

### **INTERACTION and COMMUNICATION WITH CLIENT PERSONNEL**

Communication between Peake GB personnel working on a clients premises servicing washrooms etc., by whatever method should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites, social networking sites, online gaming and blogs. Client personnel are not friends – they must not be considered as such.

Peake GB personnel shall:

- Communicate with all client personnel in an appropriate and professional manner during site servicing activities
- Only make contact with client personnel for professional reasons
- Report to the primary client representative any indications (verbal, written or physical) that suggest member of the client's personnel is acting in an inappropriate way towards them
- Be mindful if they are alone in a room with any client personnel. Leave the door open if there is no need for confidentiality.
- Report and record any situation or behaviour which they feel, might compromise the client or their own professional standing

Peake GB personnel should not:

- Give their personal contact details to client personnel
- Make contact with client personnel for personal reasons
- Have images of client personnel stored on personal cameras or home computers
- Make images of client personnel available on the internet
- Have any secret social contact with client personnel

### **PHYSICAL CONTACT**

In the unlikely circumstance that there needs to be physical contact with client personnel, it is crucial that they only do so in ways appropriate to their professional role as an employee of Peake GB Ltd. Peake GB personnel shall use their professional judgement at all times about the appropriateness of any physical contact.

Peake GB personnel should:

- Be aware that even well intentioned physical contact may be misconstrued, an observer or by anyone to whom this action is described
- Consider alternatives, where it is anticipated that client personnel might misinterpret any such contact.
- Never touch client personnel in a way which may be considered indecent
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny

### **SEXUAL CONTACT WITH CLIENT PERSONNEL**

Any sexual behaviour by a Peake GB member of staff with or towards client personnel is inappropriate.

Peake GB personnel shall not:

- Pursue sexual relationships with client personnel
- Communicate client personnel in any manner which could be interpreted as sexually suggestive or provocative, i.e. social media, verbal comments, letters, notes, e-mail, phone calls, texts or physical contact

### **ONE to ONE SITUATIONS**

Peake GB personnel in one to one situations client personnel are more vulnerable to allegations. Peake GB personnel should recognise this possibility and plan and conduct such site servicing accordingly.

Peake GB personnel shall:

- Avoid meetings with client personnel in remote, secluded areas of the client premises
- Ensure there is visual access and/or an open door in one to one situations
- Avoid use of 'engaged' or equivalent signs wherever possible

*Martin Peake*

**Managing Director**

**December 2015**

## **Peake GB Ltd. - Disclosure and Barring Service - Policy Statement**

### **General principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Peake GB Ltd complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

### **Storage and access**

Certificate information shall be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

### **Handling**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Usage**

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

### **Disposal**

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

*Martin Peake* - Managing Director

**December 2015**