



## Policies and Procedures

To ensure Life Sciences Hub Wales (LSHW) delivers its aims, objectives, responsibilities and legal requirements transparently and consistently, we develop and describe our “ways of working” in policies, procedures and other written control documents.

Policies describe LSHW’s guiding principles that underpin our decisions, behaviours and actions for everything we do.

Procedures and other written control documents translate these principles into more detailed instructions or guidance including individual responsibilities.

This page provides an overview of some of our key policies.

### 1. Policies and procedures for the conduct of company business

#### Corporate Governance

##### Anti-Money laundering Policy

LSHW is under a legal obligation to report any money laundering suspicions, as we provide company services (e.g. providing a registered office).

LSHW is committed to acting professionally, with integrity, and in accordance with all relevant laws relating to anti-money laundering. Our Anti-Money Laundering Policy sets out our responsibilities, and the responsibilities of those working for us, in observing our obligations in respect of anti-money laundering; and provides information and guidance on how to recognise risks, and when to report suspicions.

##### Anti-Corruption and Bribery Policy

It is LSHW’s policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and is committed to ensuring all employees act professionally, fairly and with integrity in all business dealings and relationships wherever they operate and implementing and enforcing effective systems to counter bribery.

LSHW will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which the company operates.

LSHW and its employees, observe and uphold arrangements to prevent bribery and corruption, and have a full awareness of the processes to be followed to raise a concern.

##### Anti-Fraud Policy



LSHW is committed to protecting its reputation, revenues, assets and information from any attempts of fraud, deceit or other improper conduct by employees or third parties. We have established arrangements for the prohibition, recognition, reporting and investigation of suspected fraud, corruption, misappropriation and other similar irregularities.

We ensure that all LSHW's financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. LSHW does not condone any behaviour that falls short of these principles.

All employees have a responsibility for putting these principles into practice and for reporting any breaches they discover.

#### Disclosure of Conflict and Declarations and Management of Interests, Gifts, Hospitality and Sponsorship Policy

LSHW is open, transparent and honest in the way it conducts its business and is committed to ensuring that its employees (and Non-Executive Directors) practice the highest standards of conduct and behaviour.

This policy complements the anti-corruption and bribery policy (see above) and sets out specific expectations in relation to interests, gifts, hospitality and sponsorship, in accordance with the Seven (Nolan) Principles of Public Life. This includes not seeking or knowingly accepting, preferential rates or benefits in kind, being impartial and honest in the conduct of their official business, using public funds to the best advantage of the company, always seeking to ensure Value for Money (VfM), not abusing/using their official position for personal gain or the benefit of family or friends, and not seeking advantage or to further private business or other interests in the course of their official duties.

We also have safeguards in place against conflict or potential conflict between private interests and public duties of members of employees and Non-Executive Directors. We also have arrangements in place to manage conflicts once identified.

#### Whistleblowing Policy

An important aspect of accountability and transparency is the provision of a mechanism to enable employees and other members of the Company to voice concerns in a responsible and effective manner. Any suspected serious misconduct or wrongdoing should be reported as soon as possible.

Where an individual discovers information which they believe shows serious malpractice or wrongdoing within LSHW then this information can be disclosed internally without fear of reprisal. We have arrangements to enable this to be done independently of line management.



### Risk Management Policy

LSHW recognises that no organisation can operate in a risk-free environment. However, risk is not something to be feared, as if it is identified, understood and managed properly it can be effectively mitigated and lead to benefits and opportunities for the Company, its employees and key stakeholders.

We are committed to the effective management of risk at all levels and will develop and maintain the appropriate systems to enable this.

We maintain a Risk Management System (RMS) as a core element of our system of internal control. Our RMS enables and empowers employees to identify, assess, manage and where appropriate exploit risks to the benefit of LSHW.

Further details on LSHW's risk management can be found in our [annual report](#).

### Security Policy

LSHW recognises the need for robust security – physical, electronic and documentary – measures. This includes the secure management of information assets by preserving the confidentiality, integrity and availability of our business information.

Our policies set out our information security and assurance arrangements, as well as providing all employees with advice and guidance.

### Environmental Sustainability Policy

LSHW recognises that it has a responsibility to the environment. We seek to continually improve our environmental performance as an integral part of our values, business strategy and corporate social responsibility.

LSHW is committed to reducing its environmental impact in line with these legislative and regulatory requirements, as supporting Welsh Government's part in the global effort to reduce the impact of climate change, particularly its ambition of achieving a [carbon neutral public sector by 2030](#).

Our commitment is contextualised by the context of the *Well-being of Future Generations (Wales) Act* – the seven well-being goals, five ways of working and the sustainable development principle.

### Business Continuity Planning and Cyber Resilience

Business continuity is about an organisation being prepared to respond to adverse situations, events and incidents to enable it to continue to function with as little disruption



as possible. This involves the identification and recognition of potential threats and an analysis of what impact they may have on business operations and service delivery.

LSHW has established business continuity arrangements in place, including a Business Continuity Plan which outlines the principles, approach and assumptions that drive the development, implementation and ongoing maintenance of these arrangements.

One of the key threats to business continuity is a cyber-attack. Cyber-attacks can quickly escalate and become a significant business disruptor with the potential to cause short and long-term harm to an organisation's digital assets, business operations and continuity.

Our Cyber Resilience Plan sets out the arrangements in place to safeguard LSHW's digital assets, both in terms of digital security systems (anti-malware protection software) and support policies / processes, to enable their oversight, usage and continuous improvement, and prepare the organisation for a cyber-attack.

Both Plans set out the response process for the management of business continuity and cyber incidents.

### **Information Governance**

#### **Data Protection Policy**

LSHW is committed to ensuring that data is collected and treated in accordance with data protection legislation including the EU *General Data Protection Regulations (GDPR) 2016*, and the *Data Protection Act 2018*.

Our Policy sets out the processes we have in place to ensure that we handle data in accordance with regulations and best practice. This includes:

- Processing personal information only where it is strictly necessary for legal and regulatory purposes, or for legitimate organisation purposes.
- Processing only the minimum amount of personal information required to fulfil these purposes.
- Providing clear information to people about how their personal information can be used and by whom.
- Only processing relevant and adequate personal information.
- Processing personal information fairly and lawfully.
- Maintaining a documented inventory of categories of personal information processed by the organisation.
- Keeping personal information accurate and up to date.
- Retaining personal information only for as long as is necessary for contractual, legal or regulatory reasons.
- Ensuring timely and appropriate disposal of data.
- Respecting the right of natural persons in respect of their data.



Our policy, and supporting procedures are based on the data protection principles. This is detailed publicly in our [Privacy Notice](#).

Data protection arrangements for candidates applying to join the LSHW Team are outlined in the [candidate privacy notice](#).

### Information and Records Management Policy

LSHW needs to know what information it possesses, where it is held, how old it is, that there remains a business need to hold it, and to ensure that it constitutes reliable evidence. This enables us to comply with the Public Records Act 1958, the General Data Protection Regulations (GDPR) 2016, the Data Protection Act 2018 and the Freedom of Information Act.

LSHW processes allow access to those who need to see this information, while preventing others from gaining access. LSHW is also able to identify personal information, know who it is shared with, and dispose of information that we are no longer entitled to hold.

### Freedom of Information

LSHW's commitment is to be transparent and open about the work that we do and how we spend public money.

As a Welsh Government Arms-Length Body, LSHW is required to ensure that it has processes in place to enable us to respond to information access requests. We also proactively publish information in our [publication scheme](#).

Further details are provided on our [Freedom of Information](#) webpage.

### Information Security

We govern the secure management of our information assets by preserving the confidentiality, integrity and availability of our business information.

We ensure that all employees are aware of, and fully comply with, their responsibilities and relevant legislation. We create and maintain a level of awareness of the need for information.

We have strong all information/data processes, information systems, networks, applications and locations.



## **Finance and Procurement**

### **Financial Regulations**

LSHW's has financial regulations which seek to maintain financial viability, achieve value for money, fulfil our responsibility for the provision of effective financial control over the use of public funds, ensure compliance with relevant legislation and safeguard company assets.

The [LSHW Framework Document](#) provides the operating framework on which the financial regulations are based.

### **Procurement Policy**

Procurement activity at LSHW is underpinned by a regulatory framework that includes the Public Contracts Regulations 2015, Wales Procurement Policy Statement and an internal Procurement Policy to ensure the adoption and use of standard processes which are open, transparent, proportional and that minimise complexity and cost timescales for suppliers.

We ensure that our processes for purchasing goods, services and works are fair and produce value for money. We ensure a set code of conduct for the procurement process, in which all suitable suppliers are treated equally and fairly. To achieve this, unless there are compelling reasons to the contrary, all procurement activity must be conducted in line with the following thresholds:

- a minimum number of competitive quotations for all purchases under £25,000 (excluding VAT) are obtained, in-line with internal Procurement Thresholds; and
- all purchases over £25,000 (excluding VAT) must be advertised on [Sell2Wales](#).

We also ensure that procurement activity supports the goals and principles as set out in the *Well-being of Future Generations (Wales) Act 2015*.

## **Health and Safety**

### **Health and Safety Policy**

LSHW's Health and Safety Policy is to enable the organisation to operate effectively and allow its employees, visitors and contractors to undertake their activities, regardless of location, without detriment to their health, safety and wellbeing.

We have established the system by which we manage health and safety, which includes legislative compliance, adequate resourcing and training to help ensure that employees are aware of their health and safety responsibilities.

LSHW also recognises the benefits of a positive health and safety culture and encourages everyone to embrace the LSHW collective ambition of working in an incident free environment.



Our organisational health and safety arrangements fulfil part of the company's duties under *The Health and Safety at Work Act 1974* and the *Management of Health and Safety at Work Regulations 1999*.

## **Welsh Language**

### **Welsh Language Policy**

LSHW is committed to actively facilitating and encouraging the use of the Welsh Language both within the organisation and in our external activities and services.

We will also meet our obligations under the Welsh Language (Wales) Measure 2011, which established a legal framework to impose duties on public organisations to comply with one or more standards of conduct on the Welsh Language.

We see this policy as forming part of a progressive and forward-looking commitment within the Life Sciences community to facilitate and promote the use of Welsh in a bilingual Wales. We also aim to raise our profile and corporate reputation and be recognised by Welsh speakers and non-Welsh speakers alike (including internationally) as a good example of a public organisation in Wales.

For further information see the [Welsh Language](#) pages on our website.

### **Welsh Language Complaints Policy**

We have established a dedicated policy to receive and address any complaints relating to the Welsh Language or our compliance with the Welsh Language Standards.

For further information see the [Welsh Language](#) pages on our website.

## **Communications**

### **Media Policy**

The media plays a significant role in boosting and protecting the reputation of LSHW, helping to communicate its strategic aims and deliver on business priorities.

Building a positive relationship across a variety of media platforms (online and offline) is a critical part of presenting LSHW's message and purpose, whilst remaining a good tool to inspire and encourage innovation across the sector. We ensure that an open, positive, and consistent approach is taken when liaising with the media.



## **2. Policies and procedures for the provision of services**

### Complaints Policy and Procedure

LSHW is committed to dealing effectively with any concerns or complaints anyone may have about its services.

For further information see the [Complaints Policy](#) pages on our website.

## **3. Policies and procedures for the employment of staff**

### Recruitment and Selection Policy

LSHW recognises that its employees are the most important asset and that its future depends upon a significant contribution by them. It is therefore essential that the Company encourages the best practice for the recruitment and selection of all employees.

LSHW is committed to maintaining professional standards and ensure that its recruitment and selection procedures are effective, efficient, fair and consistent with the LSHW Equal Opportunities and Diversity Policy.

Posts will normally be open to competition and advertised as appropriate. Candidates will be selected according to the appropriate level of skills, knowledge and experience for the job regardless of their race, religion, creed, colour, ethnic origin, nationality, gender, sexual orientation, age, disability, marital status or social status.

### Dignity at Work Policy

LSHW is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. Harassment and bullying can have very serious consequences for individuals and the Company.

Harassment or bullying may make people unhappy, may cause them stress and affect their health and family and social relationships, may affect their work performance and could cause them to leave their job. Severe cases of harassment and bullying can even lead to mental illness and suicide.

Effects on the Company can include loss of morale, poor work performance, increased turnover of staff, legal claims and damage to the Company's reputation.

Employees found guilty of harassment or bullying may face disciplinary penalties, up to and including dismissal, could be personally liable to pay compensation in legal claims, and may find their own family and social relationships are adversely affected. Serious harassment may be a criminal offence. The Company will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. The Company will also not tolerate victimisation of a person





for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

### Equal Opportunities and Diversity Policy

LSHW is committed to promoting equality of opportunity for all employees and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

LSHW does not discriminate against employees on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

The principles of non-discrimination and equality of opportunity also apply to the way in which employees treat visitors, job applicants, clients, customers, suppliers and former employees.

This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts, and on work-related trips or events including social events).

All employees have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other employees, regardless of their status.

### Stress Management Policy

LSHW is committed to protecting the health, safety and welfare of employees. It recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing causes of stress at work.

LSHW intend to ensure the wellbeing of employees by adhering to the following principles:

- Ensure that job demands are reasonable and realistic.
- Ensure employees have some influence in the way they do their work.
- Ensure employees are not subjected to unacceptable behaviour (e.g. bullying, harassment).
- Ensure employees understand their roles and responsibilities within the team.
- Ensure employees are engaged by means of consultation, updates, etc. whenever there are job or organisational changes.
- Ensure employees have access to necessary support to help them effectively manage any work pressures.
- Ensure swift responses are made to any identified concerns.



## Pay and Benefits Policy

Life Sciences Hub Wales Ltd.'s (LSHW) Pay and Benefits Policy provides clear and guiding principles for the Company's commitment to fair, competitive and appropriate pay and benefits for employees.

LSHW values the incredible commitment of all our employees helping to make Wales the place of choice for health, care, and wellbeing innovation. To recognise and reward the contribution of our employees and attract and retain the best people available to ensure the achievement of our strategic aims LSHW seeks to provide effective, competitive compensation.

The Company provides a range of salary and non-salary benefits to appeal to the diverse needs of our team and to reward our team members for their contribution to the Company's activity and innovation.

The guiding principles for LSHW's reward strategy are:

- To provide a reward model that is competitive with those of comparable positions at comparable employers, within comparable labour markets to attract and retain suitably skilled and motivated people to do their best work.
- To ensure external competitiveness and internal parity through consistent, appropriate, and responsible reward decision-making, aligned with LSHW values.
- To provide a reward model that is truly relevant and appeals to the diverse needs of our team and recognises individual contribution to the success of the company.
- To operate a system of pay that promotes fair, transparent, and ethical reward practices, meets legislative obligations, and supports a *real* living wage, as defined by the Living Wage Foundation.
- Be affordable now and in the future and secures value for money by creating a basis for pay decisions and effective budget allocation that aligns with Welsh Government pay principles for Arm's Length Bodies.

## Flexible Working Policy

Flexible Working is recognised as a valuable method of enhancing the efficiency of employees who would welcome the benefit of more flexible working arrangement, where this is feasible. Flexible Working is a general term that can include a number of innovative working arrangements and methods that can benefit the Company and employees through promoting the importance of a positive work life balance.

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## Training and Development Policy

LSHW is committed to the current and future development of employee skills, expertise and ability in support of the achievement of the Company's strategic aims, and objectives (outputs, outcomes, and benefits) and the job and career related aspirations of individual employees. LSHW recognises that effective employee development is not only vital to meeting future goals and ambitions but also makes an essential contribution to the development of a responsive, supportive and well-managed Company.

LSHW aims to:

- provide a controlled and supported approach to learning and development and clear guidance on how learning and development works in LSHW.
- provide employees with the skills required to carry out their tasks competently and compliantly and develop them in line with the business objectives.
- set out the standard corporate requirements that should be followed by all employees and managed by line managers.
- ensure that all employees have equality of opportunity for learning and development.
- develop a culture of coaching, self-development, participation and personal accountability.

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LSHW also has specific employment policies in place for its employees in relation to disciplinary, grievance, sickness absence, annual leave, maternity leave, paternity, adoption and shared parental leave, and performance improvement.

Life Sciences Hub Wales team members also have access to an Employee Handbook. This provides a summary of many of these policies in addition to other relevant information relating to employment.