

Drugs & Alcohol Policy

1. Pure Pledge Fundraising recognises that alcohol and drug abuse related problems are an area of health and social concern. The Company also recognises that alcohol and drug abuse problems can have a detrimental effect on work performance and behaviour.
2. It is therefore Pure Pledge Fundraising policy that a contractor/employee may not bring to or consume alcohol or any unlawful drugs in the designated place of work/fundraising during work time or during a period prior to work where the effects may carry over to the workplace. This includes business functions where the employee is representing the Company. Special rules may apply in relation to alcohol, where the Company sponsors an event for staff e.g. the Christmas party. In these circumstances any variation to the no-alcohol policy will be communicated in advance of the event.
3. Pure Pledge Fundraising recognises that a member of staff with alcohol or drug dependency problems needs help and support from his / her employer. However the Company also understands that it has a responsibility to all its contractor/employee and other stakeholders to ensure that any risks related to this are minimised.
4. Accordingly, Pure Pledge Fundraising policy involves two approaches
 - Providing reasonable assistance to the contractor/employee with an alcohol or drug abuse problem who is willing to co-operate in treatment for that problem.
 - Disciplinary rules, enforced through disciplinary procedures, where use of alcohol or drugs (other than on prescription) affects performance or behaviour at work, and where either (1) an alcohol or drug dependency problem is not recognised or (2) where treatment is not possible or has not succeeded.
5. The Company has not the internal resources to provide or arrange treatment or other forms of specialist assistance. Such services are provided by GPs, hospitals and other agencies. Through this policy the Company will seek both to support a contractor/employee during such specialist help, and as far as possible, to protect his/her employment/contractual obligations.

Assistance for a Member of Staff

6. The Company will, where possible, provide the following assistance to a contractor/employee:
 - Support during a period of treatment. This may include a period of sick leave or approved other leave, continuation in post or transfer to other work, depending upon what is appropriate in terms of the staff member's condition and needs of the Company.
 - The opportunity to remain or return to work following the completion of a course of treatment, as far as is practicable, in either the employee's own post or, where practicable, an alternative post.
7. The Company's assistance will depend upon the following conditions being met:
 - The Occupational Health Service (or where appropriate the individual's GP or other appropriate professional) diagnoses an alcohol or drug dependency related problem.
 - The contractor recognises that he/she is suffering from an alcohol or drug dependency problem and is prepared to co-operate fully in referral and treatment from appropriate sources.
8. Pure Pledge Fundraising and its employees/contractors must recognise the following limits to the assistance the Company can provide:
 - Where a contractor/employee fails to co-operate in referral or treatment

arrangements, no special assistance will be given and any failure in work performance and behaviour will be dealt with through the Disciplinary Procedure.

- If the process of referral and treatment is completed but is not successful, and failure in work performance or behaviour occurs, these will be dealt with through the Disciplinary Procedure.
- A member of staff's continuation in his/her post or an alternative post during or after treatment will depend upon the needs of the Company at that time.

Where Disciplinary Action Will Apply

9. In line with the Company's disciplinary rules, the following will be regarded as serious misconduct:
 - a) Attending work and/or carrying out duties under the influence of alcohol or drugs.
 - b) Consumption of alcohol or drugs whilst on duty (other than where prescribed or approval has been given).
10. Breach of these rules will normally result in summary dismissal or termination of contract, and only in exceptional cases will either notice or the reduced disciplinary action of a final written warning be applied.

Where a breach of these rules occurs, but it is established that an alcohol or drug dependency related problem exists, and the member of staff is willing to co-operate in referral to an appropriate service and subsequent treatment, the Company will suspend application of the Disciplinary Procedure and provide assistance as described above. Staff who do not comply with the treatment suggested or continue to abuse alcohol or drugs will be subjected to the application of the Disciplinary Policy

Mobile Phone, Social Media and Travel to work Policy

Personal Mobile Phone Usage

The use of mobile phones for personal calls while at work requires the removal of charity uniform and to stand well away from the charity setup. This ensures any personal conversations that take place do not bring the charity or the company into disrepute.

Travelling to and from place of work and Breaks

If you are found to be wearing charity uniform or ID when not canvassing at the designated venue - *this includes travelling to work by car, train, bus etc and any break taken whilst canvassing* - it will result in a formal warning and depending on the circumstances may result in termination of contract that Pure Pledge Fundraising has with that individual(s).

Social Media

The use of social media platforms which brings either the charity, the company or a member of staff into disrepute will result in remedial action. Any branding, either Pure Pledge Fundraising or the charity is their property and not to be used on social media without explicit permission. Any attempt to intimidate, harass or victimise any person or persons will result in termination of any contract's Pure Pledge Fundraising has with the offender.

Lone Working Policy

Our policy is to ensure that there are adequate systems in place for the health, safety and welfare of all staff and contractors.

This policy applies to all staff and contractors who may find themselves working alone at any time whilst undertaking duties for Pure Pledge Fundraising.

22% of the UK working population are lone workers. A lone worker is simply someone who works by themselves without close or direct supervision. This includes:

1. Full-time, part-time and self-employed staff members
2. Those that work from home (an ever-increasing percent of the population since 2020's COVID pandemic)
3. Those that work with the public (yes, someone surrounded by people could be a lone worker)
4. Those that work at the same location as their team, but too far away to be closely supervised, such as someone canvassing door to door, in different streets to their team or working at a private site location on their own

The following principles underpin this policy:

- No staff member or contractor should be in a situation where they feel at risk
- Everyone is responsible for avoiding and managing any risks that arise from lone working. This is essential as the Lone Working Policy clearly cannot envisage every situation, and hence staff members and contractors are expected to demonstrate common sense and to also take responsibility for their own actions and safety.
- We will involve staff and contractors in identifying risks that arise from lone working and consider ways to manage them
- Lone working risks should be identified and eliminated where possible and where this is not possible should be limited and managed
- Staff and contractors will be provided with support and guidance to assist them in staying safe
- Where appropriate, specific situations will be assessed for risk such as door-to-door canvassing
- Precautions should take into account both normal working conditions and foreseeable emergency situations
- All incidents arising from lone working must be reported directly to your team leader or if required escalate immediately to the company director.
- A failure to follow agreed safety procedures increases risk and is a decision taken by individuals for which they are personally accountable.
- Any failure to follow agreed procedures may be dealt with as a disciplinary offence for staff and contractors

As a member of staff or contractor you must report any concerns, lone working incidents or near misses to your team manager or company director.

- The Director will keep records of all lone working incidents reported to them.
- The Director is responsible for completing an incident log and will identify and implement learning to mitigate against future risk.

Lone Working Risk

Pure Pledge Fundraising has identified the following general risk areas that may arise from lone working

- Door-to-Door Canvassing
- Working alone in an office out of hours
- Meetings in empty/unfamiliar venues – such as coffee shops
- Travel – car and public transport
- Overnight stays
- Working an event alone

Assessing Risk

Safe working arrangements are based on the following process:

- An assessment of the likeliness and seriousness of the risk
- The limiting of the risk
- Control or management of the risk
- Each office location will have a procedure/guidance notes for staff wishing to work alone out of hours.
- Staff working from home should consider the risks of any meeting arranged in their own home when alone and ensure appropriate steps are taken to minimise risks
- Staff and contractors must assess the risks of where they are working/canvassing. Particular caution should be taken when streetlight is limited or the location is not public.

Responsibilities

Whatever your role, wherever you work and whoever you work with, you are responsible for ensuring that you are working in a safe environment and that you safeguard your own and others' personal safety.

Senior Leadership Team responsibilities:

- Ensuring that there are arrangements for identifying, evaluating and managing risk associated with lone working
- Providing resources for putting policy into practice
- Ensuring there are arrangements for monitoring incidents linked to lone working and that the effectiveness of this policy is regularly reviewed
- Share risk-assessments with the lone worker
- Having up-to-date contact details of your staff and contractors
- Reporting lone working incidents or near misses
- Complete the Incident Log on behalf of your staff member or contractor if they are unable to report the incident themselves

Staff and Contractor responsibilities:

Avoiding lone working where possible

- Identifying risks that may arise from lone working
- Taking everyday precautions to ensure their own safety
- Follow Pure Pledge Fundraising Ltd policies and procedures

- Reporting risks to your team manager or company director
- Keeping your team manager or company director updated with your whereabouts at all times
- Reporting lone working incidents or near misses to your line manager or company director.

Location of the Lone Worker

- Contractors should always make their location known to their team manager or company director.
- If a lone worker has to change location for whatever reason then they must inform their team leader or company director immediately, failure to do so can result in disciplinary action
- Tablet to be kept on at all times when on-field as they are traceable via GPS

Monitoring and Review

- The ongoing implementation of the Lone Working Policy will be monitored through feedback from staff and contractors to the company director.
- Any member of staff or contractor with a concern regarding these issues should ensure that they discuss this in the first instance with their line manager or campaign manager
- This policy will be reviewed annually unless there is a requirement to update sooner.

Modern-Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Pure Pledge Fundraising Ltd has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Pure Pledge Fundraising has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Pure Pledge Fundraising has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager OR the company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains. If you are unsure about whether a particular act, the

treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Anti-Fraud Policy

Introduction

This document sets out the policy and procedures of Pure Pledge Fundraising Ltd against fraud and other forms of dishonesty.

It applies to Directors, staff and contractors. Anybody associated with Pure Pledge Fundraising Ltd who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

Statement of intent

Pure Pledge Fundraising Ltd will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

All Directors, staff and contractors of Pure Pledge Fundraising Ltd have a responsibility for putting these principles into practice and for reporting any breaches they discover.

Definitions

a) Fraud: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either; a member of the public,

someone who works or is a volunteer for Pure Pledge Fundraising Ltd. The criminal act is the attempt to deceive and attempted fraud is therefore treated as seriously as accomplished fraud.

b) **Theft:** Dishonestly acquiring, using or disposing of physical or intellectual evidence, belonging to Pure Pledge Fundraising Ltd or to individual members of the organisation.

c) **Misuse of equipment:** Deliberately misusing materials or equipment belonging to Pure Pledge Fundraising Ltd for financial or material benefit.

d) **Abuse of position:** Exploiting a position of trust within the organisation for financial or material benefit.

Culture

Pure Pledge Fundraising Ltd fosters honesty and integrity in its entire staff. Directors, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the company or charity.

As part of this, Pure Pledge Fundraising Ltd will provide clear routes by which concerns may be raised by Directors, staff and contractors. Details of this can be found in the Pure Pledge Fundraising Ltd Staff/contractors Handbook.

Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice

Responsibilities

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

The Director

Overall responsibility for managing the risk of fraud has been delegated to the Director.

Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
 - reporting fraud risk issues
 - reporting significant incidents of fraud or attempted fraud to the Board of Director Directors;
- Liaising with the Charity's appointed Auditors.
- Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate anti-fraud training is made available to Directors, staff and volunteers as required; and
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

Senior Management Team

The Senior Management Team is responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud as far as possible;
- Assessing the types of risk involved in the operations for which they are responsible;
- Reviewing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their systems continue to operate effectively;
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

Staff

Every member of staff is responsible for:

- Acting with propriety in the use of company and charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Contractors

Every contractor is responsible for:

- Acting with propriety in the use of the company and charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Safeguarding and Vulnerable Persons Policy

We believe that:

- Nobody who is involved in our work should ever experience abuse, harm, neglect or exploitation.
- We all have a responsibility to promote the welfare of all of our staff and contractors, to keep them safe and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which our people not only feel safe, but also able to speak up, if they have any concerns.

Safeguarding Policy Applicability

This safeguarding policy applies to anyone working on our behalf, including contractors.

Partner organisations will be required to have their own safeguarding procedures that must, as a minimum, meet the standards outlined below, and include any additional legal or regulatory requirements specific to their work. These may, but are not limited to:

- Other UK regulators, if applicable, such as Ofsted or CQC.
- Other authorities, such as the DfES or NHS.

There may be other requirements or frameworks for those working overseas.

- Charity Commission guidance - working overseas.
- The International Child Safeguarding Standards.
- Keeping children safe online assessment tool.

Safeguarding should be appropriately reflected in other relevant policies and procedures.

Types of Abuse

Abuse can take many forms, such as physical, psychological or emotional, financial, sexual or institutional abuse, including neglect and exploitation.

Reporting Safeguarding Concerns

If a crime is in progress, or an individual in immediate danger, call the police, as you would in any other circumstances.

For contractors, make your concerns known to your line manager. If you feel unable to do so, speak to the Director

The directors are mindful of their reporting obligations to the Charity in respect of Serious Incident Reporting and, if applicable, other charities or regulator. They are aware of the Government guidance on handling safeguarding allegations.

Company Safeguarding Responsibilities

- Responsibilities should be made clear and individuals provided with any necessary training and resources to enable them to carry out their role.
- The company is aware of and will comply with the Charity Commission guidance on safeguarding and protecting people.

- The director has been given responsibility for the oversight of all aspects of safety, including whistleblowing and H&SW. This will include:
- Creating a culture of respect, in which everyone feel safe and able to speak up.
- To ensure this and related policies are being reviewed annually.
- Providing oversight of any lapses in safeguarding.
- And ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Leading the organisation in way that makes everyone feels safe and able to speak up.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and contractors.
- Planning site bookings to consider potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all staff and contractors require DBS clearance and safeguarding training are identified.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Ensuring that safeguarding requirements (e.g. DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, directors, staff, contractors and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.
- Making staff, contractors and others aware of:
- Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
- The signs of potential abuse and how to report these.

Everyone

To be aware of our procedures, undertake any necessary training, be aware of the risks and signs of potential abuse and, if you have concerns, to report these immediately (see above).

Safeguarding And Fundraising

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children.
- Staff and contractors are made aware of the Institute of Fundraising guidance on keeping fundraising safe and the NCVO Guidance on vulnerable people and fundraising.
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.
- We do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.
- We are sensitive to any particular need that a donor may have.

Charity Commission - Online Safeguarding Procedures

We will identify and manage online risks by ensuring:

- Contractors, staff and directors understand how to keep themselves safe online. You could use high privacy settings and password access to meetings to support this
- The online services you provide are suitable for your users. For example, use age restrictions and offer password protection to help keep people safe
- The services we use and/or provide are safe and in line with our code of conduct.
- Protect people's personal data and follow [GDPR legislation](#).
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns. Concerns may be reported using this policy, or direct to a social media provider using their reporting process. If you are unsure, you can contact one of [these organisations](#), who will help you.

Policy on Employing Ex Offenders

- As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Pure Pledge Fundraising Ltd complies fully with the code of practice and undertakes to treat all applicants for positions fairly.
- Pure Pledge Fundraising Ltd undertakes not to discriminate unfairly against any subject of a criminal record check based on a conviction or other information revealed.
- Pure Pledge Fundraising Ltd can only ask an individual to provide details of convictions and cautions that Pure Pledge Fundraising Ltd are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- Pure Pledge Fundraising Ltd can only ask an individual about convictions and cautions that are not protected.
- Pure Pledge Fundraising Ltd is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.
- Pure Pledge Fundraising Ltd has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.
- Pure Pledge Fundraising Ltd actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- Pure Pledge Fundraising Ltd select all candidates for interview based on their skills, qualifications and experience.
- An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
- Pure Pledge Fundraising Ltd ensures that all those in Pure Pledge Fundraising Ltd who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
- Pure Pledge Fundraising Ltd also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, Pure Pledge Fundraising Ltd ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- Pure Pledge Fundraising Ltd makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.



- Pure Pledge Fundraising Ltd undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

DBS Check Requirement

Overview

Due to the nature of work being carried out by an individual on behalf of Pure Pledge Fundraising and their clients a basic disclosure is required to ensure that no risk is posed to Pure Pledge Fundraising, their clients, store managers and staff and the general public in which they are interacting with.

A basic disclosure certificate shows any 'unspent' criminal convictions you may have in the UK. Unspent means you need to declare them. You can use this certificate to show to prospective employers or other people that need to know this information.

Under the Rehabilitation of Offenders Act 1974, some criminal convictions can be treated as 'spent' – meaning they're not relevant to basic disclosure – after a certain length of time. This is because a basic disclosure only shows any unspent convictions you may have.

You can apply for a basic disclosure yourself for any reason, for example:

- a job application
- voluntary work
- an airport security pass

Information displayed on the certificate - Your basic disclosure certificate will show:

- the date it was issued
- your name
- your address
- your date of birth
- any unspent convictions

You should enter your name on the form exactly as you want it to appear on the certificate, including any middle names. Disclosure Scotland can't change this later as part of the application.

Basic disclosure time period

Your basic disclosure shows your conviction record at a point in time, so there is no set time that it lasts for. If you already have one and apply for a new role, it is up to the new person or organisation, whether they'll accept your existing basic disclosure certificate or ask you to get a new one.

Cost - The cost of a basic disclosure is £18. You'll need to pay when you apply using a credit or debit card. Pure Pledge Fundraising can make the application on your behalf but there will be an administration fee to pay for this.

How long does it take and what next?

90% of basic disclosure applications are completed within 14 calendar days (not including postage time). You're likely to receive your basic disclosure certificate within this time, provided there are no mistakes or requests for further information. Pure Pledge Fundraising require this back within 28 days of your start date, and if there are any issues within the basic disclosure your contract may be terminated. The disclosure may also be passed on to the charity that you will be working on behalf of, if you have any issues with this then you must raise this with your operation manager before commencing canvassing for Pure Pledge Fundraising.

APPLY ONLINE - <https://www.gov.uk/request-copy-criminal-record>

After you've applied you'll be able to track the progress of your application.

Whistleblowing Policy

(Making a Disclosure in the Public Interest)

Introduction

Pure Pledge Fundraising is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Scope of Policy

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

Protection - this policy is designed to offer protection to those employees of Pure Pledge Fundraising who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose

not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality – Pure Pledge Fundraising will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations - this policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations - If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Director unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to the Director for referral.
- In the case of a complaint, which is any way connected with but not against the Director, the Director will nominate a Senior Manager or external party to act as the alternative investigating officer.
- Complaints against the Director should be passed to the Chairman who will nominate an appropriate internal / external investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Director. The Director has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach the below individual who have been designated and trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

George Purser and Brad Gillham – Company Directors

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address marked “confidential”.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed e.g. the individual's legal representative.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with Director if appropriate
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Director as appropriate.
- The Director will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Director, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Pure Pledge Fundraising recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body (e.g. the Health



and Safety Executive). A full list of prescribed people and bodies can be found on the Government Website (www.gov.uk).

All of the above policies will be reviewed annually by the Director or an appointed person by the Director, these policies were last updated on 24th Jun 2025.

I confirm that I have read, understood and agree to comply with all policies laid out by Pure Pledge Fundraising Ltd, and understand that a breach of these policies may result in termination of contract.

Full name of employee/contractor (Block Capitals)

Signed by employee/contractor

Date