



**Ballycommon**

Localised labour resources, Nationwide

## HEALTH & SAFETY POLICY

Ballycommon Services Limited is so far as is reasonably practicable committed to enforcing an effective health and safety policy in line with the Health & Safety at Work act 1974. This commitment comes not simply from the necessity to fulfil legal and regulatory requirements but from the desire to ensure that the highest reasonable standards in Health, Safety and Welfare for all our employees are achieved.

It is the policy of Ballycommon Services Limited to develop a culture in which every employee is involved in creating a safe working environment for themselves and others and we work on the principle that all accidents, injuries and occupational ill health are preventable. This policy is fully supported by the management team who will work to ensure that:

- Incidents of personal injury and occupational illness are minimised.
- All tasks are reviewed to identify hazards, assess risks and implement effective control measures and that a safe system of work is always used.
- All relevant legislation, Railway Industry Standards and other mandatory requirements are fully complied with.
- Staff refusing to work on the grounds of Health & Safety are supported.
- Adequate, competent supervision is provided to enable all employees and sub-contractors to comply with their responsibilities.
- Sufficient training and mentoring is provided to ensure the competence of all staff.
- Sufficient resources are made available to ensure health; safety and welfare provision are adequately delivered.
- Communication & consultation takes place with all employees regarding health, safety & welfare issues and that safe working practices are actively promoted.
- All Employees will embrace the Network Rail Life Saving Rules.
- The provision & maintenance of safe premises, tools, plant and equipment takes place.
- All employees are issued with Personal Protective Equipment necessary for the duties they are carrying out.
- There is provision for safe methods of handling, transport and storage of items, materials and substances as required by relevant regulations.
- The company will set safety objectives as minimum on an annual basis. These will be reviewed during the bi-annual Management Meeting.
- This policy is communicated to all employees.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

**Redmond Barry**  
Managing Director

Date

23/4/18

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## QUALITY POLICY

The Company of Ballycommon Services Limited is fully committed to a policy of quality management in the company and a philosophy of continuous improvement in all its operations. We recognise that adopting this approach gives us great commercial strength and that our commitment to a quality approach is not an optional extra.

Quality has been fundamental to our operations since the company was formed and it will continue to be vital to our success as we grow and mature.

We want all our people to be committed to quality, to recognise its importance, and to act accordingly and we recognise that it is our responsibility to provide them with the means and the motivation to do so.

Our employees are our greatest assets and we aim to give them every opportunity to use their skills and experience to improve the quality of the service we provide.

The company will set quality objective on a bi-annual basis. These will be reviewed during the bi-annual Management Meeting.

We shall not rest on our achievements but will continue to make quality a fundamental part of our policy, strategy and operations. We recognise that customers' expectations and perception of the quality of service we provide do not stand still and we are committed to meeting, and exceeding wherever possible, those expectations.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

**Redmond Barry**  
Managing Director

**Date**

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## ENVIRONMENTAL POLICY

We all have a responsibility to protect the environment from the effects of our activities. Ballycommon Services Limited takes its responsibilities seriously in this respect and is committed to reducing the impact of its activities on the environment.

To this end Ballycommon Services Limited recognises that there are many steps that it can take to continuously improve its environmental performance and thereby reduce or prevent damage to the environment. These steps can also add value to our business and make a positive contribution to the success of the company. In other words, we do not believe that good environmental management and the financial well being of the company are incompatible.

In order to meet this commitment Ballycommon Services Limited will pursue the following objectives:

- To ensure compliance with all applicable environmental legislation (Environmental Protection Act 1990) and any rail specific environmental requirements of Network Rail or its Rail Principal Contractors.
- To reduce emissions and pollution
- To improve waste management practices.
- To reduce consumption of natural resources.
- To minimise noise and other nuisances.
- To assist in the management of ecology.
- To continuously assess its environmental performance.

The necessary personnel and financial resources will be allocated to assist the Company in meeting its environmental objectives. In addition, Ballycommon Services Limited will continue to raise the levels of environmental awareness throughout its workforce and to promote this awareness to its customers and suppliers.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

**Redmond Barry**  
**Managing Director**

Date

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## DRUGS & ALCOHOL POLICY

Ballycommon Services Limited is committed to enforcing an effective Alcohol & Drugs Policy in accordance with the requirements of Railway Group Standard RIS-8070-TOM - Alcohol and Drugs (current issue), Network Rail Standard NR/L1/OHS/051 (current issue) - Network Rail's Alcohol & Drugs Policy, the Transport at Works Act 1992 and Railways Other Guided Transport System (Safety) Regulations 2006, LUL standards S1257 Drugs and Work and S1251 Alcohol and work. We recognise the importance of such a policy in its contribution towards ensuring the health and safety of our employees, sub-contractors, visitors and all those affected by our works. This policy and its mandatory application will be communicated to all staff on employment.

It is a requirement of Ballycommon Services Limited that no employee or sub-contractor shall:

- Report or attempt to report for duty having just consumed alcohol or being under the influence of drugs.
- Report for duty in an unfit state due to the use of alcohol or drugs.
- Be in possession of alcohol or drugs of abuse in the workplace or supply or attempt to supply them in the workplace.
- Consume alcohol or drugs while on duty.
- Use prescribed or over the counter medicine while working on Network Rail Managed and LUL Infrastructure without advising the person in charge.

Ballycommon Services Limited will undertake regular alcohol and drug screening of employees under the following circumstances:

- Pre-employment (If a prospective employee refuses to consent to such an examination/screening Ballycommon Services Limited has the right to immediately withdraw any offer of employment made).
- Promotion or transfer to Safety Critical activities.
- Following an incident where the use of alcohol and/or drugs may have been a factor.
- When there is cause to suspect that an employee is using or is under the influence of drugs or alcohol.
- As part of a Random screening process a minimum 5% of Sentinel competency card holders and Safety Critical employees will be Alcohol and Drugs screened per annum.

The implementation of this policy will be supported by the following:

- Refusal to undertake Alcohol and Drugs tests will be considered a positive result
- **Ballycommon Services Limited will not tolerate any departure from these rules and will take the appropriate disciplinary action which will normally result in dismissal in the event of any infringement.**

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

Redmond Barry  
Managing Director

Date

23/4/18

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## Diversity & Inclusion Policy

Ballycommon Services Ltd has a clear commitment to ensuring the provision of its services to the public, its clients and in the recruitment and employment of staff and sub-contractors, there will be equality of opportunity and treatment.

No person or group of persons shall be treated less favourably because of their:

- Race
- Religion
- Colour
- Ethnic or national origin
- Sex or sexual orientation
- Age
- Mental or physical disability

Individuals will be selected, promoted and treated on the grounds of their performance, attitude and abilities. All suitably qualified employees will be given equal opportunity to progress within the organisation.

Ballycommon Services Ltd will ensure the use of appropriate language in the workplace and safeguard against offensive and discriminatory language being used.

All those who come into direct or indirect contact with employees or applicants for employment should ensure that they understand this policy.

Ballycommon Services Ltd encourages the employment and the career development of any persons suffering from a disability.

The equal opportunity Policy will be communicated to all employees.

This Policy will be reviewed annually as part of the management review process to ensure it's continued relevance and adequacy.

**Redmond Barry**  
**Managing Director**

**Date**

16/5/18

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## HOURS OF WORK POLICY

Ballycommon Services Limited is committed to enforcing an effective Hours of Work Policy in accordance with the requirements of Network Rail Standards NR/L2/ERG/003, Management of Fatigue: Control of Working Hours for Staff Undertaking Safety Critical Work and NR/GN/INI/001 (current issue) - Guidance on the Management of Door to Door Work & Travel Time. We recognize the importance of such a policy in its contribution towards ensuring the health and safety of our employees, sub-contractors, and all those affected by our works.

Ballycommon Services Limited will take all measures as far as is reasonably practicable to ensure that all employees and sub-contractors are aware of and adhere to the guidelines for hours of work.

Ballycommon Services Limited requires that all employees or sub-contractors shall not:

- Work in excess of 12 hours per turn of duty
- Work in excess of 72 hours per calendar week
- Work more than 13 turns of duty in any 14 day period
- Take less than 12 hour's rest between booking off and on concurrent turns of duty. With the exception of the following circumstances:

Deviation from the above limits will require a Risk Assessment and will affect the Client's Principal Contractor/Plant Operators Licence.

### Travelling Time

All Ballycommon Services Limited employees and contractors who hold a Sentinel card competency or are required to undertake Safety Critical Work on behalf of Ballycommon Services Limited will be required to adhere to the following requirement with regard to travelling to and from sites and lodging away:

Travelling each way to and from site should ideally be included in the maximum 12 hours turn of duty. However where this is not possible, the travelling time must not lead an overall turn of duty time in excess of 14 hours.

Where travelling will lead to an exceedance of the above 14 hour turn of duty limit.

**LODGING WILL BE REQUIRED IN ALL CIRCUMSTANCE**

Ballycommon Services Limited has developed internal procedures to prevent employees or sub-contractors from working excess hours or shifts. Measurement of the effectiveness of these procedures will be carried out via a continuous monitoring process. Should this monitoring process reveal a departure from the procedures then appropriate action will be taken.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

**Redmond Barry**  
Managing Director

Date

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## BRIBERY POLICY

It is Ballycommon Services Limited (The Company) Policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all the countries where we operate. The Company has a zero tolerance approach to acts of Bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

This means that the Company and its employees will never seek, accept or give a bribe, facilitation payment, kickback or any other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings

### Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

### What is a bribe?

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – both parties will benefit.

- A bribe is a financial or other advantage offered or given:
- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his / her duties.

### Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

### Facilitation payments, kickbacks & donations

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

### Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

**Redmond Barry**  
Managing Director

Date

23/4/18.

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## **ANTI-BULLYING POLICY**

Ballycommon is committed to providing all employees a healthy and safe work environment. Ballycommon will ensure that procedures exist to allow complaints of bullying to be dealt with and resolved within Ballycommon, without limiting any person's entitlement to pursue resolution of their complaint with the relevant statutory authority. Ballycommon is committed to the elimination of all forms of bullying.

This policy applies to all employees of Ballycommon. It applies during normal working hours, at work related or sponsored functions, and while traveling on work related business. There will be no recriminations for anyone who in good faith alleges bullying.

### **Definitions**

Bullying is unwelcome or unreasonable behavior that demeans, intimidates or humiliates people either as individuals or as a group. Bullying behavior is often persistent and part of a pattern, but it can also occur as a single incident. It is usually carried out by an individual but can also be an aspect of group behavior (see "mobbing" below). Some examples of bullying behavior are:

Verbal communication

- Abusive and offensive language
- Insults
- Teasing
- Spreading rumor and innuendo
- Unreasonable criticism
- Trivializing of work and achievements

### **Manipulating the work environment**

- Isolating people from normal work interaction
- Excessive demands
- Setting impossible deadlines

### **Psychological manipulation**

- Unfairly blaming for mistakes
- Setting people up for failure
- Deliberate exclusion
- Excessive supervision
- Practical jokes
- Belittling or disregarding opinions or suggestions
- Criticizing in public

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Context is important in understanding bullying, particularly verbal communication. There is a difference between friendly insults exchanged by long-time work colleagues and comments that are meant to be, or are taken as, demeaning. While care should be exercised, particularly if a person is reporting alleged bullying as a witness, it is better to be genuinely mistaken than to let actual bullying go unreported.

## Mobbing

Mobbing is a particular type of bullying behavior carried out by a group rather than by an individual. Mobbing is the bullying or social isolation of a person through collective unjustified accusations, humiliation, general harassment or emotional abuse. Although it is group behavior, specific incidents such as an insult or a practical joke may be carried out by an individual as part of mobbing behavior.

## CONSEQUENCES OF BULLYING

Bullying is unacceptable behavior because it breaches principles of equality and fairness, and it frequently represents an abuse of power and authority. It also has potential consequences for everyone involved.

For those being bullied

People who have been bullied often suffer from a range of stress-related illness. They can lose confidence and withdraw from contact with people outside the workplace as well as at work. Their work performance can suffer, and they are at increased risk of workplace injury.

For the employer

Besides potential legal liabilities, the employer can also suffer because bullying can lead to:

- Deterioration in the quality of work
- Increased absenteeism
- Lack of communication and teamwork
- Lack of confidence in the employer leading to lack of commitment to the job

## For others at the workplace

People who witness bullying behaviors can also have their attitudes and work performance affected. They can suffer from feelings of guilt that they did nothing to stop the bullying, and they can become intimidated and perform less efficiently fearing that they may be the next to be bullied.

## RESPONSIBILITIES

### Managers and supervisors

- Ensure that all employees are aware of the anti-bullying policy and procedures
- Ensure that any incident of bullying is dealt with regardless of whether a complaint of bullying has been received
- Provide leadership and role-modeling in appropriate professional behavior
- Respond promptly, sensitively and confidentially to all situations where bullying behavior is observed or alleged to have occurred

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## Employees

- Be familiar with and behave according to this policy
- If you are a witness to bullying, report incidents to your Supervisor, Coss, Line Manager as appropriate
- Where appropriate, speak to the alleged bully(ies) to object to the behavior

## IF YOU THINK YOU HAVE BEEN BULLIED

- Any employee who feels he or she has been victimised by bullying is encouraged to report the matter immediately
- Where appropriate, an investigation will be undertaken and disciplinary measures will be taken as necessary - and in conjunction with Ballycommon Disciplinary Procedure 22.

Redmond Barry

Managing Director

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## Training and Development Policy

Ballycommon Services Ltd as a responsible employer is committed to the development of the skill base which it has to call upon to carry out its business.

As part of our day to day running of the business we must be conscious of the service that we provide and continually reassess our capacity to meet the needs of our customers.

We shall periodically review the skills of our staff and the sub-contractors which we call upon to provide this service, providing the necessary training and development where required.

**Redmond Barry**

**Director**

**Date:**

23/4/18

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## **Anti-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. Ballycommon Services have 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 implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Ballycommon Services is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our organisation. We expect the same high standards from all our suppliers and business partners. This policy applies to all persons working for Ballycommon services or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

### **Responsibility for the Policy**

Ballycommon Services' Director has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Director holds 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 any required training.

### **Compliance with this Policy**

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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 management 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 of suspicion of modern slavery in any parts of our business or the supply chains 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 management.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with management. 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 business. If you believe that you have suffered any such treatment, you should inform management immediately.

### **Communication and awareness of the Policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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**Breaches of this Policy**

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

The policy will be monitored and reviewed annually during the Ballycommon Services Management Review Meeting.

**Redmond Barry**  
**Managing Director**

**Date**

23/4/18

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