## Plans of Duty of Care

Duty of Care – Part IV John Kyriazoglou





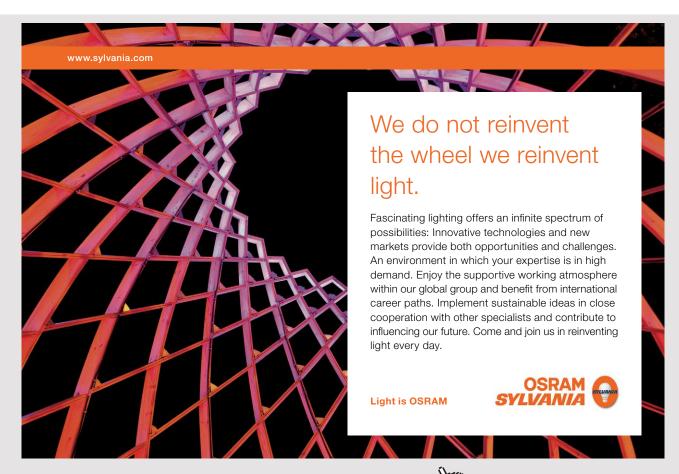
### JOHN KYRIAZOGLOU

# PLANS OF DUTY OF CARE DUTY OF CARE – PART IV

Plans of Duty of Care: Duty of Care – Part IV 1<sup>st</sup> edition © 2018 John Kyriazoglou & <u>bookboon.com</u> ISBN 978-87-403-1985-9 PLANS OF DUTY OF CARE CONTENTS

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### **SUMMARY AND CONTENTS**

**Summary:** This is the fourth part of the "Duty of Care" book.

It contains examples of plans that support, complement and enhance the contents of Parts 1, 2 and 3 of this book.

#### Contents of Part 4

- Chapter 1: Crafting Policies and Procedures Management Plan
- Chapter 2: Fire Safety Management and Evacuation Plan
- Chapter 3: Workplace Hazards Prevention Actions Plan
- Chapter 4: Data Security Management Plan
- Chapter 5: Corporate Intelligence Monitoring Management Plan
- Chapter 6: Corporate Risk Management Action Plan
- Chapter 7: Corporate Cultural Resilience Improvement Plan
- Chapter 8: Corporate Team Improvement Plan
- Chapter 9: "Duty of Care" Approach Improvement Plans

The contents of the other parts of this book are:

#### Part 1: Governance Aspects of Duty of Care

The first part contains a prologue and the first three steps of the implementation approach of seven-steps.

#### Part 2: Operations Aspects of Duty of Care

The second part contains the last four steps of the seven-step implementation approach.

#### Part 3: Principles and Methods of Duty of Care

The third part describes the principles, controls and methods used to support the implementation of management's duty of care tasks.

#### Part 5: Policies of Duty of Care

The fifth part several policies that may be used to support better the implementation of management's duty of care tasks.

#### Part 6: H R Management Controls of Duty of Care

The sixth part of this book describes a number of human resource management controls that may be used to support better the implementation of management's duty of care tasks.

#### INTRODUCTION

#### Objective of plans

The main objectives of the management plans contained in this Part of the book is to present a set of ready-made plans that could be used to implement and improve the "Duty of Care" responsibilities of board members, corporate managers and other business professionals of an enterprise (private company, public organization, etc.).

For more details on how these may be used to improve the implementation process of hard controls, see chapters 1 to 7 of Parts 1 and 2 of this book.

#### Plan preparation

Developing each plan should be done by the board via the given corporate committee (finance, production, IT, etc.). All these should be reviewed, improved and ratified by the board before their execution and implementation.

All these plans should comply with the principles embodied in the Workplace Wellness Model (see Prologue in Part 1: "B<sup>4</sup> Workplace Wellness Model": Believe; Bond; Belong; and Benefit") and the particular "Duty of Care" responsibilities of all company Board Members, Senior Management and other company personnel assigned to execute specific roles in the management of specific functions, employee wellness, health and safety, as well as programs, projects and activities.

#### Plan Revision History

Each plan should have a revision history paragraph at the end to make it easier to maintain. The contents of this are:

- 1. Title of Plan: <e.g.: Fire Safety Plan>
- 2. Original Creation Date: <day, month, year>
- 3. **Approved by:** <Name of Company officer>
- 4. **Details:** <....>
  - 4.1. **Version Number (1): <...>**
  - 4.2. **Revision Creation Date1:** <day, month, year>
  - 4.3. **Approved by:** <Name of Company officer>
- 5. **Details:** <....>
  - 5.1. **Version Number (1): <...>**
  - 5.2. **Revision Creation Date (N):** <day, month, year>
  - 5.3. **Approved by:** <Name of Company officer>

# 1 CRAFTING POLICIES AND PROCEDURES MANAGEMENT PLAN

#### Objective of this plan

The main objective of this management plan is to present to corporate managers and other business professionals a methodology that could be used to craft a company's required policies and procedures.

#### Methodology

- **STEP 1:** Establish a team (and a function) to organize and write "The Corporate Policies and Procedures Manual".
- **STEP 2:** Set general goals, specific objectives and the schedule (time-plan) for writing, reviewing and issuing this manual.
- **STEP 3:** Determine the contents of this manual. This Manual could be structured in three volumes: Volume 1 for policies, Volume 2 for procedures, and Volume 3 for forms.
- **STEP 4:** Collect, analyze and process all the required material for "The Corporate Policies and Procedures Manual".
- **STEP 5:** Design all the required corporate forms, such as: expense slips, invoices, vacation requests, purchase orders, etc.
- **STEP 6:** Write the first draft of this manual.
- STEP 7: Review and obtain feedback as regards this manual from all stakeholders.
- **STEP 8:** Get board approval and issue "The Corporate Policies and Procedures Manual" both in printed and in electronic form.
- STEP 9: Maintain this manual.
- STEP 10: Revise "The Corporate Policies and Procedures Manual".

# 2 FIRE SAFETY MANAGEMENT AND EVACUATION PLAN

#### Objective of this plan

The main objective of our Company's Fire Safety Management and Evacuation Plan is to prevent any damage or injury to all our employees and customers, visitors or partners engaged in company offices, locations and plants.

A typical example of such a plan is:

## Fire Safety Management and Evacuation Plan – Example for Company "XXY" (fictitious business entity)

#### Action 1: Declaration of Intent

- 1.1. Our Company believes that ensuring the health and safety of employees, visitors, service users and all relevant persons is essential to our business success.
- 1.2. We are committed to:
  - 1) Assessing and controlling the risks that arise from our work activities and operations.
  - 2) Ensuring safe working methods and providing safe working equipment.
  - 3) Preventing accidents and workplace related ill health.
  - 4) Providing a safe and healthy working and learning environment.
  - 5) Complying with statutory requirements, regulations and industry practices, as a minimum.
  - 6) Providing effective guidance, information, coaching, instruction and training, as required to all our employees.
  - 7) Consulting with our employees and their representatives on health and safety matters.
  - 8) Monitoring and reviewing our systems and prevention measures to ensure their effectiveness.

#### Action 2: Fire Risk Assessment and Planning Tasks

- 2.1. Fire Risk Assessments will be carried out and reviewed annually or when there is any building alteration or change of occupation and use of the premises, or following a fire incident, an emergency, etc.
- 2.2. Fire evacuation exercises will be carried out, at least annually. The purpose of these exercises is to educate all employees in the correct manner of evacuating a building in the event of an emergency situation and to meet legal obligations.

- 2.3. All evacuations will be conducted by the Fire Wardens under the guidance of a Fire Safety Officer. De-briefing sessions will accompany each evacuation drill (before and after).
- 2.4. Provisions will be made for the safe evacuation of disabled people.
- 2.5. In the event of a fire alarm outside of normal business hours, all employees and visitors are to evacuate the building. All staff, visitors and contractors will be made aware of the fire procedures.
- 2.6. All building design work shall comply with relevant fire, safety and health codes and standards.
- 2.7. Testing of building passive and active fire evacuation systems are to be conducted by an assigned officer at agreed appropriate times during normal hours and in line with current national, international or European test standards, as appropriate.
- 2.8. All building fire wardens will be trained in the use of the evacuation system.
- 2.9. Fire wardens will report any faults or problems to their respective Chief Wardens who will forward the details to the Fire Safety Officer or Health and Safety Manager.
- 2.10. A fire safety log book will be kept to record the details of all tests on passive and active preventative and protective measures, as well as training and fire drills.

#### Action 3: Senior Executive Fire Safety Responsibilities

Our Company's Chief Executive Officer or other authorized senior officer will:

- 3.1. Make certain that this Plan and any departmental fire safety policies and codes of practice that complement this Plan are in place, properly implemented and reviewed regularly.
- 3.2. Make certain that a Responsible Person is appointed to oversee and implement fire safety arrangements, and Make certain that they are Qualified Fire Safety Professional and appropriately trained to undertake their duties.
- 3.3. Make certain that arrangements are in place for the completion of fire risk assessments, including, where appropriate, technical surveys in respect of fire protection and avoidance.
- 3.4. Make certain that fire, security, and health and safety arrangements at each location of the company are complementary and support each other.
- 3.5. Make certain that annual audits of all fire systems by the appropriate teams are executed to ascertain compliance with not only statutory provisions but with this Fire Safety Management Plan.
- 3.6. Make certain that:
  - 1) Active reviews take place quarterly prior to any likely accident or event.
  - 2) Reactive reviews take place following a fire safety event.
  - 3) A review is undertaken following a fire, changes to the building, facilities, new procedures, new equipment, new materials and changes in staff numbers and roles.

- 3.7. Make certain that all fire safety procedures are improved as needs and regulations change and after a drill or fire event.
- 3.8. Have contingency plans for when life safety systems such as evacuation lifts, fire-detection and warning systems, sprinklers or smoke control systems, emergency lighting or building power system are out of order.

#### Action 4: Department Managers' Fire Safety Responsibilities

Our Company's Managers, Section Heads or Department Managers with responsibility for premises or parts of premises of the company, will:

- 4.1. Make certain that fire risk assessments are carried out for all their workplaces and locations, and for specific activities such as hot working involving welding, cutting, etc.
- 4.2. Make certain, in conjunction with the outcome of the fire risk assessment that the optimum number and type of fire extinguishers are installed in appropriate locations.
- 4.3. Make certain that fire alarm and detection systems, emergency lighting and fire extinguishers are appropriately located and properly maintained.
- 4.4. Make certain that a robust and effective emergency plan is in place at each location to safely evacuate all persons, whether employees, visitors or service users, and taking into account people with mobility, some sensory and some learning impairments, including those with temporary impairments, which will affect their ability to use stairs or otherwise evacuate premises promptly.
- 4.5. Arrange for the emergency plan to be issued to their employees, visitors, etc. to inform them what to do in the event of fire, etc.
- 4.6. Arrange for a Qualified Fire Safety Professional responsible person (who may also be the premises coordinator) to be appointed to oversee and implement fire safety arrangements at their workplace(s) on their behalf.
- 4.7. Make certain that employees are appropriately trained in fire safety procedures to reflect the requirements of the fire risk assessment.
- 4.8. Make certain that a copy of the current fire risk assessment for their premises is easily accessible.
- 4.9. Make certain that fire risk assessments are reviewed at least annually or whenever there is any alteration to the building or following an incident involving fire.
- 4.10. Ensure that effective arrangements are in place for contacting the emergency services.

#### Action 5: Fire Safety Manager's Responsibilities

Our Company's Fire Safety Manager, will:

- 5.1. Support and assist with the preparation and review, at least annually, of fire safety risk assessments.
- 5.2. Make certain that the necessary control measures are implemented to comply with the results of the Company's Fire Risk Assessment.
- 5.3. Prepare, issue and improve the emergency plan issued to all employees of the company.
- 5.4. Make certain all employees, visitors, partners and contractors are instructed in the emergency plan, as needed.
- 5.5. Organize fire drills, at least annually, review and improve fire safety controls accordingly.
- 5.6. Rehearse the instructions for supporting and assisting visitors, disabled people or those with temporary physical or other impairments to safely evacuate the premises.
- 5.7. Establish a set Key Performance Indicators (KPIs) will be used to monitor the effectiveness of the Fire Safety Management Plan. These KPIs will include:
  - 1) Number of fires recorded annually.
  - 2) Number of fire related incidents.
  - 3) Number of evacuation drills.
  - 4) Number of fire safety audits.
  - 5) Number alterations or prohibition notices from statutory authorities.
- 5.8. Make certain that Fire Alarms are regularly tested at the recommended frequency (e.g. weekly, monthly, etc.).
- 5.9. Monitor that fire alarm systems, detection devices, emergency lighting and fire extinguishers are appropriately and regularly maintained.
- 5.10. Make certain that fire action notices are appropriate and kept up to date.
- 5.11. Make certain all escape routes are kept clear of obstructions and that access to fire extinguishers and fire alarms is not impeded.
- 5.12. Ensure all escape routes are kept clear of obstructions and that access to fire extinguishers and fire alarms is not impeded.
- 5.13. Make certain that the annual testing of portable electrical equipment and periodic testing (5 yearly or as otherwise decided ) of the fixed electrical installations has been carried out.
- 5.14. Make certain that quarterly fire safety inspections of the premises are carried out.
- 5.15. Keep the fire log book or equivalent documentation up to date.
- 5.16. Issue and distribute the relevant Evacuation Guidelines (see Action 7: Evacuation Guidelines later in this plan)

#### Action 6: Employees' Fire Safety Responsibilities

#### Our employees will:

- 6.1. Make certain they are familiar with the emergency plan for their workplace.
- 6.2. Cooperate by participating in fire evacuation and drill procedures, as scheduled.
- 6.3. Observe practical fire safety arrangements, as published.
- 6.4. Cooperate with the responsible person for fire safety for their workplace.
- 6.5. Be aware and familiar with all escape routes of their location.
- 6.6. Report to their immediate manager or supervisor any concerns about fire safety.
- 6.7. Keep fire doors open, at all times
- 6.8. Know the actions to be taken on discovering a fire, hearing a fire alarm, for raising the alarm and calling the fire and rescue service.
- 6.9. Evacuate the premises, in accordance with the emergency plan, to a place of safety without putting themselves and others at risk.
- 6.10. Not attempt to extinguish a fire unless they have been specifically trained.
- 6.11. Comply with the No Smoking legislation.

#### **Action 7: Evacuation Guidelines**

- 7.1. All company employees, visitors and partners working in our company, must always follow the evacuation guidelines noted below, as instructed, and led by the Company's fire safety manager.
- 7.2. All persons must:
  - 1) Prepare and evacuate the building by way of the nearest emergency exit. Walk; do not run. Do not use elevators.
  - 2) Close but do not lock all doors as you leave.
  - 3) Before exiting through any closed door, check for heat and the presence of fire behind the door by feeling the door with the back of your hand. If the door feels very warm or hot to the touch, advise everyone to proceed to another exit.
  - 4) In the event you are unable to exit the building:
    - a) Remain calm; do not panic.
    - b) Remain low; crawl if necessary.
    - c) Place a cloth, wet if possible, over your mouth to serve as a filter.
    - d) Signal for help from a window. Use a towel, clothing, sign etc.

- 5) Upon exiting the building and proceeding to the assembly area, remain at least 20 feet away from the building walls and overhangs. Do not block any driveways, as Fire Department personnel will need access to these areas.
- 6) Employees are requested to report to their assigned assembly areas as defined by your Fire Evacuation Plan.
- 7) All persons should stay clear of the building until your appointed fire monitor has advised you to re-enter the building/area.
- 8) Employees must assist visitors during alarm/emergency situations.
- 9) Visitors may not be aware of exits/alternative exits and the procedures that should be taken during alarm situations.
- 10) Employees should calmly inform visitors of the proper actions to be taken and assist them with the evacuation.



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# 3 WORKPLACE HAZARDS PREVENTION ACTIONS PLAN

#### Objective of this plan

The main objective of our Company's Workplace Hazard Prevention Actions Plan is to prepare the company with a set of preventive actions so that any damage or injury to all our employees and customers, visitors or partners engaged in company offices, locations and plants are minimized if not avoided all-together.

A typical example of such a plan is:

Workplace Hazard Prevention Actions Plan – Example for Company "XXY" (fictitious business entity)

#### 1 INTRODUCTION

Health and safety hazards exist in every workplace. Some are easily identified and corrected, while others create extremely dangerous situations that could be a threat to your life or long-term health and wellness.

The board and the senior management of companies have a responsibility to protect all employees against health and safety hazards at their workplace.

Employees have the right to know about potential workplace hazards and to refuse work that they believe is dangerous. Employees also have a duty and responsibility to work safely with hazardous materials.

The best way to protect your business from potential lawsuits and your employees from injuries is for yourself to take action to prevent them and for your employees to learn to recognize them and avoid them.

#### 2 TYPES OF WORKPLACE HAZARDS

There are five main types of usual workplace hazards:

- **1. Physical hazards:** *Physical hazards* are the most common hazards and are present in most workplaces at some time. Examples include: frayed electrical cords, unguarded machinery, exposed moving parts, constant loud noise, vibrations, working from ladders, scaffolding or heights, spills, tripping hazards, radiation, magnetic fields, pressure extremes (high pressure or vacuum), etc.
- 2. Psychosocial hazards: These include occupational stress, anxiety, violence, etc.
- **3. Ergonomic hazards:** These include repetitive movements, improper set up of workstation and chairs, poor lighting, improperly adjusted workstations, frequent lifting, repetitive or awkward body movements, etc.
- **4. Biological hazards:** These include diseases, bacteria, viruses, insects, plants, birds, animals, and humans, etc.
- **5. Chemical hazards:** These include toxic substances, gases, cleaning products and solvents, vapours and fumes, carbon monoxide or other gases, gasoline or other flammable materials, etc.

#### 3 ACTIONS TO PREVENT WORKPLACE HAZARDS

- 1. Craft and implement a risk management process to your needs (see "5. Wellness Risk Management Plan" below) as well as health and safety policies for your production function.
- 2. Educate all personnel on how to identify and avoid hazards.
- 3. Ensure that all personnel report potential hazards at the workplace when they see one.
- 4. Carry out inspections of workplaces and audit hazard prevention practices.
- 5. Maintain a workplace hazards log to record all hazards and actions taken.
- 6. Correct all reported hazards.
- 7. Label all hazardous or controlled materials and products so that they clearly identify the product and provide hazard information about it.
- 8. Monitor the exposure of employees to identified or new hazards including the impact on their physical, spiritual and mental health.
- 9. Get advice from consultants or experts on appropriate injury preventions and hazard controls.
- 10. Connect with other similar business organizations to share knowledge and practices on hazards.

### 4 ACTIONS TO PREVENT HIGH TECHNOLOGY WORKPLACE ERGONOMIC HAZARDS

- 1. Sit at an adjustable desk specially designed for use with computers.
- 2. Have the computer screen either at eye level or slightly lower.
- 3. Have your keyboard at a height that lets your elbows rest comfortably at your sides.
- 4. Your forearms should be roughly parallel with the floor and level with the keyboard.
- 5. Adjust your chair so that your feet rest flat on the floor, or use a footstool.
- 6. Use an ergonomic chair, specially designed to help your spine hold its natural curve while sitting.
- 7. Use an ergonomic keyboard so that your hands and wrists are in a more natural position.
- 8. Take frequent short breaks and go for a walk, or do stretching exercises at your desk.
- 9. Stand often.
- 10. Take short walks at least every hour.

#### 5 WELLNESS RISK MANAGEMENT PLAN

Depending on the hazards profile of your business you may need to consider implementing a set of Hazard Risk Controls (HRCs) to controls risks at three operating stages of your business: Inputs to your business, Processing within your business and Outputs from your business.

I am proposing the following Hazard Risk Controls (HRCs) for your consideration and implementation.

#### 5.1 FIRST BUSINESS OPERATING STAGE: INPUT HRCS

These controls should be designed to eliminate and minimize hazards entering your business organization.

HRCs may be needed for:

**5.1.1. Physical Building.** HRCs are required to ensure that wellness is included in the design, construction and operation of all buildings, plants and offices, and generally in your workplaces in which your people produce products and provide services.

- **5.1.2. Health and Safety Data.** HRCs are required to ensure that wellness is included in all health and safety data and information entering your business including: information relating directly to risk management, assessment of hazards, health and safety standards, corresponding guidance and aspects of the wellness law, and any revisions, as well as other technical and management information relating to risk control and the development of a positive health and safety culture.
- **5.1.3. Personnel.** HRCs are required to ensure that wellness is included in the recruitment and selection of all employees of your company as well as in the selection of contracting organizations and external partners working at your workplace;
- **5.1.4. Physical Resources.** HRCs are required to ensure that wellness is included in the design and operation of all physical resources entering your business including materials and equipment used or operated by your people as well as the corresponding equipment and materials used by external contractors in your workplace.

#### 5.2 SECOND BUSINESS OPERATING STAGE: PROCESSING HRCS

These controls should be designed to eliminate and minimize hazards during the processing function in your business organization. HRCs may be needed for:

- **5.2.1. Work Execution.** HRCs are required to ensure that wellness is included in the way that work tasks are executed according to business standard and emergency procedures including the design of jobs and work tasks and all aspects of the way the work is done (routine or standard, non-routine or ad-hoc activities and emergency activities).
- **5.2.2. Employee Competence.** HRCs are required to ensure that wellness is included in the placement of employees, their competence for the job and any health surveillance needed.
- **5.2.3. Workplace Environment.** HRCs are required to ensure that wellness is included in the entrances and exits of all rooms and plant facilities and the general working (health protection, safety, mechanical, energy and electrical) environment where products are produced and services provided. This includes also the issues of destroying toxic materials and substances and dismantling equipment and facilities including cabling and other infrastructural components (e.g. chemical labs).
- **5.2.4. Handling of Substances.** HRCs are required to ensure that wellness is included in the way substances, parts and materials are handled, stored and transported within the customer, business function and production areas.

#### 5.3 THIRD BUSINESS OPERATING STAGE: OUTPUT HRCS

These controls should be designed to eliminate and minimize hazards during the processing function in your business organization. HRCs may be needed for:

- **5.3.1. Product Delivery.** HRCs are required to ensure that wellness is included in the way products are delivered to customers or services provided including the consideration of design and research on the health and safety and safe use of products and services, the provision of information to customers to identify evidence of harm, the delivery and transport of products including packaging, labelling and intermediate storage and the installation, setting up, cleaning and maintenance of products undertaken by employees or contractors.
- **5.3.2. Environment Protection.** HRCs are required to ensure that wellness is included in the way your business outputs to the environment, particularly wastes and atmospheric emissions and the disposal of plant, equipment, hazardous substances and other wastes (water, human, digital, paper, etc.).

# 4 DATA SECURITY MANAGEMENT PLAN

#### Objective of this plan

The main objective of our Company's Data Security Management Plan is to maintain effective data security for protecting the personal data of individuals collected, processed, used and held by the enterprise.

A typical example of such a plan is:

#### Data Security Management Plan – Example for Company "XXY" (fictitious business entity)

#### Action #1: Include Data Privacy into the Corporate Security Policy

- 1.1. The Corporate Security policy of the enterprise describes the security measures and controls that are designed to deny unauthorized access to the enterprise's facilities, equipment and resources that store personal data.
- 1.2. This corporate security policy defines the use of multiple layers of interdependent systems which include: Wire fences; Closed circuit television surveillance; Security guards; Protective barriers; Locks; Physical access control protocols, etc.
- 1.3. The Privacy Office of the enterprise ensures that this policy includes measures and controls related to the protection of personal data in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #2: Include Data Privacy into the Information Security Policy

- 2.1. The Corporate Security policy of the enterprise describes the security measures and controls that are designed to deny unauthorized access to the enterprise's facilities, equipment and resources that store personal data.
- 2.2. This Policy is a high level statement which clarifies the direction of, and support for information security; Describes the roles of personnel and the reasons for protecting data; Is supported by standards, guidelines, and operational procedures which explain in detail how to execute the specific instruction to support the Policy requirements; and is used to protect information assets from a wide range of threats to ensure business continuity, prevent security breaches, and reduce operational and business risk.
- 2.3. The Privacy Office of the enterprise ensures that this policy includes measures and controls related to the protection of personal data in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #3: Include Data Privacy into the Acceptable Use Policy

- 3.1. The Information Security policy is a written statement that communicates the organization's goals, purpose, objectives, requirements, responsibilities and standards for protecting the information maintained by the systems of the specific enterprise.
- 3.2. This policy: defines what users are, and are not; what are they allowed to do with the IT systems of an organization; and the sanctions to be applied if a user breaks the acceptable use policy of the enterprise.
- 3.3. The Privacy Office of the enterprise ensures that this use policy includes all aspects related to the protection of personal data in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #4: Include Data Privacy into Security Risk Assessments

- 4.1. A usual security risk assessment enables an enterprise to identify threats and the associated vulnerabilities which have the potential to negatively impact its business operations.
- 4.2. The security risk assessment addresses all business functions, departments and computerized systems within the organization, including those that collect, process, maintain, store, and transmit personal data.
- 4.3. The Privacy Office of the enterprise ensures that this assessment includes all aspects related to the protection of personal data in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #5: Implement IT Technical Security Controls

- 5.1. IT technical security controls are safeguards that are implemented and maintained by enterprises to prevent, avoid, counteract or minimize IT-related security risks.
- 5.2. These IT technical security controls consist of two types: hardware and software controls.
- 5.3. Enterprises use these to provide automated protection to the computer system and its computerized applications. Some examples of technical security controls include: Encryption techniques; Firewalls; Intrusion Detection System ("IDS"); Intrusion Prevention Systems ("IPS"); and Security Event and Information Monitoring System, etc.
- 5.4. Encryption is used to transform personal data using specific algorithms to turn the personal data into an unreadable format and safeguard them against those who do not possess the encryption key.
- 5.5. The Privacy Office of the enterprise ensures that all these controls as well as encryption are used to ensure the protection of personal data and that personal data are encrypted in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #6: Implement Human Resources Security Controls

- 6.1. Human resources security controls ensure that the individual employees who are or will be accessing personal data or holding positions of trust (e.g., in the Privacy Office, Information Security or IT) or access and maintain computerize systems are responsible and trustworthy individuals.
- 6.2. Such controls also ensure that when employees leave the enterprise or are transferred, steps are taken to restrict their access to systems and premises that house personal data, and ensure that no personal data remains in their custody after they leave.
- 6.3. The enterprise uses these controls to ensure that access to personal data is restricted to authorized employees and users with a legitimate business need.
- 6.4. This includes controls to: manage the user provisioning process (adding, modifying, and deleting user profiles); ensure that access is authorized by someone with appropriate level of authority; authenticate users; segregating duties; pre-screening applicants; performance appraisals, etc.
- 6.5. The Privacy Office of the enterprise ensures that all these controls are used to ensure the protection of personal data and in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #7: Include data privacy into business continuity planning

- 7.1. An enterprise maintains a business continuity plan and an IT disaster recovery plan to: Identify the organization's exposure to internal and external threats; and define how the enterprise recovers from an incident while maintaining confidentiality and integrity of personal data and computer facilities and critical application systems.
- 7.2. These plans should include regular testing and taking copies to an offsite storage as defined by the enterprise's IT disaster recovery plan.
- 7.3. The Privacy Office of the enterprise ensures that all these controls and plans are used to ensure the protection of personal data and in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #8: Develop and Implement a data-loss prevention strategy

- 8.1. Data Loss Prevention ("DLP") is a strategy and process (DLP solution) that guides and governs the protection of sensitive information in all its forms.
- 8.2. DLP solutions need to discover and fingerprint sensitive information regardless of format, and, through regular intervals, keep the DLP solution and related controls informed about changes such as new data stores.
- 8.3. An effective DLP Solution will combine network- and host-based controls to protect enterprises from careless or intentional data loss.

- 8.4. Examples include: uploading information; sending information outside the organization via email; copying information to a removable media device; data discovery; policy creation, analytics, and response; and integration with other controls such as Internet gateways for broad policy enforcement, etc.
- 8.5. The Privacy Office of the enterprise ensures that all the DLP solution is used to ensure the protection of personal data and in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #9: Conduct regular testing of data security

- 9.1. As the landscape of cyber risks is always changing it is good practice for all enterprises to conduct testing of their implemented security controls.
- 9.2. This testing should be done on a periodic basis (e.g., once per year) and should at least include a security penetration test of the organizations security controls.
- 9.3. The purpose of the test is to: Identify security vulnerabilities; Attempt to successfully exploit the vulnerabilities in order to gain some form of access to the enterprise's network, computer system and applications; and recommend specific improvements.
- 9.4. The Privacy Office of the enterprise ensures that all security tests are used to ensure the improvement of the protection of the privacy of personal data and in accordance with the legal, compliance and other data protection and privacy regulations.

#### Action #10: Maintain security certification

- 10.1. In order to improve security controls the enterprise engages with a qualified third party to provide: An independent evaluation of controls that cover security, availability, processing integrity, confidentiality and data protection and privacy; and a report that gives assurance attesting to the specific enterprise's compliance with the relevant principles and criteria.
- 10.2. The Privacy Office of the enterprise ensures that this certification improves the protection of personal data and in accordance with the legal, compliance and other data protection and privacy regulations.

### 5 CORPORATE INTELLIGENCE MONITORING MANAGEMENT PLAN

#### Objective of this plan

The main objective of our Company's Corporate Intelligence Monitoring Management Plan is to maintain effective collection, processing and monitoring of intelligence information for protecting the company's information and other activities from external business threats. This contains the following actions:

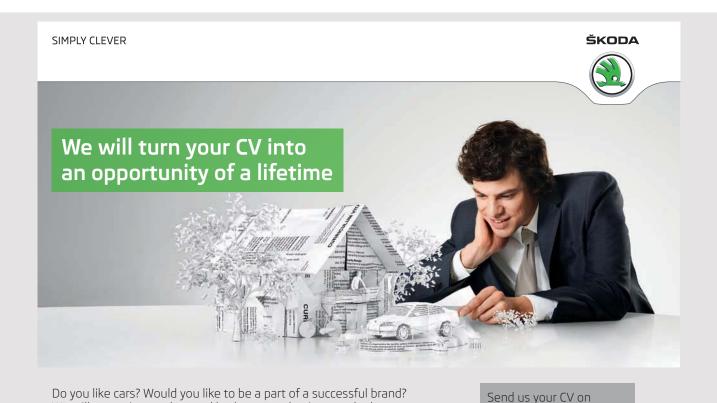
Action 1: Define the corporate intelligence mission.

We will appreciate and reward both your enthusiasm and talent.

Send us your CV. You will be surprised where it can take you.

Action 2: Obtain the necessary resources, personnel, funds, systems, office space, equipment, etc.

Action 3: Establish the organizational structure for corporate intelligence by assigning responsibilities, etc.



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- Action 4: Identify the corporate intelligence internal and external sources that will make up the corporate knowledge base.
- Action 5: Organize the internal computerized information systems and data as well as the other corporate data into a knowledge base.
- Action 6: Organize and set up the collection mechanisms for obtaining external data.
- Action 7: Obtain, review, process, analyze, prioritize and record the internal and external information in the corporate knowledge base.
- Action 8: Operate the corporate intelligence unit and provide the required reports and analyses to approved management levels.
- Action 9: Review and evaluate the results of the corporate intelligence unit.
- Action 10: Improve the structure, operation, staff, systems and reports of the corporate intelligence unit.

# 6 CORPORATE RISK MANAGEMENT PLAN

#### Objective of this plan

The main objective of our Company's Corporate Risk Management Action Plan is to establish the context and create a risk management plan for protecting the company's operations from all business risks.

#### Action 1: Establishing the context

- a) Identification of risk in a selected domain of interest,
- b) Planning the remainder of the process,
- c) Mapping out the social scope of risk management, the identity and objectives of stakeholders and the basis upon which risks will be evaluated,
- d) Defining a framework for the activity and an agenda for identification,
- e) Developing an analysis of risks involved in the process, and
- f) Mitigation of risks using available technological, human and organizational resources.

#### Action 2: Create a risk-management plan

The risk-management plan should document the appropriate controls or countermeasures to measure each risk.

#### Action 3: Set up the Risk Register.

#### Action 4: Execute the risk-management plan

This involves analyzing and taking appropriate actions on resolving all the identified (actual and potential) risks affecting your company, and monitoring all the taken actions to ensure that all the risks have been handled with the least possible effect.

### 7 CORPORATE CULTURAL RESILIENCE IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Corporate Cultural Resilience Improvement Plan is to improve the cultural resilience of all people working for our company by executing a set of improvement actions on the soft controls aspects issues related to engaging people better.

#### Actions

#### Action 1: Improve "Tone at the Top"

You can do this by:

- 1. Dialogue. Enact dialogues and discuss and resolve all ethics and integrity issues; and
- 2. **Ethical Model.** Adopt an ethical behavior model and provide examples of moral behavior in your daily management duties and oversight activities.

#### Action 2: Improve understanding of the organization by the board

You can do this by:

- 1. **Board Selection.** Select and appoint board members on the basis of education, professional background and practical experience;
- 2. **Attendance.** Ensure that board members attend critical business operations for a specific period; and
- 3. **Wellness Training**. Provide board members with specialized wellness training courses on very specific health and safety issues and areas where the given organization is active.

#### **Action 3: Improve integrity**

- 1. **Compliance.** Design and implement an effective ethics and compliance office, program and organization;
- 2. Awareness. Keep all staff aware on all ethics and compliance issues;
- 3. **Moral Example.** Providing examples of ethical behavior in your daily supervision activities; and
- 4. **Compliance Improvement.** Review and improve both ethics and compliance program and policies, as the organization grows and its regulatory aspects and expectations change.

#### Action 4: Improve operational philosophy

You can do this by:

- 1. **Fairness.** Deal with all people (internal staff, outside auditors, customers, external suppliers, government authorities, regulators, stakeholders, community, etc.) on the same basis of fairness;
- 2. **Business Conduct.** Deal with all people (internal staff, outside auditors, customers, external suppliers, government authorities, regulators, stakeholders, community, etc.) on the same written and approved rules and codes of business conduct;
- 3. **Business Policies.** Craft and implement effective ethics, human rights and procurement policies; and
- 4. **Accountability.** Communicate all company information to all parties on the basis of transparency and accountability.

#### Action 5: Improve Ethical Climate

You can do this by:

- 1. **Honesty.** Use honesty in ensuring that you always maintain a positive and ethical climate in managing and interacting with your employees, your superiors and your customers,
- 2. **Greater Good.** Leave aside and amend, as required in certain circumstances, your personal self-interest, company profit, operating efficiency, rules, procedures, etc., in order to preserve and improve the ethical climate of your business and to serve the greater good, and
- 3. **Fairness.** Deal with all your stakeholders (employees, external auditors, customers, suppliers, authorities, regulators, community, etc.) on the same basis of fairness, and,
- 4. **Rules of Business.** Deal with all your stakeholders (employees, external auditors, customers, suppliers, authorities, regulators, community, etc.) on the same basis of written and approved rules and codes of business conduct.

#### Action 6: Improve Employee Empowerment

- 1. **Authority Assignment.** Give authority and responsibility to selected employees to carry out specific actions to achieve general corporate goals and specific objectives,
- 2. **Encouragement.** Encourage employees to assume a more energetic and effective role in their work.

- 3. **Involvement.** Involve employees in assuming responsibility for improving the way things are done in their daily work activities, and
- 4. **Monitoring.** Monitor these results to ensure that these are properly done.

#### Action 7: Improve Leadership

You can do this by:

- 1. Envisioning. Have a vision, a mission and values,
- 2. Organization. Be organized to the fullest,
- 3. Execution. Plan, supervise, and execute efficiently and effectively,
- 4. **Delegation.** Delegate by assigning ownership of the work you give to employees, and always act with responsibility,
- 5. **Passion.** Be passionate and enthusiastic and get your employees involved in the decision-making process,
- 6. Training. Train and coach them as required to get the job done well,
- 7. Calmness. Handle emotional issues with calmness and fairness,
- 8. Organizational Knowledge. Know your organization extremely well,
- 9. Model Behavior. Provide a positive and moral example to others, and
- 10. Motivation. Motivate people and keep clear channels of communication.

#### Action 8: Improve Employee Motivation

You can do this by:

- 1. Reinforcement. Provide positive reinforcement to all employees,
- 2. Discipline. Carry out effective discipline and fair punishment for all transgressions,
- 3. Fairness. Treat all people fairly,
- 4. Needs Satisfaction. Satisfy employee needs on a cost-benefit case,
- 5. Goal Setting. Set achievable work-related goals,
- 6. Job Packaging. Restructure jobs and tasks to become more manageable, and
- 7. Performance Rewards. Reward people on job performance.

#### Action 9: Improve Openness and Shared Values

- 1. **Appreciation.** Appreciate the opinions, skills and knowledge of all employees, and
- 2. **Review.** Re-examine traditional organizational standards in order to achieve better and more beneficial results.

#### Action 10: Improve Information Flow

You can do this by:

- 1. **Communication Policy.** Draft and implement a communications policy, by identifying the strategic objectives of the organization, reviewing current communications practices, identifying the communications audiences and determining the communications methods and means to be used,
- 2. **Executive Training.** Get executives trained on listening techniques and practices88.
- 3. **Information Collection.** Ensure that information (internal and external), critical to achieving the objectives of the organization is identified, regularly collected and reported to management and stakeholders,
- 4. **Performance System.** Implement a performance system that identifies, collects, stores, processes, analyzes and communicates corporate performance to all approved stakeholders of the organization, and
- 5. **Information Monitoring.** Implement and monitor mechanisms to allow the easy flow of information down, across, and up the organization.

#### **Action 11: Improve Corporate Culture**

You can do this by:

- 1. **Discussion.** Discuss all cultural issues with employees,
- 2. **Model of Behavior.** Provide examples of behavior in your daily supervision activities, and
- Involvement. Involve your employees in reviewing corporate statements on vision, mission and values.

#### **Action 12: Improve Morale**

- 1. **Employee Engagement.** Provide opportunities for employees to make decisions about and influence their own work,
- 2. **Provision of responses.** Provide timely, accurate and proactive responses to their questions and concerns,
- 3. Fairness. Treat them as responsible adults with fairness and consistency,
- 4. **Corporate Policies.** Develop and publicize corporate policies and procedures while ensuring that they work effectively,

- 5. **Communication.** Communicate positively, effectively and constantly with all employees on all issues (e.g., performance, work details, etc.),
- 6. Opportunity. Afford all staff the opportunity to grow and develop, and
- 7. **Leadership.** Provide appropriate leadership and a framework of strategy, vision, mission, values and goals<sup>90</sup>.

#### **Action 13: Improve Trust**

You can do this by:

- 1. **Promotion Practice.** Promote personnel to higher levels of organizational hierarchy, who are capable of forming positive, trusting and caring interpersonal relationships with people who report to them,
- 2. **Coaching.** Develop the interpersonal relationship skills of all personnel and especially those of current managers and employees desiring promotion, by sending them to relevant courses or by coaching and mentoring programs,
- 3. Information Sharing. Keep organizational personnel informed, as much as possible,
- 4. **Commitment.** Act with integrity and keeping commitments to all participants in the affairs of the organization (employees, authorities, customers, board members, stakeholders, etc.),
- 5. **Protection.** Protect the interest of all employees in a work group, even those who are absent,
- 6. Effectiveness. Be effective, efficient and results-oriented, within limits, and
- 7. **Respect.** Listen with respect, sensitivity and full attention.

#### Action 14: Improve Corporate Attitude

- 1. **Politeness.** Use polite and positive language and manners in assigning and managing tasks,
- 2. Awarding. Connect tasks to awards,
- 3. Variety. Add variety to tasks,
- 4. Balance. Assign both liked and non-liked tasks to all employees,
- 5. **Support.** Think out a solution as regards the difficult task and situation with the person involved, and
- 6. **Coaching.** Work out a mutually-agreed solution with the person involved and coach them as required.

#### **Action 15: Improve Competence**

You can do this by:

- 1. **Assessment.** Assess your skills (managers and employees) via self-evaluation methods, benchmarking or other tools,
- 2. **Industry Training.** Take specific industry courses yourself as managers and send your employees to courses also,
- 3. **Academic Courses.** Upgrade job-related knowledge by attending university and professional seminars,
- 4. Coaching. Get involved in coaching and mentoring programs, and
- 5. Certification. Get certified by a professional association.

#### **Action 16: Improve Expectations**

You can do this by:

- 1. **Review.** Meet with employees on a regular basis to discuss problems, issues, goals and progress,
- 2. Enthusiasm. Promote enthusiasm for completing tasks,
- 3. Acknowledgement. Express confidence in each employee's ability, and
- 4. **Reinforcement.** Reinforce past achievement so that employee motivation is sustained.

#### Action 17: Improve Structure of Reporting Relationships

- 1. **Organizational Chart.** Craft an effective organizational chart and communicate it to all staff.
- 2. **Duties Description.** Develop job titles for all employees and use them in all dealings, and
- 3. **Organizational Review Process.** Review and improve both organizational chart and job titles, as the organization grows and its demands change.

# 8 CORPORATE TEAM IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Corporate Team Improvement Plan is to improve the organizational and operational aspects of the teams working in our company.

#### Action 1: Scope the problem

You have to know what the performance problem is with your team.

Assess their environment and concerns against your business requirements.

Identify the issues involved in solving the specific problem. Document the problem and the solution, in terms of specifications, needs, expectations, demands and resources.

#### Action 2: Organize the team

Assign project manager or team manager or function manager. Develop terms of reference. Define each detail team and the roles within that team.

Assign specific responsibilities.

Develop and issue project schedule and reporting mechanisms.

#### Action 3: Link team to strategy

Set clear vision, mission and values; establish targets for the project, team, function, etc., and its expectations.

Inform team members of the desired outcomes and measures of success.

Invite each member to be a part of the team and communicate the goals and why they were selected.

#### Action 4: Enable team culture

Build commitment and trust by valuing the contribution of each member of the team. Build sympathy for each person's challenges.

Ensure the competence of the whole team, as well as each member. Empower the team by allowing the members to work within the prescribed guidelines with each other to accomplish the goals. Resolve conflicts.

#### Action 5: Establish communications

Craft and implement communication policy and associated procedures.

Ensure clarity and accountability for all types of communications. Ensure that the team shares information and develops an open mind.

#### Action 6: Monitor activities

Establish regular monitoring.

Review progress.

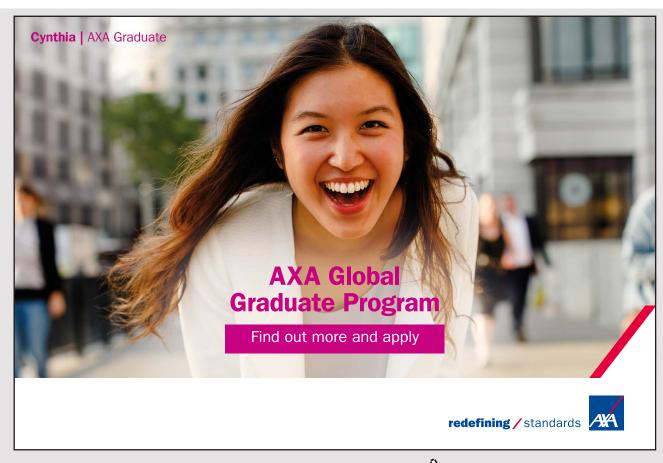
Identify issues, and resolve problems.

Close the project when all project activities have been concluded successfully.

#### Action 7: Manage performance

Develop performance policy for managers and team members. Link this policy with corresponding corporate performance system. Award managers and team members when performance targets are met.

Manage performance issues.



# 9 "DUTY OF CARE" APPROACH IMPROVEMENT PLANS

**Summary:** This chapter describes seven improvement plans for Corporate Governance, Board Effectiveness, Executive Leadership, Business Operations, Human Aspects, Trust and Confidence and Internal Controls of 60 actions (Action 1 of First plan: Include universal religious and moral principles in your professional and business affairs; Action 1 of Second plan: Practice what you preach; Action 1 of Third plan: Establish efficient financial and other business recording systems and procedures; etc.).

These may be used to improve your "Duty of Care" responsibilities as a manager or board member of your company or organization in the areas of governance, board effectiveness, leadership, etc.

Typical examples of such plans are detailed next.

#### 1 CORPORATE GOVERNANCE IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Corporate Governance Improvement Plan is to improve the spiritual and mental health of the people working in our company on the basis of ten actions, such as: Including universal religious and moral principles in business, Crafting and implement the business vision, mission and values statements, etc.

#### Actions

Action 1: Include universal religious and moral principles in your professional and business affairs.

Action 2: Craft and implement the business vision, mission and values statements, the business ethics policy and the corporate social responsibility policy of your company using well-accepted religious principles and values in the business environment you operate<sup>31</sup>.

Action 3: Solidify your people's trust in each other in your profession and company by practicing and promoting your professional and company's moral principles and values in all activities.

Action 4: Formulate and execute activities in your professional and business operations and procedures on the basis of well-accepted religious and ethical values.

Action 5: Avoid lying and deceptive advertising and discrimination of any kind in your professional and business affairs.

Action 6: Uphold the rights of your profession and industry.

Action 7: Uphold the rights of employees, business and community stakeholders.

Action 8: Be just and fair in dealing with partners, suppliers and customers.

Action 9: Support religious and nature-protection organizations and/or philanthropic activities by donating, as a business policy, a small percentage of your income or net profits.

Action 10: Report on all of these to your company board, internal staff and external stakeholders as well as your community by including all relevant data in your corporate reports and your business website.

#### 2 BOARD EFFECTIVENESS IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Board Effectiveness Improvement Plan is to improve the results of the board members of our company on the basis of twelve actions, such as: Practicing what you preach, Learn to be governed first, etc.

#### Actions

These actions relate to members of the board of directors of the company.

Action 1: Practice what you preach. You are the best example to follow for your business and professional associates.

Action 2: Learn to be governed first before you govern others.

Action 3: Put personal and family happiness in its right perspective in your professional and business life.

Action 4: If you must change both your business and your life in order to relate to others better, become happy and successful, do it with a calm attitude and patience and by respecting your limits and the bounds of society.

Action 5: You must remember to balance happiness to other things in your business, personal and family life. Look inside you: connecting to your family, your community and your country will drive you to reach a more balanced and harmonious state.

Action 6: Connect with others in your profession, community, country and around the world.

Action 7: Protect your community, country and its institutions and its laws at all your personal costs. Also protect your person, family and friends within the framework of both your society's widely-accepted ethics and your state laws.

Action 8: Provide positive reinforcement to all business personnel and treat them fairly and justly.

Action 9: Set achievable personal, family and work-related goals and reward your business people on performance.

Action 10: Promote personnel to higher levels of organizational hierarchy, who are capable of forming positive, trusting and caring interpersonal relationships with people who report to them.

Action 11: Act with integrity and keeping commitments to all participants in the affairs of your business (employees, government authorities, customers, board members, stakeholders, society, country, etc.).

Action 12: Listen with respect, sensitivity and full attention and develop the interpersonal relationship skills of all personnel (family, friends, business, etc.).

#### 3 EXECUTIVE LEADERSHIP IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Executive Leadership Improvement Plan is to improve the results of the executive managers and leaders of our company on the basis of seven actions, such as: Establish efficient financial and other business recording systems and procedures, etc.

#### Actions

These actions relate to executive managers and leaders of the company.

**Action 1:** Establish efficient financial and other business recording systems and procedures and manage and monitor your business wealth, such as: investments, accounts payable, receivable and budget very well, and your cash flow and cash very effectively.

Action 2: Establish and execute optimal anti-fraud procedures.

**Action 3:** Perform due diligence on all your staff and partners.

Action 4: Backup all your critical business data in an offsite safe location.

Action 5: Register all your patents and copyrights.

Action 6: Innovate and keep abreast of market and technology developments.

**Action 7:** Establish and execute a business policy to contribute to social causes, ecology, philanthropy and community work.

#### 4 BUSINESS OPERATIONS IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Business Operations Improvement Plan is to improve the results of the managers of our company on the basis of seven actions, such as: Make the necessary business changes with harmony and balance, etc.

#### Actions

These actions relate to managers of the company.

Action 1: Make the necessary business changes with harmony and balance.

Action 2: Allow time for your company personnel to make praying, meditation and silence their useful tools.

Action 3: As a business manager get rid of all your negative thoughts by allowing only pleasant, happy and harmonious thoughts to fill your mind.

Action 4: Preserve yourself by maintaining a healthy attitude towards sleeping, eating and relaxing, and by relating to nature.

Action 5: Learn how to handle business and professional failure and recover from it in an effective way.

Action 6: Handle difficult people within your business or profession in a fair and positive manner.

Action 7: Work out mutually-agreed solutions on problems and issues involving your associates, customers, professional and business partners.

#### 5 MANAGE HUMAN ASPECTS IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Manage Human Aspects Improvement Plan is to improve the results of managing the human resources of our company on the basis of ten actions, such as: Be sensitive, Collaborate, etc.

#### Actions

These actions relate to managers of the company.

**Action 1: Be sensitive.** Show sensitivity to other professions and companies by avoiding derogatory comments and do not criticize, condemn or complain to anyone about them.

**Action 2: Collaborate.** Make your professional and business goal the habit to work together with other professions and companies harmoniously.

**Action 3: Patience.** Show patience and maintain good relationships with everyone in business and economy (colleagues, supervisors, senior management, customers, authorities, etc.).

**Action 4: Be honest.** In a business environment, be interested in others (colleagues, supervisors, senior management, customers, etc.) with sincerity, always showing friendship, goodness and love to all.

**Action 5: Be polite.** Address the other professional or business person always in plural terms, unless the other person allows you to speak in the singular.

Action 6: Use importance in associating with others. Make the other professional or business person feel important to you, and you do that with sincerity.

**Action 7: Employ friendly rules of communication.** Start a professional or business communication in a friendly and pleasant manner. When you are in error, accept it quickly and emphatically and apologize with honesty. Express your sympathy to the other person. Keep your humor within acceptable social boundaries while rejecting slander and vulgarities.

Action 8: Manage your business time with friendship. Examine your business activities in accordance with the values of love and friendship, and your obligations. Spend 60% of your business time in critical non-emergency activities, 30% of your time in critical and emergency activities, and the remaining 10% of your time in uninteresting activities. Learn to say a friendly "no" when others attempt to load you with activities that are not aligned with your professional and business needs, vision, mission and values.

Action 9: Use positive and friendly thinking and priority. Use positive and friendly thinking to manage all the events, issues, problems and facts related to your business life and take preventive action when it is required on your part. Perform your activities based on the priorities set by you and the time requirements of your life and company, but also reinforcing the values of justice, goodness, fairness, love and friendship in all business activities.

**Action 10: Participate with friendship.** Participate in social groups, professional societies and corporate volunteering (unpaid) activities on the basis of love and friendship. Understand and know your personal limits and the limits of your business organization.

#### 6 TRUST AND CONFIDENCE IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Trust and Confidence Improvement Plan is to augment the trust and confidence of our customers in the products and services of our company on the basis of seven actions, such as: Understand that goodness, kindness, friendship and collaboration (with your customers, staff, stakeholders, etc.) needs time and dedication to develop and grow, etc.

#### **Actions**

These actions relate to managers of the company.

Action 1: **Understand** that goodness, kindness, friendship and collaboration (with your customers, staff, stakeholders, etc.) needs time and dedication to develop and grow.

Action 2: **Establish** and operate a corporate philanthropic program by crafting a social responsibility policy, deciding on the funds to be set aside for such purposes, ensuring all executives have clear roles and responsibilities regarding this program, and linking your corporate philanthropy to your business mission and activities.

Action 3: **Use** polite, positive and constructive discussions and communications to support your business relationships so that goodness and friendship can add benefits for yourself and your professional associates.

Action 4: **Learn** and practice ways to be good, to trust, to collaborate and co-operate with your professional associates, both in your work and in your other professional encounters.

Action 5: **Practice** good and kind social grooming to solidify your business relationships better. By this you will work in a more productive way, improve your trust in the other person, cooperate with better result for both parties and learn from each other in the process.

Action 6: **Define** your boundaries and limits to the breaches of goodness, kindness, trust and friendship by the other parties.

Action 7: **Manage** changes in your business environment in a fair, good, kind, friendly and effective way.

#### 7 INTERNAL CONTROLS IMPROVEMENT PLAN

#### Objective of this plan

The main objective of our Company's Internal Controls Improvement Plan is to augment the good aspects of our company's internal policies and controls on the basis of seven actions, such as: Organize yourself, Advance Your People's Career, etc.

#### Actions

These actions relate to managers of the company.

Action 1: Organize yourself. Have a corporate ethics policy, a vision and a mission statement, plan well, know your organization extremely well, act in a fair, practical, responsible, efficient and results-oriented way, and monitor and improve your actions.

**Action 2: Advance Your People's Career.** Promote personnel to higher levels of organizational hierarchy, who are capable of forming positive, trusting and caring interpersonal relationships with people who report to them.

**Action 3: Train Your People.** Develop the interpersonal relationship skills of all personnel and especially those of current managers and employees desiring promotion, by sending them to relevant courses or by coaching and mentoring programs.

**Action 4: Involve your personnel.** Be passionate and enthusiastic by keeping your company personnel informed and involved in the decision making process, as much as possible.

**Action 5: Show Commitment.** Motivate people and keep clear channels of communication; and act with integrity and keep commitments to all participants in the affairs of the business (employees, authorities, customers, board members, stakeholders, etc.).

**Action 6: Protect Your Personnel.** Protect the interest of all employees in a work group, even those who are absent; handle emotional issues with calmness and fairness; and provide a positive and moral example to others.

Action 7: Manage Work Assignments. Delegate tasks by assigning ownership of the work you give to your employees; listen to them with respect, sensitivity and full attention; and provide all necessary training, coaching and support so that they can do their job well.

PLANS OF DUTY OF CARE DISCLAIMER

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