

Processes, Policies and Procedures Manual



Health and Safety Policy

Policy

In accordance with the Health & Safety at Work Act 1974 (“the Act”), Adaptive Sales Group (“the Company”) has the maintenance of Health & Safety at Work as a declared objective. This document details the Company’s Group Health & Safety Policy (“the Policy”).

To fulfil this objective, the management of the Company shall take all reasonable and practicable precautions to safeguard the Health, Safety & Welfare of employees, customers/learners and members of the general public who have access to or contact with premises or activities which are directly under the Company’s control. The Company shall comply with legal Health & Safety requirements as a minimum standard and approved Codes of Practice where applicable.

To comply with this Policy, the Company has established the following structure of accountability:

- Overall responsibility for Health & Safety matters rests with the Managing Director.
- All employees have a responsibility and statutory duty to take reasonable care for the Health & Safety of themselves, learners and others who may be affected by their acts or omissions and are also required to co-operate with the Company in enabling it to discharge its statutory duties under the Act.
- All managers are responsible for health & safety within their respective areas of the Company’s premises and, where their remit extends to oversight of offsite activities, the health & safety provisions obtaining in respect of those activities.
- A trained Health & Safety Consultant shall provide advice where required.
- In furtherance of the Policy, the Company undertakes, in so far as is reasonably practical, to:
 - Provide and maintain premises, equipment and systems of work that are safe and without risks to health.
 - Make arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Identify and take steps to eliminate any risks or hazards which might compromise health or safety and, in particular, hazards that could be a risk to vulnerable learners with physical, hearing, sight or other impairments.
- Provide such information, instruction, training and supervision as is necessary to ensure the Health & Safety at Work of employees, associates, customers/learners and visitors.

- Maintain any place of work or learning under the Company's control in a condition that is safe and without risks to health and to provide and maintain means of access and egress that are safe and without such risks to vulnerable people.
- Provide and maintain a working/learning environment for employees, learners, associates, customers and visitors that is safe and without risks to health and is adequate as regards facilities and arrangements for their welfare.
- Provide such protective equipment as is necessary for the Health & Safety at Work of employees and customers/learners.
- Encourage employees and learners to set high standards of Health & Safety by personal example.
- Ensure compliance with the Policy by regular review of practice using risk assessment checklists.
- Regularly update employees and associates on the Policy through regular team meetings.
- Monitor the effectiveness of Health & Safety provisions, in consultation with employees and associates at the aforesaid meetings
- Keep the Policy under regular review ensuring, that it continues to meet current legislative requirements, and duly publish any amendments that may result on a timely basis.
- All necessary measures shall be taken to ensure observance of the Policy compliance with which the Company considers essential for the well being of its employees, associates, customers/learners and visitors, plus the efficiency of its operation.
- The Policy requires employees, associates and (where applicable) customers and learners to:
 - Take reasonable care for themselves and other persons (for example colleagues, associates, customers/learners, visitors to offices or training venues) who may be affected by their work or study, particularly bearing in mind those who may be more vulnerable (for example, wheelchair users or those with sight impairment).
 - Cooperate towards providing a safe place and system of work. This may include wearing protective clothing, taking part in fire drills, or using safety equipment.
 - Neither interfere with nor misuse anything provided in the interests of Health & Safety at Work.
 - Bring to the attention of management any faulty or defective equipment or plant etc, or any health or potential safety hazard of which they are aware.
 - All accidents, injuries and dangerous occurrences (this includes "near misses") must be reported and recorded using forms included in the Accident Book.
 - The H&S Coordinator must be informed as soon as possible via employee, learner, tutor, coach or team manager, so that he/she may initiate investigation and notify the appropriate authorities. Incidents covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) must be reported to the RIDDOR Incident Contact Centre (ICC).
 - Acknowledge and accept that failure to comply with the Policy may be considered a matter grave enough to warrant formal disciplinary action

Implementation of the Policy: Head Office and Training Venues

- Employees, advisers, or delivery team delivering programmes must be fully conversant with the provisions of the Head Office and Training Venue risk assessments and are responsible

for properly briefing participants in these provisions. The process for these risk assessments is described at Annex A.

- Learners shall receive embedded learning about the principles and practices of good Health & Safety observance during their programme. They shall also be encouraged to report on any Health & Safety issues that might arise.
- The team responsible for each programme shall have specific responsibility for monitoring these procedures and ensuring they are observed.

Implementation of the Policy: A Conducive Environment

- Employees, associates and learners are encouraged to suggest ways of improving Health & Safety and of raising awareness within the Company.
- Health & Safety shall be included on the agenda of team meetings
- Risk Assessments shall be carried out whenever new premises are being
- considered and reviewed at least annually and whenever changes are made to
- the working/learning environment (for example, reconfiguration of offices).

Final Statement

The Managing Director has overall responsibility for Health & Safety and for ensuring that appropriate planning and provision of resources are available to meet requirements.

All employees, associates and learners share in creating and operating in a safe environment.

Janet Eferé

Managing Director

January 2020

Environmental Policy

It is the policy of Adaptive Sales Group to maintain an environmental system designed to meet the requirements of being a good global citizen.

It is the policy of Adaptive Sales Group to:

- Strive to satisfy the requirements of all of our customers, stakeholders and interested parties whenever possible, meeting and exceeding their expectations;
- Comply with all compliance obligations, codes of practice and all other requirements applicable to our activities including the nature, scale and environmental impacts of its activities, products and services; the reduction of hazards, prevention of injury, ill health, protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, the protection of biodiversity and ecosystems and any other specific commitments which are relevant to the context of the organisation;
- Provide all the resources of equipment, trained and competent staff and any other requirements to enable these objectives to be met;
- Ensure that all employees are made aware of their individual obligations in respect of this environmental policy;
- Maintain a management system that will achieve these objectives and seek continual improvement in the effectiveness and performance of our management system based on “risk”.

This environmental policy provides a framework for setting, monitoring, reviewing and achieving our objectives, programmes and targets.

All employees will receive training to ensure awareness and understanding of the environment and its impact of the products or service in which we provide.

To ensure the company maintains its awareness for continuous improvement, the environmental system is regularly reviewed by “Senior Management” to ensure it remains appropriate and suitable to our business.

We have identified the following Environmental Objectives

- We will endeavour to deliver our services to specification, on time and to the price agreed. This will be measured by looking at client feedback, project statistics and contract values.
- We will comply with all compliance obligations, codes of practice and all other requirements applicable to our activities including the nature, scale and environmental impacts of its activities, products and services.
- We will ensure that the reduction of hazards, prevention of injury, ill health, protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, the protection of biodiversity and ecosystems are measured and acted upon accordingly. Looking into resource paper use and modes of transport and levels

of recycling – cloud based aiming towards paperless. This is measured by monitoring and measuring Adaptive Sales Group's impact to the environment which includes key performance these have been identified as monitoring use of resources such as paper and printer ink, ensuring as many staff as possible use, public transport to travel to and from the office as possible and drive to turn Adaptive Sales Group into a paperless organization.

Managing Director

January 2020

Bullying and Harassment Policy

The Adaptive Sales Group Bullying and Harassment Policy and Procedure

Everyone has the right to be treated with dignity and respect. Bullying and harassment of any kind are in no one's interest, and Adaptive Sales Group will not tolerate any form of harassment of or by its staff.

All members of staff have a responsibility for ensuring that the Adaptive Sales Group working environment is one where people's dignity is respected and for discouraging harassment by making it clear that they do not find such behaviour acceptable. Managers have a particular duty to ensure that harassment does not occur and that their own standards of conduct and those of their colleagues do not give offence.

Those who are alleged to have harassed others may be subject to the appropriate disciplinary procedures.

We want to have a supportive work and learning environment, and to avoid having anyone feeling bullied or harassed.

This Policy document consists of:

Part 1 - Descriptions of what constitutes bullying and harassment.

Part 2 - What to do if you encounter bullying or harassment at Adaptive Sales Group.

1.1. What are Bullying and Harassment?

These terms are viewed as interchangeable by most people and many definitions include bullying as a form of harassment.

Harassment, in general terms, is unwanted conduct affecting the dignity of men and women in the workplace. It may be related to age, sex, race, disability, religion, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient. Harassment can also have a specific meaning under certain laws (for instance if harassment is related to sex, race or disability, it may be unlawful discrimination). The law also gives protection against harassment relating to religion or belief and sexual orientation.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Bullying or harassment may be by an individual against an individual (perhaps by someone in a position of authority such as a manager) or involve groups of people. It may be obvious or it may be insidious. Whatever form it takes, it is unwarranted and unwelcome to the individual.

1.2. Examples of Bullying/Harassment include:

- Spreading malicious rumours, or insulting someone by word or behaviour (particularly on the grounds of race, sex, disability, sexual orientation, religion or any other potential discriminatory factors)
- Copying documents that are critical about someone to others who do not need to know.
- Ridiculing or demeaning someone – picking on them or setting them up to fail.
- Exclusion or victimisation.
- Unfair treatment.
- Overbearing supervision or the misuse of power or position.
- Unwelcome sexual advances – touching, standing too close, the display of offensive materials
- Making threats or comments about job security without foundation.
- Deliberately undermining a competent worker by overloading and constant criticism.
- Preventing individuals progressing by intentionally blocking promotion or training opportunities.

Bullying and harassment are not necessarily face to face. They may also occur in written communication, by e-mail, or phone.

Bullying and harassment make someone feel anxious and humiliated.

1.3 Cyber Bullying – Cyberbullying is the use of technology such as mobile phones and the internet to bully other people. Coping with cyberbullying can be difficult because it can happen at any time of the day. Advice on how to cope with cyberbullying in a nonwork-related environment can be found on

- www.nhs.uk/Livewell/Bullying/Pages/Cyberbullying.aspx
- www.bullying.co.uk/cyberbullying/

2.1. What can you do if you feel bullied or harassed by others at Adaptive Sales Group?

Bullying and harassment are often clear-cut, but sometimes people are unsure whether or not the way they are being treated is acceptable. If this applies to you, there are a number of things to consider, including:

- Has there been a change of management or organisational style to which you just need time to adjust. Perhaps you have a new manager or work requirements?
- Can you talk over the worries with your new team leader or other colleagues, who you may find share the same concerns?
- Can you agree changes to workload or ways of working that will make it easier for you to cope?

If you are sure that you are being bullied or harassed, there are a number of options to consider, and these are set out below. You should take any action you decide upon as quickly as possible.

2.2. Bullying and Harassment: Complaints Procedure

Any allegations of bullying, discrimination or other harassment will be dealt with promptly, sensitively, and confidentially under the grievance procedure, and all appropriate steps taken to protect individuals against victimisation or retaliation for making or being involved in a complaint.

Depending on the complainant's perception of the seriousness of the issue, there are two routes which may be pursued, informal or formal. Informal complaints may be escalated to formal if not resolved or the situation deteriorates.

Informal Procedure

Possible informal approaches are set out below:

- Talk to the person responsible, explaining your issue with their behaviour, and ask for it to stop. Be firm, not aggressive. Be positive and calm. Stick to the facts. Describe what happened. In some cases, it may be a misunderstanding or unintentional – even if the behaviour was intentional a clear indication that it is objectionable may prove sufficient to stop it.
- Write to the person concerned specifying the complaint, keeping a copy of the letter in case further action is needed
- If you find it difficult to tell the person yourself, you may wish to get someone else – a colleague or confidential counsellor – to act on your behalf. Say that, if they persist, you will make a formal complaint.
- Alert your Manager to your concern, if necessary asking them to intercede on your behalf.

Formal Procedure

Should the informal options fail or be inappropriate to the situation, a formal complaint may be raised using the grievance procedure as follows:

- Initially, in writing, to your Team Manager. The complaint should contain the following information: the nature and details of the incident, where and when it took place, and the names of any witnesses.
- In dealing with such a complaint, the manager concerned should proceed as follows:
 - Advise the Managing Director and Operations Director of the allegations.
 - Respond sensitively and promptly to the complainant.

- Preserve confidentiality where it is requested and it is appropriate to the situation.
- Speak to the person against whom the complaint has been made, giving them a copy of this Policy and advise them on the process which will be followed – or may be followed in the event of reoccurrence of the behaviour which led to the complaint.
- Give them the opportunity to respond.
- If, after separate discussions with the parties involved, the situation cannot be satisfactorily resolved, a mediating meeting with parties, the Managing Director should be held. Where appropriate/available witnesses should be consulted.
- If, at this stage, the complaint is upheld, the person against whom the complaint is made will be asked to ensure there is no reoccurrence and, if warranted, the

Adaptive Sales Group Disciplinary Procedure will be invoked, with its accompanying rights of appeal. If the complaint is dismissed, and the complainant may appeal the decision in writing to the Managing Director. The appeal will be responded to within 15 working days.

Janet Eferé

Managing Director

January 2020

Complaints Policy

Adaptive Sales Group is dedicated to providing its services to the highest standards. An important part of the processes that ensure these standards is a fair and open method of dealing with complaints, as efficiently and as rapidly as possible, to the entire satisfaction of all concerned. The objective of this procedure is to inform our customers of the most effective way of making a complaint or paying a compliment.

Making a Complaint

There are three stages:

Stage 1: Initial Complaint/Comment or Compliment

- Contact Course Tutor, where applicable. If not, go straight to Stage 2.
- Explain your concern in as much detail as possible.
- If the concern cannot be cleared there and then, ensure that the staff member provides a mutually acceptable time to report back with a solution.

Stage 2: Unresolved Concern

- If you are not satisfied with the solution provided, or the staff member has not reported back at the agreed time: contact the Managing Director, by phone, e-mail or letter, providing full details of your concern and the outcome at Stage 1. Tel: 07748 994 334, janet@adaptivesales.co.uk, Adaptive Sales Group, 13 Hawthorne Avenue, Cheshunt, Hertfordshire, EN7 5BY

Expect to be contacted within three working days.

Stage 3: Escalation

If you are still unsatisfied; the formal reply, received in Stage 2, will provide details of whether and how you can further escalate your complaint to an awarding organisation or other external body.

Equality, Diversity and Inclusion Policy

Aims

Adaptive Sales Group (Adaptive Sales Group) recognises the importance of the Equality Act 2010 and the related Public sector Equality Duty. Adaptive Sales Group aims to create a culture that supports equality, diversity and inclusion. Adaptive Sales Group recognises that we must all contribute towards the culture through our actions and words. We aim to address any barriers to equality in our systems, policies and decision making as well as in our behaviour and ways of working. Our aim is that our workforce will be truly representative of all sections of society and that each employee feels respected and able to give of their best.

Policy Statement

Adaptive Sales Group recognises that discrimination and victimisation is unacceptable and that it is in the interests of Adaptive Sales Group and its employees to utilise the skills of the total workforce. It is the Adaptive Sales Group aim to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender identity/gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation.

This policy applies to all staff, delivery team, customers, learners and candidates of Adaptive Sales Group, whether full-time, part-time, permanent, temporary or casual, on fixed-term contracts or part-time or job applicants.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our staff will not discriminate directly or indirectly, or harass customers, learners, candidates because of age, disability, gender identity/gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation when providing goods and services.

Commitment

Adaptive Sales Group is committed to fostering a positive environment in which the individual differences and contributions of all our staff are recognised and valued. Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying, harassment or victimisation will be tolerated. Training, development and progression opportunities are available to all staff. Breaches of our equality policy will be regarded as misconduct and will be dealt with under the Adaptive Sales Group grievance and disciplinary procedures.

Responsibilities of Management

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the senior management. Each team manager will ensure that:

- All their staff are aware of the policy and the arrangements, and the reasons for the policy.
- Grievances concerning discrimination are dealt with properly, fairly and as quickly as possible.
- Ensure that slavery and human trafficking are not taking place anywhere in our supply chain.
- Make reasonable adjustment to maintain the services of an employee who becomes disabled.
- Give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.
- Review employment practices and procedures when necessary to ensure fairness and to take into account any changes in the law.
- Ensure proper records are kept.

Responsibilities of Staff

Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- Comply with the policy and arrangements.
- Not discriminate in their day-to-day activities or induce others to do so.
- Not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- Inform their manager if they become aware of any discriminatory practice or victimisation.

Responsibilities to Customers

- Ensure equal access to services for all
- Identify and remove any barriers people face accessing services
- Ensure our communications and documents are available in a number of alternative and easy to understand formats which reflect the diverse needs of our customers
- Develop ongoing and open communications with our customers to ensure that our services are known, understood and accessible to all our customers, regardless of their communication needs

- Revise working practices and service delivery to ensure equal access for all including actively consulting and engaging with staff, customers, partners and other stakeholders to help shape policies and improve the service we offer, including identifying and working with underrepresented groups whose needs may not be met
- Ensure a robust equality framework and action plans are in place
- Collect customer profile information and identify new opportunities to improve data collection and use to inform how we provide our services
- Review Equality Impact Assessments for all policies and services
- Comply with current and future legislation

Adaptive Sales Group Group policies will be reviewed regularly and any discriminatory elements removed.

Third Parties

Third-party harassment occurs when an employee is harassed, or the harassment is related to a protected characteristic, by third parties such as customers, learners or candidates. Adaptive Sales Group will not tolerate such actions against its staff, and the employee concerned should inform their team manager at once that this has occurred. Adaptive Sales Group will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

Equality Training

A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programmes. Training will be provided for managers on this policy and associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.

Monitoring

Checks, regular monitoring and analysis of records provide the basis for appropriate action to eliminate any unlawful direct and indirect discrimination and to promote equality of opportunities and to ensure that the Equality, Diversity and Inclusion policy is adhered to. Actions include: observation visits to training sessions, Equality, Diversity and Inclusion surveys carried out within the organisation which include monitoring and evaluating achievement rates of candidates in relation to their gender, race, and disability status so that action could be taken if appropriate.

Any comments or complaints arising under the Adaptive Sales Group Equality, Diversity and Inclusion policy and its application should be addressed in writing to the Adaptive Sales Group Managing Director, Janet Eferé. Any complaint will be dealt with within five working days of receipt.

Review

This policy is reviewed annually by the Managing Director

Janet Eferé

Managing Director

January 2020

Expenses Policy

This policy applies to all employees/associates of Adaptive Sales Group Limited as of the 1 August 2019.

It is a framework that covers how an employee can claim and be reimbursed for reasonable and authorised expenses incurred whilst undertaking business for our company.

Please also refer to the Staff Handbook.

As an employee/associate we expect you to:

- Behave honestly, responsibly and within the guidelines of this policy (ie to keep costs low)
- Submit expenses within 30 days of incurring them and to provide sufficient description for the company to understand why you've made the purchase
- Keep all receipts. VAT receipts must be provided (credit card slips are insufficient).

As a manager, we expect you to:

- Check that purchases comply with this policy
- Approve them within one week of receipt of the claim
- Ensure the employee/associate claims within 30 days

Failure to comply with the terms of this policy may delay reimbursement or lead to the rejection of claims. Persistent or deliberate non-compliance may result in disciplinary action.

Adaptive Sales Group has a zero tolerance approach to bribery – in compliance with relevant anti-bribery

laws in all the regions in which we operate. Offering or accepting a bribe or behaving corruptly in anticipation of a bribe or advantage is not acceptable.

Allowable expenses

Travel-related expenses

Adaptive Sales Group encourages sustainable transport use. Wherever possible use public transport over

personal cars and taxis. Book trips in advance to get better prices and get pre-approval for any out-of-the ordinary travel. If you travel from home to another location without including your nominated place of employment in the journey you can claim the full mileage minus the distance of your normal commute to your place of employment. If

you travel fewer miles than your normal commute you will not be able to claim mileage.

The following travel-related expenses can be claimed:

- Mobile phones and internet connectivity: use free wi-fi whenever possible.

Reasonable internet connectivity charges can be added to a hotel bill unless already part of the negotiated rate.

- Air, rail and road travel: All bookings should be made in economy/standard class (unless you can beat the price by booking early, in which case higher classes are acceptable) and utilising booking websites such as <http://www.splitmyfare.co.uk/> or similar to minimise cost.

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- Mileage: You can claim up to 40p. You must also be insured for using your car for business purposes.

- Taxis: Always try to use public transport instead of taxis (unless you are in an unsafe area). Always keep a receipt that includes the date. You can't claim trips from work to home.

- Parking

Accommodation

- Approval must be gained from your line manager before booking a hotel. The employee/associate will be responsible for booking the hotel and responsible for all hotel cancellations.
- Per diems: These cover costs for meals when away from the office on business.
- Duty of care: This is important! Always inform others of your overnight location so we can comply with lone worker requirements. Tell your line manager (or a team-member if they are unavailable).

Food and Entertainment

- You can claim for meals while staying overnight, or if travelling for business before 7am or after 8pm and are away from the office for more than half a day.

The maximum spend limits are:

- o Hotel breakfast - £15
- o Other breakfast - £10
- o Lunch - £15
- o Dinner (including 1 alcoholic drink) - up to £30.

Client meals/entertainment costs may be higher. All entertainment claims must include a business reason and the name and company of all attendees – even

those who work for Adaptive Sales Group. This ensures we comply with the UK Bribery Act and also

helps us apply the right VAT treatment.

Other Expenses

- Postage for business purposes
- Annual eye-testing fees

Exceptions

The following travel-related expenses will not be reimbursed.

- Credit, debit and charge card fees (including interest, annual costs)
- Laundry service/dry-cleaning (unless trip is longer than 4 nights)
- Mini-bar contents
- Movies/videos, newspapers
- Parking fines
- The loss/theft of goods
- Childcare or petcare
- Any personal elements
- Damage to personal vehicles
- Spa and health/fitness clubs
- Clothes
- Flowers, sweets, confectionary
- Tourist attractions*

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- Bar bills*.

*You can claim these if the event is part of client entertainment. There might be other things that we will not pay for, so make sure you explain the business reason for each claim.

Human Rights & Modern Slavery Policy

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Adaptive Sales Group we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our business and subcontractors

Adaptive Sales Group is engaged in training and provision of Information Advice and Guidance. Our business is in the United Kingdom.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our subcontractor selection and on-boarding procedure includes due diligence of the subcontractor's reputation, respect for the law, compliance with health, safety and environmental standards and, where appropriate, references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our subcontractors, but if we were, then we would act immediately against the subcontractor and report it to the authorities.

Adaptive Sales Group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and subcontractors to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our subcontractors.

We require all subcontractors to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

Adaptive Sales Group has raised awareness of modern slavery issues by sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Privacy Policy

Thank you for visiting Adaptive Sales Group website or using our services. Our Privacy, Security & Cookie Policy explains the what, how and why of the information we collect when you visit our website or you use our Services.

It also explains the specific ways we use and disclose that information. We want to make it clear, we take your privacy extremely seriously and we never sell your data for sales or marketing use. Our aim is to be as clear and open as possible about what we do and why. We are committed to ensuring that your privacy is protected at all times. Should we ask you to provide certain information by which you can be identified when using this website or our services, then you can be assured that it will only be used in accordance with this privacy statement.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you comply with any changes.

Who we are?

Adaptive Sales Group LIMITED (Trading as Adaptive Sales Group), Company No. **11899713**

Headquarters address: Adaptive Sales Group, 13 Hawthorne Avenue, Cheshunt, Hertfordshire, EN7 5BY

Our Data Protection Officer: Janet Eferé

Contact email address: janet@adaptivesales.co.uk

We aim to respect your privacy and are committed to protecting the confidentiality of your personal information. Our aim is to be as clear and open as possible about what we do and why, which is why we go in-depth below to explain what we collect, send and use your data for and what your rights are.

General Basics

1) Definitions

These definitions should help you understand this policy and add clarity to any terms/labels we use.

When we say “we,” “us,” “our” and “Adaptive Sales Group” we are referring to Adaptive Sales Group LIMITED.

We are incorporated in England and Wales, providing education and training services (commonly referred to as training solution services) that you may use to develop your career prospects.

When we say “Customer,” we are referring to the person or entity that is registered with us to use our Services.

When we say “Services” we are referring to our training, assessment or coaching services

When we say “you,” we are referring either to a Customer or to some other person who visits our Website or contacts us directly.

“Personal Information” means any information that identifies or can be used to identify you, directly or indirectly, including, but not limited to, first and last name, email address, occupation or other demographic information.

This Privacy, Security & Cookie policy applies to this specific website, as well as any other sites or mobile applications owned or operated by us. The website, and any web pages, interactive features, applications, widgets, blogs, social networks, social network “tabs” or other online, mobile or wireless offerings that post a link to this Privacy, Security & Cookie policy, whether accessed via computer, mobile device or other technology, manner or means.

You’ll see we are committed to protecting any data that we collect concerning you. By using our Services and website you agree to the use of the data that we collect in accordance with this Privacy, Security & Cookie policy.

2) Scope & Changes

This Privacy Policy is effective with respect to any data that we have collected, or collect, about and/or from you, according to our terms of service.

We may change this Privacy, Security & Cookie policy at any time and it will supersede this version of our Policy.

Security & Cookie Policy or other notice on the website

We will take reasonable steps to draw your attention to any changes; however, we encourage you to review this Privacy, Security & Cookie Policy often to stay informed of changes that may affect you, as your continued use of the website signifies your continuing consent to be bound by this Privacy, Security & Cookie Policy. Our electronically or otherwise properly stored copies of this Privacy, Security & Cookie Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy, Security & Cookie Policy which were in effect on each respective date you visited the Website.

Adaptive Sales Group Privacy, Security & Cookie Policy

PRIVACY

Adaptive Sales Group is committed to respecting your privacy and the privacy of every person signing up to our database. The information we collect about you will be used to fulfil the required services and enable us to improve how, as an organisation, we deal with you.

Should you have a question about the data we store, our contact details are:

Janet Eferé
Adaptive Sales Group
13 Hawthorne Avenue

Cheshunt

Hertfordshire

janet@adaptivesales.co.uk

07748 994 334

The information that we collect about you will only be used lawfully (in accordance with the Data Protection Act 1998 and the General Data Protection Regulation 2018). All data is retained exclusively within the United Kingdom, or transferred only to 'third countries' where 'adequacy of protection' or specific certification as defined by The GDPR has been confirmed.

This information will not be disclosed to anyone outside Adaptive Sales Group or its associated companies, partners, and other companies with which Adaptive Sales Group has arranged services for your benefit.

We expect the information we hold to be accurate and up to date. You have the right as an individual to find out what information we hold about you and make changes if necessary; you also have the right, assuming we are not obligated by law to refuse, to ask us to stop using the information. To have your information removed or rectified, please contact janet@adaptivesales.co.uk

The type of information that we will collect on you, and you voluntarily provide to us on our website includes:

- Your name
- Address
- Telephone number(s)
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this information to include your address, purchases, services used, and subscriptions, records of conversations and agreements and payment transactions.

You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you as a service user in an efficient and effective manner.

The legal basis for processing your data is based on your specific consent, performance of a contract, compliance with a legal obligation or our legitimate interest that we will have stated at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so. Unless we are precluded from doing so by law, you have the right to remove your consent at any time via the unsubscribe link included on all emails we send, or by contacting us and requesting that processing of your details be restricted or deleted.

Unless otherwise required by law, your data will be stored for a period of 2 years after our last contact with you, at which point it will be deleted.

PROTECTION OF PERSONAL INFORMATION

Adaptive Sales Group takes precautions, including administrative, technical, and physical measures, to safeguard your Data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

Adaptive Sales Group uses industry-standard efforts to safeguard the confidentiality of Data, including encryption, firewalls and SSL (Secure Sockets Layer). We have implemented reasonable administrative, technical, and physical security controls to protect against the loss, misuse, or alteration of your Data.

COOKIES

This site uses cookies – these are small text files that are placed on your device to help this website to provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies](#) website which offers guidance for all modern browsers.

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This website sets “first party” cookies through its use of Google Analytics. We use Google Analytics to provide us with non-personal site analytics, which in turn help us improve this website. Google Analytics tracking uses cookies in order to provide meaningful reports about web site visitors’ but they do not collect personal data about you. Google Analytics sets or updates cookies only to collect data required for the reports. Additionally, Google Analytics only uses first-party cookies. This means that all cookies set by Google Analytics cannot be altered or retrieved by any

service on any domain other than tadpoletraining.com. Further detailed information on Google Analytics cookies can be [found here](#).

If you have a concern about how we handle your data, or you would like to lodge a complaint, you may do so by contacting [The Information Commissioners Office](#).

Data Protection Officer: Janet Eferé

Adaptive Sales Group

13 Hawthorne Avenue

Cheshunt

Hertfordshire

Tel: 07748 994 334

E-mail: janet@adaptivesales.co.uk

Sustainability Policy

Introduction

Adaptive Sales Group acknowledges and takes responsibility for the environmental impact of its activities. The company is committed to mitigating the impact of its operations on the natural environment.

The company will comply with all relevant environmental and sustainability legislation. It will work to increase the awareness of environmental responsibility amongst its staff and learners in delivery of all our training programmes.

Our business and subcontractors

We expect our subcontractors to similarly uphold sustainability practices.

Specifically we will:

- Ensure best practice in sustainability and overall economic performance are taken into account when considering the evolution of our activities
- Promote, monitor and improve environmental performance, developing and working towards specific targets
- Maintain a standing agenda item of sustainability on relevant meetings
- Encourage 'reuse, recycle, recover' among staff and visitors
- Seek to reduce the consumption of energy and use green energy providers only
- Monitor and reduce emissions from transport and encourage employees to use public transport, walk or share resources where possible
- Use homeworking/hybrid working as a way of reducing transport emissions
- Undertaking sustainable procurement of goods and services and avoiding the purchase of harmful or hazardous substances

Additional Information

- As part of our commitment to sustainability, the Managing Director recently completed a CMI Level 5 qualification in Sustainable Leadership

Review

This policy is reviewed annually by the Managing Director

Janet Eferé

Managing Director

January 2024

Code of Conduct

The purpose of the code of conduct: Our Code of Conduct is a way to help all employees understand the culture and rules within Tadpole Training so that they can work productively and harmoniously to achieve our goals.

Dress code: We are a professional training organisation so professional business attire is required in all customer facing roles, including face to face and on visual media such as zoom, Teams or other video conferencing platforms. When staff are not visible to customers then they may use their discretion. Clothing should be appropriate for the role and must be well maintained so that it does not result in a health and safety breach. In case of doubt, employees should liaise with their line manager for clarification.

Technology use and security in the workplace: Employees may have access to company phones, computers and other technology. These are strictly for work purposes and may not be used for any personal reasons whatsoever. Personal devices may be used and carried at work, but may not be used during normal working hours, except in the case of emergencies.

Relationships between employees: We believe that employees should be allowed to have personal relationships with one another, as long as it does not adversely affect their roles. If this occurs then it will be dealt with on an individual basis by a senior member of the management team and may, in extreme cases merit disciplinary action if it cannot be resolved.

Expectations of company culture and behaviour in the workplace: we expect all employees to work their contracted hours, take breaks and holidays as approved and give reasonable notice for any changes. Our culture is one of positivity and we want people to enjoy working here, so we encourage open and honest, supportive and positive communication. We will not tolerate bullying in any form.

Harassment and discrimination: We have a separate policy for this, but we believe all employees are entitled to a safe and supportive work environment and should not be discriminated against for any reason whatsoever.

Disciplinary actions: This is dealt with in detail in a separate policy, but we will, if necessary use a range of disciplinary methods, leading up to and including dismissal for breach of either this code or any of our specific policies