

**Walkgrove's Communication on Progress** – Prepared by Jane Lunt, Business Development Manager

**Period Covered:** 08 February 2019 to 25 January 2020

**Statement of continued support by the Chief Executive Officer**

I am pleased to confirm that Walkgrove Ltd reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of human rights, labour, environment and anti-corruption. In this annual Communication on Progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication – eg on our website and in every bid we submit.

Sarah Smith  
**Managing Director**

**Human Rights Principles**

**Principle 1:** Business should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses

***Assessment, Policy and Goals***

Walkgrove actively supports the Universal Declaration of Human Rights. We will not carry out business with any countries or regimes where flagrant human rights abuses are known, eg torture, politically motivated disappearances etc.

Walkgrove has an *Anti-Harassment and Bullying Policy* and is committed to ensuring that all employees are treated fairly and with respect. Walkgrove will not tolerate victimisation, bullying or harassment in the workplace. Walkgrove also has an *Ethical Policy* which requires that each employee conducts the company's business with integrity, in compliance with applicable laws and in a manner that excludes consideration of personal advantage. We also have a *Corporate Social Responsibility Policy*, which acknowledges that it has social as well as financial accountability, and in such recognises that its responsibilities extend to improving the environmental, social and economic sustainability of all its business operations and processes.

***Implementation***

As we expand our operations internationally, all efforts are made to ensure that countries we are trading in comply with the Universal Declaration of Human Rights.

Walkgrove has a Grievance Procedure in place and offers mediation to staff as a first stage resolution to any problems experienced in the work place. Staff consultation is run where organisational changes are being implemented to ensure staff are informed and have an opportunity to influence outcomes.

Over 50% of our employees take advantage of our flexible working and family friendly policies which allows all staff to maintain a healthy work-life balance.

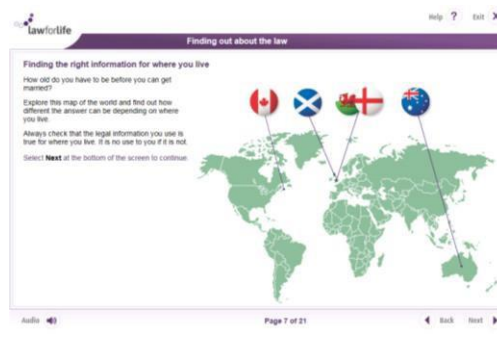
We have published our commitment to the UN Global Compact on our website to reflect our ethical business performance and to engage positively with stakeholders including employees, clients and communities.

We continue, as a business, to provide pro bono services to charity. We have provided pro bono services to the Charity, Law for Life, which exists to provide legal help and advice to those who cannot afford or do not know how to obtain legal advice in a number of areas that affect their human rights. The e-learning we developed and the deployment platform we provided free of charge, has now gone live and feedback has been fantastic. Law for Life commissioned an independent evaluation of the e-learning pilot. The pilot took place over a 2- month period and was funded by the Legal Education Foundation and the evaluation considers whether the pilot was successful in terms of the effectiveness of the e-learning approach for improving legal capability. Below are some of the comments from learners.

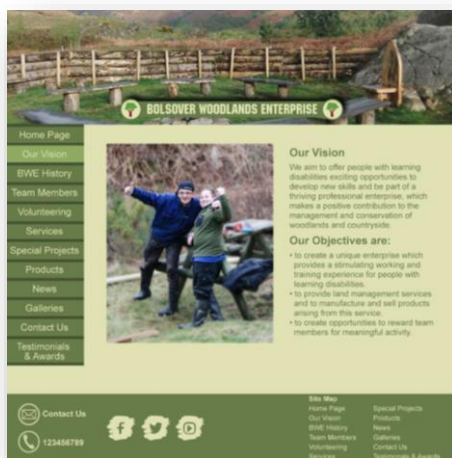
*“This really opened my eyes. I didn't know most of these things. I didn't know that I had any rights, especially about appealing wrong decisions”*

The reaction from Law for Life towards Walkgrove and its pro bono services is also reflected in the evaluation report:

*“Law for Life was very lucky to find Walkgrove. Walkgrove provided excellent support for this initiative and it is unlikely that the modules could have been produced within the budget available without Walkgrove's commitment to this work.”*



We also provided pro bono services to a local charity, Bolsover Woodland Enterprise, who needed help to develop their responsive website. Their aim is to offer people with learning disabilities exciting opportunities to develop new skills and be part of a thriving professional enterprise which makes a positive contribution to the management and conservation of woodlands and countryside.



Walkgrove's Policies, described above, reflect our proactive stance on human rights.

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation

### ***Assessment, Policy & Goals***

Walkgrove re-affirms its support of the ILO Core Conventions and will not do business with any organisation that uses forced or child labour.

All Walkgrove employees are issued with a contract of employment which clearly states their terms and conditions including pay rates and overtime pay arrangements. All staff are issued with a Company Handbook which includes information on standard terms and conditions of employment, company benefits, company rules, grievance and disciplinary procedures.

Walkgrove complies with all relevant health and safety legislation and provides a range of different safety related training to staff as appropriate to their job role.

### ***Implementation***

Walkgrove consults with staff on a continuous basis and has just instituted a Company Review Day where the year is reviewed in terms of what has been achieved and where we want to go.

Walkgrove has a range of Human Resources Policies which support best practice in terms of labour and employment including an Equal Opportunities Policy and a Dignity at Work Policy.

Walkgrove has a Whistleblowing Policy to:

- Provide avenues for Walkgrove employees to raise concerns about malpractice or wrongdoing in confidence and receive feedback on any action taken.
- Ensure that staff receive a response to concerns that are raised and that they are aware of how to pursue them if you are not satisfied.
- Reassure staff that they will be protected from possible reprisals, harassment or victimisation if they make a disclosure in good faith.

Walkgrove's Managing Director continues to work as a Trustee of the E-Learning Industry Charity, Learn Appeal, to support education through technology in the UK and globally. Initiatives have included support for the protection of albino children in Malawi being carried out by Coventry University. In the past year, the charity has again increased its profile massively and this is due in no small way to the resources and support provided by Walkgrove who want to give something back to the community. Two projects are about to start; one in Kenya and one in the UK with Barnardos. Walkgrove has funded the building of seven capsules for these projects. The capsules house a battery which will cope with 18 hours of constant use, a WiFi router with a range of up to 300 metres and the option to upgrade this to increase range to 1 km and a capacity of between 140-200 concurrent users. Although the unit can connect to the internet for updates if necessary, the content is stored locally on an SD card which can either be updated via the internet or by replacing the SD

card. The developers of the capsule, Appitierre, have agreed to give the IPR to Learn Appeal.

Walkgrove is also providing the means to formally evaluate the project in Kenya via the scanning and analysis of over 120 feedback forms. We continue to provide support at events by providing staff to help at exhibitions.

### ***Measurement of Outcomes***

Walkgrove has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Compact Labour principles.

Walkgrove has not been subject to any health and safety statutory notices or prosecutions in the last year.

## **Environment**

**Principle 7:** Businesses should support a precautionary approach to environmental changes;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies

### ***Assessment, Policy & Goals***

Being mostly office or home based, the nature of Walkgrove's business makes our environmental impact small. Walkgrove has an Environmental Policy which includes commitment to increase the amount of waste we are able to recycle and decrease the amount of waste going directly to landfill.

We have a policy for car-sharing wherever possible and we use tele-conferencing wherever possible.

All toner cartridges are recycled. Printing is kept to an absolute minimum.

### ***Implementation***

This year we have set up a waste separation and composting facility. All waste paper is shredded on site and recycled and, on average 'saves' six trees per year according to our supplier.

The nature of our business, ie the design and delivery of bespoke training, puts us in a good position to explain the benefits to the environment that online learning can bring in terms of reducing carbon footprint and we seek to do this wherever possible and deemed to be effective.

### ***Measurement of Outcomes***

Walkgrove has never had a reportable environmental incident and would not expect to, given the nature of our operations. We have never been subject to any statutory notices or prosecutions.

## **Anti-Corruption**

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery

### ***Assessment, Policy & Goals***

Walkgrove is compliant with the Bribery Act and it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. Walkgrove supports the UN Convention Against Corruption and does not operate in countries or with organisations who are corrupt.

### ***Implementation***

The Finance Director is ultimately responsible for anti-corruption within Walkgrove and our Anti-Bribery Policy sets out clearly exactly what could be considered to be bribery in terms of business operations. The Policy also covers the receiving of hospitality and gifts. All staff have been trained. Walkgrove reviews its Confidentiality and Data Protection Policies, which ensure that staff are aware of the need to protect the personal data that we necessarily have access to and which cannot be disclosed, on an annual basis. Walkgrove is ready for the impending changes to the data protection laws via GDPR in May 2018.

Walkgrove gained accreditation to both ISO 9001:2015 and ISO 27001:2017 standards.

Our quality and information security policy provides a framework for setting, monitoring, reviewing and achieving our objectives, programmes and targets. Customer service is an essential part of the quality process and to ensure this is fulfilled, all employees receive training about quality, information security and the impact they have on customer service.

Our business management system is regularly reviewed to ensure it remains appropriate and suitable to our business and it is subject to both internal and external annual audits.

The scope of this policy relates to use of the database and computer systems operated by the company from its office in South Normanton, Derbyshire, England, in pursuit of the company's business of providing training consultancy, generic training solutions and designing and developing bespoke blended learning solutions.

In addition, we are audited annually by Achilles UVDB, which entails an annual evaluation of our management systems and an on-site assessment. The latest audit was carried out in February 2018.

The UVDB Verify Audit specifically examines our approach to Safety, Health, Environment and Quality and Corporate Social Responsibility. The Verify protocol provides companies with an independent assessment of suppliers' management systems in each of the discipline areas both from an internal management system perspective as well as a test of the application onsite. Passing the Achilles assessment is an essential requirement for working with the offshore and utilities sectors.

### ***Measurement of Outcomes***

Walkgrove has not been involved in any legal cases, rulings or other events related to corruption or bribery. Walkgrove's financial statements are prepared by our auditors and this is used as one of the methods of identifying any spurious payments which could be related to bribery or corrupt behaviour.