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VALUES AND BEHAVIOURS FRAMEWORK

**Prepared by
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For further information about PositiveLee Ltd or the latest version of this document, please go to www.leecambule.com or get in touch with info@leecambule.com to find out more.

If you require translation facilities or information in other languages or formats, including Welsh, Braille, and large font or on CD or tape then this can be made available on request. Please get in touch and ask for details.

1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

The purpose of this document is to define our business policy in relation to the values and behaviours that underpin the delivery of our services and the running of our business. This combines a number of traditional corporate policy documents:

- Code of Conduct;
- Environmental Policy;
- Equality, Diversity and Inclusion Policy;
- Social Responsibility Policy;
- Unreasonable Behaviour Policy.

This document combines elements of strategies, policies, processes and standards in one place to support us in delivering one element of the business. For more information about our business strategy including our vision, mission and objectives, please refer to the latest **PositiveLee Business Plan** document.

This document integrates with other key business documents including our Safeguarding Policy, Confidentiality Policy and Data Protection controls.

1.2. AUDIENCE FOR THIS DOCUMENT

You may be interested in the contents of this document if you are a client or stakeholder of our company, which means that you may be interested in finding out more about the values of our organisation and our approach to upholding those values through our behaviours and attitudes as a business.

1.3. TERMINOLOGY

- Equality – ensuring everybody has an equal opportunity and is not treated differently or discriminated against because of their characteristics.
- Diversity – taking account of the differences between people / groups of people, and placing a value on those differences.
- Inequalities – the unequal or unjust opportunities afford one person / group of people over another.
- Discrimination – the different or unfair treatment of one person / group of people based on their characteristics.
- Environmental impacts – an action that affects the environment in a positive or negative way.

1.4. CONTEXT

We have five core values at PositiveLee Ltd, the initials of which form the word PEACE. This is a sign that if we uphold our values well, we can deliver peace for the people and communities we serve with our products and services:



- **Professionalism** - Designing quality, professional services that are accessible, understandable and relatable;
- **Empathy** - Treating people with compassion and without judgment, wherever they are or however they feel;
- **Authenticity** – Open communication and genuine lived experience at the heart of everything we do;
- **Creativity** – Using storytelling and creative expression to unlock solutions while embracing business innovation;
- **Empowerment** – Helping people build confidence, resilience, and self-belief without dependency.

At this time, our business does not employ staff and is not set-up as an employer. Some of these policies and standards are written to apply to people who are directly employed by our company (should our business grow and expand in the future) but they may also apply indirectly to people who volunteer with us as well as people who act as suppliers, intermediaries or representatives of our business.

PositiveLee Ltd is a limited company (Company Number 16718844) registered in Llanelli, Carmarthenshire, Wales SA14 9QA. Our business delivers a range of services relating to mental health, transformation and creativity.

You can find out more about our business, including what products and services we provide, how we are managed and how to get in contact with us, via our website or email info@leecambule.com for our latest Business Plan.

2. CODE OF CONDUCT

2.1. BACKGROUND

The PositiveLee Ltd Code of Conduct outlines the behaviours, standards, and expectations that guide how we work, communicate, and represent the company. It supports a culture of integrity, respect, inclusion, and professionalism.

This Code applies to:

- Employees;
- Associates and contractors;
- Volunteers;
- Partners acting on behalf of PositiveLee Ltd.

All individuals must uphold this Code when carrying out any PositiveLee Ltd business, whether on-site, off-site, or online.

2.2. OUR POSITION

PositiveLee Ltd operates in line with four principles:

1. **Positive Impact** – ensuring our work contributes to wellbeing, empowerment, and meaningful change.
2. **Integrity & Accountability** – acting honestly, transparently, and responsibly.
3. **Compassion & Respect** – treating everyone with dignity, fairness, and empathy.
4. **Quality & Professionalism** – delivering high-standard work that reflects our expertise and care.

These principles guide every decision, interaction, and piece of work we undertake.

2.3. PROFESSIONAL BEHAVIOUR AND RESPONSIBILITIES

2.3.1. Integrity and Honesty

All representatives must:

- Be truthful and transparent in communication
- Declare conflicts of interest
- Avoid misleading claims or misrepresentation
- Conduct business ethically at all times

2.3.2. Respectful Communication

PositiveLee Ltd promotes a culture of empathy and kindness. All individuals must:

- Treat others with dignity and courtesy
- Use clear, respectful, non-discriminatory language
- Listen actively and engage constructively
- Avoid aggressive, hostile, or inappropriate communication
- Maintain professional boundaries at all times

2.3.3. Inclusivity and Anti-Discrimination

We do not tolerate discrimination, harassment, or bullying of any kind. You must not behave in ways that demean or exclude others based on:

- Race or ethnicity
- Gender identity or expression
- Sexual orientation
- Religion or belief
- Disability or health status
- Age, socio-economic status, or lived experience

We actively promote accessible and equitable practice.

2.3.4. Confidentiality and Data Protection

All staff and associates must:

- Protect client, partner, and company information
- Comply with UK GDPR, our Privacy Policy, and our Data Protection Policy
- Only access information necessary for their role
- Not share confidential information with unauthorised individuals

2.3.5. Safeguarding

Everyone representing PositiveLee Ltd must:

- Act in accordance with the Safeguarding Policy
- Recognise signs of potential harm
- Report safeguarding concerns immediately
- Prioritise safety, dignity, and wellbeing

2.3.6. Boundaries and Professionalism

Representatives must:

- Maintain appropriate personal–professional boundaries
- Avoid dual relationships that may impair judgement
- Not provide services beyond their competency or role
- Use social media responsibly when referencing work

2.4. QUALITY AND STANDARDS OF WORK

2.4.1. Competence and Continuous Improvement

All staff and contractors must:

- Work within their skillset, training, and professional expertise
- Seek support or escalation when needed
- Commit to ongoing learning, feedback, and reflective practice

2.4.2. Accuracy and Transparency

Work must be:

- Factually accurate
- Evidence-based
- Delivered in accordance with agreed processes and policies
- We acknowledge and correct mistakes openly and promptly.

2.5. ETHICAL STORYTELLING AND USE OF LIVED EXPERIENCE

PositiveLee Ltd works with sensitive, personal narratives. All representatives must:

- Follow the Ethical Storytelling Policy
- Prioritise consent, dignity, and empowerment
- Avoid exploiting or sensationalising lived experience
- Ensure individuals retain ownership and agency over their stories
- Uphold trauma-informed practice at all times

2.6. HEALTH, SAFETY AND WELLBEING

PositiveLee Ltd is committed to creating a safe, supportive working environment.

Staff must:

- Prioritise their own wellbeing
- Follow company risk assessments and safety procedures
- Report health and safety concerns
- Avoid working in ways that cause harm or undue stress

2.7. CONFLICTS OF INTEREST

Representatives must:

- Declare personal, financial, or organisational interests that may affect decision-making
- Avoid activities that compromise impartiality or trust
- Refrain from accepting gifts or benefits that could influence judgement

2.8. USE OF COMPANY RESOURCES

Staff must:

- Use company equipment, branding, and materials responsibly
- Avoid unauthorised use of intellectual property
- Represent the brand professionally in all public-facing work

2.9. UNACCEPTABLE BEHAVIOUR

Examples of conduct that breaches this Code include:

- Abuse, aggression, or harassment
- Breach of confidentiality
- Discriminatory behaviour
- Misrepresentation of qualifications or role
- Intimidation or unreasonable demands
- Failure to follow safeguarding or data protection rules
- Dishonest or unethical practice

Such behaviour may lead to disciplinary action, contract termination or legal escalation.

3. ENVIRONMENTAL IMPACT POLICY

3.1. BACKGROUND

An environmental policy is a statement of what we are going to do and a commitment to do it. Environmental impacts are the measurement of the effect of our actions (i.e. human activities) on the environment, including harm on ecosystems.

The reason for creating an environmental policy is to ensure the decisions we make and the actions we take are down with consideration of these environmental impacts. There are often knock-on effects from the negative impacts such as social and economical. There are also opportunities to make positive impacts through our decisions.

3.2. OUR POSITION

We take pride in delivering a quality service, and in adding value to the local community and the wider environment. As such we are committed to proactively managing our environmental and sustainable development impacts. We abide by all relevant legislation and codes of practice. We are committed to pollution prevention and the continual improvement of our environmental impacts.

For our company, we are a small, part-time business with limited impacts on the environment. For instance, we don't produce a lot of waste, we don't use a lot of raw materials, we don't have any sites or workplaces to run and maintain. Much of our service delivery happens at home (via digital channels) or on site at our clients' premises, which will be subject to the client's relevant policies and practices.

3.3. OUR POLICY

Our key areas of improvement focus on site energy efficiency, our use of raw materials & packaging and waste management. Specifically, we plan to:

1. Working with responsible suppliers: Our business is taking steps to encourage good practice within the supply chain.
2. Products & services: Our business is taking steps to reduce its use of raw ingredients and materials and to ensure the processes are efficient.
3. Appropriate packaging: Our business is taking steps to ensure packaging protects products and the environment.
4. Efficient transport: Our business is taking steps to reduce vehicle use and improve fuel efficiency.
5. Use and End of Life: We are taking steps to minimise energy use and waste arising from our products and services during their use and at end of life.

6. Using land, energy and water wisely: Our business is taking steps to reduce reliance on natural resources.
7. Preventing waste and pollution: We are taking steps to reduce its impacts.
8. Well-being of staff and your local community: We are working towards being socially responsible.
9. Measuring impacts: We measure and manage the environmental and social impacts of our activities.
10. Branding and marketing: Our business is taking steps to raise awareness of its good practice and get positive results.

We will regularly review our progress through our **Environmental Action Plan** and take remedial action in the event of falling short of our business objectives. This document is a living policy, reviewed annually, and we welcome input of clients, suppliers and employees.

4. EQUALITY, DIVERSITY AND INCLUSION

4.1. BACKGROUND

An equality and diversity policy is a statement of our principles. Our business will work closely with clients and individuals who will include people and groups of people who are very different from each other. It is important that we treat people fairly without prejudice, that we embody the principles of equality, diversity and inclusivity.

According to the Equality Act 2010, it is illegal to discriminate against people or groups of people because their protected characteristics. These are **age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation**. Treating anyone differently on the basis of these characteristics is not only against the law, it is morally wrong and we want our business to demonstrate the highest standards through our commitment to this policy.

4.2. OUR POSITION

Our business condemns all forms of discrimination and has developed this equality policy to promote our equality objectives. The aims of this policy are therefore, to:

- Eliminate any form of discrimination within the business on the grounds set out in this policy;
- Create inclusive and sustainable communities in the area that are free from discrimination and harassment;
- Ensure all clients have equal access to high quality services that meet their needs;

- When providing services, we ensure that are clients, stakeholders and suppliers are treated fairly and with dignity, in accordance with the Equality Act 2010;
- Furthermore, it is recognised that if the above aims are to be successfully achieved the development of additional key equality and diversity policies is required.

We are aware of, and value, the different groups of clients and possible future clients that we serve, and aim to deliver services that meet the needs of this diverse group. All individuals can expect to receive equal access to the services we provide now and in the future.

4.3. OUR POLICY

Detailed below are the equality statements and commitments that, when implemented, will ensure our strategic aims and objectives are met:

1. Confidentiality of information is maintained at all times.
2. The business has considered physical and social barriers that may prove a barrier to clients and we have considered how to overcome those barriers.
3. We promote our commitment to delivering an inclusive service.
4. The business respects the bilingual nature of Welsh communities, recognizing and where possible promoting the use of the Welsh language. See the TMU Welsh Language Policy for further information.
5. The business will also endeavour to provide suitable interpreting services where appropriate, and will ensure that buildings are accessible to all wherever possible or that a suitable alternative is provided.
6. Delivering equality good practice through our suppliers.
7. We ask suppliers for a copy of their Equal Opportunities Policy.
8. We are signed up to Welsh Governments Ethical Employment Supply Chain.

As a Sole Trader business with no employees, the following equality statements and commitments are not currently applicable to our business (however, we commit to reviewing this policy and including these statements and commitments if and when the business grows to the point that we are employing staff):

1. We understand that equality activities benefit, attract and retain staff.
2. The business advertises vacancies widely to widen the number of potential applicants.
3. We are registered as an accredited living wage employer.
4. We are a Disability Confident employer.
5. The business has a Staff Handbook to ensure fair and legally compliant staff management practice.
6. Our Staff Handbook is regularly reviewed to ensure it is fit for purpose.
7. We implement regular staff appraisals

4.4. CODE OF PRACTICE

If you feel that you have been treated unfairly or suffered harassment because of your gender, marital status, race, religion, colour, age, disability or sexual orientation, you should report this without fail to the business. Any such complaints will be fully investigated as speedily as possible, and you will be kept advised of action taken.

If you are dissatisfied with any decision, you have the right to use our formal complaints procedure.

Monitoring will also include assessing how the equality policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues

4.5. LAW AND GOOD PRACTICE

In implementing this policy, we will endeavour to meet all legal obligations under the protected characteristics of Equality Act 2010:

“We embrace diversity, promote equal opportunities for all and eliminate unlawful discrimination in all areas of our work.”

5. SOCIAL RESPONSIBILITY

5.1. BACKGROUND

PositiveLee Ltd is committed to creating positive social impact through ethical practice, responsible decision-making, and meaningful engagement with the communities we serve. This Social Responsibility Policy outlines our commitments to people, communities, the environment, and long-term sustainable business practice.

This policy applies to:

- All PositiveLee Ltd employees, contractors, associates, and partners
- All business activities, products, services, and communications
- All projects delivered on behalf of clients, stakeholders, and communities

5.2. OUR POSITION

We commit to:

- Upholding the highest ethical standards across all operations
- Ensuring honesty, fairness, and transparency in decision-making
- Maintaining compliance with UK legislation, professional codes, and industry standards
- Applying ethical approval processes for research, storytelling, and engagement activities

We believe in a **people-first approach** and commit to:

- Treating all individuals with dignity, respect, and compassion
- Actively preventing discrimination, bullying, or harassment
- Ensuring accessibility and inclusion in all products, projects, and communications
- Supporting the mental health and wellbeing of employees and contractors

We aim to create a positive, lasting **contribution to communities** we support by:

- Designing services and products grounded in lived experience
- Engaging community members in meaningful, co-productive ways
- Supporting local charities, organisations, and grassroots initiatives
- Promoting equality, empathy, and improved social outcomes through our content and services

5.3. OUR RESPONSIBILITIES

5.3.1. Environmental Responsibility

PositiveLee Ltd is committed to reducing its environmental footprint by:

- Minimising waste, energy use, and carbon emissions in our operations
- Prioritising digital-first approaches where appropriate
- Using sustainable suppliers and materials wherever feasible
- Considering environmental impacts when developing products and services

5.3.2. Responsible Procurement

We commit to:

- Working with suppliers who uphold ethical labour practices
- Avoiding partners or vendors engaged in exploitation, discrimination, or environmental harm
- Prioritising social enterprises, local suppliers, and sustainably-aligned businesses

5.3.3. Accessibility and Inclusion

We design with inclusivity at the core by:

- Ensuring our content is accessible across diverse abilities and needs
- Considering cultural, linguistic, and cognitive needs in user experience design
- Following accessibility best practice standards (e.g., WCAG)

5.3.4. Voice of Lived Experience

PositiveLee Ltd is dedicated to centring real lived experience by:

- Embedding co-production and user participation in product and service design
- Compensating participants fairly for their time, expertise, and insight
- Ensuring that individuals' voices are represented ethically, sensitively, and with consent
- Using insights to inform continuous improvement and innovation

5.3.5. Responsible Storytelling

All content, narratives, and media produced by PositiveLee Ltd will:

- Present individuals with dignity and respect
- Avoid sensationalism or exploitation
- Seek informed consent on how stories, quotes, and images are used
- Promote hope, compassion, and empowerment

5.4. IMPLEMENTING THIS POLICY

5.4.1. Training

We will ensure:

- All staff and contractors receive induction on this policy
- Training is reviewed and refreshed annually

5.4.2. Integration into Workflows

This policy will be integrated into:

- Product development and quality assurance processes
- Project planning and delivery frameworks
- Supplier onboarding and procurement decisions

5.4.3. Reporting and Accountability

We maintain an open culture of accountability and commit to:

- Providing confidential mechanisms for raising concerns
- Promptly investigating concerns relating to ethics, discrimination, or environmental harm
- Acting swiftly to correct wrongdoing or poor practice

6. UNREASONABLE BEHAVIOUR

6.1. BACKGROUND

PositiveLee Ltd is committed to providing a safe, respectful, and supportive environment for all employees, contractors, clients, partners, and members of the public. This policy sets out how we define, manage, and respond to unreasonable behaviour while ensuring fairness, dignity, and compassionate communication.

6.2. OUR POSITION

The aim is to:

- Protect staff and associates from harm, abuse, and undue stress
- Ensure productive, respectful engagement with clients and stakeholders
- Maintain high-quality service delivery
- Establish clear expectations and procedures

This policy applies to:

- All employees, contractors, associates, and volunteers
- All clients, stakeholders, and partners engaging with PositiveLee Ltd
- Interactions by email, phone, video call, in-person meetings, events, social media, or written correspondence

6.3. OUR POLICY

PositiveLee Ltd promotes a safe, non-judgemental, trauma-informed culture.

Everyone deserves to be treated with dignity and respect.

We aim to de-escalate and resolve difficulties wherever possible

We will not tolerate abusive, harmful, threatening, or disruptive conduct

We will act proportionately, balancing fairness with the safety and wellbeing of our team

6.4. DEFINITIONS OF UNREASONABLE BEHAVIOUR

Unreasonable behaviour may include (but is not limited to):

6.4.1. Abusive or Aggressive Behaviour

Threats of harm or violence

Yelling, swearing, intimidation, or verbal aggression

Discriminatory, hateful, or harassment-based language

Persistent personal attacks or derogatory remarks

6.4.2. Unreasonable Demands

Insisting on actions outside the scope of our services

Excessive or unrealistic expectations

Demanding immediate responses or preferential treatment

Refusal to accept clear boundaries or limitations

6.4.3. Unreasonable Persistence

Repeatedly contacting multiple staff about the same issue

Excessive phone calls, emails, or messages

Refusing to accept decisions or outcomes

Reopening previously resolved matters

6.4.4. Disruptive Behaviour

Interrupting meetings or online sessions

Preventing progress in project work

Using social media or public platforms to pressure staff

Any behaviour that disrupts staff wellbeing, workflow, or safety

6.5. TRAUMA-INFORMED APPROACH

PositiveLee Ltd acknowledges that some individuals may behave in challenging ways due wholly or in part to:

- Trauma
- Mental distress
- Crisis situations
- Communication barriers

Where appropriate, staff will respond with empathy, understanding, and support—without compromising safety or professional boundaries.

6.6. MANAGING UNREASONABLE BEHAVIOUR

6.6.1. Step 1 – Verbal or Written Warning

If behaviour is becoming challenging or unreasonable, the staff member may:

- Clearly explain the issue
- Set boundaries
- Request that the behaviour stops
- Offer alternative ways to communicate

A written boundary-setting communication may be issued.

6.6.2. Step 2 – Adjustments or Restrictions

If unreasonable behaviour continues, PositiveLee Ltd may introduce proportionate restrictions, such as:

- Limiting communication to specific channels (e.g., email only)
- Restricting frequency of contact
- Appointing a single point of contact
- Pausing or rescheduling meetings
- Ending conversations if behaviour becomes abusive

6.6.3. Step 3 – Suspending or Terminating Engagement

If behaviour poses significant risk or continues despite warnings, PositiveLee Ltd may:

- Suspend services
- Withdraw from a contract, project, or engagement
- Terminate the relationship where contractually permissible
- In severe cases, involve legal or safeguarding authorities

6.6.4. Appeals

If restrictions or termination of engagement are imposed, individuals have the right to request a review. Appeals must be:

- Submitted in writing
- Reviewed by a senior leader not previously involved
- Concluded within a reasonable timeframe

PositiveLee Ltd may uphold, amend, or remove restrictions based on evidence.

6.7. INDIVIDUAL RESPONSIBILITIES

Staff and associates must:

- Remain calm, professional, and respectful
- Follow de-escalation guidance and use trauma-informed communication
- Document incidents promptly and accurately
- Escalate concerns to leadership
- Not place themselves at risk

6.8. COMPANY RESPONSIBILITIES

The organisation will:

- Provide a safe working environment
- Support staff experiencing distress or abuse
- Investigate reports of unreasonable behaviour
- Apply restrictions fairly and consistently
- Maintain confidentiality and privacy

6.9. RECORDING AND MONITORING

All incidents of unreasonable behaviour will be:

- Logged securely
- Reviewed by leadership
- Used to inform risk assessments and support plans
- Treated confidentially in line with UK GDPR

7. CONTACTING US

7.1. DOCUMENT APPROVALS

This document has been approved by the Director and will be reviewed annually or when:

- Legislation changes
- New risk areas emerge
- Organisational needs evolve

7.2. ENQUIRIES

We may update this policy periodically. The updated version will be posted on our website and this document is available on request. For any enquiries relating to this policy:

PositiveLee Ltd
Email: info@leecambule.com
Registered in the UK

7.3. RAISING A COMPLAINT

Concerns or breaches may be reported to:

The Director of PositiveLee Ltd

Reports will be handled:

- Promptly
- Confidentially
- Fairly and transparently

No person will be penalised for reporting genuine concerns.