

# PROFESSIONAL INDEMNITY SERVICES PORTFOLIO



## **IS YOUR BUSINESS COMPLIANT WITH MANDATORY WORKPLACE REGULATIONS?**

- The first step in avoiding negligence claims is ensuring your business is compliant with the law. From prioritising health and safety to enforcing strict data protection practices, it is crucial to comply with regulations such as those from the HSE or under the General Data Protection Regulation (GDPR). Holloway & Gauntlet Insurance Services can keep you updated on mandatory compliance standards with our library of resources, including compliance toolkits, regulatory updates, detailed checklists and guidance directly from the HSE.

## **DO YOUR EMPLOYEES HAVE THE RESOURCES TO REDUCE POTENTIAL ERRORS?**

- Safety isn't the responsibility of a single employee or manager—everyone at your business needs to be on-board if you want to experience the benefits of a safe workplace. Creating a strong safety culture also helps mitigate the risk of employee errors, keeping professional indemnity claims at a minimum. Our employee-facing documents can help workers stay safe and avoid mistakes.

## **HOW DOES YOUR BROKER HELP YOU AVOID NEGLIGENCE RISKS AT YOUR BUSINESS?**

- We're dedicated to the ongoing support of your business needs. We will work with you throughout the year to ensure your business implements proper risk management techniques against potential negligence claims, providing in-depth, employer-facing articles, customisable workplace policy templates and detailed cover overviews.

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# Professional Indemnity Cover

As a professional, you are expected to provide quality services within the accepted standards of your profession. However, despite your best intentions, mistakes or misjudgements are bound to occur and can have serious consequences. Clients could sue you or your company, and in addition to paying to defend yourself in court, you would also be responsible for potentially extensive compensation costs if found at fault. If you fail to protect yourself against this liability, the consequences for your business could be financially devastating.

## Professional Indemnity Cover

First and foremost, you can protect yourself with professional indemnity insurance cover. In the event of a claim, this policy will cover defence costs in court and any monetary damages awarded to the claimant if you are found at fault.

However, just purchasing cover is not enough. You will also need to engage in effective risk management as well as report claims on first knowledge. Reporting and responding to claims immediately by developing an appropriate response plan can ensure that you have the best chance of a favourable outcome.

## Quick Response Plan

Your best risk management defence is to craft a very specific plan for responding to professional indemnity claims. The following elements should be addressed in your plan:

- Report the claim to your insurer as soon as possible and in accordance with the requirements of your policy. Insurers will accept verbal notifications and written notifications. Late

notifications could void your cover and enable insurers to not pay the claim.

- Insurers will appoint a legal defence team to represent you in the claim. Insurers may identify or hire an expert. The claimant will generally hire an expert witness to testify that you breached your professional duty, so insurers will have an expert defend your work. This could be a third party or even someone from your firm.

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Even the smallest error can have serious consequences. Professionals need to protect themselves with professional indemnity cover.

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- Consider gathering documents, taking notes and photographing anything relevant to the claim.
- Designate a claims management project team within your office. Who will assemble and review documents, chronicle events leading up to the claim, communicate with involved parties, attend depositions and perform other necessary duties?
- Assemble documents and stay organised. A large claim can be very time intensive, but the more organised you are with documents and timelines, the less it will cost you in lost hours.

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## Provided by Holloway Insurance Services

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# Key Features of Professional Indemnity Insurance

Professional indemnity (PI) cover offers protection against losses that result from legal action due to a negligent act, error or omission by your organisation. This form of insurance can also cover concerns such as slander, libel and breach of contract. PI cover is especially critical for organisations that provide professional advice, offer educated recommendations, design solutions or represent the needs of others. In fact, recent research from insurance experts revealed that the top contributors to the PI market include medical professionals, construction and design organisations, financial service providers and solicitors.

PI insurance policies are tailored to address your professional risks and organisational needs. Most PI cover includes the following key features:



**Legal defence.** If a client files a claim against you, you'll be required to defend yourself in court—regardless of whether the claim is justifiable. PI insurance will provide you with cover for all of your legal expenses associated with the case.



**Legal compensation.** In the event that a client wins their case against you, they will most likely be awarded the sum of money that was lost as a result of your advice. Depending on the claim, the client could also be awarded additional compensation. Both types of payments are covered by a PI policy.



**Run-off insurance.** Even though your organisation may no longer be operational, you may still have a claim filed against you. Run-off insurance helps to ensure that those claims are covered.



**Fidelity guarantee insurance.** Your organisation may experience a financial loss, or items from your property may be stolen as a direct result of fraud, theft or dishonesty by one of your employees. Fidelity guarantee insurance helps to cover the cost of what was taken.



**Liability for breach of warranty of authority.** If your organisation takes an action in good faith on behalf of your client, but you do not actually have the authorisation to do so, this warranty will provide you with the cover for any expenses accrued.



**Collateral warranty.** A collateral warranty provides a third party (eg a building owner) with the legal capability to enforce an original contract between you (eg a contractor) and your client (eg the building developer). With this in mind, a collateral warranty would allow the third party to claim their losses directly from you if you breach the original contract. In this instance, PI insurance can help cover the costs of that claim.

You can protect yourself, your organisation and your reputation by investing in PI cover.

Contact Holloway Insurance Services today to discuss bespoke PI insurance solutions.

# Professional Indemnity Run-off

Everybody makes mistakes. However, depending on your profession, one mistake could ruin your career if you neglect to purchase professional indemnity (PI) insurance. PI policies help protect professionals—such as accountants, engineers and architects—from any errors that they may have made while doing their jobs. These errors can include things like making a simple accounting mistake, providing negligent advice or constructing a structurally unsound building.

With a PI policy, professionals are protected from claims filed by customers following errors. However, this type of policy only provides cover for errors made by active professionals. What happens when a PI claim is filed after a professional has ceased trading?

Even after they have ceased trading due to things like retirement or a dissolved partnership, professionals might still face a PI claim. That is when PI run-off cover becomes invaluable—it protects professionals from claims related to errors they allegedly made in the past.

Depending on the circumstances and your profession, you could be liable for claims resulting from your alleged inadequate professional advice, services or designs for up to 15 years after you stop trading. Are you prepared to cover your own legal costs and expenses 15 years into retirement? Probably not—which is why PI run-off cover is so vital.

While run-off cover is intended as a supplement to PI policies, it is distinct and may operate differently. Therefore, be sure that you understand how run-off cover works in order to better protect your business, reputation and future financial stability.

### How Does Run-off Cover Work?

Run-off cover does not vary greatly from a standard PI policy. To understand how run-off cover functions, you first

must understand how claims-made insurance policies operate.

Run-off cover, like PI insurance, operates on a claims-made basis. Claims-made policies cover claims made during the policy period, regardless of when the incident or negligence took place. Claims-occurring policies, on the other hand, cover incidents or negligence that occurred during the policy period, regardless of when the claim was made.

The difference, then, is that claims-made policies provide cover for when the claim is made (meaning a policy will cover claims so long as they are made during the policy period), while claims-occurring policies provide cover for when the incident occurred (meaning a policy will cover incidents that occurred during the policy period, even if the claim is made years later after the policy has been cancelled).

Because PI policies are claims-made policies, once they expire, they will not cover any more claims. That leaves you exposed years into the future after you retire or stop trading for mistakes you made in the past, which is why you should consider run-off cover.

### Who Needs It?

Run-off cover is required for certain professions, such as solicitors, accountants, architects, financial advisers and some health care professionals. However, if you have provided any type of professional service—such as offering advice, making educated recommendations, developing design solutions or representing the needs of others—run-off cover may not only be appropriate, but essential.

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# CYBER RISKS & LIABILITIES

## Basic Loss Control Techniques

Protecting your business from cyber-risks can be an overwhelming venture. A new day means more viruses are being discovered, more spam is being delivered to your inbox and yet another well-known company is the victim of a data breach.

The world will never be free of cyber-risks, but there are many loss control techniques you can implement to help protect your business from exposures.

### 1. Install a firewall for your network.

- Operating systems often come with pre-installed firewalls, but they are generally designed to protect just one computer. Examine the firewall's options and select the best configuration to keep the computer safe.
- If your business has a network of five or more computers, consider buying a network firewall. They can be pricey but network firewalls provide a fine level of cover for an entire network.

### 2. Install anti-virus, anti-malware and anti-spyware software.

- This loss control technique is the easiest and most effective way to increase security at your business. Make sure to install the software on each computer in your network—computers that don't include these types of software are much more likely to be exposed and can possibly spread malware to other computers in the network.
- There are a host of viable options for each type of software, ranging in price from free to an annual subscription. Be sure to keep the software as up-to-date as possible.

### 3. Encrypt data.

- No firewall is perfect. If a hacker manages to get

through your firewall and into your network, your data could be a sitting duck. Encryption will make the data unreadable to a hacker.

- Consider using an encryption program to keep computer drives, files and even email messages safe from hackers.
- ### 4. Use a Virtual Private Network (VPN).
- A VPN allows employees to connect to your company's network remotely. VPNs eliminate the need for a remote-access server, saving companies lots of money in remote server costs.
  - In addition to these savings, VPNs also provide a high level of security by using advanced encryption and authentication protocols that protect sensitive data from unauthorised access.
  - If your company has salespeople in the field or employs workers who work from home or away from the office, a VPN is an effective way to minimise cyber-risks.
- ### 5. Implement an employee password policy.
- One of the most overlooked ways to keep your business safe is instituting a password policy. Essentially, a password policy should force employees to change work-related passwords every 90 days. The policy should encourage the creation of easy-to-remember, hard-to-guess passwords that include letters, numbers and special characters.
    - For example, an easy-to-remember, hard-to-guess password could be 'M1dwbo2510'. (My first daughter was born on 25 October.)
  - Passwords that contain words from the dictionary or contain sensible combinations (abc123, qwerty, etc) should never be allowed. Let employees know that they should not write passwords down and leave them in a desk or out in the open.

# GDPR

## Compliance Toolkit



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# BUSINESS CONTINUITY PLANNING

PROVIDED BY:

**Holloway &  
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Insurance  
Services**



## Business Continuity Planning Toolkit

## What is business continuity planning?

Business continuity planning is the process of creating a plan in order to recover the most vulnerable parts of your company after a business interruption occurs. Your company's business continuity plan, in conjunction with business interruption insurance, form your business continuity management (BCM) programme. Businesses with strong BCM programmes are more resilient in emergencies and disasters.

## Why is business continuity planning important?

More than 60 per cent of small businesses do not have a formal emergency response plan. A business continuity plan, if implemented and maintained, can be the difference between successfully recovering from a business interruption and going out of business.

## How do I use this guide?

The Business Continuity Planning Toolkit pairs with the Business Continuity Sample Plan, providing descriptions of each section of the sample plan. This toolkit follows the same format as the sample plan, making it easy to use as guidance when developing the sample plan together.

This toolkit is divided into six sections:

1. Direction and Control
2. Communication
3. Life Safety
4. Property Protection
5. Community Outreach
6. Recovery and Restoration
7. Implementation and Maintenance

Each section goes over the critical activities your organisation needs to implement before, during and after a business interruption.

# CHECKLIST | EQUIPMENT SECURITY

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Inspector Name:	Date:
Inspector Signature:	

Equipment loss due to theft can spike project costs. While you may be able to get cover for a certain amount of loss, there are still the costs associated with paying the excess, replacing stolen depreciated items with new ones and production delays. In fact, uninsured costs usually exceed the costs paid by the insurance cover, adding to operating expenses.

To minimise your risk of equipment theft, you must plan ahead and establish guidelines to adhere to at all times. The following recommendations are useful when implementing a security plan.

PLANNING AND PREVENTION TECHNIQUES	YES	NO	N/A
Establish specific theft-prevention policies and communicate them to all workers and subcontractors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hold supervisors and employees responsible for implementing the programme and doing their part to prevent theft.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Offer incentives to employees for applying the theft prevention programme such as reporting suspicious acts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Remind employees of the theft prevention programme with verbal and written reminders.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop a system to identify individuals who deliver parcels, materials and equipment, such as requiring that they display a driving licence, company-issued badge. If there are doubts as to who the individual is, contact his or her employer for verification.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Analyse equipment theft losses to identify patterns and the effectiveness of your prevention efforts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visit work crews on a regular basis to review theft prevention techniques.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop an inventory system for all equipment and tools, such as assigning equipment to supervisors and employees by serial number.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Document all items checked in and out of your headquarters.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do not oversupply a work crew with equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Arrive at job sites before work begins and after the working day with a checklist of the equipment and tools checked out. Determine if all items are present and accounted for.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lock and/or immobilise equipment during off hours by doing the following: attaching anti-theft devices to equipment (steering-wheel locks, kill switches, tyre and wheel/axle locks, locked side panels and locking fuelling caps) and lock levers and handles.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Put an alarm system on equipment and trailers containing tools. Install padlock shields on trailers as well as trailer-wheel and hitch locks.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inscribe identification numbers on all tools and equipment twice—once in an obvious way, and the other hidden. To deter theft, display warning signs that serial numbers are recorded.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paint tools and equipment in bright colours.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place your company's logo or other identifying images on the equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Company name:	Date of risk assessment:
	Next assessment due:
Risk assessment performed by:	Location:

## Completing a Risk Assessment

### 1. Identify the hazards.

This is the most important aspect of your risk assessment. A good starting point is to walk around your workplace and think about potential hazards. When you work in the same place every day, it is easy to overlook hazards. Follow these tips to help identify the ones that matter:

- Take account of non-routine operations, such as maintenance or cleaning operations.
- Think about long-term hazards to health, such as exposure to harmful substances.
- Review data sheets and manufacturers' instructions for chemicals and equipment—they can help explain hazards.
- Look back at your accident and ill-health records to identify less obvious hazards.

### 2. Think about who might be harmed and how.

Ask your employees what they think the hazards are, as they may notice things that are not obvious to you and may have ideas on how to control risks. For each hazard, be clear about who might be harmed—it will help you identify the best way of controlling the risk. This doesn't mean listing each person. Identify groups of people, such as employees or passers-by.

- Identify how people or groups may be harmed and what type of injuries may occur. Think about people not in the workplace all the time, such as visitors or contractors.
- Include people with disabilities, contractors or members of the public. Remember that some workers may have particular needs, such as young employees or expectant mothers.

### 3. Evaluate the risks and decide on precaution.

Risk is a part of everyday life—it is impossible to eliminate each one. However, be sure you understand the main risks and how to manage them responsibly. Generally, you must do everything 'reasonably practicable' to protect people from harm. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. If possible, eliminate the risk altogether. If this is not possible, you must determine how to control the risk so that harm is unlikely. Some practical steps you could take include finding safer alternatives to current work practices, reducing exposure to a hazard and consulting with workers to ensure their health and safety.

### 4. Record your significant findings.

Make a record of your significant findings—the hazards, how people might be harmed by them and what processes you have in place to control the risks. A risk assessment should be able to demonstrate that:

- A proper check was made and you involved your employees or their representatives.
- You considered who might be affected and involved your employees in the process.
- You dealt with all major hazards. The precautions are reasonable and the remaining risk is low.

### 5. Review your assessment periodically and update when necessary.

Few workplaces stay the same. Eventually, you will bring in new equipment, substances or procedures that could lead to new hazards. Review your risk assessment on an ongoing basis, and ask yourself:

- Have there been any significant changes?
- Are there improvements you still need to make?
- Have your workers spotted a problem?
- Have you learnt anything from accidents or near misses?

# Slips and Trips Protection Programme and Training Materials

Effective Date:

Revision #:



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NOTE: A Slips and Trips Programme PowerPoint Presentation accompanies this document.

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## Reference Standard

The Health and Safety at Work Act 1974 requires employers to ensure, as long as it is reasonably practicable, the health, safety and welfare of all employees at work. The Management of Health and Safety at Work Regulations 1999 requires employers to carry out risk assessments and set up procedures in case of serious and imminent danger and danger areas. The Workplace (Health, Safety and Welfare) Regulations 1992 also requires floors to be suitable, in good condition and free from obstruction so employees can move around safely.

**Be sure that all procedures are also developed in accordance with provisions outlined by any other Acts or Regulations that may apply to your organisation.**

## Purpose

This policy establishes how will enhance safe working conditions at this facility through the establishment of specific walking and working surface requirements and protection from slips and trips.

## Scope

This policy applies to all employees and all company contractors, visitors or vendors.

## Responsibilities

### Senior management will:

- Require the full application and integration of this policy into daily operations, as applicable, in all areas of responsibility and with all direct reports.
- Assess managers and supervisors on their ability to apply this policy in their areas of responsibility.
- Provide fall protection to affected employees.

### The Safety Administrator will administer all aspects of this policy to include:

- Maintaining and updating the written programme as required.
- Coordinating necessary training for all affected employees.
- Providing necessary technical assistance to managers and supervisors.
- Periodically assessing the effectiveness of this programme and its implementation in all affected areas of the company.

### Managers and supervisors will:

- Know how this policy applies to those under their direct control.
- Integrate and enforce the provisions of this policy in their areas of responsibility.
- Periodically audit the effectiveness of this policy in their areas of responsibility.
- Coordinate training for all affected employees.

## Professional Indemnity Cover Under CDM 2015

The need for professional indemnity (PI) cover has grown over the past several decades as more people enter professional service-based professions. PI insurance covers 'traditional' professions—such as architects, contractors and engineers—and can protect yourself, your business and your reputation in the event of legal action due to a negligent act, error or omission.

However, managing your PI risk is not a single event done in isolation. It is a task that requires regular assessments to determine whether your risk has changed due to changes in the work you do, the clients you serve or the legislation that governs your business. As a construction professional, one such change that potentially broadened your PI risk was the introduction of the Construction (Design and Management) Regulations 2015 (CDM 2015 Regulations), which works to ensure the health, safety and welfare of all construction workers.

Rather than supplement the previous regulations (CDM 2007), the current version supersedes the previous rules and procedures. There have been several key changes to the regulations that you—as the owner or manager of a construction firm, or a construction professional, such as a designer or contractor—will need to learn in order to control your PI risk.

### CDM 2015 Regulations Explained

The objective of the CDM 2015 Regulations is to emphasise health and safety through increased coordination between the three primary parties, which are client, designer and contractor. This focus is reflected in the five following key changes:

1. All projects must have the following:
  - Workers who have the correct skills, knowledge, training and experience

- Contractors who will provide appropriate supervision, instruction and information
  - A written construction phase plan that details the project
2. A build project—regardless of whether it is non-domestic or domestic—where more than one contractor is involved, must have the following:

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The introduction of the CDM 2015 Regulations potentially broadened your PI risk with the creation of the new principal designer role. Are you properly managing your new PI gaps?

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- A principal designer who is responsible for planning, managing, monitoring and coordinating the pre-construction phase of the project
- A principal contractor who is responsible for planning, managing, monitoring and coordinating the construction phase
- A health and safety file that outlines how to safely perform routine procedures and clean up the worksite

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## Regulatory Update

# The Senior Managers & Certification Regime

### Quick Facts

- The SM&CR will go into effect on 9th December 2019. Any organisation that provides financing options for their customers must comply with the SM&CR.
- This regime will be implemented and enforced by the FCA—the authority responsible for regulating the UK’s financial services sector.

The SM&CR is intended to enforce a culture of protecting customers and their finances by increasing individual accountability.

**On 9th December 2019**, the Senior Managers & Certification Regime (SM&CR) will come into effect throughout the UK. The regime—which will be implemented and enforced by the Financial Conduct Authority (FCA)—will replace the current FCA Approved Persons Regime. **This regulatory change will impact all FCA solo-regulated firms**, which means that any organisation that provides financing options for their customers must comply with the SM&CR.

### Overview of the SM&CR

The FCA—an independent, non-governmental body responsible for regulating the UK’s financial services industry—is implementing the SM&CR to enforce a culture of protecting customers and their finances.

At a glance, the SM&CR will require employees within an organisation to be held accountable for their conduct and competence when providing financial services. Most importantly, individual staff members will need to take personal responsibility for their actions.

Under this new regime, any staff members who carry out functions that could pose a risk of significant harm to the organisation or its customers must now be assessed and deemed fit for the role by the organisation.

With this in mind, the SM&CR will require organisations to provide the FCA with more detailed information on individuals’ responsibilities. Further, organisations will need to regularly train and monitor their staff to ensure competence and conduct.

### Who Needs to Comply?

While the SM&CR has applied to banks, credit unions, building societies and dual-regulated investment businesses since 2016, the regime will now extend to any organisation that provides financing options for their customers.

The SM&CR will also apply to any overseas-based individuals performing important functions for FCA-regulated organisations, as well as individuals based in the UK branch of an overseas organisation.

### How to Comply

Failure to comply with the SM&CR can have serious consequences. The FCA stated that it won’t hesitate to take action against organisations for not ‘taking reasonable steps’ to ensure SM&CR compliance.

# Safety Matters

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## It's No Accident

Accidents can happen at any time in the workplace, often when you least expect them. However, many on-site accidents can be avoided by focusing on safe practices and taking necessary safety precautions.

### Know the Hazards

The cause of accidents can almost always be traced to a dangerous act, an unsafe condition or a combination of the two. For example, a worker could fall off a ladder that was not secured properly— an accident caused by the unsafe act of not securing the ladder.

Or, a worker could slip on a spill that was not cleaned up, which would be an accident caused by an unsafe condition. In either instance, the accident could have been avoided by following proper safety precautions.

To avoid accidents, it's important to understand what can caused them. There are countless unsafe conditions that can lead to accidents, but common hazards include:

- Using defective or broken equipment
- Misusing equipment or tools
- Performing tasks without proper training
- Unsafe handling or disposal of materials
- Injuries due to debris or spills

### Safe Steps to Avoid Accidents

The first step to keeping yourself and co-workers safe is to stay alert on-site and not let routine or familiarity lure you into carelessness. Always observe safety

precautions before and during a task, even if those precautions make the task more inconvenient or take longer to complete. Cutting corners may not seem like a big deal, but doing so is a primary cause of accidents.

Next, know your job. The more you know about your job, the safer you'll be. Know the proper procedures and safety precautions for any task you do and if any questions arise during your working day, be sure to talk to your supervisor.

And finally, make a personal contribution. A good way to start this is to follow safety rules. Certain rules in the workplace are made for your protection, so follow them. Just because an unsafe act is not specifically listed as being prohibited, it doesn't mean you should do it. Use your common sense when evaluating if an act is safe or not – there may be a very easy way to make it safer if you think it through.

### Focus on Good Habits

It's natural to work yourself into habits. When you break a safety rule, you've taken the first step towards forming a bad habit — a habit that can lead to an injury. Good habits, such as following safety precautions and noticing unsafe conditions, are just as easy to form.

Develop a safe attitude. This is probably one of the most difficult things to recognise because most of us have the mistaken notion that it's always someone else who gets hurt. If we all do our share in observing the safety rules and staying alert, everyone will benefit.

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# Customer Grievance Policy

Location: **[INSERT LOCATION]**Effective Date: **[INSERT DATE]**

## Introduction

is committed to providing our customers with high-quality products and excellent service. To continue to ensure that the same level of excellence is provided to you, we encourage you to submit feedback. With your feedback, we are able to make improvements to our products and services.

We understand that sometimes we do not provide the high level of service or quality that we aspire to achieve. Therefore, we want to help you resolve your complaint in a timely and satisfactory manner. At , we promise to listen to your complaint, treat it seriously and with respect, and learn from it.

Our customer grievance policy covers complaints about the following:

- The standard of service that we provide;
- The behaviour of our staff; and
- Any action or lack of action by staff affecting an individual or group.

Our customer grievance policy does not cover the following:

- Matters that have already been fully investigated through this grievance procedure;
- Anonymous complaints; or
- Complaints about access to information where procedures and remedies are set out in legislation.

## 's Standards for Handling Complaints

- Your complaint will be treated both seriously and with respect—regardless of whether it is submitted by letter, email or in person.
- You will be treated with courtesy and fairness as you work with a representative.
- Your complaint will be treated in confidence within the department.
- Your complaint will be dealt with promptly—we will acknowledge that we have received it within **[NUMBER OF WORKING DAYS]** and send you a full response within **[NUMBER OF WORKING DAYS]**. If we cannot send a full reply within **[NUMBER OF WORKING DAYS]**, we will inform you of the reason and let you know when we will be able to provide you with a full response.
- We will publish information concerning your complaint in our annual report about the numbers and categories of complaints that we received over the course of the year as well as the percentage of complaints that have been upheld.

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Prepared by Holloway Insurance Services

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