



A SUMMARY OF CDC HUMAN RESOURCES POLICIES

- 1 RECRUITMENT**
- 2 REMUNERATION**
- 3 EMPLOYMENT PERFORMANCE & DEVELOPMENT**
- 4 EQUALITY AT WORK**
- 5 WHISTLEBLOWING**

A SUMMARY OF HUMAN RESOURCES POLICIES

1 RECRUITMENT

It is CDC's policy to recruit the most suitable person for each vacancy, regardless of sex, race, religion or belief, age or perceived age, sexual orientation or disability. Wherever possible, existing employees will be invited to apply for promotion opportunities when a suitable vacancy arises. Staff concerned with recruitment must ensure that they comply fully with the organisation's equal opportunities policy at every stage of the recruitment process.

Job description / Person specification

The Line Manager and HR Adviser should use the Job Description / Person specification Template to develop the job criteria and agree salary, grade and bonus information.

Applications

All job applications will be acknowledged within two weeks of receipt.

External applicants who are invited to an interview will be sent a map showing the location of the interview and an outline of the form of the interview, and appropriate personnel (receptionist and all those who will be attending the interview) must be informed that they are expected.

In accordance with the organisation's equal opportunities policy, reasonable attempts will be made to accommodate the particular needs of any person who has notified the organisation that he or she has a disability within the meaning of the Disability Discrimination Act 1995 at all stages of the recruitment process.

Interviews

Where appropriate, skills tests will form part of the interview. However, psychometric testing will only be used if the test has been validated in relation to the job and is administered and validated by a suitably trained person.

It is normally expected that between six and eight candidates will have first interviews, following which potential candidates on the short list will be invited back for re-interview by the Line Manager and Departmental Head or, where appropriate, member(s) of the Senior Management team.

All interviewers should complete an Interview Feedback form which should be returned to HR.

Applicants who are not shortlisted will be informed of this fact as soon as possible. This should be done by the Line Manager or by HR Adviser.

A SUMMARY OF HUMAN RESOURCES POLICIES

2 REMUNERATION

Salary Policy

It is the objective of the Company's remuneration structure to establish competitive levels of salary which reflect market practice across all functions and levels, and to achieve this the company participates regularly in externally-run surveys of competitive market practice covering salaries and employee benefits.

Salaries are reviewed annually with increases approved by the Remuneration Committee taking effect from 1 January. There is no contractual entitlement to a pay increase. The Salary Review is driven by market information. There is likely therefore to be differentiation in the level of adjustments.

Employees who join the company after 1 October in any year will not be eligible for a salary review on 1 January.

HR Committee

The HR Committee is made up of the full membership of the Management Committee together with the HR Adviser. The role of the Committee will be to:

- Consider annual salary recommendations;
- Consider recommendations for promotions;
- Evaluate jobs
- Agree bonuses paid to employees under the Short Term Incentive Plan
- Review documentation relating to HR salary policies, including the Incentive Plan Schemes.

Job Evaluation

All jobs are related to one of eight broad grades. New positions (or where there is significant change in any existing position) are slotted into a band following discussion by the HR Committee.

Promotion to a job with more seniority may receive a Promotional Adjustment to reflect the increased responsibilities of a particular role. It is also possible in certain circumstances to receive an adjustment where the role has grown. Recommendations for promotion should be put forward for consideration by the HR Committee using the Internal Promotion Recommendation form.

Incentive Schemes

All permanent members of staff will be entitled to participate in the Company's incentive plans applicable from time to time. Details of the current plans are as set out in the plan rules. Salary for bonus purposes will be the basic salary. The schemes are operated at CDC's absolute discretion and so participation in the schemes gives rise to no guarantee or legitimate expectation of any entitlement. CDC reserves the right, in its absolute discretion, to vary the terms, and/or the level of bonus payable, under any bonus schemes from time to time in force. Employees will not be able to participate in the schemes if they are no longer employed by CDC or if they are working out a period of notice on the date that bonus payments are made.

A SUMMARY OF HUMAN RESOURCES POLICIES

3 EMPLOYMENT PERFORMANCE AND DEVELOPMENT

Annual Performance Review

Annual reviews seek to achieve three main objectives –

- to set realistic performance standards and targets in relation to departmental and corporate plans;
- to stimulate coaching and counselling of staff;
- to identify individual training and development needs.

Reviews should complement, not replace, the regular dialogue on performance targets, achievements and training and development needs. With effective communication, there should be no surprises. All staff should be formally reviewed annually, with quarterly, less formal, reviews also taking place.

Training and development

The Company seeks to create an environment in which employees can contribute to their maximum ability, to give scope for initiative by allocating authority with responsibility, and to encourage the taking of decisions at the lowest appropriate level. Employees also have a particular responsibility to develop themselves, to extend their knowledge, and to do whatever they can to realise their full potential.

Managers have a responsibility to guide employees on self development and in particular are required to:

- give regular advice and guidance and to use the annual performance review interview to enable employees to realise their full potential and to achieve maximum effectiveness
 - encourage employees to pursue developmental opportunities
 - recommend skill training and personal development courses as appropriate
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A SUMMARY OF HUMAN RESOURCES POLICIES

4 EQUALITY AT WORK

Equal opportunities

CDC is committed to providing equal opportunities in employment. This means that all job applicants and employees of CDC will receive equal treatment regardless of race, colour, ethnic or national origins, disability, gender (including pregnancy), marital status or sexual orientation.

It is unlawful to discriminate against individuals either directly or indirectly in respect of their race, gender, marital status or on grounds of their disability. The relevant statutes amended, as appropriate, are the Race Relations Act 1976, the Sex Discrimination Act 1975 and the Disability Discrimination Act 2004.

Codes of Practice relating to race and sex discrimination have been produced by the Commission for Racial Equality and the Equal Opportunities Commission and have been used as the basis for this policy. There is also a Code on the elimination of discrimination in the field of employment against disabled persons, which is reflected in this policy. The Company is committed to implementing these codes.

Recruitment

CDC will take reasonable steps to ensure that applications for employment are encouraged without regard to gender (including pregnancy), race, colour, ethnic or national origin, disability, marital status or sexual orientation and will ensure that there are equal opportunities at all stages of the recruitment process.

Promotion

Promotion within the Company is based on merit and without regard to race, colour, ethnic or national origins, disability, gender (including pregnancy), marital status or sexual orientation.

Disciplinary and grievance procedures

The policy applies to all employees of CDC. Acts of discrimination on grounds of race, colour, ethnic or national origins, disability, gender (including pregnancy), marital status or sexual orientation by any employee, or a failure by any employee to comply with CDC's Equal Opportunity Policy will result in disciplinary action.

When any employee has a grievance as a result of alleged discrimination on grounds of race, colour, ethnic or national origins, disability, gender (including pregnancy), marital status or sexual orientation, CDC will treat this seriously and take appropriate action.

All dealings

CDC will deal with all persons with the same attention, courtesy and consideration regardless of race, colour, ethnic or national origins, gender (including pregnancy), disability or sexual orientation.

Discrimination and harassment

A SUMMARY OF HUMAN RESOURCES POLICIES

Discrimination at work on the grounds of gender, disability, colour, race, nationality and ethnic or national origin is unlawful, and will be treated as a serious disciplinary matter. Similarly, sexual or racial harassment or harassment on grounds of disability will be treated as a serious disciplinary matter.

Dignity at work - non harassment policy

CDC supports the rights of all people to seek, obtain and hold employment without harassment.

It is CDC's policy to make every effort to provide a working environment free from harassment and intimidation (whether sexual, racial or otherwise). CDC will not permit or condone harassment towards employees (including temporary employees), contractors working in CDC's offices, clients, suppliers or indeed any persons visiting CDC's offices.

All employees of CDC have a personal responsibility to behave in a manner which is not, nor is likely to be perceived as, offensive to others.

The aim of this non-harassment policy ("the Policy") is to draw attention to, and seek to prevent all types of behaviour which amount to harassment and which are therefore unacceptable. Any person acting in breach of the Policy may be liable to disciplinary action.

Definition

"Harassment" in the context of the Policy, means misconduct of a physical, verbal or non-verbal nature when:

- it is unsolicited and unwelcome and/or
- submission to such conduct is implicitly or explicitly a term or condition of an individual's continued employment and/or
- submission to such conduct is implicitly or explicitly a term or condition for decisions which could affect promotion, salary or any other job condition and/or
- such behaviour creates an intimidating, hostile or offensive work environment for one or more individuals

The following are examples of behaviour that are likely to be inappropriate and unacceptable. These examples do not form an exhaustive list:

- physical conduct - unwanted physical conduct, including unnecessary touching, patting or pinching, assault, coercing sexual activity, physical threats and insulting or abusive behaviour or gestures
 - verbal conduct - unwelcome advances, propositions or pressure for sexual activity, offensive flirtations, lewd comments or abusive language which denigrates or ridicules, insults which include but are not limited to gender or race-related or which relate to sexual orientation (including racist or sexist name-calling) and offensive comments about dress, appearance or physique, and the writing and/or sending of written materials, including e-mails, of an offensive nature
 - non-verbal conduct - the display of pornographic or sexually suggestive pictures, offensive objects or written materials, the display of sexually or racially offensive written or visual material, including graffiti, the organising of kiss-o-grams or strip-o-
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A SUMMARY OF HUMAN RESOURCES POLICIES

grams, hostility to employees on the grounds of their race or gender or disability or sexual orientation or other unacceptable non-verbal conduct which denigrates a person.

Harassment may constitute discrimination under the Sex Discrimination Act 1975 and the Race Relations Act 1976 and, accordingly, may be unlawful. The harasser may be held personally liable for such conduct. In addition, harassment may constitute a criminal offence, rendering the harasser liable to criminal prosecution.

Procedure

In recognition of the sensitivity of this subject, the following procedure has been established to facilitate the resolution of harassment complaints. Both the complainant and the alleged harasser have the right to be accompanied at any stage in this procedure by another employee.

Issues relating to harassment can always be referred by any employee to his or her Line Manager. However, it is recognised that not everyone may wish to discuss a matter relating to harassment directly with their Line Manager.

If any employee feels that he or she has been subjected to harassment he or she should not hesitate at any time to discuss this, in full confidence, with HR Adviser.

Wherever reasonably possible, an employee who believes that he or she has been the subject of harassment should tell the person responsible that he or she finds their behaviour offensive and ask them to stop.

It is recommended that the employee who is the subject of the harassment keep personal notes of all events from the first instance.

If the harassment continues, or a single incident is sufficiently serious, or the employee is unable to confront the person carrying out the harassment, then the employee should report the incident(s) either to their Line Manager or to HR Adviser.

Under normal circumstances, CDC would encourage such a complaint to be made at the earliest possible opportunity and in any event within one month of the alleged incident taking place.

The individual that the complainant chooses to approach will, in the first instance, provide support and assistance and listen to any complaint, treating it sensitively, seriously and confidentially.

If the complainant wishes to pursue the matter further or if the person to whom the complaint has been made decides to pursue the matter further in any event, the complainant will be asked to make a formal complaint. Where a formal complaint has been made, a prompt investigation will be conducted.

If it is decided that the complaint is well founded CDC's disciplinary procedure will be invoked. If it is decided that the complaint is not well-founded then the employee who has made the complaint will be advised accordingly.

Malicious and unfounded allegations of harassment will also be subject to disciplinary proceedings against the complainant.

A SUMMARY OF HUMAN RESOURCES POLICIES

Victimisation

CDC will not tolerate intimidation, victimisation or unfair discrimination against any person who makes a complaint of harassment or who assists in an investigation of alleged harassment. Retaliation against an employee who complains of harassment can be expected to lead to disciplinary action.

5 WHISTLEBLOWING

Policy Statement

CDC is committed to the highest possible standards of conduct, openness, honesty and accountability and takes seriously any issues of malpractice or wrongdoing. It encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relationships. In particular, CDC recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and CDC's success ensured.

Staff are often the first to realise there may be something seriously wrong within the workplace and CDC expects any member of staff who has a serious concern about any aspect of CDC's work to come forward to voice those concerns and to feel supported when doing so.

The Public Interest Disclosure Act 1998 (PIDA) protects employees who "blow the whistle" about malpractice or wrongdoing with an organisation. This Act makes provision on the kinds of disclosures which may be protected, the circumstances in which such disclosures are protected and persons who may be protected.

This policy is designed to provide guidance to all those who work with or within CDC and who may from time to time feel that they need to raise certain issues relating to CDC with someone in confidence.

Who is covered by the Policy?

This policy and procedure applies to all CDC employees, whether permanent or temporary, agency workers, contractors and their staff. It also covers suppliers and those providing services under a contract within CDC in their own premises. The term "employee" within this policy is used to describe any of the above.

What is covered by the Policy?

Disclosing a concern which the employee genuinely and in good faith believes that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation, would qualify for protection under PIDA:

- (a) a criminal offence has been committed, is being committed or is likely to be committed;
 - (b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
 - (c) a miscarriage of justice has occurred, is occurring or is likely to occur;
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A SUMMARY OF HUMAN RESOURCES POLICIES

- (d) the health and safety of any individual has been, is being or is likely to be endangered;
- (e) the environment has been, is being or is likely to be damaged;
- (f) information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Procedure for raising a concern

While it is not necessary that employees prove the breach or failure that they are alleging has occurred or is likely to occur, but may simply raise a reasonable suspicion, they should note that they will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence or if they make the disclosure motivated by a reason which is not in good faith.

If employees wish to raise or discuss any issues which might fall into the above category they should contact HR Adviser or, in the absence of the HR Adviser, or in any other circumstances the General Counsel, who will treat the matter in confidence. The concern may be raised orally or in writing and the employee must ensure that they make it clear they are raising the concern using this procedure. The earlier the concern is raised the easier it will be that effective action is taken. It would be helpful to provide the background and history of the concern (giving relevant dates, names and locations), the reasons for the particular concern about the situation and details of evidence / witnesses.

In such cases it is likely that further investigation will be necessary and employees may be required to attend a disciplinary or investigative hearing as a witness. Appropriate steps will be taken to ensure that their working environment and/or working relationship is/are not prejudiced by the fact of the disclosure.

If employees reasonably believe that the relevant failure (ie one of the set of circumstances listed above under clause 1) relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than CDC has legal responsibility, then they should make that disclosure to that other person. Also, employees may make such a disclosure to Public Concern at Work (www.pcaw.co.uk), the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of CDC, employees believe that disclosure within the organisation is inappropriate or has been unsuccessful. Disclosures made to employees' legal advisors in the course of obtaining legal advice will be protected.

Within five working days, the person with whom the concern was raised will acknowledge its receipt in writing, irrespective of how the concern was raised. The concern will then be investigated. Investigation does not imply either acceptance or rejection of an individual's concerns. The initial enquiry will be undertaken, wherever possible within 10 working days by the most appropriate person. This will not involve a detailed investigation but sufficient information will need to be gathered in order that a decision can be made as to whether further investigation will take place.

Where appropriate, the matters raised may:

- be investigated by management or through the disciplinary process;
 - be referred to the police;
 - be referred to an external auditor or other external investigation;
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A SUMMARY OF HUMAN RESOURCES POLICIES

In order to protect individuals and those accused of misdeeds or possible malpractice or wrongdoing, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which CDC will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for instance discrimination) will normally be referred for consideration under those procedures.

Within fifteen working days of a concern being raised, the person with whom the concern has been raised will write to the individual who raised the matter indicating how it is proposed to deal with the concern and giving an estimate of how long it will take to provide a final response and informing them whether any initial enquiries have been made. This letter will also state whether further investigations will be carried out and by whom or the reason why no investigation is to be carried out.

Employees should be aware that the policy will apply where a disclosure is made in good faith and where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the organisation), or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the organisation's Disciplinary Policy and Procedures and may constitute gross misconduct for which summary dismissal is the sanction.

While CDC hopes that such disclosures will never be necessary within the Company, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

Taking the Matter Further

There may be occasions where a worker considers it necessary to raise the matter externally, e.g. to raise it with the appropriate external authority or if they feel the matter has not been properly addressed or if the employee reasonably believes that the matter will be covered up.

If an employee is unsure whether or how to raise a concern or wants confidential advice, contact can be made with the independent charity Public Concern at Work (www.pcaaw.co.uk). Their lawyers can provide free confidential advice on how to raise a concern about serious malpractice or wrongdoing at work.

Further information can also be obtained from the Advisory, Conciliation and Arbitration Service (ACAS) at www.acas.org.uk.

In circumstances where an employee decides to raise the matter externally, they will only be protected under this procedure, and under employment law, where the disclosure is made in accordance with the PIDA. This means that the disclosure must fall under one of the categories listed in paragraph 15c above and must be made in one of the following ways:

- in the course of obtaining legal advice;
 - to a prescribed regulatory body provided the disclosure is made in good faith and the employee reasonably believes the prescribed body is responsible for the matter of concern and that the allegations are substantially true;
 - to other third parties where the employees makes the disclosure:
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A SUMMARY OF HUMAN RESOURCES POLICIES

- in good faith, with reasonable belief that the information and allegations are substantially true, and
 - does not make the disclosure for personal gain, and
 - has already raised the matter with CDC or prescribed regulator, unless the employee reasonably believes that they will suffer a detriment, or there is not a prescribed regulator and they reasonably believes that evidence will be concealed or destroyed or they make the initial disclosure to CDC, and
 - in all of the circumstances it is reasonable to make the disclosure.
- the disclosure is of an exceptionally serious nature and the whistle-blower make the disclosure:
 - in good faith, with reasonable belief that the information and allegations are substantially true, and
 - does not make the disclosure for personal gain, and
 - in all of the circumstances, it is reasonable to make the disclosure.

Employees should not, in any circumstance, approach the media or press.

Support for Employees raising a concern

CDC is committed to good practice and high standards and wants to be supportive of individuals who raise concerns and those affected by the raising of a concern as appropriate. Employees who experience stress as a result of their involvement in this process can seek counselling and support through CDC's Employee Assistance Programme by contacting PPC (Positive People Company). CDC will take steps to minimise any difficulties which individuals may experience as a result of raising a concern, for example if they are required to give evidence in Court then CDC will arrange for them to receive advice about the procedure and, if necessary, be fully prepared for a Court appearance.

Confidentiality

If an employee raises an issue, every effort will be made not to reveal their identity. It must be recognised, however, that in order to investigate the matter, information must be obtained and/or other employees questioned and therefore total confidentiality cannot be guaranteed. If criminal proceedings require that information is passed on, it may become necessary to reveal the employee's identity. In such circumstances, the employee will be consulted before this action is taken.

Anonymous Allegations

Concerns raised anonymously will be considered at the discretion of CDC taking into account the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

CDC expects that whistle-blowing will be made in "good faith" and will treat abuse of the whistle-blowing procedure extremely seriously. CDC reserves the right to take appropriate action against the whistle-blower if they are found not to have acted in good faith.

ENDS
CDC GROUP
26 MAY 2011
