



## LONDON SECURITY SERVICES (UK) LTD

YOU'RE IN SAFE HANDS WITH US

Telephone: 020 8294 1444

Suite 1, Unit 2, Mulberry Place, Pinnell Road, London. SE9 6AR

Email: Sales@lss-security.co.uk

### Serious Incident Policy and Procedure

#### Purpose

The purpose of this policy is to give London Security Services (LSS) staff and other stakeholders the opportunity and confidence they need to raise concerns internally, and to allow LSS to take steps which will prevent any serious incident occurring again. LSS expects that in almost all cases, raising concerns internally in accordance with this policy will be the most appropriate action to take.

This Policy applies to all staff of LSS, and any other individual or organisation which has a relationship with LSS.

#### Policy

##### Introduction

LSS is a small security company, and as such significant incidents or events will occasionally occur which may negatively impact the company (**Serious Incidents**). LSS takes malpractice or matters which could affect its status very seriously and through this policy wishes to encourage open communication with its employees and stakeholders about any concerns.

This policy aims to provide guidance on how you should approach and deal with the reporting of a Serious Incident or matter and for employees and stakeholders of LSS, should be read in conjunction with LSS's Whistleblowing Policy. The Whistleblowing Policy provides employees with (the protection from any detriment as a result from making a 'qualifying disclosure' (as defined in that policy).

This policy is distinct from LSS's grievance and complaints procedures. If, as a member of staff, you have a personal complaint relating to your employment you should consult the Grievance Policy.

#### Reporting Requirements

A reportable event is any event or circumstance that materially affects or could affect LSS's legal form or business model, and/or its willingness or ability to comply with its conditions of registration. Accordingly, the purpose of this Policy is to encourage employees and third parties to report any Serious incident to LSS to enable it to safeguard its funds, reputation and regulatory status.

#### Scope

This policy applies to all employees of LSS, and any other individual or organisation which has a relationship with LSS.

## **Procedure for Reporting an Incident**

In the first instance and as soon as reasonably practicable, details of any Serious Incident should be submitted in writing to the Operations Director if this is not possible because they are the subject of the report or are involved it should be submitted to the HR Manager.

When making a report, the reporting individual should include the following information:

The nature of the incident or circumstances

The impact or potential impact the incident or circumstance has, or could have on LSS

The date of the incident or circumstance, or whether the incident or circumstances is suspected

The names of any individuals involved or suspected of being involved in the incident or circumstance

Whether the reporting individual reported the incident or circumstance to another individual, or regulatory body before, making a report in accordance with this Policy to an employee, the police or to a professional body.

Details of any ongoing inquiries into the incident or circumstance and any actions taken to date

Whether any applicable LSS policies have been consulted i.e. the Whistleblowing Policy, Health and Safety or Environmental Policy. The person to whom the report is submitted to will decide whether the incident or circumstance is a Serious Incident which should be dealt with under this policy.

## **Anonymity and Confidentiality**

LSS takes confidentiality seriously and will, if requested, keep the identity of an individual reporting a Serious Incident under this Policy confidential. Individuals can also report such an incident or circumstance anonymously however, this may mean that LSS is not able to investigate the matter as effectively as those made openly.

## **Investigation Process**

Upon receipt of the report of a serious incident, the Operations Director will, if deemed appropriate, offer to hold a meeting, in confidence, with the person who submitted the report. The purpose of the meeting will be for the Operations Director to obtain as much information as possible about the incident or circumstance.

Following the meeting the Operations Director will determine if the incident or circumstance is a Serious Incident under this Policy, and if so, will appoint an 'Investigating Manager'. The Investigating Manager will normally be a senior manager independent of the matter.

An incident may be referred by the Investigating Manager to the police.

The following process will be followed:

It will be conducted as sensitively and quickly as possible

The Investigating Manager will their findings, together with appropriate recommendations, to the Operations Director normally within 28 days of being appointed although this depends on the complexity of the matter and the number of individuals involved.

The person who reported the incident or circumstance will be informed whether:

The incident is considered to be a Reportable Event

Further internal action is to be taken

A written record will be kept throughout the Investigation process

Confidentiality will be maintained throughout the process consistent with a fair investigation and any reprisals against or victimisation of the person who reported the Incident will be treated as serious disciplinary matter which may lead to dismissal.

### **Monitoring of Reportable Incidents**

A record will be maintained of all incidents qualifying as Reportable Events by the HR Manager. The record will be periodically reviewed to establish if there are patterns of Serious Incidents which should be addressed by LSS.

