



Business Policies

Company standards and service commitments

Phone Guys Limited | Company number 13747280

These policies set the standards Phone Guys requires in its work and business relationships. Each policy defines its scope, responsibilities and required actions. The accountable director is responsible for implementation, oversight and review.

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Approved by	Simon Diss Accountable director
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Policy	Reference
1 Equality diversity and respectful work policy	PG-ED-001
2 Environment and responsible waste policy	PG-EN-001
3 Ethical business and anti bribery policy	PG-ET-001
4 Safeguarding and site conduct policy	PG-SG-001
5 Service quality and complaints policy	PG-SQ-001
6 Information security and data protection standards	PG-IS-001

Contact

info@phoneguys.uk | 03300 557 595

Cowran Estate, Pennington, Ulverston, LA12 0JW, United Kingdom

Use an agreed secure route for sensitive information. Customer contracts, site instructions and the relevant privacy, accessibility, complaints and CCTV notices apply alongside these policies.

1 Equality diversity and respectful work policy

Document	Version	Effective	Next review
PG-ED-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Recruitment, employment, subcontracted work, customer service, business travel, online communication and conduct at client sites.

Purpose and standard

Phone Guys will make decisions fairly and treat people with dignity. We will prevent unlawful discrimination, bullying, harassment and victimisation in our work. These standards apply to how colleagues, applicants, customers, visitors and suppliers are treated, including behaviour by third parties connected with our work.

Fair decisions and reasonable adjustments

Recruitment, pay, work allocation, development and access to services must be based on relevant requirements and evidence. Decisions must not discriminate unlawfully because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. We will consider reasonable adjustments with the person concerned and record the agreed practical steps, responsibility and review.

Behaviour expected

- Use respectful language and accessible explanations. Avoid assumptions about a person's ability, background, identity or family circumstances.
- Do not use threatening conduct, unwanted sexual behaviour, humiliating jokes, exclusion, offensive images or repeated unreasonable treatment. This applies in person, in messages and at work events.
- Do not disadvantage anyone for raising a concern in good faith, supporting another person or requesting an adjustment. A concern may not be upheld and still have been raised honestly.

Responsibilities

The accountable director will approve prevention measures and fair procedures. The operations lead will assess risks associated with lone visits, third party contact, work events and online conduct, arrange proportionate briefings and intervene when behaviour is unacceptable.

Everyone must follow this policy and report concerns. Customers and subcontractors must be told the conduct expected on our work.

1 Equality diversity and respectful work policy continued

Raising and handling a concern

A person may speak to the operations lead or contact the director directly. A complaint about the usual contact must be referred to an uninvolved director or a suitably independent external reviewer. The accountable director must provide an uninvolved route for any complaint concerning the usual contact. Informal resolution may be offered where appropriate; it must not be required before a serious concern is considered.

- Record the concern accurately, agree a safe contact method and consider immediate protective arrangements. Listen without pre-judging the outcome.
- Explain the process, who will handle it and the next update. Investigate proportionately and fairly, allow people to respond and consider relevant evidence.
- Limit disclosure to people who need the information. Explain that complete confidentiality cannot be promised where protection, a fair process or law requires disclosure.
- Give a reasoned outcome and explain how to request a review by someone not responsible for the original decision. Record corrective action and check for retaliation.

Prevention and review

The operations lead will include these standards in induction and role briefings, explain reporting routes and maintain appropriate briefing records. The director will consult workers about practical barriers and review decisions, complaints and adjustments for recurring problems. Any disciplinary response will follow a fair procedure and the applicable employment arrangements.

Contact and related policies

Policy concerns may be raised using the company contact details on the first page or in writing to the director. Ask for a private conversation before sharing sensitive personal details. The existing accessibility statement and complaints page continue to apply; this policy does not replace them. External advice and legal rights remain available.

Records and review

Keep adjustment and complaint records in a restricted location with access and retention decided for their purpose. Review this policy at least annually and sooner after a significant complaint or relevant legal change. The director will review relevant changes to harassment law and update the prevention arrangements.

2 Environment and responsible waste policy

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PG-EN-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Office work, travel, procurement, installation, maintenance and the handling or removal of equipment at customer sites.

Purpose and standard

Phone Guys will consider environmental impacts when planning work and buying, installing, maintaining or removing equipment. We will reduce avoidable waste and pollution, use resources carefully and comply with the waste and environmental requirements that apply to the actual location and activity.

Planning and purchasing

- Confirm whether equipment can be repaired, reused or upgraded before proposing replacement, where technically suitable and approved by the owner.
- Select equipment and packaging with regard to fitness for purpose, service life, energy use, repairability and disposal. Explain material trade-offs to the customer.
- Plan journeys and deliveries efficiently where this is compatible with customer access, service needs and safe working. Avoid unnecessary idling and wasted visits.
- Take accurate quantities to site, protect materials from damage and return reusable surplus through the agreed route.

Waste ownership and separation

Before removal, the operations lead must agree who owns the equipment and waste, who is responsible for its movement and the approved destination. Separate reusable equipment, electrical items, batteries, packaging and other waste where required. Protect data-bearing equipment from unauthorised access. Do not treat a customer's general bin as an approved disposal route.

Responsibilities

The director will resource lawful waste arrangements and approve environmental claims. The operations lead will identify job-specific waste streams and the applicable jurisdiction, check contractors and give workers disposal instructions. Workers and subcontractors must keep waste secure, prevent escape and report spills or an uncertain disposal route before proceeding.

2 Environment and responsible waste policy continued

Transfer and disposal procedure

- Identify and describe the material accurately, including any hazardous properties, batteries or data-bearing components. Check whether electrical equipment, hazardous waste or another specific regime applies.
- Check that the carrier and receiving site are authorised for that waste and activity. Record the check and obtain the transfer or consignment information required for the actual movement.
- Package, segregate and secure waste to prevent injury, leakage, fire or escape during storage and transport. Follow battery handling and site fire precautions.
- Use an approved data erasure or destruction method for equipment containing information. Record owner authority, the asset reference, method and the disposal evidence without publishing sensitive details.
- Retain the required transfer records for the applicable period and check that agreed disposal or recovery evidence has been returned. Escalate gaps rather than marking them complete.

Pollution and unexpected conditions

Stop the relevant work if there is an uncontrolled spill, damaged battery, unknown substance or suspected hazardous material. Protect people, follow the site emergency arrangements and inform the operations lead. Do not disturb suspected asbestos or undertake specialist treatment beyond competence and authorisation. Record any incident, referral and corrective action.

Improvement and honest claims

Maintain proportionate purchasing, travel and waste records and use them to set and review improvement actions. Record what is measured, the period covered and the method. Do not claim carbon neutrality, net zero performance, universal recycling or an environmental certification without current, relevant evidence.

Review and related policies

Review this policy annually and when work scope, law, a waste contractor or a significant environmental risk changes. The Health and Safety Policy covers safe working arrangements. The existing environment and supplier pages remain public context; project waste plans and lawful transfer records provide the operational evidence.

3 Ethical business and anti bribery policy

Document	Version	Effective	Next review
PG-ET-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Directors, workers, agents and subcontractors acting for Phone Guys in sales, tenders, purchasing, delivery and business relationships.

Purpose and standard

Phone Guys will compete honestly and make business decisions on legitimate commercial grounds. Bribery, facilitation payments, secret commissions, false records and improper influence are prohibited. No one may offer, request, promise, give or accept an advantage intended to obtain an improper business outcome, including through a third party.

Gifts hospitality and conflicts

- Do not give or accept cash, cash equivalents, personal rebates or concealed benefits. Do not offer hospitality or gifts connected with a live tender, award decision, regulatory decision or other situation where impartiality could reasonably be questioned.
- Before offering or accepting any other gift or hospitality, disclose its nature, value, parties and business purpose to an uninvolved director and obtain a written decision. The director must record any standing limits or authorisations. Without one, approval is required for each case.
- Declare actual or potential conflicts, including personal relationships, outside interests and financial interests in a customer, bidder or supplier. Record how the conflict will be managed and remove the conflicted person from the decision where needed.

Buying and using third parties

The operations lead must check a proposed supplier's identity, capability and relevant safety, security, labour and environmental risks before committing work. The depth of checks must reflect the risk and value of the relationship. Agree scope, price, access and the ethical standards in writing. Do not use an agent or subcontractor to do something that Phone Guys could not properly do itself.

Director responsibilities

The accountable director will assess bribery risks, approve proportionate controls and communicate them to people exposed to those risks. Commercial pressure must not override a concern. The director will arrange independent consideration when a report concerns a director or usual decision maker.

3 Ethical business and anti bribery policy continued

Tender and payment controls

- Provide accurate statements about experience, policies, qualifications, insurance and delivery capability. Obtain evidence before making a claim or answering a declaration.
- Record the basis of a purchasing or award decision. Protect confidential bid information and reject requests for hidden benefits or competitor information.
- Check invoices against the agreed work and pay an established business through an authorised process. Independently verify unexpected bank-detail changes through a trusted contact route.
- Record discounts, commissions, gifts, hospitality, conflicts and exceptions transparently. Do not disguise an improper payment as an expense, donation or consultancy fee.

Labour and supply chain concerns

Watch for indicators of coercion, withheld identity documents, unsafe conditions or recruitment fees imposed on workers. Escalate credible concerns, assess immediate protection needs and obtain appropriate specialist or authority advice. Do not make unsupported claims that a supply chain is free from exploitation. Any separate statutory modern slavery statement requires its own applicability check and approval.

Speaking up and response

Report a suspected breach to the operations lead or directly to an uninvolved director. Record facts and preserve relevant evidence without conducting an unauthorised investigation. The director will assess the report, protect people from retaliation for a good faith concern and arrange an impartial investigation. Reporters may seek lawful external advice or use an appropriate external reporting route. Confidentiality will be limited to what a fair process and legal duties permit.

If personal safety is threatened

Do not put yourself at risk to refuse a demand. Move to safety, contact emergency services where necessary and report the facts to the director as soon as it is safe. Any payment made under an immediate threat must be recorded accurately and reviewed with appropriate advice; it must not be concealed or treated as normal business.

Records and review

Keep decisions and investigation records securely, restrict access and retain them according to their purpose and legal obligations. Review this policy annually and following a significant concern, change in business activity or new high-risk relationship. Existing supplier, anti-bribery and speaking-up pages remain in place.

4 Safeguarding and site conduct policy

Document	Version	Effective	Next review
PG-SG-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Visits, surveys, installations, support and remote access that may affect children, adults at risk or other members of the public.

Purpose and standard

Phone Guys will plan work to avoid harm, respect personal boundaries and respond promptly to safeguarding concerns. Staff must follow the client's safeguarding and site rules as well as this policy. Technology work does not authorise personal care, supervision of children or adults at risk, private contact or access to information unrelated to the agreed task.

Before a site visit

- The operations lead must identify whether the site is occupied by children or adults at risk, agree the client safeguarding contact and confirm supervision, work zones, visitor identification and permitted hours.
- Assess each role and activity before deciding which checks are lawful and appropriate. A visit to a school or care setting does not by itself establish eligibility for every DBS check. Record the basis for any check and comply with site access restrictions while verification is outstanding.
- Agree how work areas, tools, cabling, cameras and access-control equipment will be secured. Arrange work to minimise unsupervised contact and disruption to privacy or care.
- Give the assigned people the relevant conduct and reporting briefing before access; retain the actual briefing record when completed.

Conduct on site

- Sign in, display the required identification and stay within authorised areas. Follow escort arrangements; never bypass access controls or lend a pass.
- Use respectful language and avoid being alone with a child or adult at risk where the task can be organised otherwise. Do not exchange personal contact details, offer private lifts or make personal social-media contact.
- Do not photograph, record, copy or share images or personal information except for the authorised work and agreed purpose. Avoid private areas and unnecessary viewing of CCTV or records.
- Keep tools and work areas secure. Stop and seek guidance if supervision, access or safety arrangements differ from the plan.

4 Safeguarding and site conduct policy continued

Responding to a disclosure or concern

- If someone is in immediate danger, call 999 and follow the site emergency arrangements. Do not wait for a company email response.
- Listen calmly, take the concern seriously and avoid leading questions. Do not promise secrecy, investigate the allegation yourself or confront the person suspected.
- Make a factual record of what was observed or said, including the time, place, exact words where possible and action taken. Separate facts from interpretation.
- Tell the client's safeguarding lead and the Phone Guys operations lead promptly, unless doing so could increase risk or implicates that person. Escalate directly to an uninvolved director and the relevant safeguarding authority when needed.
- If the usual contact is unavailable, involved or not taking a serious concern forward, use the responsible local authority or police route. The site's location determines the correct referral authority.

Escalation and confidentiality

The accountable director is responsible for appointing a safeguarding contact and deputy, verifying referral routes and arranging appropriate briefing before work creates relevant safeguarding exposure. Information must be shared only with people who need it to protect someone, manage the incident or meet a legal duty. Restrict records and preserve evidence. An allegation concerning a worker must be handled with appropriate specialist advice and fair employment procedures.

Site and surveillance boundaries

Camera placement, viewing permissions, access credentials and disclosures must follow documented client instructions and the relevant data responsibilities. This policy does not authorise continuous observation, emergency intervention or disclosure of footage outside the agreed service. The existing CCTV and monitoring page and the customer schedule continue to govern those service boundaries.

Review and local routes

Review this policy annually and after a significant incident or change in client work. The Westmorland and Furness Council safeguarding page is a reference for sites in that area. For a Marlborough or other site, verify that site's local authority and client safeguarding contacts before attendance. Company enquiries are not an emergency service.

5 Service quality and complaints policy

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PG-SQ-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Enquiries, quotations, contracted services, installation, support, handover, complaints and corrective action.

Purpose and standard

Phone Guys will agree what is to be delivered, keep customers informed and check work against the agreed requirements. We will take complaints seriously, investigate fairly and use the findings to correct problems and improve work. These arrangements supplement the existing complaints page and the terms agreed with each customer.

Agreeing and delivering the work

- Confirm the customer's need, site conditions, scope, exclusions, dependencies and acceptance criteria before starting. Record material assumptions and any unresolved questions.
- Use people with the competence and authority required for the task. Confirm customer contacts, access, maintenance windows and any safeguarding or security requirements.
- Explain options, charges and changes clearly. Obtain the required approval before carrying out work outside the agreed scope or incurring additional charges.
- Keep proportionate records of work, checks, configuration changes and outstanding defects. Provide agreed handover information and a clear support route without exposing credentials.

Service commitments

Response targets, availability, maintenance, escalation and restoration commitments apply only where agreed in the customer's service schedule. This policy creates no new numerical service level, emergency service or continuous monitoring promise. Where a target cannot be met, explain the issue, action being taken and the next update through the agreed route.

Responsibilities

The director will appoint a complaint owner and review significant or repeated failures. The operations lead will coordinate delivery checks, record nonconformities and assign corrective actions with owners and dates. Workers and subcontractors must raise defects and avoid presenting incomplete work as accepted or a temporary workaround as a permanent solution.

5 Service quality and complaints policy continued

How to raise a complaint

Email info@phoneguys.uk, telephone 03300 557 595, or write to the director at Cowran Estate, Pennington, Ulverston, LA12 0JW. Provide a contact method, relevant reference, a description of the issue and the outcome sought. Ask for a secure channel before sending sensitive information. You may request an accessible format or reasonable communication adjustment.

Handling procedure

- Record the complaint and assess urgency, safety, safeguarding, privacy and any service impact. Route urgent risk through the appropriate incident process rather than waiting for ordinary complaint handling.
- Acknowledge receipt, identify the owner and explain the next step and expected update. Set dates appropriate to the circumstances and the contract; do not assume a published response time that has not been agreed.
- Investigate the records and listen to those involved. Explain any delay and agree a revised update. Keep the customer informed without sharing another person's confidential information.
- Give a reasoned written outcome, actions or remedy where appropriate, and an explanation of how to request a further review. Record whether the customer accepts the outcome.
- If requested, arrange review by someone not responsible for the original decision where practicable. Explain any applicable external escalation route after checking the service and customer's rights.

Fairness and learning

A person will not receive worse service for making a complaint in good faith. Keep records restricted to those who need them and follow the approved retention arrangements. Assign corrective action to a named role, verify completion and consider whether similar customers or services are affected. The director will review significant incidents and recurring themes.

Related notices and rights

The current complaints page remains the public entry point. Privacy requests, safeguarding concerns and security incidents also follow their specialist process. Contractual and statutory rights remain available. The director must verify any sector-specific complaints obligations and applicable scheme before describing it to a customer.

6 Information security and data protection standards

Document	Version	Effective	Next review
PG-IS-001	1	17 October 2026	17 October 2027

Approved by Simon Diss | Accountable director | 17 October 2026

Phone Guys Limited | info@phoneguys.uk | 03300 557 595

Scope Company and customer information handled through business systems, devices, support activity, site work, communications and approved suppliers.

Purpose and standard

Phone Guys will protect information from unauthorised access, loss, alteration and misuse, and handle personal data for defined and lawful purposes. Controls must reflect the information, service and risk.

Accountability and data roles

The director is accountable for approving information risks, resources and responsibilities. The operations lead must identify the systems, information, owners and suppliers used for each service. Before processing customer data, record whether Phone Guys acts as controller or processor, the permitted purpose, instructions, access, retention and incident responsibilities. Put the required contract and data terms in place before access.

Access and working practices

- Use individual authorised accounts, the minimum access needed and strong authentication appropriate to risk. Enable multifactor authentication where available, prioritising privileged and remote access. Record any exception and compensating control.
- Use approved devices and software, protect stored and transmitted information appropriately, lock unattended devices and apply supported security updates. Verify implementation rather than assuming a product provides protection by default.
- Keep passwords, recovery codes and keys in an approved controlled method. Do not send them through public forms, chat, shared documents or ordinary support correspondence.
- Approve and record remote customer access, confirm the person requesting a sensitive change and end access when the work, role or relationship ends.
- Collect only necessary personal information, keep it accurate and apply a documented retention and secure disposal decision. Handle sensitive and criminal-record information with additional care.

6 Information security and data protection standards continued

Continuity suppliers and service records

Identify information and configurations needed for recovery, choose proportionate backup and restoration arrangements and record actual test results. Assess suppliers before sharing data or granting access, including contractual, security, retention and any international transfer requirements. Customer monitoring, logs, recovery targets and subcontractor arrangements must be defined for the actual service; none are guaranteed by this public policy.

Incident and concern procedure

- Report a suspected loss, unauthorised access, phishing attempt, disclosure or material service risk to the operations lead promptly. Preserve evidence and avoid unauthorised changes that could destroy it.
- The operations lead will assess and contain the incident with authorised assistance, record affected information and services, and escalate significant risks to the director and relevant customer contact.
- The director will assess notification duties and applicable deadlines promptly, using current ICO guidance and specialist advice where needed. A processor must support the controller and follow the agreed incident terms. Record the notification decision and its basis.
- Agree recovery action, verify restoration and permissions, record the cause where established and assign corrective actions. Do not claim an incident is resolved solely because a service restarts.

Privacy requests and public reporting

Use info@phoneguys.uk, 03300 557 595 or written contact to the director for policy or privacy questions and to request a secure reporting route. Do not send passwords, camera credentials, payment details or sensitive evidence through the public Concierge. For an urgent incident, use the agreed customer incident contact and escalate if no response is obtained; public contact channels are not an emergency or continuously monitored service.

Existing notices and review

The current privacy notice, cookie notice, CCTV page and customer data terms continue to explain their specific purposes and boundaries. The operations lead must maintain records of actual providers, data roles, lawful purposes, retention and authorised access. Review these standards annually and after a significant incident, system change or relevant legal change.