

SUBJECT: YOUTH ENTERPRISE – EUROPEAN SOCIAL FUND (ESF)

INSPIRE PROGRAMMES - INSPIRE COMPLIANCE

ADMINISTRATOR POST CREATION

MEETING: INDIVIDUAL MEMBER DECISION

DATE: 13th February 2019

DIVISION/WARDS AFFECTED: ALL

1. PURPOSE:

1.1 To request approval for the creation of a new Inspire Compliance Administrator post from 1st April 2019, in line with succession planning laid out for the current Youth Enterprise Business Administration Apprentice, and the resulting additional responsibilities. This post is part funded by the European Social Fund Inspire programmes (I2A; I2W) with match funding previously approved within the financial profiles of extensions to the Inspire programmes in <u>July 2017</u> and <u>September 2018</u> and therefore can be afforded within the MTFP

2. RECOMMENDATIONS:

2.1 To approve the creation of a new Inspire Compliance Administrator post and the subsequent salary increase for the postholder.

3. KEY ISSUES:

- 3.1 Cabinet have previously approved the Monmouthshire <u>NEET Reduction Strategy</u> 2018-21: A Great Start for All, within which Priority 5 is "Strengthening employability skills and opportunities for employment" for young people. Approval demonstrates the Local Authority's commitment to developing meaningful apprenticeship opportunities with sustainable career pathways.
- 3.2 The Inspire programmes are part funded by the European Social Fund and are subject to audit and verification checks by the Welsh European Funding Office (WEFO) and European Funding Audit Team (EFAT). The Inspire Compliance Administrator will administer the day to day compliance and verification checking of both Programmes, as well as providing administrative support to the delivery team.
- 3.3 I2A provides education and well-being support, and qualifications for young people aged 11-16 years most at risk of becoming NEET and I2W provides employability support, qualifications and work placements for unemployed young people aged 16 -24 years.
- 3.4 The I2A and I2W programmes were approved by Cabinet in March 2016 for three years, with an increase in programme provision for 18 to 24 year olds approved by Cabinet on the 5th July 2017. Further extensions to I2A and I2W to December 2021 and December 2022 respectively were approved in <u>September 2018</u>.

4. OPTIONS APPRAISAL

Option	Benefits	Risks
Do nothing	Reduced match funding requirement for the ESF funded Inspire programmes	 No compliance and verification post for essential project monitoring Loss of external funding contributing to salary costs for this post

		 Failure to offer a sustainable career pathway for an apprentice.
Approve the creation of new post	 Align the postholders grade with comparable posts within the local authority Demonstrate a commitment to providing sustainable career pathways for apprentices within the local authority 	None Identified

5. EVALUATION CRITERIA

5.1 An evaluation assessment has been included in Appendix 1 for future evaluation of whether the decision has been successfully implemented.

6. REASONS:

- To deliver high quality monitoring and verification checking to ensure the Inspire programmes in Monmouthshire are compliant with the standards set out by the Regional Central Lead Team, Welsh European Funding Office. European Funding Audit Team and the Authority's internal audit team.
- The Inspire Compliance Administrator post will contribute towards improved efficiency in programme reporting and support the overall performance of the Inspire programmes through on site monitoring checks whilst leading on the rollout of the programme's Management Information System.
- 6.3 The introduction of this post in place of the Business Administration Apprentice role will recognise the additional roles and responsibilities assumed by the postholder and reflect the appropriate grading as demonstrated by the job evaluation process.

7 RESOURCE IMPLICATIONS:

- 7.1 The current post of Business Administration Apprentice is paid National Minimum Wage based on age. Job evaluation for the Inspire Compliance Administrator post resulted in a grading to Band D, SCP 17-21. This post will be part funded by the European Social Fund and will end in conjuction with the Inspire Programmes in Monmouthshire.
- 7.2 The additional cost for this post was included within the base budget consideration approved by Cabinet in September 2018 and are therefore funded from within the existing MTFP.

8 WELLBEING OF FUTURE GENERATIONS IMPLICATIONS(INCORPORATING EQUALITIES, SUSTAINABILITY, SAFEGUARDING AND CORPORATE PARENTING):

The post of Inspire Compliance Administrator contributes to the delivery on the Inspire programmes which have significant equality impacts as identified in the assessment (Appendix 2), summarised below for members' consideration:

The Inspire programmes will improve provision, opportunties and outcomes for all young people who are at risk or who are NEET. It is anticipated that the programmes will have a positive impact on the young peoples' social, emotional, health and wellbeing, education and skills. This proposal does acknowledge that due to personal, social and educational barriers, not every young person will progress and sustain education, employment or training.

9 **CONSULTEES**:

Head of Enterprise and Community Development SLT Cabinet

10. BACKGROUND PAPERS:

Evaluation Criteria (Appendix 1)
Future Generations Evaluation (Appendix 2)
Job Description (Appendix 3)

11. AUTHOR:

Hannah Jones, MCC Youth Enterprise Manager

12. CONTACT DETAILS:

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E-mail: <u>hannahjones@monmouthshire.gov.uk</u>

Appendix 1 - Evaluation Criteria - Cabinet, Individual Cabinet Member Decisions & Council

Title of Report:	YOUTH ENTERPRISE – EUROPEAN SOCIAL FUND (ESF) INSPIRE PROGRAMMES – INSPIRE COMPLIANCE	
	ADMINISTRATOR POST CREATION	
Date decision was made:	13th February 2019	
Report Author:	Hannah Jones	

What will happen as a result of this decision being approved by Cabinet or Council?

The Youth Enterprise Business Administration Apprentice will assume the post of Inspire Compliance Administrator and it's associated roles and responsibilities.

12 month appraisal

What benchmarks and/or criteria will you use to determine whether the decision has been successfully implemented?

The following criteria will determine whether the decision has been successfully implemented:

- Appointment of current Business Administration Apprentice to the new post
- Monitoring and verification performance on the Inspire programmes within Monmouthshire
- Overall programme performance of the Inspire programmes within Monmouthshire
- Improved co-ordination of administration support for the Inspire delivery teams within Monmouthshire

12 month appraisal

What is the estimate cost of implementing this decision or, if the decision is designed to save money, what is the proposed saving that the decision will achieve?

The cost of implementing this decision will be an increase in annual salary from the 1st of April 2019 from National Mimimum Wage to SCP17, Band D. This increase in salary was included in the financial profile for the Inspire programme extension, which was approved by Cabinet in September 2018.

12 month appraisal

Any comments



Future Generations Evaluation (includes Equalities and Sustainability Impact Assessments)

Name of the Officer Hannah Jones	Please give a brief description of the aims of the proposal
Phone no: 07738 340 418 E-mail:hannahjones@monmouthshire.gov.uk	The creation of a new Inspire Compliance Administrator post to contribute to the delivery of the Inspire programmes
Name of Service: Youth Enterprise	Date Future Generations Evaluation 23 rd January 2019

NB. Key strategies and documents that may help you identify your contribution to the wellbeing goals and sustainable development principles include: Single Integrated Plan, Continuance Agreement, Improvement Plan, Local Development Plan, People Strategy, Asset Management Plan, Green Infrastructure SPG, Welsh Language Standards, etc.

1. Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal.

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs	The aim of the Inspire programmes is to create the conditions for young people most at risk to thrive. It will enable young people to feel confident and capable in school with peers and others and enjoy the curriculum. The programmes will equip young people with the appropriate skills to manage and sustain further education, employment and training.	Developing bespoke interventions and support packages to support the learner's needs.
A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and	The programmes will work within the Environmental Sustainability Objectives set by WEFO (Welsh	Sharing expertise, networks and resources will ensure a good provision for our young people.

	Does the proposal contribute to this goal? Describe	What actions have been/will be taken to mitigate
Well Being Goal the positive and negative impacts.		any negative impacts or better contribute to positive impacts?
can adapt to change (e.g. climate change)	European Funding Office) and deliver to the indicators set for ESF(European Social Funding) Youth Employment and Attainment priority. The programmes will address issues such as waste, recycling, minimize energy usage and efficient use of such resources, whilst also raising awareness of environmental issues and healthy lifestyles.	
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	The Inspire team will work with young people, supporting them to overcome health and wellbeing barriers by either delivering health or wellbeing workshops and/or support, linking learners with health care professionals, organisations and networks and other health and wellbeing services. The young people's health and wellbeing is a crucial element to reducing their overall risk of becoming NEET.	The one to one support from responsible partners will enable us to identify and address individual need. Setting agreed goals and reinforcing recognition and achievements. A reduction in the barriers to participation is a key element to enable young people to be engaged, supported and valued. The level of support offered will be high and consistent.
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	Programmes will encourage safe and appropriate use of IT and the internet, developing young peoples' ICT literacy skills, preparing them for further learning, education and training. The programmes will link to the wider community, helping young people be active citizens in their community and have a greater awareness of community safety.	Encourage safer use of the internet and raise awareness of the harmful effects and consequences of inappropriate use of social media
A globally responsible Wales Taking account of impact on global well- being when considering local social, economic and environmental wellbeing	The programmes are funded by the ESF and the managing authority is WEFO. WEFO has undertaken a full Socio Economic Analysis to identify needs, challenges and opportunities across Wales. It will corporate ESDGC (Education, Sustainable	Working closely with our Local Authority partners and Careers Wales we will share resources and good practices to ensure young people have the best

Well Being Goal	Does the proposal contribute to this goal? Describe the positive and negative impacts.	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
	Development and Global Citizenship) elements enable young people to become globally responsible citizens.	opportunities to engage in global well –being and how this impact's on their community.
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	The programmes will have marketing, publications and printed literature available bilingually where appropriate. The programmes will conform to the Welsh Language Legislation Welsh Language Wales Measure 2011 and accompanying welsh language standards.	Encouraging young people to embrace the vibrant welsh culture and language.
A more equal Wales People can fulfil their potential no matter what their background or circumstances	The programmes will develop effective ways to engage and provide support for those individuals regardless of ethnic origin, gender, disability sexual orientation or religion to ensure all young people actively participate in and benefit from the programme. The programme will follow WEFO's and the LA Equal Opportunity's Policy stipulates how staff can best promote equality of opportunity and outcomes for young people regardless of age, race, ethnicity and disability.	All of our policies and procedures are guided by the current local and national equal opportunities guidance and legislation.

2. How has your proposal embedded and prioritised the sustainable governance principles in its development?

	Development nciple	Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?
	Balancing short term need with long	The long term future plan is that young people that have engaged with Inspire2Achieve and/or Inspire2Work will remain in education, employment or training and their risk of becoming NEET is reduced.	With the financial investment from the Local Authority to a further 3 years for Inspire2Achieve until December 2021 and a further 4 years for Inspire2Work until December 2022.
Long Term	term and planning for the future	This will reduce the likelihood of future or continuing poverty amongst young people. It will also deliver improved health and well-being for young people, whilst also instilling a work ethic for young people and seeing aspiration levels rise.	The aim is to develop resilience in those young people 'most at risk' or who are NEET, to improve their confidence and skills. Thus enabling them to progress into education, employment or training
Collaboration	Working together with other partners to deliver objectives	The Inspire2Achieve programme is a regional programme, Newport is the lead beneficiary, working with the following joint beneficiaries; City of Cardiff County Council, Monmouthshire County Council, The Vale of Glamorgan3 Council, Coleg Gwent, Cardiff and Vale College, Careers Wales. The Inspire2Work is a regional programme. Newport City Council is the lead beneficiary, working with the following joint beneficiaries; City of Cardiff County Council, Monmouthshire County Council, The Vale of Glamorgan Council and Llamau.	
Involvement	Involving those with an interest and seeking their views	The programmes will involve learners in the design delivery, evaluation and redesign of the learning experiences. As part of the learning journey, the team understands the necessity for bespoke learning opportunities involving the learner and fostering shared responsibility and autonomy of the learner as well as constant progress.	The programmes will discuss at point of referral the learner's needs, vocational pathways and training route options. It will provide formative reviews of the learning experience, have informal discussions and evaluations during and at end of programmes.

Sustainable Development Principle		Does your proposal demonstrate you have met this principle? If yes, describe how. If not explain why.	Are there any additional actions to be taken to mitigate any negative impacts or better contribute to positive impacts?	
Prevention	Putting resources into preventing problems occurring or getting worse	The Inspire programmes are preventative initiatives to enable the reduction in the risk of young people becoming NEET and reduction in the number of young people who are NEET. It is anticipated that the long term impact of the programmes will challenge behaviors, actions and attitudes, subsequently establishing firm foundations on which to support in the future and provide generic skills.	The programmes will be monitored and reviewed as part of the action plan to ensure targets are on track and then young people feel the programmes are meeting their needs and expectations.	
Integration	Considering impact on all wellbeing goals together and on other bodies	The programmes will work with young people supporting them to overcome health and wellbeing barriers by either delivering health and wellbeing programmes and/or support, linking young people with health care professionals, organisations and networks and other health and wellbeing services. The young peoples' health and wellbeing is a crucial element to reducing their overall risk of becoming NEET.	The programmes will be monitored and reviewed through amount of referrals to specialist support for emotional wellbeing; progress of each young person during the programme and through termly discussions with other professionals within the school community.	

3. Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below. For more detailed information on the protected characteristics, the Equality Act 2010 and the Welsh Language Standards that apply to Monmouthshire Council please follow this link: http://hub/corporatedocs/Equalities/Forms/AllItems.aspx or contact Alan Burkitt on 01633 644010 or alanburkitt@monmouthshire.gov.uk

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	We aim to engage with young people 11-24years most at risk of becoming NEET (not in education, employment or training) or who are NEET.	None identified	N/A
Disability	We aim to engage and support young people to meet with individual needs without discrimination.	None identified	N/A
Gender reassignment	We aim to provide a provision which is inclusive for transgender people and groups We will address any issues in regards to work placements, employment and training opportunities.	None identified	N/A
Marriage or civil partnership	Not applicable	None identified	N/A
Pregnancy or maternity	Risk assessment will be in place for pregnant young people ensures all health and safety measures have been addressed and the well-being of the young person is paramount.	None identified	N/A
Race	Young people referred onto our programmes will be given the same opportunities regardless of race. The relevant support will be provided to meet individual needs	None identified	N/A

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Religion or Belief	We aim to offer bespoke packages of support that will take into account young peoples' religion and religious beliefs.	None identified	N/A
Sex	We aim to offer opportunities that will take into account individual needs regardless of sex.	None identified	N/A
Sexual Orientation	We aim to offer opportunities that will take into account individual needs regardless of sexual orientation.	None identified	N/A
Welsh Language	We will adhere to the Welsh Government Welsh Language Policy. We will aim to provide bilingual learning opportunities if there is a need.	None identified	N/A

4. Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding.

Are your proposals going to affect either of these responsibilities? For more information please see the guidance

http://hub/corporatedocs/Democratic%20Services/Safeguarding%20Guidance.docx and for more on Monmouthshire's Corporate Parenting Strategy see

http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx

	negative impacts your on safeguarding and enting What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
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Safeguarding	Safeguarding is a priority, young people on our programmes will have a multiple barriers and are vulnerable individuals. All youth enterprise staff and volunteers have completed the Safeguarding level 1.The programmes will link with Building Stronger Families, Multi-Agency Early Support and Prevention Referral and Intervention Pathway Panel and monthly multi-agency meetings in schools.	None identified	N/A
Corporate Parenting	The Inspire programmes target young people who are looked after children (LAC) and care leavers. We aim to provide a tailor package which is flexible to their needs and circumstances.	None identified	N/A

5. What evidence and data has informed the development of your proposal?

The following data has identified and informed the need to develop the Inspire2Achieve programme;

- The Local Authority Early Identification process identifying young people most at risk in key stage 3 and 4.
- The Careers Wales 5 Tier model data, identifying young people 16 -18 years in tier 4 who are in education, employment or training yet are at risk due to circumstances.
- Young people 19 -24 years who are vulnerable and are still in education.

The following data has identified and informed the need to develop the Inspire2Work programme;

- The Careers Wales 5 Tier model data young people in tier 1 and 2 of the system who are NEET
- NOMIS figures identifying the number of 19 -24 year olds that claim job seeker allowance
- 16 -24 vulnerable groups identified through local partnership forums.

The work of the CYP Strategic Partnership, Post 16 Steering Group and the Keeping in Touch Group have identified the need for further intervention for those most vulnerable to participate and engage in the school curriculum and sustain future education, employment and training.

6. SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?

It is anticipated that the Inspire programmes will have a positive impact on the young peoples' social, emotional, health and wellbeing, education and skills. This will develop their resilience and improve their life chances. This proposal does acknowledge that due to personal, social and educational barriers, not every young person will progress into further education, training or employment.

7. ACTIONS: As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable.

What are you going to do	When are you going to do it?	Who is responsible	Progress
To implement the creation of a new Inspire Compliance Administrator post to contribute to the delivery of the Inspire programmes		Hannah Jones	To be reported on an annual basis

8. MONITORING: The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review.

The impacts of this proposal will be evaluated on:	April 2020
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9. VERSION CONTROL: The Future Generations Evaluation should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development wherever possible.

Version No.	Decision making stage	Date considered	Brief description of any amendments made following consideration
1	Economy and Development Select Committee	19 th July 2018	
1	Cabinet	5 th September 2018	





ROLE

PROFILE

ROLE TITLE: Inspire Compliance Administrator

Fixed term post til 31st December 2022

POST ID:

GRADE: Band D SCP 17 -21 £18,672 - £20,541

HOURS: 37 per Week

LOCATION: County Hall, Usk, which may change in the future if the service location needs

to relocate. Relocation or disturbance expenses will not be paid if this

happens.

RESPONSIBLE TO: Inspire Coordinator

WELSH LANGUAGE ASSESSMENT:

Welsh language skills are desirable

PURPOSE OF POST:

As part of the Youth Enterprise team, you will contribute towards the business delivery by leading on the compliance and administrative support for the ESF funded Inspire Programmes, Inspire2Achieve and Inspire2Work.

Our Purpose:-

Youth Enterprise is an integral part of MCC's Enterprise and Innovation Directorate. We work with young people and adults across the county supporting them through education, employment and training. We engage with the business sector supporting the development of local employment and training and entrepreneurial opportunities.

The Purpose of this Role:-

To contribute to the delivery of business and administrative support for Inspire Programmes delivered by the Youth Enterprise team. To support Youth Enterprise to collate performance data using the required information management systems and lead on the compliance of the programmes.

Expectation and Outcomes of this Role:

Working with the Inspire Coordinator you will be expected to provide effective administrative support for the Inspire programmes. You will lead on all aspects of compliance for the Inspire programmes, ensuring that staff meet requirements and that lead authority, WEFO (Welsh European Funding Office) & EFAT (European Funding Audit Team) audits are successfully completed. You will be responsible for administering the qualification centre operated by Youth Enterprise Programmes.

You will receive a training plan along with the opportunity to further develop your business administration and ICT skills.

Your responsibilities are to:-

Work alongside the Inspire Coordinator to provide business and administrative support to the team as required and lead on the Compliance element of the programmes including:

- 1. Deliver business and administrative support for the Inspire programmes including monitoring files, checking compliance for audit checks and meeting regularly with the delivery team to ensure all evidence is recorded accurately.
- 2. Monitor and input information into the Inspire programmes database system.
- 3. Be a point of contact for Inspire workers, able to answer any queries around paperwork, compliance and CEMP (information management system).
- 4. Work with the Inspire Administrator to run the Early Identification Tool (data system of learners' information including attendance, behaviour and attainment) for Key Stage 2, 3 and 4 pupils and provide data as and when required.
- 5. Prepare information for quarterly monitoring reports and claims.
- 6. Attend Inspire programme local and regional meetings.
- 7. Contribute to the maintenance of relevant filing systems, either computerised or manual via: filing of case and general papers; checking and maintenance of accurate records; raising and maintaining case files and archiving.
- 8. Work with the Inspire Coordinator to support the Youth Enterprise Qualification Centre and Internal Quality Assurance process for all Youth Enterprise Programmes.
- 9. Maintain the Qualification Centre administration process.
- 10. To use relevant office equipment, including photocopier, paper shredder and maintain such via the ordering of necessary supplies and equipment and maintenance/repair.
- 11. Supporting the organisation of meetings as necessary including booking rooms, arranging attendance and circulating paperwork in good time.
- 12. Assisting in taking and distributing minutes of meetings ensuring actions, recommendations and discussions are recorded.

- 13. Contribute to the management of petty cash system as directed by the Inspire Administrator.
- 14. Undertaking word processing and photocopying.
- 15. Taking Messages and passing onto the relevant officers.
- 16. Opening and distributing incoming mail.
- 17. Demonstrate a commitment to team working.
- 18. Be flexible in approach, delivery and working hours.
- 19. Maintain safe working practices for self and others, in accordance with the authority's policy statement on Health and Safety at Work.
- 20. To abide by the principles and practice of equality of opportunity as laid down in the Council's Equal Opportunities Policy.

Person Specification

Requirements

Education/Qualifications/Knowledge

 NVQ level 3 or equivalent in Business Administration. Knowledge, practical experience and understanding of IT applications, e.g Microsoft, Excel, Word etc.

Experience

- Relevant experience of working in administrative environment.
- Have experience of managing systems for record keeping, collation of information and statistics.

Communication/Interpersonal Skills

- Good written and oral communication skills
- Good interpersonal skills and the ability to work well in a team.

Aptitudes and Skills

- Computer literate with basic word processing skills (Microsoft Packages).
- Must be able to give examples of working accurately and under pressure and to deadlines.
- Effective organisational skills.
- Able to observe confidentiality in all aspects of work.
- Possess an adaptable style and be able to manage change.

Equal Opportunities

 Able to demonstrate a clear understanding of equal opportunities principles and practice and a commitment to their effective implementation in a Business and Enterprise context.

Special Circumstances

 Appointment to this post will be subject to an Enhanced Disclosure Check with the Criminal Records Bureau

Here's what we can provide you with:-

- Full support of manager and team members
- Full range of training and CPD opportunities
- Laptop and mobile phone
- Nominated supervisor for regular support

What else you need to know.....Monmouthshire Values are:

Openness: We aspire to be open and honest to develop trusting relationships.

Fairness: We aspire to provide fair choice, opportunities and experiences and become an

organisation built on mutual respect.

Flexibility: We aspire to be flexible in our thinking and action to become an effective and

efficient organisation.

Teamwork: We aspire to work together to share our successes and failures by building on our

strengths and supporting one another to achieve our goals.

And this role, will work with Monmouthshire to achieve these.

In addition:

All employees are responsible for ensuring that they act at all times in a way that is consistent with Monmouthshire's Equal Opportunities Policy in their own area of responsibility and in their general conduct.

The authority operates a Smoke Free Workplace Policy which all employees are required to abide to.