

## Corporate and Social Responsibility Policy

### Aim of the Policy

Athona Ltd is an established supplier of temporary and permanent staffing solutions and as such takes seriously its corporate and social responsibilities as a provider of of reputable staffing solutions.

### Who is this policy for?

Any person or body who interacts with Athona for supply services of temporary or permanent staffing solutions, this can include temporary workers, NHS and private clients, and regulatory bodies. This policy can also extend to any member of the public or their representatives, staff, businesses, public and voluntary bodies who may be a third party to our services.

### What is covered by this Policy?

- Equality Diversity and Accessibility
- Income Security
- Working Hours
- Modern Slavery, Child Labour and Inhumane Treatment
- Health and Safety
- Internal Staff Development
- Apprenticeships
- Anti-Bribery and Corruption
- Protection of Temporary Workers (including transparency of 'take home pay')
- IR35 and ITEPA Legislation
- Supply chain & prompt payment of suppliers.
- Quality Assurance
- Sustainability
- Carbon Reduction
- Giving Back – Charity Fundraising

### Equality, Diversity and Accessibility

We promote a working environment that is free from discrimination, bullying or harassment; offering remuneration packages with equal pay and opportunities regardless of gender that accurately reflect qualifications and experience, providing meaningful career opportunities by providing training opportunities, apprenticeships and work placements.

### Income Security, Working Hours, Modern Slavery, Child Labour and Inhumane Treatment



We pay all our staff above the legal minimum wage and the Living Wage in compliance with the Working Time Directive or its equivalent in the countries in which we operate. We encourage our suppliers do the same. We do not use slave, illegal child or forced labour (including human trafficking) either directly or through our supply chain and record the actions we have taken to avoid this in our published [Modern Slavery Policy](#)

### **Health and Safety**

We provide and maintain a clean, healthy and safe working environment and operate in accordance with our health and safety policy.

### **Internal Staff Development**

Athona conduct regular staff reviews to develop the company culture and monitor staff wellbeing. A flexible working practice is supported by our HR department policies and procedures. An annual appraisal system for all employees allows for praise, constructive feedback and identifies areas of development for the forthcoming year.

### **Apprenticeships**

Athona offers apprenticeships to local young citizens. We are not only committed to recruiting and developing the careers of long term employees but we also look for bright individuals who are looking to gain exposure to the work place to support our local economy.

### **Anti-Bribery and Corruption**

We operate in an open and honest way with stakeholders, including our clients and suppliers. We maintain a Gift Log and a Bribery and Corruption Risk Register and, in accordance with our Anti Bribery and Corruption policies, apply a zero-tolerance approach to acts of bid-rigging, mis-selling, bribery or corruption by any of our employees, business partners or temporary workers.

Our contracts with suppliers clearly set out the agreed terms and conditions and we encourage suppliers to adopt responsible business policies for mutual benefit including improving local labour standards and environmental management in the supply chain.

### **Protection of Temporary Workers**

We comply with regulation 13A of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (the 'Conduct Regulations'), to ensure transparency of information for agency workers by providing a key information document for all new agency workers. All agency workers are provided a copy of their Agency Worker Rights and a Key Information Document prior to choosing to engage with us.

### **Whistleblowing and Grievance Mechanisms**



We foster a culture of openness and accountability in which all staff, temporary workers, clients and suppliers are encouraged to raise genuine concerns about malpractice, breaches of policy, regulatory non-compliance, safeguarding issues, or any form of wrongdoing without fear of victimisation or detriment.

We maintain a comprehensive Whistleblowing Policy that complies with the Public Interest Disclosure Act 1998 (as amended) and best practice guidance from the Department for Business and Trade. Concerns may be raised confidentially through multiple channels, including line managers, the designated Whistleblowing Officer, or via an independent external reporting hotline. All disclosures are investigated promptly, fairly and confidentially, with appropriate corrective action taken where necessary.

Temporary workers and agency staff are made aware of these protections during onboarding and through the Key Information Document. We ensure that no worker suffers any detriment for making a protected disclosure. Regular training and awareness raising is provided to all employees and managers on their rights and responsibilities under the Whistleblowing Policy.

This commitment supports our broader aims of transparency, regulatory compliance and the protection of vulnerable individuals in the healthcare and education sectors we serve.

### **Umbrella Company and PAYE**

We are committed to full compliance with 2026 PAYE rules for labour supply chains involving umbrella companies. We conduct rigorous due diligence on umbrella providers (e.g., FCSA / SafeRec accredited, audited), maintain real-time monitoring, and ensure only compliant partners are used. We accept joint and several liability implications where applicable and prioritise direct PAYE or compliant models to minimise risk for clients and workers.

### **IR35 and ITEPA Legislation**

We ensure that all of our temporary workers who work through their own company pay employment taxes and national insurance contributions (NICs) in a similar way to employees, where they would be employed were it not for the PSC, or other intermediary that they work through in accordance with IR35 and the Income Tax (Earnings and Pensions) Act.

### **Prompt Payment**

In accordance with our Procurement Policy we pay our suppliers in a timely fashion and operate in accordance with the Prompt Payment Code wherever possible.

### **Quality Assurance**

Our ISO9001:2015 Quality Management System ensures that our service delivery meets client requirements, ensuring our staff are service focussed, respectful and



professional in all dealings designed to meet the needs of all parties involved in the supply of temporary and permanent workers. The ISO9001:2015 ensures that the business and all its activities are designed to reduce risk and continuously improve our services in order to achieve future plans.

We maintain the highest standards of data protection, information security and confidentiality, which are of critical importance given the sensitive nature of healthcare and education staffing. Athona is fully committed to compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Network and Information Systems (NIS) Regulations. All staff receive regular data protection and cybersecurity training, and we operate robust policies covering data minimisation, lawful processing, subject access requests, breach notification and secure disposal of information.

We maintain accredited cyber security measures including Cyber Essentials and conduct regular penetration testing and risk assessments to protect candidate, worker and client data. Data quality, cyber security and confidentiality remain a high priority. We seek and respond to the opinions of our employees and clients to inform continuous improvement, investigating and responding promptly to any complaints in accordance with our ISO9001:2015 Quality Management System procedures.

### **Sustainability**

We consider the social, economic and environmental aspects of our business decisions in accordance with our Environmental Management Policy and operate in a way that guards against unfair business practice. We seek to protect the environment by operating in accordance with our environmental initiatives. Athona invests in its environmental responsibilities to ensure a cleaner greener working environment.

### **Carbon Reduction**

Athona Ltd is committed to achieving net zero emissions by 2050. Our Carbon Reduction Plan is available [here](#). By targeting the three main sources of emissions within our organisational control it will make the most impact and produce the quickest reduction in emissions:

- Encourage the reduction of temporary worker commuting emissions through improved data capture and awareness of the impact of their travel choices, promoting more sustainable forms of transport through available schemes and behaviour modification.
- Further reducing use of gas and electricity within our office premises, by adopting further technological controls and behaviour modification through education of emissions impact with our employees.
- To further reduce Business Travel using vehicles, instead opting first for online meetings and second using public transport as the main source of travel.

Carbon Reduction Initiatives:

- We are currently in the process of adopting the ISO14001 Environmental Management System.
- We are reviewing our business travel policy to opt for online meetings in the first instance and secondary to use public transport as the default method of transport.
- We are developing reporting tools to monitor and share emissions data and awareness of its impact to increase adoption of emissions reduction schemes throughout the business.
- We will adopt a companywide 'Switch Off' campaign to ensure all electrical devices are switched off out of hours.
- We have retained a hybrid working environment since Covid 19 allowing staff flexibility to work from home for part of the week.
- We have removed disposable items i.e. plastic and paper cups providing reusable items only.
- We will encourage car sharing wherever possible and during the summer months promote a cycle to work scheme.
- We have been mindful of reductions in emissions through adoption of a number of energy saving measures since relocating to our current premises in December 2018. We ensured as part of the design that PIR sensors and LED lighting was installed throughout the building to save on energy consumption.
- In 2018 we also introduced print release software to reduce wasted printing by requiring employees to physically key in a passcode at the printer to release their printing, rather than sending it to the printer and forgetting it which has significantly reduced paper and printer usage, therefore reducing consumables and waste.
- Whilst very minimal, we have always opted for recycling schemes for WEEE equipment and the use of certified shredding for confidential waste ensuring that the waste is recycled. We will continue to use certified schemes that recycle office waste rather than sending to landfill.

## **Giving Back – Charity Fundraising**

As part of our Corporate Social Responsibility, Athona Recruitment is committed to raising vitally needed funds for local and national charities. Since our formation in 2003, the staff have voted to support a range of charities on an annual basis and undertaken a number of corporate sponsorship activities to raise money for local and national causes.

## **Review and Approval**

This policy will be reviewed at least annually or sooner as required by changes to regulation or policy.

This document was approved by:



Stewart London, Founder

v1.4 April 2026