



Congratulations &  
Welcome!



The Broadline Group Temporary Workers Handbook



# Content

<b>Introduction</b>	<b>2</b>
<b>A Good Start</b>	<b>2</b>
<b>Why Work for Us</b>	<b>2</b>
<b>Your First Steps</b>	<b>3</b>
<b>Bank Details</b>	<b>3</b>
<b>PPS Number</b>	<b>3</b>
<b>Revenue Commissioners Office</b>	<b>4</b>
<b>Method of Payments</b>	<b>5</b>
<b>Timesheet</b>	<b>6</b>
<b>Payroll Queries</b>	<b>6</b>
<b>Holiday Pay</b>	<b>6</b>
<b>Ethical Trading Policy</b>	<b>8</b>
<b>Sick Leave</b>	<b>9</b>
<b>Grievance Procedure</b>	<b>10</b>
<b>Disciplinary Procedure</b>	<b>11</b>
<b>Dismissal</b>	<b>12</b>
<b>Health &amp; Safety at Work</b>	<b>14</b>
<b>Electrical Safety</b>	<b>14</b>
<b>Fire Safety</b>	<b>14</b>
<b>Safe Manual Handling</b>	<b>15</b>
<b>Handling Chemicals</b>	<b>15</b>
<b>CCTV</b>	<b>16</b>
<b>Mobile Phone Use</b>	<b>16</b>
<b>Testing for Intoxicants</b>	<b>16</b>
<b>Alcohol and Drug Policy</b>	<b>16</b>
<b>Bullying / Dignity at Work</b>	<b>17</b>
<b>Anti-bribery and Corruption Policy</b>	<b>19</b>
<b>Specific Policies for Food Handlers</b>	<b>25</b>
<b>Hair for Food Handlers</b>	<b>25</b>
<b>Hair for Waiting/Bar staff</b>	<b>25</b>
<b>Jewelry</b>	<b>26</b>
<b>Perfume/Aftershave</b>	<b>26</b>
<b>Uniform for Food Handlers</b>	<b>28</b>
<b>Uniform for Waiting/Bar staff</b>	<b>28</b>
<b>Laundry</b>	<b>28</b>
<b>Footwear</b>	<b>28</b>
<b>Facial</b>	<b>28</b>
<b>Tattoos</b>	<b>28</b>
<b>Health and Hygiene</b>	<b>29</b>
<b>Ten Point Code for People Working with Food</b>	<b>29</b>
<b>Infection Control</b>	<b>30</b>
<b>Contracts and Arrangements</b>	<b>31</b>
<b>Your Responsibility</b>	<b>32</b>
<b>Prohibited</b>	<b>33</b>
<b>Written Permission Request</b>	<b>33</b>
<b>Specific Authorization Required</b>	<b>33</b>

# Introduction

To familiarise yourself with The Broadline Group, its operations and the workings of the Temporary Recruitment Division, we have produced this booklet, which should provide you with much of the basic information you require.

However, should you have any additional questions our recruiters will always be available to help you.

## A Good Start

- Remember - First impressions are lasting impressions
- Strive for Excellence - Deliver your best
- Put Customers First – Understand their needs & surpass their expectations
- Enthusiasm is Essential - Be passionate about what you do
- Being a Team Player is key to Success
- Use your Initiative and be prepared to be flexible
- Give that Extra 5% - Pay attention to detail

## Why Work for us

- Competitive pay rates with premium weekend rates
- Paid weekly
- Holiday pay
- Flexible hours
- You can increase your knowledge and skills to further your career
- We have a large client database
- We have numerous offices throughout the country
- Contract positions are also available
- Temporary contracts may lead to permanent positions
- You can temp for us while we are working on placing you in a permanent position
- You will be in direct contact with one of our consultants who will co-ordinate your working week and take care of any issues you may have
- Uniform and training are provided by The Broadline Group if required

# Your First Steps

Upon registering The Broadline Group you will be emailed a link to complete your personal details, which include your PPS number and your bank account.

See details below:

## Bank Details

All Temporary staff must set up a bank account into which wages can be paid by EFT.

Upon registering with us please bring the following details with you:

- Name and address of Bank/Building Society
- IBAN
- BIC
- Account Holders Name

If you do not already have a bank account, please set one up immediately to ensure that you receive your wages as quickly and efficiently as possible.

## PPS Number

Only the Department of Employment and Social Protection (DEASP) can provide you with a PPS number.

- You should attend your nearest PPS number allocation centre.
- To find centres logon to the DEASP's website at [www.welfare.ie](http://www.welfare.ie)

N.B. It takes approximately 5 working days to receive your PPS Number after your appointment.

# Revenue Commissioners Office

It is important to note that if you have any queries regarding your tax, you must contact the Tax office (Revenue) yourself on Tel: 01 874 6821 or Lo Call: 1890 333 425, we cannot do this on your behalf.

For more information visit [www.revenue.ie](http://www.revenue.ie)

Make sure to contact the relevant unit and quote the relevant The Broadline Group registered number as follows:

The Broadline Group:

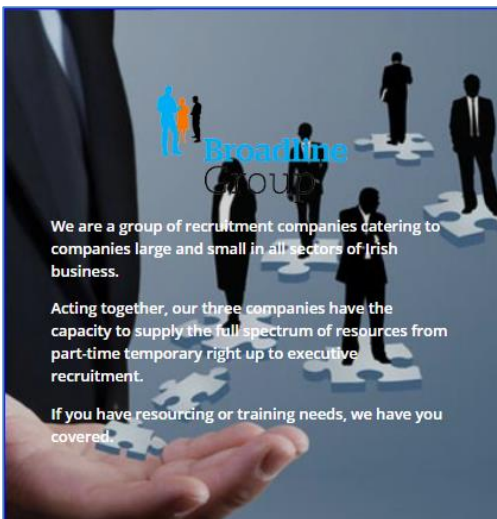
Employer Registration Number: 9848158T

Accounts Department Contact Details:

E-mail: [accounts@broadlinegroup.ie](mailto:accounts@broadlinegroup.ie)

Tel: 01 404 7172

More details at [www.broadlinegroup.ie](http://www.broadlinegroup.ie)



**Broadline Group**

We are a group of recruitment companies catering to companies large and small in all sectors of Irish business.

Acting together, our three companies have the capacity to supply the full spectrum of resources from part-time temporary right up to executive recruitment.

If you have resourcing or training needs, we have you covered.



Broadline Recruiters are one of Ireland's leading recruitment agencies in Industrial and Hospitality. We supply services to many Irish and Global brands and our dedicated teams of recruitment specialists have the expertise to understand your aspirations and help you secure your ideal career or resource the most demanding of projects.



# Method of Payment

## Timesheets

### General

The Broadline Group pays all temporary staff based on approved timesheets.

- You will need to record all hours worked on each placement on the timesheet provided.
- You will then be required to sign this timesheet, and have it signed by a nominated company representative.
- Please ensure that your name and the client's name are printed clearly on the timesheet before submitting it for payment.
- To avoid any unnecessary payment delays, please ensure that your timesheet is fully legible.
- All corrections on your timesheet must be initialled.

### Submitting Timesheets

- To submit your timesheets for processing you should download the app provided for this purpose.
- This app is available in Apps store and Play store and has a full usage description in the help menu.



**Broadline Recruiters**

- It is your responsibility to get your timesheet to us as quickly as possible after your placement has been completed.
- If you do not have access to a smartphone, you may return the physical timesheet to your local The Broadline Group Office
- To ensure same week payment your timesheet must be delivered either using the app or by hand, no later than 10 A.M on Monday morning of the following week.

Sample Timesheet for The Broadline Group



**This Timesheet must be with your consultant before 9am on Monday, failure to meet this deadline will result in a delayed payment.**

Company name \_\_\_\_\_ Unit/Dept./Order No. \_\_\_\_\_  
 Employee name \_\_\_\_\_

Week Starting Monday / /  
 Week Ending Sunday / /

	Start Time	Finish Time	Total Hrs worked ex. lunch/breaks	Overtime Hrs x 1.5	Overtime Hrs x 2	Break 1 received	Break 2 received	Please give reason if breaks were not received
Monday								
Tuesday								
Wednesday								
Thursday								
Friday								
Saturday								
Sunday								

Employee Signature \_\_\_\_\_  
 Comments \_\_\_\_\_  
*Before sending this timesheet please ensure all hours are tracked correctly and that you and your manager have signed that all hours are correct.*

Tel: (0)1 404 7172 Fax: 01 404 7170  
 Email: info@broadlinerecruiters.com  
 www.broadlinerecruiters.com

Clients Signature \_\_\_\_\_  
 Clients Name \_\_\_\_\_  
 Comments \_\_\_\_\_

*If a client engages a temporary in a temporary/permanent position within 12 months of the completion of that temporary of his/her assignment with the client, the client will be liable to the company for the temporary/permanent introduction fee. By signing this timesheet I authorize Broadline Recruiters to pay the employee all hours claimed and raise an invoice accordingly.*

**Payroll Queries**

- Payroll Queries should be addressed directly with your recruiter, not with clients.
- Payslips can be checked on the timesheet app or will be emailed to candidates on request.

**Holiday Pay**

- All temporary staff are entitled to holiday pay at a rate of 8% of hours worked on your basic hourly rate up to a maximum of 20 days per year.
- All temporary staff must provide a minimum of 2 weeks' notice to The Broadline Group of any holiday requests.

**HOLIDAY PAY WILL ONLY BE PAID WHEN YOU ARE ACTUALLY TAKING HOLIDAYS.**





# Ethical Trading Policy

The Broadline Group is committed to equal opportunities as a core principle and is fully compliant with Employment Equality Legislation.

- We will ensure that work opportunities are offered to candidates based on merit and ability only.
- The Broadline Group will not tolerate discrimination either directly or indirectly on the grounds of age, gender, family status, marital status, disability, race, religious beliefs, sexual orientation, or ethnicity.
- Please note, in accordance with current legislation, all non-EU Nationals must:
- Present a valid work permit and their in-date passport to register for work.

## Employment is freely chosen

All candidates submit their CV through our advertising platforms, then our Recruitment and Selection Process proceeds.

## Working Conditions

It is the Company's policy that all reasonable and practical steps will be taken to ensure the health and safety of people and to prevent damage to property. To enable us to fulfil our responsibility for health and safety at work, it will be the duty of every employee in the company and all members of our temporary staff to co-operate with us and our clients in every respect concerning health and safety at work.

## No Employment of Child Labour

Broadline Group does not employ workers under the age of 18.

## National Minimum Wage

The National Minimum wage is adhered to at all times and adjusted in accordance with law. We are also governed by the EU Agency Workers Directive Act 2012 for all pay rates at entry level.

## Hours of Work

The Working Time Act is followed and complied with in accordance with Irish Legislation.

## No Discrimination is Practice

The use of disciplinary procedures is required where an employee's conduct, attendance or performance is of concern to an employer. The disciplinary process as set out below is designed to help promote fairness and impartiality in the treatment of individuals.

It is always our objective that the process should be used to emphasise and encourage improvement in the performance of individuals where they are failing to meet the required standards, and not as a means of exacting punishment.

Every effort will be made to ensure that any action taken under this procedure is fair, with you being given every opportunity to state your case and appeal against any decision that you consider to be unjust.

## No harsh or Inhumane treatment is allowed.

### Introduction

- Many people in our society are victimised and harassed as a result of their gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the travelling community.
- Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. Whatever form it takes, personal harassment is always serious and is totally unacceptable.
- We recognise that personal harassment can exist in the workplace as well as outside and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating, and unpleasant working environment.

### Policy

- We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all our employees.
- We have published these procedures to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.
- We recognise that we have a duty.

## Sick Leave

All temporary staff must inform us as soon as possible, regardless of the reason, if they are sick or unavailable for work.

- We require a minimum of one hour's notice of your inability to attend work.
- The Broadline Group does not pay sick leave to temporary staff.

# Grievance Procedure

Should any member of our workforce, whether temporary or permanent, have a problem or concern with their assignment or working conditions, they should in the first instance attempt to settle their grievance informally with the Consultant of the Employment Business responsible for that assignment.

If a temporary worker's grievance cannot be settled informally, or a formal approach is preferable, the temporary worker should raise it formally with the Director of the Employment Business as follows:

**Written Statement** – The Temporary Worker must set out their grievance in writing and send this statement to the Director of the Employment Business

**Meeting** – The Employment Business will invite the Temporary Worker to attend a meeting to discuss the grievance once the Employment Business has had a reasonable opportunity to consider its release to that information. After the meeting, the Employment Business will inform the Temporary Worker of its decision and work towards rectifying the issues raised where practicable.

# Disciplinary Procedure

The use of disciplinary procedures is required where an employee's conduct, attendance or performance is of concern to an employer. The disciplinary process as set out below is designed to help promote fairness and impartiality in the treatment of individuals.

It is always our objective that the process should be used to emphasise and encourage improvement in the performance of individuals where they are failing to meet the required standards, and not as a means of exacting punishment.

Every effort will be made to ensure that any action taken under this procedure is fair, with you being given every opportunity to state your case and appeal against any decision that you consider to be unjust.

The following general guidelines are used when inviting you to a disciplinary hearing.

- Disciplinary action, where necessary, is taken speedily and in a fair, uniform and consistent manner.
- The employee is advised of the nature of the complaint against them and will be given the opportunity to state their case before any disciplinary action is taken.
- An employee may be disciplined only after careful investigation of the facts as presented.
- It is important to note that on some occasions temporary suspension on full pay may be necessary so that that an uninterrupted investigation can take place. This must not be regarded as disciplinary action or a penalty of any kind.
- Other than for an 'off the record' informal reprimand, an employee has the right to be accompanied by a fellow employee, who may be allowed to act as a witness or speak the employees' behalf at all stages of a formal disciplinary process.
- An employee will not normally be dismissed for a first breach of discipline, except where this is a case of gross misconduct or serious negligence. In this case the penalty may be dismissal without notice and without payment in lieu of notice.
- If an employee is disciplined, they will receive an explanation of the penalty imposed and will have the right to appeal against the finding and the penalty.

## Three Stage Warning Process

- The employer can reserve the right to initiate the warning procedure at any stage, or to jump stages, depending upon the circumstances of the case. Minor transgressions will be dealt with informally, but where the matter is serious, the following warning procedure may be used.

## Formal Verbal Warning

- A formal verbal warning which will remain in effect for a nine-month period.

## Written Warning

- A written warning will remain in effect for one year.

## Final Written Warning

- A final written warning will normally be disregarded after one year.

## Dismissal

### General Notes

- If you are in a supervisory or managerial position, then demotion to a lower status may be considered as an alternative to dismissal.
- In exceptional circumstances, suspension from work without pay for up to five days as an alternative to dismissal may be considered.
- Gross misconduct offenses once proven, will result in dismissal without notice.
- Every employee has the right to appeal against any disciplinary action.
- The Broadline Group or the Client business may pursue a disciplinary procedure under the Unfair Dismissal Act 1977 (Amended 1993).
- Both procedures will comply fully with fair procedure and natural justice.

### Dismissal Appeals

- Employees' will be informed at the time of notification of dismissal how and to whom appeals should be addressed.
- Appeals must be submitted in writing within 5 working days of the dismissal decision.

# Health & Safety



# Health & Safety at Work

## Health and Safety Policy

It is the Company's policy that all reasonable and practical steps will be taken to ensure the health and safety of people and to prevent damage to property. To enable us to fulfil our responsibility for health and safety at work, it will be the duty of every employee in the company and all members of our temporary staff to co-operate with us and our clients in every respect concerning health and safety at work.

In this policy the term safety is defined to mean:

- The prevention of any injuries
- The promotion of occupation health and hygiene
- The control of situations likely to damage property and equipment
- Fire prevention and control
- The protection of the general public
- To investigate any situation that may give rise to risk

## Electrical Safety

The following precautions must always be followed in relation to Electrical Safety:

- Ensure all servicing and installation is carried out by a competent person
- Electrical equipment must be serviced on a regular basis
- Employees must not carry out repairs on defective equipment unless qualified and authorised to do so
- Always ensure hands and clothes are dry when working with electrical equipment
- Avoid overuse of extension cables
- Do not use electrical equipment near a source of water
- Report any defective equipment and remove from service until repaired
- Ensure sockets are not overloaded
- Inspect cables and plugs of electrical appliances prior to use
- Switch off and unplug appliances when not in use.

## Fire Safety

Be aware of procedures to be followed in the event of an emergency evacuation.

Ensure that you know where all the fire exits are located within your area and where the evacuation point is for your area.

- Do not obstruct emergency routes or exits.
- Do not interfere with, or cause damage to, firefighting equipment.

## Safe Manual Handling

### Planning

- Identify the manual handling task using TILE: Task Individual Load Environment
- What is the task that needs doing (T)?
- Will it involve risky or twisting postures to lift it (I)?
- Is the load too heavy or awkward (L)?
- Is condition of the workplace compatible to carrying out the task (E)?
- Preparation
- Remove clutter from floors and clear obstacles in walkways.
- Ensure floors are in good condition with no uneven surfaces and wear suitable.
- Footwear
- Obtain the assistance of other people if necessary.
- Check the load for weight, stability, or other unusual characteristics.

### Performance

- Keep your feet flat on the floor and maintain a broad stable base
- Bend your knees
- Keep your back straight (your back does not have to be vertical) and do not bend from the trunk
- Get a good firm (palmer) grip on the load, grasp the bottom inside and top outside corner
- Always keep your arms in line with your trunk
- Hold the weight close to the centre of gravity
- Turn your feet in the direction of the movement.

### Handling Chemicals

- All chemical products must be stored and labelled correctly in a designated area
- Always read the label before using any chemical
- Adhere to manufacturer's instructions for use
- Never mix chemicals as they may produce toxic gases which are harmful to health
- Avoid direct contact with any chemical.
- Always use Personal Protective Equipment (PPE) provided and wash hands after removing gloves
- Cover any cuts or abrasions to the skin with a waterproof plaster
- No eating, drinking or smoking while working with chemicals
- Wash hands thoroughly after using chemicals not leave opened containers of chemicals unattended.
- Report any defects in plant or equipment

The following circumstances must be reported verbally to a supervisor immediately:

- Any accident or incident which may have resulted in the release of a dangerous substance in the workplace
- If you are not aware of how to handle or use a substance
- If you are not provided with suitable hazard information for a substance



## CCTV

CCTV may be used to monitor Health and Safety and any breaches of discipline on the client business premises.

In general CCTV systems will record 24/7.

Any alleged incident that may arise in which you are alleged to be involved will result in the employment of CCTV recorded footage

Footage will be made available to any Garda investigation and/or will be employed in any internal investigation.

Please note that such footage employed in the context of such investigations may result in disciplinary action up to and including dismissal.

## Mobile Phone Use

You may not use your mobile phone while on duty, unless you have the express permission of your Supervisor/Line Manager.

Unauthorized use may lead to disciplinary action including your dismissal.

## Testing for Intoxicants

We (and our client businesses) reserve the right to refer you for testing for intoxicants to a medical Doctor designated by us and you will co-operate in attending such testing.

Failure to attend such testing will be subject to disciplinary measures and may result in dismissal.

## Alcohol and Drugs Policy

Under legislation we, as your employer, have a duty to ensure so far as is reasonably practicable, the health and safety and welfare at work of all our employees and similarly you have a responsibility to yourself and your colleagues. The use of alcohol and drugs may impair the safe and efficient running of the business and/or the health and safety of our employees. The effects of alcohol and drugs can be numerous: - (these are examples only and not an exhaustive list)

- Absenteeism (e.g. unauthorised absence, lateness, excessive levels of sickness, etc.)
- Higher accident levels (e.g. at work, elsewhere, driving to and from work).
- Work performance e.g. difficulty in concentrating, tasks taking more time, making mistakes, etc.)
- If your performance or attendance at work is affected as a result of alcohol or drugs, or we believe you have been involved in any drug related action/offence, you may be subject to disciplinary action and dependent on the circumstances, this may lead to your dismissal.

# Bullying/ Dignity at the Work Policy

## Bullying

### DEFINITION

“Workplace Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual’s right to dignity at work.

An isolated incident of the behavior described in this definition may be an affront to dignity at work but, as a once off incident, is not considered to be bullying.” The policy applies to employees both in the workplace and at work associated events such as meetings, conferences, and office parties whether on the premises or off site.

The policy applies to bullying/harassment not only by fellow employees but also by a client, customer or other business contact to which an employee might reasonably expect to come into contact, within the course of his/her employment. Such behaviour may be conducted by an individual or group against another person or persons and may take the form of verbal, non-verbal or physical. Behaviour, which persists over a period shall be regarded as bullying. Informal Procedure While in no way diminishing the issue or the effects on individuals, an informal approach can often resolve matters. Therefore, an attempt should be made to address an allegation of bullying as informally as possible.

The objective of this approach is to resolve the difficulty with the minimum of conflict and stress for the individuals involved. Any employee who believes he or she is being bullied should explain clearly to the alleged perpetrator(s) that the behaviour in question is unacceptable. Where the complainant finds it difficult to approach the alleged perpetrator(s) directly, he or she should seek help and advice from a contact person.

Formal Procedure If an informal approach is inappropriate or if after the informal stage, the bullying persists, the following formal procedures should be invoked:

- a) The complainant should make a formal complaint in writing to his/her immediate manager.
- b) The alleged perpetrator(s) should be notified in writing that an allegation of bullying has been made against them. They should be given a copy of the complainant’s statement and advised that they shall be afforded a fair opportunity to respond to the allegation(s).
- c) The complaint should be subject to an initial examination by a designated member of management, who can be considered impartial, with a view to determining an appropriate course of action.

### Investigation

The investigation should be conducted by either a designated member or members of management or, if deemed appropriate, an agreed third party. The investigation should be conducted thoroughly, objectively, with sensitivity, utmost confidentiality, and with due respect for the complainant and the alleged perpetrator(s).

The investigator(s) should meet with the complainant and alleged perpetrator(s) and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts surrounding the allegation(s). Both the complainant and alleged perpetrator(s) may be accompanied by a work colleague or employee/trade union representative if so desired.

Every effort should be made to carry out and complete the investigation as quickly as possible and preferably within an agreed timeframe.

On completion of the investigation, the investigator(s) should submit a written report to management containing

the findings of the investigation. Both parties should be given the opportunity to comment on the findings before any action is decided upon by management. The complainant and the alleged perpetrator(s) should be informed in writing of the findings of the investigation. Outcome Should management decide that the complaint is well founded, the alleged perpetrator(s) should be given a formal interview to determine an appropriate course of action. If either party is unhappy with the outcome of the investigation, the issue may be processed through the normal industrial relations mechanisms.

General Front-line Managers/Area Directors have a particular responsibility to ensure that bullying does not occur, if it does they should report the incidents to the Managing Director as soon as they are advised.

Please note: Once a person has been named and accused of bullying an investigation must take place.

## Grievance Procedure

In any organization workers may have problems or concerns about their work, working environment or working relationships that they wish to raise and have addressed. A grievance procedure provides a mechanism for these to be dealt with fairly and speedily before they develop into major problems and potentially collective disputes.

Grievance procedures enable individuals to raise issues with management about their work, or about their employers', clients', or their fellow workers' actions that affect them. Please note this must be outside the scope of normal everyday duties ☒ Nothing in this procedure is intended to prevent you from informally raising any matter you may wish to mention. Informal discussion can frequently solve problems without the need for a written record but if you wish your grievance to be formally recorded and investigated, please make this clear at the outset.

If you feel aggrieved at any matter relating to your work (except personal harassment, for which there is a separate procedure following this section), you should:

- First Stage, employees should put their grievance to their manager (preferably in writing). Where the grievance is against their manager the matter should be raised with a more senior manager. If the grievance is contested the manager should invite the employee to attend a hearing in order to discuss the grievance. The employee can be accompanied by a fellow employee or a trade union representative. The manager should respond in writing to the grievance within a specified time.
- Second Stage, If the matter is not resolved in Stage 1 the employee should raise the matter with more senior management where there is a hearing held and again they have a right to be accompanied. Following the hearing the manager should respond to the grievance in writing within a specified period.
- Final Stage, If the grievance has not been resolved at the stage, the employee should go to a higher level of management – Chief Executive, Managing Director. The employee must present their case at a hearing and have the right to be accompanied. The manager should give a decision within a specified time and should inform the employee that this is the final stage.

# Anti-bribery and Corruption Policy

## 1 Introduction

- 1.1 At Broadline Group we are committed to the highest standards of integrity. We conduct and adopt a zero-tolerance approach to bribery and corruption.
- 1.2 This policy applies to all our employees and independent contractors.
- 1.3 Bribery and corruption remain major issues in world trade, despite the many dedicated efforts to prevent them. They are very damaging to the societies in which they occur.
  - 1.3.1 Divert money and other resources from those who need them most.
  - 1.3.2 Hinder economic and social development.
  - 1.3.3 Damage firms, not least by increasing the cost of goods and services.
- 1.4 Our legal obligations are primarily governed by the Criminal Justice (Corruption Offences) Act 2018.
- 1.5 We run our organisation with integrity and in an honest and ethical manner. All of us must work together to ensure it remains untainted by bribery or corruption.
- 1.6 This policy is a crucial element of that effort. It has the full support of our Senior Management team. It sets out the steps all of us must take to prevent bribery and corruption in our firm and to comply with relevant legislation.

## 2 What are bribery and corruption?

- 2.1 Corruption is the misuse of office or power for private gain.
- 2.2 Bribery is a form of corruption. It includes offering, promising, giving, accepting, or seeking a bribe.
- 2.3 A bribe is a financial or other advantage, promised, requested, or given to induce a person to perform a relevant function or activity improperly or to reward them for doing so.
- 2.4 In practical terms, a financial or other advantage is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts, or anything else of value.
- 2.5 The timing of the bribe is irrelevant, and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly.
- 2.6 It is not necessary for the individual or organisation actually to receive any benefit as a result of the bribe.
- 2.7 All forms of bribery and corruption are strictly prohibited.
- 2.8 This means that you must not:
  - 2.8.1 Give or offer any payment, gift, hospitality or other benefit in the expectation that a firm advantage will be received, or to reward any firm received;
  - 2.8.2 Accept any offer from a third-party that you know, or suspect is made with the expectation that we will provide a firm advantage for them or anyone else;
  - 2.8.3 Give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure.
- 2.9 No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### 3 Who can be involved in bribery and in what circumstances?

3.1 Bribery and corruption may be committed by our:

3.1.1 Employees, directors, contractors or anyone they authorise to do things on our behalf;

3.1.2 Representatives and other third parties who act on our behalf;

3.1.3 Suppliers;

3.1.4 Clients (because they might try to induce one of our people to give them more favourable terms);

3.2 Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of the organization, sometimes a government or other public official.

### 4 The legal position on bribery

4.1 Bribery and corruption are criminal offences. It is illegal:

4.1.1 To pay or offer to pay a bribe;

4.1.2 To receive or agree to receive a bribe;

4.1.3 To bribe a foreign public official.

4.2 A commercial organisation can also commit an offence if a person associated with it bribes another person intending to obtain or retain an advantage for the organisation.

4.3 It does not matter whether the bribery or corruption occurs in Ireland or abroad. An act of bribery or corruption committed abroad may well result in a prosecution in Ireland. Nor does it matter whether the act is done directly or indirectly.

### 5 Our position on bribery

5.1 Our position is simple: we conduct our firm to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. Such acts would damage our reputation and expose us, and our employees and representatives, to the risk of regulatory action, fines and imprisonment. We take a zero-tolerance approach to bribery and corruption by our people and our third-party representatives.

### 6 What are indicators of corruption and bribery?

6.1 Common indicators of bribery and corruption include those listed below. There may well be others:

6.1.1 Payments are for abnormal amounts or purposes (e.g. commission), or made in an unusual way, e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in a currency or via a country that has no connection with the transaction;

6.1.2 Process is bypassed for approval or sign-off of terms or other commercial matters or we are prevented from or hindered in monitoring commercial processes;

6.1.3 Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally; they may make trips at short notice without explanation, or have a more lavish lifestyle than expected;

6.1.4 Decisions are taken for which there is no clear rationale;

6.1.5 Records are incomplete or missing.

Who is responsible for this policy?

6.2 The Managing Director has overall responsibility for this policy and is responsible for ensuring this policy is adhered to by all employees and independent contractors.

## 7 Your responsibilities

7.1.1 Reading and being aware of the contents of this policy;

7.1.2 Complying with this policy; and

7.1.3 Reporting cases where you know, or have a reasonable suspicion, that bribery or corruption has occurred or is likely to occur.

7.2 We will not penalise anyone for making a report.

## 8 What should you do if you think something is wrong?

8.1 Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to our organisation (see 7.1.3). We cannot maintain our integrity unless we do so. If you discover or suspect bribery or corruption, whether by:

8.1.1 Another employee or independent contract;

8.1.2 A third party who represents us;

8.1.3 One of our suppliers or competitors;

8.1.4 Anyone else—perhaps even a client.

8.2 You must inform the Managing Director.

8.3 You must make your report as soon as reasonably practicable. You may be required to explain any delays.

## 9 Consequences of failing to comply

9.1 We take compliance with this policy very seriously.

9.2 Failure to comply puts both you and our business at risk.

9.3 You may commit a criminal offence if you fail to comply with this policy. The criminal law relating to bribery and corruption carries severe penalties.

9.4 Because of the importance of this policy, failure to comply with any requirement may lead to disciplinary action under our procedures, which may result in dismissal for gross misconduct.

# Specific Policies for Food Handlers

## Personal Hygiene Procedures

Employees have a moral and legal responsibility to maintain high standards of personal hygiene at all times. All food handlers are sources of contamination for food and must take all precautions to prevent any possible contamination of food that they handle or come into contact with. Please pay special attention to your personal hygiene – brush your teeth, use deodorant, hair must be washed regularly, bathe/shower daily.

## A Guide to acceptable Personal Hygiene:

Hands are potentially a serious source of contamination and the following precautions must always be observed:

- Nails must be short and clean
- Nail varnish must not be worn
- You must not work with food if you are suffering from any skin infections on your hands/arms
- Cuts or other wounds must be covered with a brightly coloured waterproof dressing
- Hands must be washed frequently and specifically on the following occasions:
  - Before starting work
  - After cleaning, emptying bins, cleaning dirty crockery etc.
  - After handling raw products
  - After using the toilet
  - After touching any part of the face or head
  - After eating, drinking or smoking

## Hair for Food Handlers

- Hair must be well groomed.
- Short hair must be contained in a head covering, e.g. cap or hairnet, when preparing food.
- Long hair must be properly tied back, without any tailing ends, and fully contained in approved hair covering. Personal hair coverings/accessories are not permitted.

## Hair for Waiting/Bar Staff

- Waiting/Bar staff are not required to wear a head covering but they must either have their hair short or neatly tied back whilst on duty.

## Jewellery

Jewellery is a potential source of contamination and must not be worn when working with food. Food handlers must not wear jewellery other than:

- A plain wedding band
- Small sleeper earrings which should contain no stones or other loose parts (Nose rings are not allowed)
- are not permitted in food production areas





### Uniform for Food Handlers

- Uniforms must be worn and maintained in a good condition and must be clean and ironed.
- Protective clothing must not be worn outside of the workplace.
- Personal clothing must not be kept in food handling or storage rooms.
- Uniforms should consist of plain black trousers, black polo shirt and a black apron.
- In the case of chefs, full uniform must be worn consisting of jacket, trousers, apron, hat and safety shoes. Designer Logos are not allowed on uniforms.

### Uniform for Waiting/Bar Staff

- For waiting/bar staff uniform consists of a long sleeve white shirt, plain black trousers, black waistcoat and black bowtie.
- No personal garments can be worn over uniforms

### Laundry

- Uniforms must be washed separately from other clothes.
- Soiled uniforms should be kept separately from clean uniforms.

### Footwear

- All members of staff working in kitchen's/catering establishments must wear safety shoes.
- Shoes worn whilst at work must be clean, fully enclosed at the toe and the heel, low heel with a good slip resisting treat.
- Sandals or soft shoes such as trainers are not permitted for safety reasons.
- Safety shoes must not be worn outside of work.

### Facial

- Subtle use of makeup is permitted.
- Face should be clean shaven or facial hair should be neatly trimmed.

### Tattoos

- Visible body tattoos are not permitted

# Health & Hygiene

## Ten Point Code for People Working with Food

- Regularly wash your hands and nails thoroughly before you commence working and always after entering your work area, after using the toilet, handling raw produce, handling waste products, smoking, handling dirty containers, crockery etc.
- Do not touch your nose, mouth or hair without washing your hands immediately afterwards. Only use the designated hand wash basins for washing your hands and forearms – never use for washing utensils.
- You have a legal obligation to immediately report to your supervisor or any infections of the skin, nose, throat or bowel.
- Cover cuts, boils, open wounds or any septic areas completely with an approved waterproof dressing.
- Do not take any food or drink out of the premises that does not belong to you.
- Keep nails short and clean. Do not wear jewellery, nail varnish or watches.
- Approved clean protective clothing, hats, hairnets, overalls, etc. must always be worn correctly.
- It is in your interest and a requirement of The Broadline Group that you immediately report to a supervisor if you come across anything which appears to be below acceptable standards or if equipment does not appear to be working properly
- Always use clean utensils and equipment and do not handle food unnecessarily.
- Never smoke, eat or drink other than in specifically designated areas.

## Infection Control

You are a serious source of contamination if you are suffering from any of the symptoms of blood poisoning.

You must immediately report to your Supervisor if you, or any close member of your household is suffering from any of the following symptoms:

- Stomach cramps
- Vomiting
- Diarrhoea
- Discharge from the ears or nose
- Skin infections on the hands or arms

# Contracts & Arrangements

1. Temporary staff must familiarise themselves with the client's safety policies, procedures and emergency plans on their first visit to each site and must always comply with them.
2. The Broadline Group will liaise with clients to ensure the safety of their staff and where protective clothing or safety equipment is required, ensure that these items are available for the assignment.
3. Temporary staff must always adhere to client's health and safety practices and take reasonable care of their own safety and the safety of other people who may be affected by their activities.
4. In the case of accident or injury, temporary staff must notify both the client and The Broadline Group without delay.

Accidents at work need to be investigated, recorded in the client's accident book and where appropriate, notified to The Broadline Group.

The following details should normally be recorded:

- Field Staff personal details
- Time/date and location of accident
- Type of incident and how it occurred
- Activity at the time of the accident
- Description of injuries sustained
- Witness details

# Your Responsibility

The Broadline Group shall as far as it is reasonably practicable, implement health and safety policies and procedures. You must also comply with all the rules for employees laid down by the Health & Safety at Work Act, The Factories Act, Offices, Shops and Railway Premises Act and any regulations made under them or any other industrial safety legislation.

It is your responsibility whilst at work to take reasonable care of your own safety and the safety of other people who may be affected by your activities

You must comply with the instructions laid down by management regarding safety

You must use the means and facilities provided for the purpose of health and safety at work properly. You must not misuse or interfere with anything provided in the interest of health & safety.

You must not undertake tasks or use machines for which you have not received training or instruction

Always use equipment as directed. Never take short cuts to save time

You must not use unguarded machinery where guards are a statutory requirement

When using machinery familiarise yourself with the location of emergency cut-off switches

Never attempt to repair any electrical or other equipment – always report any defects to your manager immediately

Where heavy lifting is necessary, ensure that you have had instruction from the client company in safe lifting techniques

If you have an accident at work, you must ensure that you enter the details in the client's accident book and inform The Broadline Group



For reasons of safety and insurance cover, certain jobs are prohibited, and some will require special written authorisation from The Broadline Group. These include:

### Prohibited

- Mining, tunnelling, quarrying
- Drop forging
- Demolition work
- Work on moving amusement devices
- Working on aircraft
- Pest control/logging or forestry work
- Making and/or handling explosives

### Written Permission Required

- Working at heights on ladders, erecting scaffolding or any other temporary levitation devices above 5 metre
- Carriage of dangerous goods or chemicals using motorised vehicles
- Working below ground level
- Chemical manufacture
- Working with coated substance
- Offshore work
- Using powered cutting tools
- Erecting or dismantling metal constructions
- Anything where you may consider the health & safety of either yourself or other persons to be at a higher risk than normal

### Specific Authorisation Required

- Subject to ability and qualifications:
- Using power tools
- Working over 5m from the ground on scaffolding or ladders
- Dismantling/wrecking machinery
- Erecting/dismantling metal constructions
- Exterior building and structure renovation