport options.
- Minimise waste, and prioritise reduction, reuse, and recycling of materials and resources throughout our operations.
- Operate transparently, legally, and ethically, showing respect for people, communities, and the environment.
- Comply fully with all applicable environmental laws, regulations, and standards.
- Procure goods and services responsibly, giving preference to suppliers and products with strong environmental and social credentials.
- Encourage sustainable supply chains, promoting repair, refurbishment, and reuse over replacement wherever practicable.
- Prevent environmental incidents, and maintain clear procedures to minimise and manage any adverse impacts should they occur.
- Continually monitor and improve our environmental performance, setting clear objectives and reviewing progress annually.
- Promote environmental awareness, encouraging our staff, partners, and contractors to adopt similar sustainable practices wherever possible.

By implementing this policy, Duncan's aims to support a cleaner, safer, and more sustainable future for all.

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd

Duncan Private Hire – Feedback & Complaints Policy
Committed to Excellence in Service

At Duncan Private Hire, we are committed to delivering a high-quality, reliable, and professional service to all our customers and stakeholders. Your feedback is essential in helping us maintain and improve our standards.

Our Service Commitment

We strive to:

- Deliver clear, accurate, and up-to-date information tailored to the needs of our customers and in line with current best practices and specifications.
- Understand our customers' expectations through regular consultation and provide services that meet agreed quality standards.
- Maintain the highest levels of professionalism, with a focus on impartiality, confidentiality, reliability, and value for money.
- Treat every individual with courtesy, respect, and professionalism at all times.

These service standards reflect our dedication to continuous improvement and are regularly reviewed in line with evolving best practice and government guidance.

Your Feedback Matters

We actively welcome all feedback—positive or negative—as it helps us refine our services and continue to meet your expectations.

If you have a suggestion, compliment, or general comment, we encourage you to contact us. Your views are important, and we value every opportunity to learn and improve.

Making a Complaint

If you are unhappy with any aspect of the service you have received, we encourage you to raise the issue as soon as possible:

1. Initial Resolution
Please contact the team member who originally handled your request. They are best placed to understand and resolve your concern quickly and efficiently.
2. Formal Complaint
If you are not satisfied with the initial response or your concern relates to a member of our staff, you may submit a formal complaint in writing. Please include all relevant details to help us investigate the matter thoroughly.

Contact Details for Formal Complaints:

Duncan Private Hire

6 Lysander Road

Melksham

SN12 6SP

✉ Email: [Insert email address if applicable]

3. Our Response

- You will receive written acknowledgment of your complaint within five working days.
- We aim to issue a full response within twenty working days. If further information is needed, we will keep you informed of any delays.
- In some cases, the Director, Peter Simpson, may conduct a detailed review and respond personally with the outcome.

At Duncan Private Hire, we take all feedback seriously. We are committed to resolving complaints fairly, transparently, and promptly—ensuring every customer feels heard and respected.

Tell Us What You Think – Your Voice Matters.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire – Sickness Absence Policy

Supporting Employee Wellbeing & Operational Continuity

Policy Statement

At Duncan Private Hire, we recognise the importance of maintaining a healthy, supported, and productive workforce. We are committed to promoting the well-being of our employees and understand that, at times, absence due to illness is unavoidable.

This policy aims to balance the needs of the business with those of employees who require time off to recover from ill health. We are dedicated to managing sickness absence fairly, consistently, and with sensitivity.

Policy Scope

This policy applies to all employees and forms part of the induction materials provided to new team members. It provides:

- Clear expectations for employee attendance.
- Duncan's responsibilities in managing and supporting employees through sickness.
- A fair and structured process for reporting, managing, and returning from sickness absence.

Note: This policy excludes workplace-related accidents, which are addressed under our Health & Safety Policy.

Core Principles

We are guided by the following principles:

- Regular attendance is a fundamental requirement of employment.
- Absence will be managed in line with ACAS guidelines and employment law.
- Reasonable sick pay will be provided in accordance with eligibility and certification.
- Sickness levels will be monitored to support early intervention and improve workplace conditions.
- We will work collaboratively with employees to identify support mechanisms to reduce absences.
- Consent will be sought before requesting medical advice or reports.
- All health-related information will be handled with strict confidentiality, in line with data protection regulations.
- Employees may request to speak with someone of the same gender regarding medical matters.
- Unexplained or unsubstantiated absences may result in disciplinary action.
- We will make all reasonable adjustments to support staff with disabilities, in line with the Equality Act 2010.

Reporting Absence

Employees must notify their line manager by telephone as early as possible—no later than their normal start time—on the first day of absence. If possible, notice should be given the evening before to help arrange cover. If the manager is unavailable, a message should be left with a senior colleague.

When reporting absence, employees should confirm:

- The nature of the illness.
- An expected return date.

Certification Requirements

Day 1 to 7

Employees can self-certify for up to 7 calendar days (including weekends/non-working days). A Self-Certification Form must be completed upon return.

Day 8 and Beyond

A doctor's Medical Certificate (Fit Note) is required from the eighth calendar day. It must:

- Be received within 3 working days.
- Cover the entire duration of absence with consecutive dates.
- Gaps in certification may be treated as unauthorised absence.

Additional Guidelines

Leaving Work Unwell

If an employee leaves work due to illness:

- Less than 50% of the shift worked: time will count as sickness absence (Self-Certification Form required).
- More than 50% worked: time will not be counted as absence.

Sickness During Annual Leave

To reclaim annual leave due to illness:

- Notify your manager on the first day of illness.
- Submit a medical certificate, regardless of duration.

Medical Appointments

- Appointments should be scheduled outside work hours where possible.
- When not possible, they should cause minimal disruption.
- Evidence of the appointment may be required.
- Full-day absences for medical reasons must follow self-certification procedures.

Statutory Sick Pay (SSP)

Eligible employees will receive Statutory Sick Pay from the start of employment, provided the appropriate medical certification is supplied. For details, refer to HMRC guidelines.

Return to Work Procedure

Employees returning after 7+ days' absence must meet informally with their line manager to discuss:

- The cause and context of absence.
- Fitness to return to work.
- Any required support or adjustments.

A 'fit for work' note is required if the employee wishes to return before their Medical Certificate expires.

Managing Absence

Frequent or Short-Term Absences

If an employee has 3 or more instances of sickness within 12 months:

- An informal review will be held to discuss concerns and support options.
- A record of the discussion and agreed actions will be retained.
- If attendance does not improve, a medical report may be requested (with the employee's consent).
- Further review meetings will take place, and clear expectations for improvement will be set.

Failure to improve may result in formal action under the Disciplinary Procedure.

Long-Term Absence (Over 1 Month)

For absences exceeding one month:

- An informal welfare meeting will be arranged after two months, or sooner if appropriate.
- The employee may bring a colleague or representative.
- If unable to attend, alternative communication (e.g. home visit, email) will be used.

Medical reports from a GP or Occupational Health may be requested to:

- Understand the condition and likely recovery time.
- Explore necessary workplace adjustments.
- Assess fitness for return to work.

A formal meeting will be arranged to review the findings and agree on next steps, which may include:

- Return to current role.
- Adjusted role or duties.
- Redeployment or alternative role.
- If no reasonable adjustments can be made, and return is not feasible, a further meeting will be held to consider ending employment on medical grounds.

Disability & Terminal Illness Considerations

Disability-Related Absence

Absences relating to disability (e.g. treatment or equipment fitting) are managed separately from standard sickness and recorded as **disability leave**.

We will:

- Make reasonable adjustments where necessary.
- Offer rehabilitation periods or training where appropriate.
- Consider alternative roles if the existing role is no longer suitable.

Terminal Illness

Cases involving terminal illness will be handled with utmost compassion and flexibility. With appropriate medical guidance and employee consent, we will:

- Support continued work where possible (e.g. part-time or flexible).
- Extend sick pay at management discretion.
- Handle employment matters sensitively and on a case-by-case basis.

Confidentiality and Support

All medical information is handled with strict confidentiality in compliance with the Data Protection Act and GDPR. Duncan's is committed to supporting employee health through respectful dialogue, professional support services, and a commitment to wellbeing at work.

For questions about this policy, contact your line manager or the Director.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

DUNCAN PRIVATE HIRE

General Data Protection Regulation (GDPR)

Information Storage, Processing and Sharing Policy

Document Control

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001	19 Oct 2021	Master Document Produced	Clark Ferguson	C Ferguson
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003	15 Apr 2026	Reviewed	Clark Ferguson	C Ferguson

1. Introduction

The General Data Protection Regulation (GDPR) (EU) 2016/679 provides a legal framework that sets out how personal data must be handled. Duncan Private Hire ("the Company") is committed to full compliance with the GDPR and ensuring that all personal data is collected, stored, processed, and shared responsibly and lawfully.

This policy applies to all personal data held by Duncan Private Hire in relation to customers, employees, and third-party contacts, and outlines our responsibilities, guiding principles, and procedures.

2. Scope

This policy applies to all employees, contractors, and data processors acting on behalf of Duncan Private Hire who handle personal data in the course of their duties.

3. GDPR Overview

GDPR enhances the privacy rights of individuals and imposes specific responsibilities on organisations that collect or process personal data. It came into effect on 25 May 2018, replacing the UK Data Protection Act 1998.

4. The Eight Principles of Data Protection

Duncan Private Hire adheres to the following GDPR principles:

- 1. Lawfulness, Fairness & Transparency**
Individuals are informed of who we are, why we collect data, and how it will be used. We ensure transparency through clear privacy notices.
- 2. Purpose Limitation**
Data is collected for specified, explicit, and legitimate purposes only (e.g. booking fulfilment or employment compliance).
- 3. Data Minimisation**
Only the minimum data necessary is collected and processed.

4. **Accuracy**
Data must be accurate and, where necessary, kept up to date. Driver data may be cross-referenced using DVLA tools (e.g. gov.uk view-my-driving-licence).
5. **Storage Limitation**
Data is not retained longer than necessary. Customer and staff information is retained for no more than three calendar months unless legally required otherwise.
6. **Integrity and Confidentiality (Security)**
Personal data is protected through access controls (e.g., password protection for digital files and locked storage for physical documents).
7. **Accountability**
The Company is responsible for, and must be able to demonstrate, compliance with all principles.
8. **Restricted Transfers**
Personal data will not be transferred outside the EEA unless adequate safeguards are in place.

5. Lawful Bases for Processing

Processing of data will be lawful only if at least one of the following applies:

- Consent has been given
- Processing is necessary for a contract
- Legal obligation compliance
- Protection of vital interests
- Public task or official authority
- Legitimate interests pursued by Duncan Private Hire, balanced against the rights of the data subject

6. Special Category Data

Processing of sensitive personal data (e.g. health status, criminal history) requires additional protection. Such data will only be processed if:

- Explicit consent has been given
- Required by law for employment
- Necessary to protect vital interests
- Necessary for legal claims or justice administration

7. Rights of Data Subjects

Individuals have the following rights:

1. **Right to be Informed**
Clear information is provided at data collection.
2. **Right of Access**
Individuals can request access to their personal data (Subject Access Request).
3. **Right to Rectification**
Inaccurate or incomplete data must be corrected within one calendar month.
4. **Right to Erasure**
Personal data may be deleted upon request in specific circumstances.
5. **Right to Restrict Processing**
Data can be limited from processing but still retained.
6. **Right to Data Portability**
Individuals may request a copy of their data in a portable format.

7. Right to Object

Processing can be objected to where based on public interest or legitimate interests.

8. Rights in Automated Decision-Making and Profiling

Individuals have rights over automated decisions.

8. Subject Access Requests (SAR)

SARs must be made in writing and will be fulfilled within one calendar month. Identification must be provided. Duncan Private Hire reserves the right to refuse or charge for requests that are manifestly unfounded or excessive.

(Refer to Appendix 1 – SAR Form)

9. CCTV Usage

Duncan Private Hire operates CCTV for security. Images are collected and processed in accordance with GDPR principles and are:

- Used solely for safety and security
- Stored securely
- Not retained longer than necessary
- Not shared externally unless legally required

10. Personal Data Breaches

In the event of a data breach:

- Duncan Private Hire will notify the relevant authority within 72 hours
- If the breach poses a high risk to individuals, those affected will be informed
- All breaches are recorded internally
- A breach response protocol is in place

11. Policy Review

This policy will be reviewed annually or sooner if legislation or operational needs require it. The review will ensure continued GDPR compliance.

Approved by:

Peter Simpson

Director, Duncan Private Hire

Signed Electronically

APPENDIX 1

Subject Access Request (SAR) Form

Complete this form to request access to personal data held by Duncan Private Hire. This assists us in efficiently locating and providing the requested information. Submission of ID is required.

SECTION 1: Requester Details

- Full Name:
- Address:
- Contact Number:
- Email:

SECTION 2: Are You the Data Subject?

(Please circle)

Yes / No

If no, provide written authorisation from the data subject and proof of both identities.

Acceptable Proof of Identity & Address

(Submit scanned copies only)

- ID: Passport, photo driving licence
- Address: Utility bill, bank statement (within 3 months)

SECTION 3: Data Subject Details (if different)

- Name:
- Address:
- Contact Number:
- Email:

SECTION 4: Information Requested

(Please describe the data you are seeking and any relevant details.)

SECTION 5: Purpose of Request

(Please tick if applicable)

- Why we are processing your data
- Who has access to your data
- The source of your data

SECTION 6: CCTV Data Request

Would viewing the images suffice? (Yes / No)

SECTION 7: Declaration

I confirm the above information is accurate and understand this request will be handled in accordance with GDPR.

Signed: _____ Date: _____

Duncan Private Hire
Equal Opportunities Policy
Revision Date: 15 Apr 2026

1. Policy Statement

Duncan Private Hire is committed to fostering an inclusive, equitable and respectful working environment. We promote equality of opportunity for all current and prospective employees and do not tolerate any form of discrimination or unfair treatment.

We treat all individuals fairly and without bias, regardless of gender, sexual orientation, marital or civil partnership status, race, colour, nationality, ethnic or national origin, religion or belief, age, disability, or trade union membership.

2. Scope and Application

This policy applies to all stages of employment and engagement with Duncan Private Hire, including:

- Recruitment and selection
- Pay and benefits
- Terms and conditions of employment
- Career development, promotion and training
- Transfer, redeployment, and redundancy
- Dismissal and disciplinary procedures

3. Fair Practice and Justifiable Criteria

No condition, requirement, or practice will be imposed without objective justification if it may put individuals at a disadvantage due to any of the protected characteristics outlined above. All employment decisions will be based solely on job-related criteria, individual merit, and business needs.

4. Policy Implementation and Review

We are committed to continuous improvement and will regularly review our recruitment practices, HR policies, and decision-making procedures to ensure compliance with this policy. Selection and progression processes will be monitored to confirm they reflect fairness, consistency, and non-discrimination.

5. Responsibilities

The overall responsibility for the implementation and monitoring of this policy lies with the Director, Peter Simpson. However, every member of staff shares responsibility for promoting and upholding our values of equality, dignity and inclusion at work.

Managers and supervisors are expected to lead by example and ensure that their teams operate in accordance with both the letter and spirit of this policy.

6. Breach of Policy

Any breach of this policy, including acts of discrimination, harassment or victimisation, will be treated seriously and may result in disciplinary action, up to and including dismissal.

Duncan Private Hire encourages any employee who believes they have been subject to discrimination to raise the issue through the appropriate internal procedures, with the assurance of a fair and confidential process.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire
Equal Opportunities Monitoring Form

Part of the Minibus Policy & Code of Practice for the Safe Use of Minibuses

Date: 15 Apr 2026

At Duncan Private Hire, we are committed to being an Equal Opportunities Employer. In support of this commitment, we collect monitoring data to ensure fair and non-discriminatory practices in recruitment, training, development, and progression.

Completion of this form is voluntary. The information provided will be treated with the strictest confidence and used solely for monitoring purposes, in accordance with the Data Protection Act. No information will be used in a way which allows any individual to be identified outside of lawful requirements.

Please mark **X** in one box for each category.

1. Gender

- Female
- Male
- Prefer not to say

2. Age Group

- Under 20
- 20–29
- 30–39
- 40–49
- 50–60
- Over 60

3. Ethnic Origin

(As defined by the UK Office for National Statistics. Please select one option only.)

White

- British
- Irish
- Any other White background:
.....

Mixed / Multiple ethnic groups

- White and Black Caribbean
- White and Black African

- White and Asian
- Any other Mixed background:
.....

Asian or Asian British

- Indian
- Pakistani
- Bangladeshi
- Any other Asian background:
.....

Black or Black British

- Caribbean
- African
- Any other Black background:
.....

Other Ethnic Group

- Chinese
- Any other ethnic group:
.....
- Prefer not to say

4. Disability

Under the Equality Act 2010, a disability is defined as a physical or mental impairment which has a substantial and long-term adverse effect on your ability to carry out normal day-to-day activities.

- Yes
- No
- Prefer not to say

If yes, you may specify the nature of your disability (optional):

5. Consent

In accordance with the Data Protection Act 1998, please indicate that you consent to the information provided being stored and processed for equal opportunities monitoring.

- I confirm that I consent to the processing and storage of the information I have provided above, as outlined.

Name:

Date:

Thank you for completing this form.

This information helps us support a fair and inclusive working environment at Duncan Private Hire.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire

Confidentiality & Code of Conduct Policy

Effective Date: 15 Apr 2026

Applies To: All Staff and Contractors

1. Purpose

This policy outlines Duncan Private Hire's commitment to maintaining the highest standards of confidentiality when handling client or patient-identifiable information. It ensures compliance with legal obligations including the Data Protection Act 1998, Human Rights Act 1998, and related standards within healthcare and public services.

2. Policy Overview

As a service provider working closely with NHS organisations, Duncan Private Hire recognises the importance of handling sensitive data with care, discretion, and integrity. Staff may come into contact with personal, health, or identifying information during the course of their duties. Such data must be treated with strict confidentiality, used appropriately, and shared only when legally justified and authorised.

All employees are personally accountable for protecting the confidentiality of client/patient-identifiable information.

3. Scope

This policy applies to:

- All client/patient-identifiable information in any format (paper, digital, verbal).
- All staff, contractors, temporary workers, and anyone operating on behalf of Duncan Private Hire.

4. Legal Framework

4.1 Data Protection Act 1998 (DPA)

Controls the use, storage, and processing of personal data, protecting individuals' privacy.

4.2 Common Law Duty of Confidentiality

Confidential information must not be shared without consent, unless explicitly authorised by law.

4.3 Human Rights Act 1998

Recognises the individual's right to privacy and family life.

4.4 Administrative Law

Public bodies must operate within legal powers when managing personal information, especially around consent.

5. Definitions

Patient/Client-Identifiable Information (PII):

Any data that can directly or indirectly identify an individual, including:

- Names, initials, addresses, dates of birth, NHS numbers
- Postcodes, occupations, ethnic background, and combinations of data points

Unauthorised Persons:

Anyone who does not have a legitimate, role-based reason to access specific confidential information.

6. Key Principles of Data Confidentiality

All staff must follow these principles when handling confidential information:

1. Justify the purpose for using confidential data.
2. Limit access strictly to those who need to know.
3. Use the minimum necessary information.
4. Obtain informed consent where required.
5. Ensure physical and digital security of records.
6. Follow data retention and destruction protocols.
7. Be aware of and comply with legal responsibilities.

7. Practical Guidelines

7.1 Handling and Access

- Do not access information unless required for your role.
- Never view your own or others' records unless formally authorised.
- When in doubt, ask your manager before accessing or sharing information.

7.2 Physical Security

- Keep paper records secure and out of public view.
- Lock rooms or secure cabinets where confidential records are stored.
- Adopt a clear desk policy – no sensitive information should be left unattended.

7.3 Electronic Data Security

- Always log off or lock screens when away from your workstation.
- Use strong, private passwords. Never share login credentials.
- Ensure all digital files containing personal information are encrypted and stored securely.
- Do not store PII on portable devices unless absolutely necessary and authorised.

7.4 Data Transfer

- Mark all documents containing personal data as "CONFIDENTIAL".
- Use sealed and clearly addressed envelopes for internal and external mail.
- Confirm recipient details before sending information.
- Avoid including unnecessary identifiers; redact where appropriate.
- For digital transfers, use secure, encrypted systems or authorised platforms.

7.5 Conversations & Verbal Communication

- Avoid discussing personal information in public or non-secure areas (e.g. hallways, waiting rooms).
- When discussing sensitive matters by phone, confirm the recipient's identity.
- Keep meetings private, and limit the sharing of identifiable details.

8. Off-Site and Portable Equipment Use

If using mobile devices or transporting confidential information:

- Secure physical devices and records at all times.
- Obtain permission before removing information from site.
- Ensure encryption and password protection on all devices.
- Never leave devices in vehicles unattended.

9. Breaches of Confidentiality

Breaches of this policy are serious offences and may result in:

- Disciplinary action, including termination of employment.
- Legal consequences for both individuals and Duncan Private Hire.
- Reputational damage to our organisation and NHS partners.

If you suspect a breach or receive data in error, **report it immediately** to your line manager.

10. Staff Responsibilities

All staff must:

- Understand their role in maintaining confidentiality.
- Participate in regular training on data protection.
- Know how to report concerns and breaches.
- Respect client/patient privacy as they would expect for themselves.

11. Final Note

Client/patient trust is built on our commitment to protecting their privacy. By following this policy, we uphold the integrity and professionalism of Duncan Private Hire and our service to the community.

For any questions or clarifications, please contact your line manager.

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd

Duncan Private Hire: Health & Safety Policy Statement

At Duncan Private Hire, we are fully committed to ensuring a safe and healthy working environment in accordance with the Health & Safety at Work Act 1974 and all subsequent legislation. Our core objective is to prevent occupational injuries and illnesses and to maintain an accident-free workplace.

We provide our employees with the necessary equipment, training, information, and supervision to ensure they carry out their duties safely and responsibly.

Our Commitment

We recognise our legal and moral responsibility to protect the health and safety of everyone affected by our operations – including employees, visitors, contractors, temporary workers, and the general public.

While Duncan Private Hire takes all reasonable steps to ensure safety, health and safety in the workplace is a shared responsibility. Employees must take reasonable care for their own wellbeing and that of others and report any concerns or risks immediately.

Training & Supervision

Employees will receive thorough training relevant to their role and will not be expected to undertake tasks they are not confident or competent to complete safely. Open communication is encouraged to maintain safety standards at every level.

All incidents and injuries, no matter how minor, must be reported. This allows for accurate records and continuous improvement of our safety protocols.

Ongoing Policy Review

Our Health & Safety Policy is reviewed regularly and formally updated at least annually, or sooner if operational changes occur.

Safety Roles & Responsibilities

Name	Role	Responsibility
Peter Simpson	Director	Overall responsibility for Health & Safety
Katrina Damiral	Company Secretary	Policy implementation and monitoring
Clark Ferguson	Yard & Office Manager	Area-specific Health & Safety supervision

Communication

We ensure all employees understand and adhere to our safety standards through:

- Verbal instructions from supervisors
- Written documentation, including this policy

- Leading by example

Co-operation & Employee Duties

Creating and maintaining a safe workplace relies on full co-operation. Employees are expected to:

- Comply with safety procedures
- Co-operate with management
- Report unsafe conditions immediately

Non-compliance may lead to disciplinary action.

Safety Training

Training is essential to our safety culture. All staff will be:

- Trained before beginning new roles
- Educated on PPE use, emergency protocols, and safe work practices
- Given opportunities to voice concerns during training sessions

Trainer	Department	Responsibility
Clark Ferguson	Yard & Office	Safety training & management

Workplace Inspections

Regular inspections are carried out by Steve Damiral to ensure compliance with the Workplace (Health, Safety & Welfare) Regulations 1992 and to keep safety practices current and effective.

Work Equipment

We comply with the Provision and Use of Work Equipment Regulations 1992. All equipment is:

- Safe and suitable for use
- Operated only by authorised personnel
- Maintained to a high standard
- Properly marked with safety warnings where required

Manual Handling

In accordance with the Manual Handling Operations Regulations 1992:

- Manual lifting is avoided wherever possible
- Where unavoidable, tasks are assessed for safety
- Appropriate equipment and PPE are used to reduce risk

Display Screen Equipment (DSE)

Duncan Private Hire complies with DSE regulations to minimise risks associated with VDU screen use. We provide:

- Risk assessments of workstations
- Regular screen breaks
- Eye tests and corrective eyewear, if needed
- Ongoing training on DSE safety

Expectant Mothers

We comply with the European Directive on Pregnant Workers:

- Risk assessments are carried out for new/expectant mothers
- Adjustments or suspensions on full pay will be made where necessary
- Night work will be avoided if advised by a doctor

Fire Safety

Fire safety equipment is maintained by Safeguard. All staff must:

- Report any fire or potential hazard immediately (dial 999)
- Know emergency procedures
- Never attempt to fight a fire unless it is safe to do so

Accident Reporting & Investigation

Duncan Private Hire complies with RIDDOR 1995. All accidents are thoroughly investigated and documented by the Director or an appointed individual, including:

- Details, photos, and eyewitness accounts
- Analysis and follow-up on preventative actions

First Aid

First aid stations are clearly marked and accessible. First aid kits are in all vehicles and throughout the workplace. A list of qualified First Aiders and emergency contacts is posted at each first aid station.

General Safety Rules

All employees must:

- Follow safety procedures at all times
- Report hazards or unsafe practices immediately
- Refrain from working under the influence of drugs/alcohol
- Use tools/equipment only if authorised and trained
- Wear appropriate PPE
- Maintain clean and tidy workspaces

Unsafe acts such as horseplay or unauthorised tampering with equipment are strictly prohibited.

Tool & Equipment Maintenance

- Use only by qualified and authorised staff
- Tools must be in good working condition and stored safely

- Damaged or defective tools must be reported and replaced immediately

Manual Lifting Guidelines

- Use mechanical lifting aids wherever possible
- Inspect loads and routes before lifting
- Team lifts must be co-ordinated
- Use correct lifting posture: bend knees, keep back straight

Work Environment

- Workspaces must be kept clean and hazard-free
- Spills must be cleaned immediately
- Waste must be disposed of appropriately

This Health & Safety Policy will be reviewed and updated annually or following any significant operational change.

Signed: electronically signed
Peter Simpson
Title: Director
Company: Duncan Private Hire
Date: 15 Apr 2026

Duncan Private Hire – Whistleblowing Policy

1. Purpose of the Policy

At Duncan Private Hire, we are committed to conducting our business with integrity, transparency, and accountability. This Whistleblowing Policy is designed to provide all employees and associated personnel with a clear and confidential process for reporting concerns about wrongdoing within the company.

We encourage an open culture where staff feel safe and supported in raising serious concerns about misconduct, illegal activity, or breaches of company policy, without fear of reprisal.

2. What is Whistleblowing?

Whistleblowing is the disclosure of information by an employee or worker who reasonably believes that there is malpractice, risk, or wrongdoing within the organisation that is in the public interest to report. This may include unlawful conduct, health and safety risks, or unethical behaviour.

We understand that speaking up can feel difficult. However, raising concerns early allows us to address issues quickly and maintain the standards we all value.

3. Our Commitment

Duncan Private Hire is fully committed to:

- Encouraging a culture of openness and honesty.
- Investigating all concerns raised in good faith.
- Protecting individuals who raise genuine concerns from retaliation or victimisation.
- Taking prompt and appropriate action where wrongdoing is found.

4. Scope of the Policy

This policy applies to all individuals working at or with Duncan Private Hire, including:

- Permanent and temporary employees
- Casual and agency staff
- Contractors and authorised volunteers
- Interns and individuals on work experience

5. What Can Be Reported?

You can report any serious concern that falls within the public interest, including but not limited to:

- Criminal offences or breaches of the law

- Miscarriages of justice
- Breaches of health and safety regulations
- Environmental damage
- Fraud, corruption, or misuse of company resources
- Unethical, unprofessional, or discriminatory behaviour
- Safeguarding concerns involving clients or colleagues
- Any conduct that conflicts with Duncan's values or codes of practice

6. Safeguards Against Retaliation

We understand that whistleblowing can be daunting. Duncan Private Hire ensures that:

- Anyone who raises a concern in good faith will be protected from disciplinary action, dismissal, or victimisation.
- We will take action against anyone who attempts to intimidate or retaliate against a whistleblower.

If you are targeted or treated unfairly as a result of raising a concern, this will be treated as a serious disciplinary matter.

7. Confidentiality

All whistleblowing reports will be handled sensitively and, wherever possible, in confidence. Your identity will not be disclosed without your consent, unless required by law or in the interest of a full and fair investigation.

We encourage you to identify yourself when making a report, as anonymous concerns may be more difficult to investigate. However, anonymous reports will still be considered where possible.

8. Criteria for Whistleblowing Protection

To be protected under this policy, the disclosure must meet the following criteria:

- You reasonably believe the information is true and in the public interest.
- You are not acting for personal gain.
- The concern is not raised maliciously or with false intent.

9. How to Raise a Concern

You can raise concerns in the following ways:

- Initially: Speak to your immediate line manager or supervisor.
- Alternatively: If the concern involves your manager or you feel uncomfortable raising it at that level, you can report it directly to a senior member of management or the Director.
- Reports can be made verbally or in writing. All concerns will be taken seriously and handled in line with our internal investigation procedures.

You will be provided with feedback and updates, where appropriate, throughout the investigation process.

10. Further Action

If you are not satisfied with how your concern has been handled internally, and it is in the public interest, you may contact an external body such as:

- The Health and Safety Executive (HSE)
- The Environment Agency
- The Local Authority
- A relevant professional regulator

Guidance on this is available via the government's whistleblowing resources.

If you have any questions about this policy or need advice before raising a concern, please speak with your manager or contact senior management in confidence.

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd

Duncan Private Hire – Safeguarding Policy

1. Introduction

Duncan Private Hire is committed to safeguarding and protecting vulnerable children and adults who come into contact with our services. We recognise that protection from abuse is a fundamental right and integral to our operational standards.

A vulnerable adult is defined as any person aged 18 or over who, due to disability, age, illness, or mental health, may require community care services and is unable to protect themselves from significant harm or exploitation.

Our duty extends equally to all vulnerable children and adults, ensuring they are safeguarded from abuse or neglect in every interaction with Duncan Private Hire.

2. Our Commitment

We are dedicated to:

- Upholding the rights of vulnerable children and adults to live free from abuse, regardless of age, culture, gender, disability, race, religion, or sexual identity.
- Responding promptly and appropriately to any suspicion or allegation of abuse.
- Ensuring all staff understand their responsibility to report concerns without delay.
- Working collaboratively with partner organisations to prevent, identify, and respond effectively to safeguarding concerns.

3. Core Values and Principles

- Vulnerable individuals have the right to dignity, privacy, independence, and self-determination.
- We promote the fullest possible involvement of vulnerable people in decisions affecting their lives.
- Support networks significant to the individual are respected and involved where appropriate.
- Responses to safeguarding concerns are proportionate and tailored to the situation.
- Both the vulnerable individual and the alleged abuser are entitled to legal protection and fair treatment.
- Vulnerable people have the right to comment, complain, and access independent advice or advocacy.

4. Policy Objectives

Our safeguarding policy aims to:

- Provide safe environments and protection for vulnerable children and adults.
- Equip staff with the knowledge and confidence to identify and respond to safeguarding concerns effectively.

- Foster an organisational culture that prioritises the welfare and safety of vulnerable individuals.

5. Recognising Abuse

Abuse can take many forms, including but not limited to:

- **Physical Abuse:** Includes hitting, slapping, pushing, misuse of medication, or inappropriate restraint. Indicators may include unexplained bruises or unusual behaviour.
- **Sexual Abuse:** Involves any non-consensual sexual activity or exploitation. Signs may include behavioural changes or self-harm.
- **Psychological Abuse:** Encompasses threats, humiliation, isolation, or verbal abuse. Symptoms can include anxiety, withdrawal, or loss of confidence.
- **Financial Abuse:** Covers theft, fraud, coercion over financial matters, or misuse of benefits. Possible signs include sudden financial difficulties or missing possessions.
- **Neglect:** Failure to provide necessary care, medical attention, or basic needs. Indicators include poor hygiene, malnutrition, or frequent illness.

Racial, homophobic, or other discriminatory abuse may overlap with the above categories and will be addressed accordingly.

6. Prevention and Good Practice

Preventing abuse requires a proactive, holistic approach focused on the needs of vulnerable individuals. This includes:

- Rigorous staff recruitment, training, and supervision.
- Promoting awareness and vigilance among all team members.
- Supporting staff who report concerns through a protected whistleblowing process.
- Balancing confidentiality with the need for appropriate information sharing.

7. Code of Conduct

All staff must:

- Treat vulnerable children and adults with respect, dignity, and care.
- Avoid any form of physical, sexual, emotional, or discriminatory behaviour.
- Refrain from inappropriate relationships or conduct that could be seen as exploitative.
- Never engage in or condone illegal or unsafe behaviour.
- Act professionally and challenge any poor or abusive practice.
- Maintain clear boundaries and ensure actions prioritise the individual's well-being.

8. Responsibilities of Staff

Staff working with vulnerable individuals must:

- Stay alert to situations posing potential risks.
- Organise their work environment to maximise safety.
- Maintain visible and accountable practice.
- Foster a culture of openness where concerns can be raised and addressed promptly.

9. Our Safeguarding Commitment

Duncan Private Hire will:

- Ensure all staff and volunteers understand safeguarding risks and issues.
- Promote best practice to minimise harm.
- Provide clear guidance on how to report concerns.
- Act swiftly to support and protect those at risk.

10. Responding to Concerns

It is not the role of staff to determine if abuse has occurred but to report concerns immediately to designated safeguarding officers or appropriate authorities. Investigations may include:

- Criminal proceedings
- Safeguarding investigations
- Internal disciplinary processes

Duncan Private Hire guarantees full support and protection for any employee who reports concerns in good faith.

11. Confidentiality

All safeguarding information will be handled sensitively and confidentially. Details will be shared strictly on a “need to know” basis and stored securely in line with data protection laws.

12. Recruitment and DBS Checks

To protect vulnerable individuals, all staff at Duncan Private Hire undergo enhanced Disclosure and Barring Service (DBS) checks before commencing employment.

Signed: electronically signed

Peter Simpson

Position: Director

Date: 15 Apr 2026

Duncan Private Hire Infection Control Policy

Overview

Infection control encompasses a comprehensive set of policies, procedures, and techniques designed to prevent the transmission of infectious diseases among staff and service users. At Duncan Private Hire, all employees are at risk of contracting or spreading infections, particularly when exposed to blood or bodily fluids such as urine, feces, vomit, or sputum. These substances can carry pathogens that pose significant health risks if proper precautions are not observed.

Policy Statement

Duncan Private Hire is committed to maintaining the highest standards of infection control to protect both our staff and service users. We recognise that strict adherence to infection prevention protocols—especially effective hand hygiene—is critical to safeguarding health and safety.

Our infection control approach complies fully with:

- Outcome 8: Essential Standards of Quality and Safety – Cleanliness and Infection Control
- Regulation 12: Health and Social Care Act 2008 (Regulated Activities) Regulations 2010, focusing on risk assessment and control of healthcare-associated infections.

Aim

To prevent the spread of infection among staff, service users, and the wider community by ensuring the consistent application of effective infection control measures.

Objectives

- Protect service users and staff from infection risks associated with workplace activities.
- Ensure all staff understand and implement fundamental infection control principles.

Legal Compliance

Duncan Private Hire commits to adhering to all relevant legislation, including:

- Health and Safety at Work Act 1974 and Public Health Infectious Diseases Regulations 1988 – Duty to prevent infection spread.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 – Duty to report disease outbreaks and workplace incidents (e.g., needlestick injuries).
- Control of Substances Hazardous to Health (COSHH) Regulations 2002 – Duty to identify and manage infectious hazards.

Infection Control Procedures **Hand Hygiene**

Effective handwashing is the most important measure to prevent cross-infection. Staff must:

- Maintain high standards of personal hygiene.

- Thoroughly wash and dry hands:
 - Between every service user contact, regardless of contact intensity.
 - After handling bodily fluids, waste, or soiled items.
 - After using the toilet.
 - Before handling food.
 - After smoking.
 - Before and after any care-related activity.

Use liquid soap and disposable paper towels wherever possible. Cuts or abrasions must be covered with waterproof dressings at all times.

Antiseptic or antimicrobial hand preparations should be used when dealing with known infectious cases, including antibiotic-resistant bacteria such as MRSA. Alcohol-based hand rubs are supplementary and not replacements for washing with soap and water.

Protective Clothing

Duncan Private Hire provides suitable personal protective equipment (PPE):

- Disposable gloves and aprons for contact with bodily fluids or personal care tasks.
- Sterile gloves for clinical procedures, changed between each service user and never reused.
- Non-sterile gloves for non-clinical use.

The office is responsible for ensuring continuous supply of PPE.

Waste Management

- Clinical waste must be disposed of in sealed yellow bags, labelled with the service user's address.
- Non-clinical waste goes into standard black bags.
- Yellow bags should be sealed when three-quarters full and stored securely awaiting authorised collection.
- Staff should notify their line manager if supplies run low.

Spillages

All spillages of bodily fluids or waste must be treated as potentially infectious and cleaned immediately. Protective gloves and aprons must be worn during cleaning.

Reporting

Duncan Private Hire complies with RIDDOR requirements to report notifiable disease outbreaks to the Health and Safety Executive (HSE). Records of outbreaks must be maintained with details and submitted to the HSE by the Registered Manager.

Training

New staff will review this policy during induction. Existing staff may receive refresher training upon request.

Hand Washing Technique

Proper handwashing involves:

1. Wet hands, apply soap.
2. Rub palm to palm.
3. Rub palm over back of opposite hand, fingers interlaced.
4. Palm to palm with fingers interlaced.

5. Interlock fingers and rub.
6. Rotational rubbing of thumb clasped in palm.
7. Rotational rubbing of fingertips in palm.

Hands must be thoroughly dried with disposable towels to prevent chapping and contamination.

Vehicle Cleaning

- All passenger vehicles must be cleaned after each patient transfer, including all equipment and seating.
- A deep clean is conducted every 35 days to maintain hygiene standards.
- Monthly spot checks ensure ongoing vehicle cleanliness.

Infection Control Checklist (Sample)

Criteria	Yes	No	Comments
Vehicle interiors are clean, dust-free, and well-maintained.	<input type="checkbox"/>	<input type="checkbox"/>	
Floors and edges are visibly clean with no debris.	<input type="checkbox"/>	<input type="checkbox"/>	
Alcohol hand rub is available at point of care.	<input type="checkbox"/>	<input type="checkbox"/>	
Wet wipes available for visibly soiled hands.	<input type="checkbox"/>	<input type="checkbox"/>	
Linen changed after every patient.	<input type="checkbox"/>	<input type="checkbox"/>	

Duncan Private Hire remains dedicated to providing a safe, hygienic environment through stringent infection control practices.

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd

Duncan Private Hire
Information & IT Security Policy

Policy Overview

Duncan Private Hire is committed to protecting all forms of information—whether written, verbal, electronic, or printed—from accidental or unauthorized alteration, destruction, or disclosure throughout its entire lifecycle. This protection extends to the hardware and software used to process, store, and transmit such information, ensuring robust security measures are in place at all times.

All related policies and procedures must be documented, accessible to those responsible for their enforcement, and activities governed by these policies must also be recorded. Documentation—whether electronic or physical—will be retained for a minimum of six years following its creation or update. Regular reviews will ensure all policies remain current and appropriate, with review intervals set by each department within Duncan Private Hire.

Each department or entity within Duncan Private Hire may develop specific policies and procedures tailored to their operational needs, provided they align with this overarching policy. New systems must comply with these standards from implementation; existing systems will be updated to meet compliance as feasibly and promptly as possible.

Scope

This policy safeguards the confidentiality, integrity, and availability of all information assets across Duncan Private Hire. It applies to all employees, contractors, volunteers, and any personnel with access to Duncan Private Hire systems and data ("Involved Persons"). It covers all hardware, software, networks, and data ("Involved Systems") utilized within the organization.

The policy governs all protected health information (PHI) and other sensitive data types as defined by Duncan Private Hire's classification standards.

Risk Management

Periodic comprehensive risk assessments will be conducted to identify threats and vulnerabilities affecting Duncan Private Hire's information systems. These assessments will cover:

- Internal and external risks, including natural, human, electronic, and non-electronic threats.
- Existing vulnerabilities that may expose information assets.
- Evaluation of assets and technology supporting data collection, storage, and dissemination.

The combined analysis will estimate risks to the confidentiality, integrity, and availability of information. Each entity will determine the frequency of these assessments. Based on

findings, appropriate mitigation strategies will be implemented to minimize vulnerabilities and protect critical information assets.

Key Definitions

- **Affiliated Covered Entities:** Legally separate entities that operate collectively under a unified compliance framework.
- **Availability:** Authorized personnel can access information when needed.
- **Confidentiality:** Information is protected from unauthorized access or disclosure.
- **Integrity:** Information remains accurate and unaltered except through authorized means.
- **Involved Persons:** All workers within Duncan Private Hire, including employees, contractors, volunteers, and temporary staff.
- **Involved Systems:** All IT equipment, platforms, applications, and data used within Duncan Private Hire.
- **Protected Health Information (PHI):** Individually identifiable health information related to an individual's medical history, treatment, or payment for healthcare services.
- **Risk:** The likelihood of compromise to confidentiality, integrity, or availability of information assets.

Roles & Responsibilities

Information Security Officer (ISO):

- Develops, implements, and enforces security policies and controls in collaboration with management.
- Provides security support, advice, and education across the organization.
- Oversees security audits and reports regularly on security status.
- Advises on classification, protection, and handling of information assets.
- Leads ongoing staff education on information security best practices.

Information Owner:

- Typically a manager responsible for information creation or primary usage.
- Defines data retention schedules in consultation with legal advisors.
- Ensures controls to maintain confidentiality, integrity, and availability.
- Authorizes access and delegates custodianship.
- Communicates security requirements and reports incidents promptly.
- Supports staff training and awareness initiatives.
- Oversees system procurement and implementation approval processes.

Information Custodian:

- Manages day-to-day handling, processing, and storage of information.
- Implements physical and procedural safeguards as directed by the owner.
- Controls access and ensures authorized information release.
- Collaborates with the ISO and owners to maintain secure information environments.

Continued: Custodian Responsibilities

- Releasing information as authorised by the Information Owner and/or the Information Privacy/Security Officer, following procedures that ensure data privacy.
- Evaluating the cost-effectiveness of proposed or existing controls.

- Maintaining current and relevant information security policies, procedures, and standards, in coordination with the ISO.
- Promoting employee awareness and education through ISO-approved programs.
- Promptly reporting any loss, breach, or misuse of Duncan Private Hire information to the ISO.
- Identifying and responding to security incidents and initiating timely corrective actions.

User Management Responsibilities

User management includes any Duncan Private Hire personnel who oversee or supervise employees, contractors, or others with access to company systems.

Managers are responsible for:

- Reviewing and approving access requests for their staff.
- Initiating updates to user access rights when roles or job functions change.
- Promptly notifying relevant teams of employee terminations or transfers and enforcing local offboarding protocols.
- Ensuring revoked employees are denied physical access—this includes collecting access cards, keys, and updating lock combinations where applicable.
- Providing employees with appropriate training on the secure and efficient use of IT systems.
- Reporting any suspected or known misuse of information to the ISO.
- Initiating corrective actions upon identifying security issues.
- Following internal approval processes for the procurement or deployment of new software or systems.

User Responsibilities

A user is any individual who is authorised to read, input, or modify Duncan Private Hire information.

Users are expected to:

- Access data solely in alignment with their job responsibilities.
- Comply with all Information Security Policies, procedures, and specific controls established by the data owner or custodian.
- Keep personal authentication mechanisms (e.g., passwords, security tokens, PINs) secure and confidential.
- Immediately report any actual or suspected data breach, loss, or misuse to the ISO.
- Participate in corrective measures when security issues are identified.

Information Classification

Information classification helps ensure appropriate security controls are applied based on data sensitivity. All information must be protected for its integrity and accuracy, regardless of classification.

Classification is determined based on the most sensitive element of the data and applies across all formats (physical, digital, oral).

Classification Levels:

1. Protected Health Information (PHI):

Data that identifies or could reasonably identify an individual, relating to their physical or mental health, the provision of healthcare, or payment for healthcare services.

Examples include medical records, treatment history, insurance data, and associated demographics.

- **Risks:** Improper use or disclosure may breach UK data protection laws and result in legal, financial, and reputational damage.

2. Confidential Information:

Highly sensitive data not classified as PHI, including personnel records, financial data, access credentials, and proprietary research.

Access must be strictly controlled and limited to those with a legitimate business need.

- **Risks:** Unauthorized access may violate regulations or harm business interests.

3. Internal Information:

Data intended for use within Duncan Private Hire and its affiliates. While not highly sensitive, its distribution outside the organisation may still be inappropriate.

- **Examples:** Internal emails, operational policies, non-public reports.

4. Public Information:

Information explicitly approved for external release by an authorised party.

- **Examples:** Public websites, brochures, press releases.

Computer and Information Control

All systems, hardware, software, and data used or managed within Duncan Private Hire are considered company assets and must be protected against unauthorised access, tampering, or destruction.

Software Ownership & Usage

- All software developed or procured on behalf of Duncan Private Hire is company property and may not be copied or used outside the organisation unless expressly permitted by a license agreement.
- All installed software must comply with licensing terms and company acquisition policies.

Virus Protection

- Duncan Private Hire enforces a multi-layered antivirus strategy—encompassing desktops, servers, and network gateways—approved by the ISO and IT Services.
- Users are prohibited from disabling or interfering with antivirus protection tools.
- All electronic files must be scanned prior to execution or storage.

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 (ISO) 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. Acceptable methods include:

- Context-based access: Access control based on transaction context such as time of day, location of the user, and strength of user authentication.
- Role-based access: Access rights are assigned to predefined roles, with users assigned one or more roles based on their job function.
- User-based access: Access is granted based on the individual user’s identity.

Identification / Authentication

Unique user identification (user ID) and authentication are required for all systems that access PHI, Confidential, or Internal Information.

Authentication methods must include at least one of the following:

- Strictly controlled passwords (see **Attachment 1 – Password Control Standards**)
- Biometric identification
- Tokens with PIN

Additional authentication controls:

- Authentication controls (passwords, tokens, etc.) must be known only to the user.
- Systems must automatically time out and require re-authentication after 15 minutes of inactivity.
- Users must log off or lock their systems when unattended.

Data Integrity

Duncan Private Hire must corroborate that PHI, Confidential, and Internal Information has not been altered or destroyed in an unauthorised manner. Examples of controls that support data integrity include:

- Transaction audits
- Disk redundancy (RAID)
- ECC (Error Correcting Memory)
- Checksums
- Encryption of stored data
- Digital signatures

Transmission Security

To prevent unauthorised access during transmission of data over communication networks (including wireless):

- Implement integrity controls and encryption where appropriate.
- Transmission must follow ISO-approved protocols and encryption standards.

Remote Access

- Remote access is permitted only through Duncan Private Hire-approved devices and secure pathways.
- PHI, Confidential, and Internal Information stored or accessed remotely must maintain the same level of protection as internal systems.
- Unauthorised remote access methods are strictly prohibited.

Physical Access

Access to information processing facilities is restricted to authorized personnel only.

Required controls:

- Mainframe and File Server Areas: Must be access-controlled and environmentally protected.
- Workstations/PCs: Must prevent unauthorised viewing or access.
 - Position screens away from public view
 - Use secure workstation location criteria
 - Enable auto screen savers with passwords
- Facility Access Controls:
 - Contingency Operations: Facility access procedures during emergencies
 - Facility Security Plan: Safeguard facility and equipment from physical threats
 - Access Control and Validation: Validate facility access based on user roles
 - Maintenance Records: Document physical facility security changes

Emergency Access

Mechanisms must be in place to allow access to systems and applications during emergencies when assigned custodians are unavailable.

Procedures must document:

- Authorisation
- Implementation
- Revocation

Equipment and Media Controls

Policies must govern the secure handling, disposal, and movement of electronic media containing PHI and other sensitive information.

- Disposal/Reuse: Secure disposal of:
 - Paper
 - Magnetic Media (floppy disks, hard drives, zip disks)

- CD-ROMs
- Accountability: Maintain logs of media movement and custodianship
- Data Backup: Back up PHI prior to equipment movement

Media and Mobile Device Controls

- External media containing PHI/Confidential Information must be labeled and secured.
- Mobile devices must have:
 - Power-on passwords
 - Auto logoff/screen saver with password
 - Encrypted storage
- Devices must not be left unattended in unsecured areas.
- Breaches due to mishandling of mobile devices or media will result in personal accountability.

Data Transfer / Printing

- Mass Transfers: Requests involving PHI must be approved and include the minimum necessary data.
- Printing: PHI/Confidential data must be printed only when necessary and safeguarded.
- De-identification: Where possible, PHI should be de-identified for educational/research use.

Oral Communications

Staff must avoid discussing PHI or Confidential Information in public or semi-public areas. Use discretion when using cell phones or communicating near:

- Waiting areas
- Hallways
- Elevators
- Public transportation

Audit Controls

Mechanisms must be in place to log and review access to systems that use or store PHI. These audit records must be:

- Reviewed regularly
- Retained for six (6) years
- Used to track security incidents and unauthorized activity

Evaluation

Periodic evaluations must be conducted in response to environmental or operational changes to ensure ongoing protection of electronic PHI and alignment with current standards.

Contingency Plan

Each entity must prepare to recover from damage to IT systems or data loss.

Components include:

- Disaster Recovery Plan: Restore data after disasters
- Emergency Mode Operation Plan: Continue operations during adverse events
- Testing and Revision: Periodically test and revise contingency plans
- Applications and Data Criticality Analysis: Assess and document system/data importance

Compliance

This policy applies to all users of Duncan Private Hire information, including employees, contractors, volunteers, and affiliates. Violations may result in:

- Disciplinary actions (including termination)
- Loss of affiliation
- Legal consequences (for breaches of PHI or confidentiality)

Violations include but are not limited to:

- Unauthorised access or disclosure of PHI/Confidential Information
- Sharing or misusing passwords or user credentials
- Using or installing unauthorised software
- Tampering with or destroying information intentionally

Attachment 1 – Password Control Standards

Minimum password standards for access to PHI, Confidential, and Internal Information:

- Passwords must not be shared (except with designated security managers)
- Change frequency: 45–90 days based on data sensitivity
- Minimum length: 6 characters
- Passwords must not be auto-saved (except approved SSO)
- Avoid dictionary or guessable words (e.g., pets' names, birthdays)
- Use alphanumeric combinations

System-enforced standards must include:

- Encrypted password transmission
- Password input hidden (non-display fields)
- Lockout after 3 failed attempts in 15 minutes (30-minute lockout)
- Password history tracking to prevent reuse

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire Recruitment Process

At Duncan Private Hire, we are committed to a recruitment process that is clear, thorough, and fair. Our goal is to ensure:

- All candidates meet the high-performance standards expected at Duncan Private Hire.
- Recruits share our commitment to safeguarding, equality, and inclusion.
- We continue to deliver exceptional service and ensure a safe environment for children, young people, and vulnerable adults.
- Every applicant is treated with professionalism and respect throughout the recruitment journey.

Applying for a Role

We currently advertise and manage our vacancies through the **GOV.UK 'Find a Job'** service. This streamlined online platform offers a fast and user-friendly application process that ensures the best candidates have a positive experience from the outset.

By registering online, you can:

- Create a personal candidate profile.
- Set up tailored email alerts for future opportunities.
- Monitor your application progress in real-time.
- Update your profile and information at any time.
- Choose whether we retain or remove your details from our records.
- Receive timely updates at each stage of the process.

All candidates must complete and submit an online application form via the portal.

If you require an alternative format (e.g., large print or paper-based application), please contact us on **01225 790232** or email **info@duncanprivatehire.com**, quoting the vacancy reference number.

Shortlisting

Each application is carefully reviewed by our recruitment manager, who assesses candidates against the criteria outlined in the job advert.

Applicants who meet the requirements will be invited to an interview. All shortlisting decisions are communicated via email.

Please Note: Due to the nature of the role, we are unable to consider applicants with disabilities for driving positions, in compliance with legal and operational obligations.

Interview Preparation

Invitations to interview are sent via email. You'll usually be able to accept your allocated time directly through the online system.

To prepare for your interview:

- Ensure you provide accurate, complete, and concise information.
- Carefully review the job details and reflect on how your skills align.
- Be ready to answer common and role-specific questions.
- Demonstrate a positive attitude and clear motivation for joining Duncan Private Hire.
- Research our company values and understand the nature of the position.
- Use the online portal to confirm, reschedule, or cancel your interview if needed.

Commitment to Safeguarding

Duncan Private Hire is dedicated to safeguarding children, young people, and vulnerable adults. As such, our recruitment process includes:

- Safeguarding-related interview questions for all applicants.
- Enhanced questioning for roles with direct client contact.
- Thorough checks on employment gaps and previous experience.

Interview and Assessment

We conduct structured, competency-based interviews led by a panel of two or more managers. During your interview, you'll be asked to give examples that demonstrate your skills and experience. You'll also have the opportunity to ask questions and learn more about the role.

Additional assessments may be required as part of the selection process. If you have a disability and require adjustments, please let us know in advance. We are committed to making reasonable accommodations.

Right to Work and ID Verification

All offers of employment are subject to verifying your eligibility to work in the UK, as required by the Asylum and Immigration Act 2006.

You must bring original documents to your interview (no digital copies), as specified by the UK Home Office. These are necessary for both identity verification and, where applicable, DBS checks.

References

Once a conditional job offer is made, we will request references from:

- All employers or educational institutions over the past three years.
- A professional referee to cover any gaps in employment of six months or more.

Please note that employment is conditional upon receipt of satisfactory references.

DBS (Disclosure & Barring Service) Checks

For roles involving contact with children, young people, or vulnerable adults, candidates must complete an Enhanced DBS Check.

Other positions, particularly those involving access to secure sites or systems, may require a Standard DBS Check.

Qualifications Verification

If professional qualifications or memberships are required for the role, you will be asked to provide original certificates and membership documents at the interview. Please bring photocopies along with the originals.

Recruitment Agencies

Duncan Private Hire does not accept speculative CVs or unsolicited contact from recruitment agencies. Candidate information is not shared.

Identification Checklist – DBS & Right to Work

To complete your application, you must bring original documents and one photocopy of each from the categories below to your interview:

List 1 – One of the following:

- Valid Passport
- Biometric Residence Permit (UK)
- Full UK Birth/Adoption Certificate

List 2 – One of the following:

- Driving Licence (photo card and counterpart if applicable)
- HM Forces ID Card
- Valid UK Visa/Work Permit
- Firearms Licence

List 3 – One of the following (must show proof of address):

(Dated within the last 3 months):

- Utility Bill (excluding mobile phones)
- HMRC tax notification
- Child Benefit/Other Benefits Statement
- Job Centre Plus confirmation
- Bank/Building Society Statement (original, not printed online)

(Dated within the last 6–12 months):

- Mortgage Statement
- Council Tax Bill (current year)
- Financial Statement (e.g., pension, endowment, ISA)
- P45 / P60

Document Criteria Checklist

- ✓ One document shows your signature
- ✓ One document confirms your current address
- ✓ All documents are valid, original, and current
- ✓ No documents are internet printouts
- ✓ One document is provided from each list

If your current name differs from your identification documents, you must provide supporting evidence (e.g., Marriage Certificate, Deed Poll).

Failure to provide valid documentation may delay or prevent any offer of employment.

Declarations

Candidate Declaration (to be signed at interview)

I consent to Duncan Private Hire and its authorised third-party providers using my personal information to obtain references and complete a DBS check in line with current government security guidelines. I understand that references will be requested from all employers, education providers, or benefit offices within the last three years.

Signature: _____ **Date:** _____

Print Name: _____

Interviewer Declaration

I confirm I have seen and verified the original documents listed above and retained photocopies. The candidate signed the declaration in my presence. I understand no offer of

employment can be made without the correct documentation and that any false declarations may result in disciplinary action or prosecution.

Signature: _____ **Date:** _____

Print Name: _____

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd

Duncan Private Hire

Staff Communications Policy

1. Introduction

Effective communication is essential to the continued success of Duncan Private Hire. Clear, timely, and respectful communication ensures our staff are well-informed, confident in their roles, and able to deliver a high standard of service to our partners and customers.

This policy outlines the standards, responsibilities, and methods of communication that support our business goals and workplace culture. It ensures every team member understands their role in fostering a professional and collaborative environment.

2. Our Communication Vision

Our goal is to communicate with clarity, openness, and mutual respect. Whether speaking with colleagues, customers, or external partners, our communication should always be:

- Timely and relevant
- Clear and easy to understand
- Respectful and inclusive
- Constructive and solutions-focused

3. What We Mean by Communication

Communication at Duncan Private Hire goes beyond sharing information—it includes how we manage relationships, build trust, and foster inclusion. It's about tone, behaviour, and responsibility.

Effective communication involves both sending the right message and delivering it in the right way.

4. Communication Channels

We use a range of communication methods suited to different purposes, including:

- Verbal Communication – Face-to-face discussions, phone calls, briefings
- Written Communication – Emails, letters, reports, memos, meeting minutes
- Vertical Communication – Up and down the management structure
- Lateral Communication – Across departments and functions

5. Communication Standards

All communication at Duncan Private Hire must meet the following standards:

- **Open & Transparent**
Decisions and updates are shared where appropriate, with explanations for non-disclosure where necessary.
- **Accurate & Timely**
Information is relevant, factual, and delivered when needed.
- **Clear & Understandable**
Language is simple, jargon-free, and not open to misinterpretation.
- **Two-Way & Inclusive**
Communication flows in all directions, supporting dialogue, feedback, and collaboration.
- **Efficient & Purposeful**
Communication is delivered through the most suitable channel in a cost-effective and audience-appropriate way.

6. Roles & Responsibilities

All Staff

Every employee is expected to:

- Follow this Communications Policy and uphold professional standards.
- Use the appropriate communication channels in their role.
- Be proactive in addressing poor or unclear communication.
- Share relevant information promptly and appropriately.
- Respond constructively to feedback on communication style.

Line Managers

In addition to the above, managers are expected to:

- Facilitate effective two-way communication between their team and senior management.
- Provide timely and constructive feedback.
- Identify and address communication challenges within their teams.
- Promote a culture of openness, inclusion, and collaboration.
- Support staff development in communication skills.

Directors

Directors are responsible for:

- Leading by example and championing best practices in communication.
- Driving staff engagement across the organisation.
- Addressing communication breakdowns with urgency and professionalism.
- Ensuring communication processes support the company's vision and values.
- Reviewing and improving communication strategies regularly.

7. Good Communication in Practice

Team Meetings

- Scheduled regularly with full team attendance
- Inclusive agendas, open to staff input
- Forums for strategic updates, feedback, sharing best practice, and safety updates

One-to-One Meetings

- Held routinely between managers and their direct reports
- Used to review progress, support development, and address concerns

Open Door Policy

Managers should maintain an approachable and supportive presence. Duncan Private Hire encourages an "Open Door Policy," providing drivers and staff the opportunity to discuss concerns or suggestions informally or formally.

Feedback

Staff should always receive feedback on raised issues, suggestions, and business updates. Line managers play a key role in ensuring this feedback loop is maintained.

8. Use of Email & Internet

- Emails should be professional, concise, and only used when appropriate.
- Responses to emails and calls should be timely.
- Sensitive or complex matters may be better addressed in person or via a phone call.
- Company policies and procedures are accessible via our website:

 www.duncanselfdrive.com

9. Policy Review

This Communications Policy will be reviewed annually by Duncan's management team to ensure it remains effective and aligned with business needs.

By adhering to this policy, all staff help build a workplace where communication is a strength, not a barrier.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire

Menopause in the Workplace Policy

1. Purpose and Commitment

At Duncan Private Hire, we are committed to supporting the health, wellbeing, and dignity of all employees. This policy aims to foster a workplace culture that is open, respectful, and supportive of colleagues experiencing menopause or perimenopause.

We recognise that menopause is a natural stage of life, but it can present a range of physical and psychological symptoms that may impact an individual's wellbeing and performance at work. Our goal is to ensure employees feel supported and empowered to discuss their needs and to access appropriate adjustments when required.

2. Understanding Menopause

Menopause typically occurs when a person's menstrual periods cease permanently, often accompanied by a range of symptoms. It can affect individuals in different ways and may begin with perimenopause, the transitional phase leading up to menopause.

Common Physical Symptoms

- Hot flushes
- Insomnia or disturbed sleep
- Fatigue
- Headaches
- Skin irritation
- Urinary discomfort
- Difficulty concentrating

Common Psychological Symptoms

- Mood changes or irritability
- Anxiety and panic attacks
- Low confidence
- Depression
- Memory issues

Additionally, Hormone Replacement Therapy (HRT) and other prescribed treatments may cause side effects such as nausea, leg cramps, or headaches, which may also impact work.

3. Open Communication and Confidentiality

We encourage a workplace culture where employees feel safe and supported to talk openly about their health. If you are experiencing symptoms of menopause that are affecting your work, you are encouraged to speak confidentially with your line manager.

Alternatively, if you would prefer to speak with another member of staff, you are welcome to do so. Your wellbeing is our priority, and any discussions will be handled with sensitivity and discretion.

Managers may also initiate a conversation if they notice changes in performance or wellbeing and will do so with care and respect. These discussions aim to identify any reasonable adjustments that can improve comfort and productivity.

4. Workplace Adjustments and Support

Duncan Private Hire is committed to supporting employees through reasonable workplace adjustments, tailored to individual needs. Adjustments will be agreed in consultation with the employee and regularly reviewed to assess their effectiveness.

Examples of Reasonable Adjustments:

- Relocation of work area (e.g. closer to restrooms or windows, away from temperature extremes)
- Flexibility with workwear requirements
- Provision of fans or additional temperature control
- Adjusted task allocation based on time-of-day energy levels
- Additional rest breaks
- Flexible working hours or the option to work from home

All adjustments will be assessed in line with health and safety risk assessments and made in collaboration with the individual concerned.

5. Legal Considerations

Under the **Equality Act 2010**, an employee experiencing significant menopause-related symptoms may be protected if those symptoms qualify as a disability. In such cases, Duncan Private Hire will ensure that appropriate and lawful reasonable adjustments are made.

6. Training and Awareness

All managers will be provided with guidance and training to understand menopause and its workplace impact. Training will cover:

- How to have supportive conversations with employees
- Identifying appropriate adjustments
- Legal responsibilities under equality legislation

We aim to build awareness and understanding across all levels of the business to reduce stigma and improve support.

7. Workplace Behaviour and Conduct

All employees are expected to maintain a respectful, supportive, and inclusive work environment. Duncan Private Hire has a zero-tolerance approach to bullying or harassment in any form, including behaviour related to menopause.

Any employee who feels they have been treated unfairly or disrespectfully due to menopause-related matters is encouraged to report concerns to their line manager or Director. All complaints will be treated seriously and handled with strict confidentiality.

8. Policy Review

This policy will be reviewed annually by the management team to ensure it remains relevant, effective, and in line with evolving best practices and legal requirements.

By promoting an environment of understanding and support, Duncan Private Hire is committed to ensuring all employees can thrive throughout every stage of their working life.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Hire Ltd

Disciplinary Policy

1. Purpose

This policy outlines the procedures Duncan Hire Ltd will follow in managing employee conduct or performance issues. Our aim is to ensure matters are addressed consistently, fairly, and in accordance with best employment practices. It promotes corrective action and employee development while safeguarding company standards.

2. Scope

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

3. Guiding Principles

- **Fairness:** All disciplinary matters will be handled impartially, ensuring that every employee is treated equitably.
- **Consistency:** Disciplinary actions will be applied uniformly across the business to avoid bias or discrimination.
- **Transparency:** Employees will be made aware of relevant workplace policies, behavioural expectations, and the consequences of non-compliance.
- **Due Process:** Employees will be given a fair opportunity to respond to any concerns or allegations before action is taken.
- **Progressive Approach:** Whenever appropriate, we will adopt a step-by-step disciplinary process, escalating only when necessary.

4. Examples of Misconduct

Misconduct may include, but is not limited to:

- **Attendance & Timekeeping:** Frequent lateness or unauthorised absences.
- **Performance-Related Issues:** Failing to meet performance standards or job responsibilities.
- **Policy Violations:** Breaches of company procedures or standards.
- **Serious Misconduct:** Insubordination, harassment, theft, or other unacceptable behaviour.
- **Health & Safety Violations:** Actions that compromise safety for oneself or others.

5. Disciplinary Procedure

a. Informal Counselling

For minor issues, supervisors may conduct an informal discussion with the employee. The objective is to provide constructive feedback and support improvement without initiating formal action.

b. Verbal Warning

If concerns persist, a formal verbal warning may be issued. This will be documented and shared with the employee, outlining:

- The nature of the concern
- Expected improvements
- Timeline for review

c. Written Warning

In cases where there is no improvement or if the issue is more serious, a written warning may be issued. This document will include:

- Details of the misconduct
- Reference to prior warnings
- Required corrective action
- Potential next steps

Employees will be asked to acknowledge the written warning with their signature.

d. Suspension

For repeated offences or serious breaches, the company may impose a suspension without pay. The duration will depend on the severity of the issue. Suspension may also be used to allow for a formal investigation.

e. Termination of Employment

If an employee fails to improve despite prior disciplinary steps, or in cases of gross misconduct, termination may be necessary. All termination decisions will be made following a full review, in accordance with legal and procedural requirements.

6. Appeals Process

Employees have the right to appeal any formal disciplinary action. Appeals must be submitted in writing to the relevant manager or designated authority within **5 working days** of the decision.

The appeal will be reviewed by a manager not previously involved in the case. A final decision will be communicated promptly and in writing.

7. Confidentiality

All disciplinary procedures will be handled with the utmost confidentiality and professionalism. Information will only be shared with those directly involved in the process.

8. Policy Review

This policy will be reviewed annually by management to ensure ongoing relevance, fairness, and compliance with current employment law and best practice.

Signed: electronically signed

Peter Simpson

P Simpson

Director

Duncan Hire Ltd

Duncan Private Hire Illegal Drug & Alcohol Policy

Policy Statement

Duncan Private Hire is committed to maintaining a safe and healthy work environment for all employees, clients, and the public. This includes promoting an alcohol-free/illegal drug free workplace, particularly for employees who operate Home to School vehicles. This policy outlines the expectations, procedures, and consequences related to illegal drug/alcohol use among drivers.

Scope

This policy applies to all employees who operate company vehicles, including but not limited to drivers of minibuses, vans, cars, and other motorised vehicles.

Use of Drugs/Alcohol

It is an absolute rule that any driver does not consume any illegal drugs/alcohol during or in the period before any journey. Since blood alcohol/illegal drug 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.

Illegal Drug/Alcohol Testing

Duncan Private Hire reserves the right to conduct illegal drug/alcohol testing for employees involved in safety-sensitive positions, including Home to School transport. Testing may be conducted but not limited to the following situations:

Random Testing

Employees may be subject to unannounced illegal drug/alcohol testing on a random basis.

Post Accident Testing

Employees involved in a workplace accident that results in injury or significant property damage may be required to undergo illegal drug/alcohol testing.

Reasonable Suspicion Testing

If a manager has reasonable suspicion that an employee may be under the influence of alcohol, the employee may be required to undergo testing.

Consequences of Violation

Violation of this policy will result in disciplinary action, by immediate termination of employment. Employees found to be under the influence of illegal drugs/alcohol whilst on duty will have their employment terminated immediately.

Confidentiality

All information related to illegal drug and alcohol testing will be treated as confidential and will only be disclosed to those with a legitimate need to know.

Review and Revision

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws. It may be revised as and when needed without consultation/agreement.

Clark Ferguson
(original Signed)

C Ferguson
Manager
Duncan Hire Ltd

Read and signed By (Print Name):

Signature:

Date Signed:

Manager Initials:

Modern Slavery and Human Trafficking Statement
Duncan Hire Ltd

Financial Year 2024/2025

1. Organisational Overview

Duncan Hire Ltd, trading in conjunction with Duncan Self Drive & Duncan Private Hire, operates as a provider of self-drive hire and specialist passenger transport services. With a head office based in Swindon and an additional operational site in Melksham, the business delivers self drive vehicles and accessible transport services to both wheelchair users and able-bodied passengers on a consistent, year-round basis. Strategic leadership and operations are overseen by 2 Directors.

2. Our Understanding of Modern Slavery

Duncan Private Hire recognises modern slavery as encompassing a wide range of exploitative practices, including:

- Human trafficking
- Forced or coerced labour through physical or psychological threat
- The control or ownership of individuals through abuse or threats
- Treatment of individuals as commodities or property
- Physical confinement or restrictions on freedom of movement

3. Our Commitment

We are committed to upholding the principles of the Modern Slavery Act 2015 and maintaining transparent, ethical practices across all areas of our operations and supply chains. Our stance includes:

- A zero-tolerance approach to slavery and human trafficking
- Avoidance of, or withdrawal from, relationships with any organisation knowingly involved in such practices
- Ensuring that all labour involved in the delivery of our services is voluntarily provided and legally employed within the UK

- Exceeding statutory employment standards where possible, as part of our ethical obligations

4. Risk and Exposure

While our exposure to modern slavery is considered limited due to the nature of our services, we remain vigilant:

- Our key supply chains relate to service provision, where minimal external labour involvement occurs
- We assess and monitor these relationships to identify and mitigate any potential risks of unethical labour practices

5. Our Due Diligence Approach

To prevent modern slavery within our operations and supply chains, we have implemented the following measures:

- Conducting appropriate due diligence on suppliers and service partners
- Monitoring public enforcement reports and maintaining readiness to disengage from non-compliant partners
- Enabling confidential reporting via our Whistleblowing Policy, and taking all concerns seriously
- Taking action against any entity or individual associated with confirmed modern slavery involvement

6. Measuring Effectiveness

We assess our effectiveness through the following actions:

- Maintaining a centralised and up-to-date supplier database
- Monitoring whistleblowing reports and responding appropriately
- Taking corrective action promptly where necessary

7. Policy Framework

Our commitment is underpinned by a suite of internal policies, including:

- A Modern Slavery Prevention Policy
- A Whistleblowing Policy that encourages staff to report ethical concerns without fear of reprisal

8. Governance and Accountability

We have appointed a Compliance Manager responsible for overseeing our adherence to modern slavery legislation and ensuring internal policies remain robust and effective. The Compliance Manager conducts annual reviews and coordinates training for relevant staff on identifying and addressing modern slavery risks.

9. Statement Review and Approval

This statement has been prepared in accordance with Section 54(1) of the Modern Slavery Act 2015 and applies to Duncan Private Hire and associated operations for the financial year 2024/2025. It will be reviewed and updated annually.

Signed:

Peter Simpson

Position: Director

Date: 15 Apr 2026

Operating Instruction: Driver and Passenger Assistant Cooperation

Purpose:

To ensure safe, efficient, and professional home-to-school transport operations through effective teamwork between the Driver and Passenger Assistant (PA).

Instruction:

1. The Driver and Passenger Assistant must work closely together each day to provide a safe and supportive service for all passengers.
 - Communicate clearly about pick-up and drop-off schedules.
 - Support each other to maintain a calm and positive environment for passengers.
 - Share relevant information about passengers' needs or travel arrangements in a timely and professional manner.
2. Roles and Responsibilities:
 - The Driver is responsible for the safe operation of the vehicle at all times.
 - The Passenger Assistant is responsible for supervising and assisting passengers during journeys, including managing behaviour and addressing any passenger issues.
3. When Issues Arise:
 - If a problem occurs involving passengers or behaviour during transport, the Passenger Assistant should take the lead in resolving it.
 - The Driver must remain focused on driving safely and allow the Passenger Assistant to manage passenger-related issues.
 - The Driver should only intervene if a situation poses a direct safety risk to or prevents safe operation of the vehicle.
 - Both parties should report any incidents or concerns to the Transport Coordinator/Transport Manager or relevant supervisor as soon as practicable.
4. Professional Conduct:
 - Always maintain a respectful and cooperative working relationship.

- Discuss any disagreements privately and professionally after the journey, not in front of passengers.
- Remember that teamwork and clear boundaries between roles are key to delivering a high-quality and safe transport service.

Signed: electronically signed
Peter Simpson
P Simpson
Director
Duncan Hire Ltd