

Health and Safety Policy



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Amendment Record

Version	Date	Changed By	Version Comment
1.0	22/05/2024	Errol Adams	Document Published
2.0	08/06/2024	Errol Adams	Improved the terminology used within the 'Procurement' block of the policy to remove colloquial language and added additional spacing between words within the 'Disciplinary Rules' block.
3.0	17/08/2024	Admin Citation	The following policy sections have been updated: Smoking in the Workplace Temporary Works Accident and Near Miss Reporting Design and Technology Dispensing and Administering Drugs Safe Systems of Work and Standard Operating Procedures Health and Safety Responsibilities- all 9 tiers Disciplinary Rules
4.0	24/08/2024	Admin Citation	Block titles updated to remove '2024 V2 NOT YET READY FOR

Version	Date	Changed By	Version Comment
			USE'
5.0	25/10/2024	Admin Citation	Change made to the format of the Smoking section to allow it to display correctly on the contents page.

Disclaimer

This Health and Safety Policy has been developed by S W Hygiene Limited in conjunction with Citation Ltd to discharge our legal duties and to ensure the well-being and safety of all individuals, who may be affected by our acts or omissions associated with our work activities. We recognise the paramount importance of creating and maintaining a safe and healthy working environment and which meets the requirements of relevant legislation.

We are fully committed to upholding the highest standards of health and safety across all our activities. We expect our employees and others who may work on our behalf to uphold this commitment to protect the health, safety and well-being of all those affected by our operations. This Policy will be communicated to our employees and other interested parties.

In order to ensure the health and safety policy is maintained effectively, it is essential that all references and information are up-to-date and accurate. Where changes occur within our business or enterprise e.g. the introduction of new processes or systems, or where there are organisational changes that impact on the health and safety responsibilities, a nominated representative will notify Citation Ltd to ensure that relevant changes are made.

For us to fulfil our statutory duties, employees are legally required to cooperate with management on all matters pertaining to health, safety, and welfare. We encourage all employees to inform management of any areas of the health and safety policy that they feel are inadequate or misrepresented to ensure that the policy is maintained as a true working document.

While Citation Ltd provides advice aligned with health and safety legislative frameworks, ultimate responsibility and accountability rest with S W Hygiene Limited. This includes the identification and implementation of risk control measures, reinforcing our commitment to the health, safety, and welfare of our employees and all those affected by our actions.

Health and safety management system

The law requires that employers have suitable arrangements in place to manage health and safety in their own and every workplace under their control workplaces. To support with this, S W Hygiene Limited engaged the services of Citation Ltd.

As part of our commitment to good and effective health and safety management in our business we will regularly review our policy arrangements with our employees and with Citation and will make changes and improvements whenever needed.

This health and safety policy has been designed to be integrated with any formal management system that may be in place (e.g. ISO) and we'll monitor its effectiveness by following the widely recognised cycle of Plan, Do, Check, Act.

More guidance on this and the topics in this policy is available in Atlas, the Citation on-line platform. The "Useful Documents" area and sustainability hub are good places to start when looking for resources and guidance.

Health and safety policy statement

Compliance and Commitment

S W Hygiene Limited commits to ensuring, as far as reasonably practicable, the health, safety, and welfare of our employees and others affected by our operations. We aim to:

- Control risks from work activities.
- Consult with employees on health and safety matters.
- Provide safe working conditions and equipment.
- Provide necessary training and supervision.
- Prevent accidents and health issues.
- Comply with relevant Health, Safety and Fire legislation.

Directors Responsibilities:

- Implement and adapt the health and safety policy as needed.
- Ensure sufficient resources are allocated to meet safety objectives.

Management Responsibilities:

- Prioritise health and safety to prevent injuries and property damage.
- Protect all persons from foreseeable risks.

Employees Duties and Consultation:

- Employees are informed of their duties under this policy.
- Regular consultation with employees to integrate their feedback and improve safety practices.

Systematic Safety Management

We have implemented arrangements to support the effective implementation of this health and safety policy and we commit to:

- Identify hazards, assess risks, and determine control measures.
- Ensure all employees understand and follow the necessary safety procedures.
- Prepare emergency procedures, including evacuation in case of fire or other significant incidents, are clearly set out and communicated to all staff.

We regard all health and safety legislation as setting a minimum compliance standard which we aim to exceed wherever possible and we expect management to achieve their targets without compromising health and safety in any way

Signature:

Date:

Position:

Review:

Health and Safety Organisation Chart



Responsibilities

Tier 1

The Directors will ensure that :-

- Take ultimate responsibility for health, safety and fire.
- Ensure the business complies with all applicable health, safety and fire legislation.
- Ensure all work activities are included in our health and safety policies and arrangements.
- Sign off the health and safety policy.
- Establish processes for reviewing the health and safety policy to ensure compliance with health and safety legislation.
- Demonstrate visible leadership and a commitment to health, safety and wellbeing, to ensure health and safety is given equal importance as other objectives.
- Set health and safety targets and objectives in line with our values.
- Ensure competent persons are appointed to advise on health and safety aspects including fire safety.
- Communicate the importance of health and safety.
- Communicate health and safety performance to drive continuous improvement.
- Ensure communications are provided so that they can be understood by all relevant persons, considering factors such as language, disability and comprehension.
- Monitor and measure compliance against health and safety standards, including that of third parties.
- Undertake consultation with employees and trade unions, when required.
- Establish, implement and monitor health and safety objectives and procedures.
- Make suitable resources available for health and safety controls, including people, processes and technology.
- Ensure relevant persons are provided with sufficient information, instruction and training.
- Provide competent occupational health services, where necessary.
- Ensure nominated competent persons complete and regularly review risk assessments and maintain records.

- Ensure nominated competent persons complete and regularly review COSHH assessments so that safe handling and use of hazardous substances is practiced.
- Ensure maintenance of equipment and facilities is undertaken.
- Ensure statutory examinations for equipment are completed in line with legislative requirements.
- Ensure suitable first aid provisions are in place e.g. people trained for medical emergencies and first aid supplies.
- Ensure emergency procedures are communicated, practised and followed.
- Demonstrate visible leadership and a commitment to health, safety and wellbeing, by setting the right example for others to follow and displaying the right behaviours.
- Distribute and communicate health and safety information.
- Ensure health and safety issues are discussed, and escalate suggested improvements.
- Check team members have the necessary knowledge, skills and training to be able to do their job safely.
- Take care of your own health and safety and take steps to protect others who may be affected by your actions or failures to act.

Tier 2

The Managers will ensure that :-

- Establish processes for reviewing the health and safety policy to ensure compliance with health and safety legislation.
- Demonstrate visible leadership and a commitment to health, safety and wellbeing, to ensure health and safety is given equal importance as other objectives.
- Implement arrangements to ensure contractors have the necessary competence and resources to carry out work safely.
- Communicate the importance of health and safety.
- Communicate health and safety performance to drive continuous improvement.
- Ensure communications are provided so that they can be understood by all relevant persons, considering factors such as language, disability and comprehension.
- Monitor and measure compliance against health and safety standards, including that of third parties.
- Undertake consultation with employees and trade unions, when required.

- Establish, implement and monitor health and safety objectives and procedures.
- Ensure relevant persons are provided with sufficient information, instruction and training.
- Provide and monitor the use of necessary personal protective equipment.
- Maintain records of accidents and incidents ensuring legal compliance.
- Manage building safety features including emergency exits.
- Ensure nominated competent persons complete and regularly review risk assessments and maintain records.
- Ensure nominated competent persons complete and regularly review COSHH assessments so that safe handling and use of hazardous substances is practiced.
- Ensure maintenance of equipment and facilities is undertaken.
- Ensure statutory examinations for equipment are completed in line with legislative requirements.
- Ensure suitable first aid provisions are in place e.g. people trained for medical emergencies and first aid supplies.
- Ensure emergency procedures are communicated, practised and followed.
- Demonstrate visible leadership and a commitment to health, safety and wellbeing, by setting the right example for others to follow and displaying the right behaviours.
- Distribute and communicate health and safety information.
- Ensure health and safety issues are discussed, and escalate suggested improvements.
- Check team members have the necessary knowledge, skills and training to be able to do their job safely.
- Take care of your own health and safety and take steps to protect others who may be affected by your actions or failures to act.
- Take action if you see something isn't safe or doesn't look right – contact your line manager to raise potential hazards.
- Don't intentionally or recklessly interfere with or misuse resources and equipment provided for health and safety.
- Only perform duties you have been authorised and assigned to do.
- Report accidents and near misses in line with our reporting procedures.

Tier 3

The Employees will ensure that :-

- Take care of your own health and safety and take steps to protect others who may be affected by your actions or failures to act.
- Take action if you see something isn't safe or doesn't look right – contact your line manager to raise potential hazards.
- Cooperate with management and work in accordance with this health and safety policy and any associated training, information or instruction provided.
- Don't intentionally or recklessly interfere with or misuse resources and equipment provided for health and safety.
- Only perform duties you have been authorised and assigned to do.
- Report accidents and near misses in line with our reporting procedures.

Accident and near-miss reporting

RIDDOR – The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

By law, some accidents, incidents and near misses need to be reported to the Health and Safety Executive (HSE) within legally specified timeframes.

This includes (but isn't limited to):

- work-related incidents that result in fatalities
- work-related incidents causing employees to be absent from work for more than 7 days
- specified injuries, like amputations
- certain incidents that cause harm to people other than our employees
- occupational diseases
- specific dangerous occurrences - e.g., the collapse of load-bearing parts of lifting equipment.

We will check if the law requires an incident or near miss to be reported to the HSE, and if so, we will ensure the online reporting form is completed and submitted within the legally specified timeframe.

Fatal accidents and major incidents must be reported immediately to the Incident Contact Centre on **0345 300 9923**.

Where required, we will seek advice and support from Citation's Health & Safety advice line.

Accident and near-miss reporting (RIDDOR) Guernsey

By law, some accidents, incidents and near misses need to be reported to the Health and Safety Executive (HSE) within legally specified timeframes.

This includes (but isn't limited to):

- fatalities to workers or non-workers resulting from a work-related accident
- serious injuries, including:
 - fractures to the skull, spine or pelvis
 - fracture of any bone in the arm or wrist, leg or ankle
 - amputations
 - scalping
 - injury or loss of consciousness resulting from electric shock
 - any injury resulting in the injured person being immediately admitted to hospital for over 24 hours.
- over-three-day injuries (injuries which result in the injured person being off work, or unable to carry out their normal duties for over three days - not including the day of the accident, but including non-working days)
- dangerous occurrences, such as:
 - the collapse, overturning or failure of load-bearing parts on lifting equipment
 - explosion or fire causing a suspension of work
 - collapse of a scaffold over 5 metres tall
 - collapse of a building or structure
 - plant or equipment coming into contact with overhead powerlines.
- certain work-related diseases including:
 - poisonings
 - skin diseases such as cancer
 - occupational asthma
 - occupational cancers.

We will check if the law requires an incident or near miss to be reported to the HSE, and if so, we will ensure the online reporting form is completed and submitted within the legally specified timeframe.

Fatal accidents, major specified injuries and dangerous occurrences must be reported immediately to the **HSE on 0148 122 0010** (or, out of office hours, to **Guernsey Police on 0148 122 2222**).

Where required, we will seek advice and support from Citation's Health & Safety Team

Accident and near-miss reporting (RIDDOR) IOM

By law, some accidents, incidents and near misses need to be reported to the Health and Safety at Work Inspectorate within legally specified timeframes.

These include but are not limited to:

- fatalities to workers or non-workers resulting from a work-related accident
- serious injuries, including:
 - fractures to the skull, spine or pelvis
 - fracture of any bone in the arm or wrist, leg or ankle
 - amputations
 - scalping
 - injury or loss of consciousness resulting from electric shock
 - any injury resulting in the injured person being immediately admitted to hospital for over 24 hours.
- over-three-day injuries (injuries which result in the injured person being off work, or unable to carry out their normal duties for over three days - not including the day of the accident, but including non-working days such as weekends)
- dangerous occurrences, such as:
 - the collapse, overturning or failure of load-bearing parts on lifting equipment
 - explosion or fire causing a suspension of work
 - collapse of a scaffold
 - collapse of a building or structure
 - plant or equipment coming into contact with overhead powerlines.
- certain work-related diseases including:
 - poisonings
 - skin diseases such as cancer
 - occupational asthma
 - occupational cancers.

We will check if the law requires an incident or near miss to be reported to the Health and Safety at Work Inspectorate, and, if so, we will ensure the online reporting form is completed and submitted within the legally specified timeframe.

Fatal accidents, serious injuries and dangerous occurrences must be reported to the Health and Safety at Work Inspectorate as soon as practicable on **0162 468 5881**.

Where required, we will seek advice and support from Citation's Health & Safety advice line.

Accident and near-miss reporting (RIDDOR) NI

By law, some accidents, incidents and near misses need to be reported to the Health and Safety Executive Northern Ireland (HSENI) within legally specified timeframes.

This includes (but isn't limited to):

- fatalities to workers or non-workers resulting from a work-related accident
- major injuries, including:
 - amputations
 - fractures (other than to fingers or toes)
 - dislocation of the shoulder, hip, knee, or spine
 - loss of sight (temporary or permanent)
 - any chemical, hot metal burn or penetrating injury to the eye
 - any injury resulting from electrical shock or burn leading to unconsciousness, or requiring resuscitation, or admittance to hospital for more than 24 hours.
- non-fatal accidents to non-workers (if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment)
- dangerous occurrences, such as:
 - near misses involving the collapse, overturning or failure of a load-bearing part on any machinery or freight container
 - failure of any closed vessel or associated pipework when the internal pressure is above or below atmospheric pressure
 - plant or equipment contact with overhead electric lines
- over-three-day injuries (injuries which result in the injured person being off work, or unable to carry out their normal duties for over three days - not including the day of the accident, but including non-work days)
- following the death of an employee (if this occurs within one year of a reportable injury that led to that employee's death)
- certain work-related diseases, including:
 - occupational asthma
 - carpal tunnel syndrome
 - hand-arm vibration syndrome (HAVS)
 - infections due to biological agents, such as anthrax or hepatitis
 - any occupational cancer
- gas incidents (where there is a fatality, loss of consciousness, or hospital treatment required for an injury relating to the distribution and supply of flammable gas).

We will check if the law requires an incident or near miss to be reported to HSENI, and, if so, we will ensure the online reporting form is completed and submitted within the legally specified timeframe.

If a worker is killed, or a member of the public is killed or taken to hospital, this must be reported immediately to the local enforcing authority on **0800 0320 121**.

Alcohol and drug misuse

Alcohol and drug misuse can negatively affect the safety and wellbeing of people in the workplace and our operational productivity and effectiveness. That includes using illicit substances and abusing prescription or over-the-counter medication.

Clear guidelines are important to manage these risks effectively, so below we've outlined our commitment and approach to education, testing, and disciplinary measures to protect all employees and our operations.

Medication disclosure

Employees prescribed medication that could impair their work performance must inform management. Everyone must report to work capable of performing their duties safely and effectively.

Confidentiality and support

Disclosures of alcohol or drug misuse will be handled with strict confidentiality, following legal standards and company policies. Employees who are struggling with alcohol or drug misuse will be encouraged to seek assistance through available resources.

Drug and alcohol testing

We reserve the right to perform random drug and alcohol testing to ensure workplace safety. This applies to all employees and anyone undertaking work on our behalf.

Disciplinary action

Where it's identified that an alcohol and/or drug problem has resulted in unacceptable behaviour or performance, it may be dealt with in line with our disciplinary or capability procedures. Depending on the circumstances of the individual case, this may lead to disciplinary action such as dismissal.

We will review and update this policy regularly and as necessary to ensure it remains effective and legally compliant.

Asbestos

Asbestos and almost anything containing it presents a hazard to health, so we commit to protecting our employees and others who may be exposed to it on the premises that we work from.

Contractors and service agents

At times we may use external resources to support our needs, including contractors, sub-contractors, labour only, or agency workers and service agents. These external resources may supplement our own or provide a specialist service that we cannot. They will be acting on our behalf whilst carrying out the work we require and will be required to have suitable and adequate liability insurance.

We make our selection based on demonstrable competence and their compliance with our qualifying criteria to ensure legal compliance and quality of work.

Pre-qualification questionnaires

We use questionnaires to uniformly assess:

- their ability to do the job safely and as expected
- training, qualification and experience
- relevant accreditations relating and third-party certification/accreditations, e.g., SSIP, ISO
- resource, references, and adequate insurance.

If appropriate, we'll do additional research and obtain references to check these.

Contractors will need to provide suitable and sufficient risk assessments and method statements prior to work being completed.

Induction and safety

Prior to any work taking place, we will provide external resources with an induction covering site-specific health and safety information, emergency procedures, and any particular hazards. Where necessary, a permit to work system will be implemented and followed.

Contractors will be required to notify us immediately if for any reason they cannot carry out their work in accordance with any agreed method statement, permit or safe system of work.

Records will be maintained such as, but not exclusive to; approval and planning documents, training, risk assessments and method statements, safe systems or work and permits to work.

Access

Throughout their engagement, contractors and service agents will be prohibited from any areas where they do not have our permission to operate and conduct their activities. They're not allowed to use any of our plant, tools or equipment without permission.

Supervision & Monitoring

Assigned supervision depends on the circumstances but may include direct on-site oversight, chaperoning, or a nominated contact for queries. We monitor and review the work activities and safety performance of all external resources, and will communicate any findings or issues that require improvement. Where necessary to manage significant health and safety risk we shall require external resources to stop work, suspend the person(s) involved and/or leave the premises.

Emergency Procedures

External resources will be made familiar with and trained in emergency response procedures relevant to their work.

Reporting

Employees should notify management of any suspicious behaviour or unsafe practices by external persons. We shall take action if we're informed or suspect somebody of acting unsafely.

Control of Substances Hazardous to Health

We will always thoroughly assess hazardous substances through Control of Substances Hazardous to Health (COSHH) assessments. We will consider the nature of substances, the work environment, and specific hazards involved. Our aim isn't just legal compliance; we want to continuously improve how we manage hazardous substances, following the hierarchy of control measures outlined in relevant guidance.

What are hazardous substances?

Hazardous substances include a wide range of materials that could cause harm through ingestion, inhalation, skin contact, or other means. They can be solids, liquids, vapours, gases, asphyxiants, or biological agents.

All hazardous substances we use need to follow legislative labelling practices and be accompanied by up-to-date Safety Data Sheets (SDS). SDS include crucial information and will be important for our hazardous substance risk assessments. If a SDS is not supplied with the product we will not use it, unless or until the supplier provides one"

Risk Assessment

We will complete comprehensive risk assessments to identify and control exposure to hazardous substances to as low as is reasonably practicable. Our approach will focus on the hierarchy of control measures:

- Elimination
- Substitution
- Engineering controls
- Administrative controls
- Personal protective equipment (PPE)

How we will work safely with hazardous substances

- We will make sure all relevant employees complete training on handling hazardous substances to promote safety in the workplace
- we will make sure that exposure to hazardous substances does not exceed any relevant Workplace Exposure Limit, including regular monitoring
- we will make sure health surveillance and health monitoring is carried out, where deemed necessary
- any equipment provided to control exposure will be suitable for purpose, and inspected and maintained, including thorough examinations where appropriate
- we will prioritise communication and consultation to make sure stakeholders are actively involved in the risk assessment process, including: providing

emergency information; regular policy reviews and/or updates; checking that hazardous substance risk assessments align with current legislative requirements and best practices.

Disciplinary rules

We recognise the importance of Health & Safety in our daily operations. To ensure a safe working environment, we have established a set of safety guidelines that are crucial for the wellbeing of all our team members. Following these guidelines is expected and valued, and if after investigation it is determined that there has been a failure to follow our rules, disciplinary action may be taken against our employees, up to and including gross misconduct.

Safety in the workplace

We will remind our employees of the importance of following and respecting all established safety rules. It's essential to:

- Properly use and not tamper with any safety equipment, signs, labels, or warning devices provided for protection.
- Follow protocols related to hazardous materials, lifting equipment, and operating machinery to ensure your safety and that of others.
- Act responsibly and avoid behaviours that could lead to accidents or incidents.
- Assist and not hinder any investigations into accidents to help prevent future occurrences.

Employees collaboration

We rely on our employees to help maintain a safe environment. This involves:

- Being mindful of your own safety and the safety of others.
- Respecting and not misusing anything provided for health, safety, and welfare purposes.
- Promptly reporting any potential hazards or safety concerns.
- Following specific safety guidelines relevant to your role and wearing any provided safety clothing or equipment as required.

Our aim is to create a supportive and safe working atmosphere. We believe that by working together, we can achieve this goal. Your cooperation and commitment to these principles are key to our shared success and safety.

Display Screen Equipment

We're focused on comprehensive display screen equipment (DSE) assessments that consider the nature of tasks, the work environment, and potential risks. We're committed to following the law and constantly improving how we manage DSE.

Key measures we will take:

- **Equipment provision:** We will provide suitable, adjustable DSE to meet the individual needs of identified DSE users.
- **Workstation setup training:** DSE users will receive training on ergonomic principles to help reduce risks of musculoskeletal and visual discomfort.
- **Workstation assessments:** We will introduce a self-assessment process for users to spot and tackle ergonomic issues.
- **Encouraging breaks and varied posture:** Regular breaks and changes in posture will be encouraged to reduce fatigue and discomfort for DSE users.
- **Reporting and monitoring:** We'll ask users to report any DSE-related discomfort or pain and regularly monitor to find areas for improvement and ensure ergonomic practices are followed.
- **Communication and consultation:** DSE users will be actively involved in DSE management processes, with regular reviews and updates of our policy to keep in step with current laws and best practices.

Our goal is to maintain a work environment that is safe, healthy, and complies with regulations.

Inclusive workplace

We're committed to creating a supportive, inclusive, safe and healthy work environment for all employees. Every person has the right to a safe workplace, so the Health & Safety of all employees, including those with additional or different needs, is crucial.

- **Risk assessment:** We will carry out comprehensive risk evaluations, considering all aspects of the work environment, work activities and equipment, as well as the individual needs and capabilities of employees.
- **Reasonable adjustments:** We will undertake reasonable adjustments to mitigate the risks and prevent any form of disadvantage.
- **Review:** Periodically, we will review and update risk assessments to reflect any changes to the workplace and the needs of individuals, monitoring the effectiveness of the control measures and adjusting them as necessary to maintain a safe working environment.
- **Training, support and systems:** We will provide additional support, training, information, supervision and safe systems of work related to each particular circumstance, as well as taking into account any specific needs concerning safety in the event of an emergency - including clear guidance on evacuation procedures.

We will ensure confidentiality is maintained throughout to respect the privacy of individuals.

Driving at work

Work-related road accidents significantly impact business safety, with employees involved in road traffic incidents posing a major concern. Our goal is to foster safe driving practices among our employees to minimise these risks.

Hazards in work-related driving

Driving for work involves various risks, including:

- **The driver:** Their experience, health, fitness, and wellbeing.
- **The vehicle:** Its suitability, ergonomic design, and safety features like seat belts.
- **The journey:** Considerations of route, distance, travel times, and adverse weather.

Other risks include vehicle theft, personal injury, and breakdowns.

Our commitments

To enhance driving safety, we pledge to:

- Conduct and communicate risk assessments for driving activities.
- Implement and communicate suitable control measures.
- Verify driver competence, licensing, and insurance.
- Ensure employees complete relevant training or refresher courses on work-related driving.
- Plan journeys thoughtfully, considering factors like travel time and weather conditions.
- Train drivers in vehicle safety checks and emergency procedures.
- Maintain vehicle roadworthiness and suitability for tasks.
- Require correct insurance and valid MOT for privately used vehicles in work-related driving.
- Equip vehicles with emergency aid items, as determined by risk assessments.
- Secure transport items, including equipment, chemicals, or medicines, in line with manufacturer recommendations.

Mobile device use

Where required we will provide hands-free kits for mobile device use, forbidding the use of handheld devices unless paired with a hands-free system.

Emergency procedures

In emergencies like vehicle breakdowns or incidents, employees should:

- Move safely to the roadside and contact breakdown services if alone or feeling vulnerable.
- Use hazard lights and avoid opening doors or windows to strangers.

- If outside the vehicle, take the ignition key, lock all doors (except the passenger door for quick access), and stay behind barriers or away from traffic.
- Confirm the identity of breakdown service personnel upon their arrival, ensuring they match your provided details.

Electricity

We'll make sure electrical installations and equipment are safely managed in our Complex. Electrical hazards in the workplace include things like contact with live parts, short circuits, equipment overheating, fire, explosion, and contact with overhead lines.

We'll ensure that all portable electrical appliances in our workplace, including personal items, are safely managed and comply with relevant regulations and guidelines

Risk assessment and control measures

We'll risk assess our activities and identify control measures to eliminate, and if not, reduce the risk of harm from electricity as low as reasonably practicable, and communicate these to every relevant person.

Contractors

Depending on the service they're providing, contractors may need to follow safe electrical isolation and lock-off procedures and be issued a permit to work. Where these are needed we'll verify contractors have the necessary expertise and qualifications for the tasks.

Information, instruction, training and support

We'll provide employees with appropriate information, training, and supervision. We'll engage qualified, skilled electrical professionals for the design, construction, selection, and installation of our electrical systems and equipment.

We'll ensure employees follow safe work practices based on industry best practices. All employees will be instructed that only those who are trained and authorised to perform electrical tasks are allowed to do so.

Installation work, maintenance and inspection

Detection testing (by qualified, experienced people) is allowed, where essential.

We'll make sure inspections of our installations and equipment are conducted in line with current law, approved codes of practice and industry guidelines.

We will swiftly address any recommendations from these inspections, prioritising issues classified as C1 or C2.

Access to electrical switchgear and fuse boards is prohibited except for authorised persons.

Portable appliance testing will be conducted to identify and mitigate risks such as contact with live parts, short circuits, overheating, and fire hazards at suitable intervals as deemed necessary by a competent person.

When we rent equipment from a reputable supplier, we will treat and manage this equipment with the same level of care and consideration as our own property.

We'll ensure that employees know how to spot and report defective items, including visual indicators like damaged/scorched socket outlets/connections/leads, etc.

Electricity on site

During work on construction projects, we commit to safely managing electrical supplies, installations, and equipment to protect everyone involved.

All work associated with electrical equipment, if danger may arise from it, will be carried out only by or under the direct supervision of persons with appropriate electrical qualifications.

Overhead power lines and underground services

Work around, or near, overhead power lines and underground services will be thoroughly planned, with site rules followed (including CAT scans, safe isolation, permits to work, personal protective equipment, and warning signage) and employees trained to follow safe working practices. Where necessary, energy providers will be engaged to safely isolate supplies.

Live work

We'll only do live work if it's not reasonably practicable for the electrical supply to be dead. Live work will only be carried out by qualified, competent persons following a thorough risk assessment and communication of safe work practices, including to clients.

Fixed and portable electrical installations and equipment

Fixed and portable electrical installations and equipment will be regularly inspected, marked, and logged. Inspection frequency will be compliant with current regulations, approved codes of practice and applicable industry guidance.

Regular inspections, marking, and logging of all electrical installations and equipment ensure compliance with industry standards and swift handling of defects. We prioritise the use of 110v or battery-operated tools, applying additional protections like Residual Current Devices (RCDs) for 240v equipment, and ensure we consider the safety of generators and alternative systems. All equipment will be included in regular inspection and test regimes.

Training and emergency procedures

Employees have responsibilities like visual equipment checks, compliance with safety rules, reporting defects, and using electrical equipment carefully. Suitable training will be provided including communication of relevant safety procedures. Refresher training will be given, as required.

Our focus is to prevent electrical incidents and ensure a safe working environment on site. We will ensure that suitable first aid provisions are in place or risks associated with this type of work.

Emergency planning

An emergency plan is a set of arrangements designed to protect employees and others in the event of an emergency, like a fire, explosion, chemical spill, serious injury event or natural disaster.

While we will take all reasonably practicable steps to prevent emergencies, emergency plans will help us minimise the risks of potential emergencies, manage those situations effectively, and restore normal conditions.

As part of the emergency plan, we will cover:

- **Risk assessments:** Conduct thorough risk assessments to understand and prepare for potential emergencies and their impact on us, considering current legislation and relevant guidance
- **Emergency responses and training:** Establish an emergency response team to coordinate emergency actions and train employees and stakeholders. Incorporate regular drills and testing of our emergency procedures to ensure effectiveness and preparedness
- **Emergency procedures:** ensure the plan includes any necessary evacuation, rescue, shelter and shutdown/lockdown procedures
- **Roles and assignment:** assign specific roles to team members and make sure they're trained and competent
- **Communication:** establish a communication strategy to notify employees, stakeholders, and authorities, maintaining a clear chain of command and accessibility
- **Equipment:** identify and keep ready any necessary equipment and alternative facilities, along with a comprehensive emergency contact list.
- **Review:** Review plans regularly and following any significant changes or incidents

Further, all reportable incidents will be reported promptly, followed by reviews of incident procedures to continually improve emergency responses.

Fire

To protect all employees, contractors, visitors, and other relevant persons, we'll make sure that all necessary preventive and protective fire measures are identified and put in place.

Fire risk assessment

We'll conduct a suitable, sufficient fire risk assessment to identify the risks employees and other persons could be exposed to from our undertakings, as well as the general fire precautions needed to comply with the relevant legal requirements and prohibitions.

We'll review the fire risk assessment either:

- annually
- if the fire risk assessment recommends sooner, or
- after a fire-related event (whichever is soonest).

We'll make sure a thorough record is made of all the findings and that an action plan is implemented to fix any issues as soon as reasonably possible.

Testing and inspection

We'll complete (and record) all necessary annual, bi-annual, and regular inspections and tests to make sure the protective systems and equipment provided are in a serviceable condition and easily accessed.

Emergency procedures

We'll make sure we produce, implement and communicate suitable emergency procedures, taking into account the size and nature of our undertakings.

Training

We'll provide appropriate information, instruction and training to employees, and other relevant persons so they can safely complete any duties for the management of fire safety and the safe evacuation of premises.

We expect employees to participate in any required training and exercises and to report any damaged or missing preventive/protective measures provided.

We expect that employees will follow training and protocols at all times, especially before and during a fire incident. All employees are expected to engage in fire prevention and to ensure mutual safety in the event of a fire (without compromising their own safety).

Monitoring and Review

We'll monitor the effectiveness of the control measures we've put in place and take steps to further reduce the risk where practical.

First aid at work

First aid is vital for managing health emergencies at work, making our environment safer and more responsive.

Risk assessment

We regularly check for hazards that might need first aid. These checks follow all relevant rules, helping us stay proactive about health and safety.

First aid provision

Following the law, we've looked at our first aid needs, including mental health first aid. We've got the right equipment, places, and people for first aid, based on what we do, how many of us there are, and the specific risks we've found.

Training and skills

Employees who give first aid are trained and skilled, meeting all legal requirements. We keep training them so they stay good at what they do and know the latest in first aid.

First aid locations

We have enough first aid locations for our work, how many of us work here, and the risks we know about. Everyone can get to these places or kits easily.

Telling everyone what to do

Everyone knows about our first aid steps. We tell them where first aid is, who our first aiders are, and what to do if there's an emergency.

Checking and updating

We often look at our first aid setup to make sure it works well and follows the latest laws and good ideas. We learn from any accidents to make things better.

Emergency steps

We've made clear plans for emergencies to help us react fast and correctly. We've told everyone these plans and check them when things change at work.

Keeping records

We write down what we check, train, and any accidents that happen. We keep these records safe and ready for officials to see if needed.

Extra steps for young people

For schools and nurseries, we follow what local education authorities say about first aid training. Even though it's not a must, our risk checks also think about people who aren't our employees, making sure first aid is there for everyone.

Gas safety

Improperly installed or maintained gas appliances and fittings pose significant hazards, resulting in the risk of fire, explosions, gas leaks, and carbon monoxide poisoning. We are committed to making sure gas safety in our workplace is as safe as possible by managing the risks of gas fittings and equipment.

Annual inspections, testing and maintenance

- Only Gas Safe Registered Engineers will install, maintain, and repair gas installations and portable equipment. We commit to safe work practices for maintenance, inspection, and testing. They will be required to carry a Gas Safe ID card and show it when asked.
- Our gas systems, including appliances, flues, and gas-powered devices such as heaters, fireplaces, stoves, and refrigerators, will be serviced, tested, and inspected annually by a certified Gas Safe Engineer.
- Regular property inspections will also check visible pipework and appliances. Any identified damage or wear will be promptly inspected by a Gas Safe Engineer.

Monitoring and issue resolution

- We will continuously monitor our gas inspection, design, installation work, and the gas safety management system through a competent person.

- We will quickly investigate any reports of potential issues such as suspected malfunctions, abnormal flame behaviour, or damage to the system or appliances.

Carbon monoxide safety

- A carbon monoxide detector will be installed near each fixed gas-fired appliance and routinely tested, with replacements made before they expire.

Standards and compliance

- We will use only standard gas fittings that meet CE or UKCA standards.
- We will implement recommendations from servicing, maintenance, or safety certifications according to the engineer's advice.

Record keeping

- We will keep comprehensive records of all gas safety-related documents, including certifications, for a minimum of two years.

Emergency preparedness

- If there is an actual or suspected gas escape, we'll take all reasonable steps to clear all persons from the area, shut off the gas supply and notify the gas authorities immediately using the National Gas Emergency Service number appropriate to your Complex location.

Hand tools

Simple hand tools, such as hammers, screwdrivers, and chisels, are manually operated devices crucial for many manual tasks in the workplace. Despite their simplicity, incorrect use or poor maintenance can lead to serious injuries.

We recognise the shared responsibility between employer and employees to ensure these tools are used safely.

Implementing safety measures:

- **Conduct risk assessments:** We will assess risks associated with the use of simple hand tools in work activities, implementing control measures to minimize risks as much as reasonably possible.
- **Ensure correct tool selection:** The safety of using simple hand tools hinges on choosing the right tool for the job. Tools must be used only for their intended purposes to prevent injury risks.
- **Restrict use of personal tools:** Only company-provided simple hand tools are allowed for our work activities to ensure regulation and policy coverage; personal tools are strictly banned.
- **Proper tool storage:** All tools must be stored in provided tool bags or toolboxes. Sharp or pointed items must not be carried in pockets to avoid

injury. Where necessary, relevant personal protective equipment (PPE) should be worn.

- **Regular inspections and maintenance:** Tools will be inspected before each use and maintained regularly. Damaged or underperforming tools must be reported and replaced.
- **Training and refresher courses:** All employees using simple hand tools will receive training on their use, along with periodic refreshers and toolbox talks, recorded in their training records.

Monitoring and reviewing

The safe use of hand tools will be continuously monitored. We will regularly review relevant risk assessments and procedures to ensure ongoing safety and compliance.

Health surveillance

We are committed to ensuring that the health of our employees is not impacted by their work. For all employees remain exposed to health risks after controls are put in place, we'll put in place health surveillance – a scheme of ongoing health checks to monitor and address any health issues.

Types of surveillance

- **Health surveillance:** For residual risks like noise, vibration, and hazardous substances, aiming to detect occupational diseases like dermatitis and occupational asthma early.
- **Medical surveillance:** For high-hazard exposures such as asbestos, lead, and ionising radiation, as specified by regulations.

Objectives

- identify work-related ill health at an early stage
- monitor the effectiveness of control measures
- encourage employees to raise health concerns
- ensure compliance with health and safety legislation.

Commitment

We will:

- conduct initial and ongoing risk assessments to identify health hazards and employees at risk
- consult with employees about health surveillance
- determine the need for health surveillance based on exposure risk and in line with any specific legislative requirements
- inform those who may be affected about the purpose of health surveillance and obtain their informed consent

- consider and co-operate so far as reasonably practicable with a health professional's recommendation to make adjustments to an affected employee's work.

Provision of services

- Implement specific health surveillance measures for employees identified at risk.
- Use qualified professionals to devise the health surveillance programme and undertake assessments.
- Ensure assessments are proportionate to the level of risk.

Records and reporting

- We will maintain surveillance records respecting data protection laws.
- We will report findings and any health trends (including any concerns raised by employees identified to management for action).

Information, instruction and training

As part of promoting a positive health and safety culture in our Complex, we will provide suitable information, instruction, and training to all employees, including full-time, part-time, temporary and contract workers, so they can work safely and responsibly.

We will ensure that:

- Employees are provided with resources (time and financial) to receive training to carry out their role
- Information, instruction and training contain sufficient detail on risks and hazards
- Training contains detailed instruction on how to mitigate the risks and hazards involved
- Employees know how to respond to emergency situations
- Training is provided at suitable timeframes and is repeated at suitable intervals. This will include on induction, or when they are exposed to new or increased risk for example due to a change in responsibilities, equipment, or system of work.
- Information, instruction and training is recorded and documented
- The information, instruction and training we provide takes into consideration employees vulnerable persons such as disabled workers, young people, pregnant workers etc. or those who do not speak English as their first language
- Training will be delivered by those who have the necessary skills, knowledge, experience and qualifications – i.e. competence - to provide training on the specific topic

- There is adequate supervision to make sure everyone understands and behaves in accordance with the information and training provided to them.
- We regularly monitor and review the effectiveness of the information, instruction, and training provided to ensure continuous improvement.

Legionella

We're dedicated to safeguarding our employees and others from the health risks posed by Legionella bacteria in water systems within our controlled premises.

Understanding Legionellosis

Legionellosis is a term for diseases caused by Legionella bacteria, including Legionnaires' disease—a potentially fatal pneumonia. Anyone inhaling contaminated water droplets from systems like showers is at risk of infection.

Risk factors:

- **Bacteria multiplication:** Risk increases in conditions favouring bacterial growth, such as poorly maintained systems and temperatures between 20 – 45°C.
- **Aerosol generation:** Devices creating and spreading aerosols, like showers and cooling towers, heighten exposure risks.
- **Vulnerable groups:** Certain individuals, including those over 45, smokers, and those with weakened immune systems, are at greater risk.

We will perform risk assessments to evaluate the exposure risks from our water systems and activities. Specialists will be engaged for complex systems.

Duty holder responsibilities

As duty holders, we're responsible for:

- Identifying and evaluating risk sources through comprehensive risk assessments.
- Implementing control measures and developing a Written Scheme for foreseeable exposure risks.
- Appointing a Responsible Person for daily operational control in line with the Written Scheme.
- Ensuring water system equipment is designed to minimise Legionella risks and comply with regulations.
- Providing training and information to personnel involved with water systems.
- Designing water systems to eliminate or reduce Legionella risks.
- Regularly maintaining and monitoring water systems, including temperature checks and bacteria levels.
- Keeping detailed records of risk assessments, control measure implementations, and system operations.

- Reducing scalding risks while controlling Legionella.
- Following RIDDOR reporting requirements for any related incidents.

This policy underlines our ongoing commitment to minimising Legionella risks through committed management practices, continuous monitoring, and following Health & Safety regulations.

Lifting Operations and Lifting Equipment (LOLER)

Lifting operations and the use of lifting equipment can be dangerous - whether the equipment is owned by us or not. So we must take necessary steps to protect the health and safety of our employees and others who could be at risk of injury.

There's a range of possible hazards from using lifting equipment. So, we will complete suitable and sufficient risk assessments for lifting operations and equipment, and create safe systems of work (where applicable). We're committed to carrying out lifting operations in line with relevant, current legislation and regulations.

Planning lifting operations

- all lifting operations will be planned by a competent person
- where the lifting operation is complex, a documented plan will be written by persons with adequate training, knowledge, and skills
- the lifting equipment provided will be fit for purpose and suitable for the task/processes
- lifting operations will only be carried out by competent persons who have received suitable training, following lifting plans and safe systems of work
- an appropriate level of supervision will be applied (in line with the level of risk)
- lifting operation plans will also include information relating to emergency procedures
- if the lifting operation cannot be carried out as planned it will not proceed until the risks and safe working procedures have been reviewed

Examinations and inspections

We will make sure that lifting equipment and accessories undergo thorough examinations following the recommendation of a competent person and in line with current legislation.

We will also make sure that:

- lifting equipment and accessories are always inspected by a competent person before use
- the good condition of lifting equipment is maintained, with safe working loads clearly displayed

- suitable documented records are kept confirming training, competency and inspections of equipment
- if defects are identified that may cause danger to people, we will take the equipment out of use, report it to the responsible person, and arrange for remedial works to be carried out by a competent person
- employees report any hazards/defects identified to the responsible individual
- employees follow safe systems of work and risk assessments.

Lone working

Lone workers are employees who perform their duties independently, without immediate supervision.

This can include:

- Individuals working alone in workshops, shops, offices, or kiosks
- Employees who work from home
- Employees working outside of standard operating hours e.g. cleaners, maintenance, and security personnel
- Employees operating alone in secluded areas e.g. in a warehouse
- Employees working on their own at outdoor locations

Risk assessment and control measures

- We will conduct risk assessments tailored for lone working, focusing on work nature, environment, and any individual vulnerabilities.
- We aim to eliminate the need for lone working, especially in high-risk scenarios like confined spaces or working at height.
- We will develop and communicate safe work practices for lone tasks.
- We will communicate findings and controls to relevant employees

Information, instruction and training

- We will give our employees training and instruction for working alone so they can identify and address potential hazards.
- Instructions on emergency procedures will be communicated to ensure lone workers can check in or quickly raise an alert for assistance.

Health, welfare and resources

We will establish procedures for regular health and welfare checks which may include the utilisation of scheduled check-ins, buddy systems, or automated check-in devices.

We will make sure our lone workers are fully equipped with the necessary tools and resources for their safety while working. This may involve supplying them with personal

protective equipment (PPE), mobile phones, first aid provisions, and vital emergency contact details.

We encourage immediate reporting to managers of any health concerns that could impact lone working safety.

Manual handling

Tasks that involve manual handling, like lifting, carrying, pushing, or pulling loads, can lead to injuries. These risks are heightened when the tasks require awkward movements or if the person has pre-existing injuries. Manual handling-related incidents can happen anywhere in the workplace, no matter the weight of the items being handled.

We're committed to making sure manual handling in our workplace, for all who maybe affected, including employees, contracts and temporary workers, is as safe as possible. We will eliminate or reduce the need for physically demanding tasks as part of our workplace activities where possible, whether on-site or working remotely.

Risk assessment and control measures

We will complete risk assessments in line with current legislation and guidance (if manual handling is necessary and it isn't reasonably practicable for us to avoid it). These assessments will consider the task, individual, load, and environment (TILE).

Where we can't eliminate manual handling we'll implement control measures to reduce the risk of harm to as low as reasonably practicable, we will:

- use lifting aids and equipment,.
- re-design tasks to minimise risk factors, including twisting, bending, and reaching.

Information, instruction, training

We will provide:

- mandatory manual handling training for all relevant persons
- where practicable, and required for safety - information regarding the weight and weight distribution of items handled
- training to cover risks, safe lifting techniques, and use of mechanical aids.
- refresher training regularly, when new risks are identified and if there is any change to the way the task is done.

Monitoring

We will regularly review our risk assessments and safety arrangements to check they're in line with the latest legislation, formal guidance and best practice.

Inspection, maintenance and servicing of lifting equipment will follow the manufacturer's guidelines and legal requirements.

We shall investigate any accidents or injuries reported to us and related to manual handling tasks. Incidents that result in musculoskeletal injuries will be investigated so

that we can review our risk assessments and working methods to prevent future occurrences.

Stress and mental wellbeing

We are dedicated to protecting all of our employees from undue stress and enhancing their mental health and wellbeing, treating everyone with respect.

Risk assessments: Our goal is to constantly make our workplace's stress, mental health environment and culture better. We'll do risk assessments to spot and reduce any work processes, procedures, and behaviours that could cause stress or harm our colleague's mental health.

Work Planning: We aim to minimise the work demands placed on our employees, provide good communication, and where possible, will encourage job rotation to help staff develop and form positive relationships, and support any vulnerable individuals.

Support from Mental Health First Aiders: Where it's a good fit, we'll choose and train Mental Health First Aiders. They'll know how to spot common mental health issues at work and guide our employees to the right support.

Training for early identification: We'll train our employees and managers to notice early signs of stress and encourage all employees to speak up about stress, mental health and wellbeing concerns.

Monitoring: We will continually monitor the work environment for early signs of stress or mental health issues and take appropriate action to protect employees.

Special considerations for night workers: We'll make sure night workers can have a free health check regularly.

Providing support: We're committed to offering or arranging the right support to tackle stress, mental health and wellbeing challenges for all employees.

We urge our employees to get involved with our stress management and mental health processes and to share any worries as soon as they arise.

Monitoring, inspection and review

Health and safety monitoring and review in the workplace are crucial for identifying potential hazards, ensuring legal compliance, and driving continuous improvement in safety practices.

Implementing a management system

- We will implement a health and safety management system that includes proactive and reactive monitoring and reporting. It'll incorporate essential health and safety documentation such as our policy, risk assessments, and safe work systems.

- We will regularly evaluate these components and make necessary adjustments to maintain a safe working environment.

Risk assessments and work systems

- We will conduct thorough risk assessments and establish effective work systems. We'll continually monitor and adapt these systems as needed to minimise risks.
- The competence of subcontractors will also be assessed and monitored to ensure they meet safety standards.

Reviewing health and safety performance

- We will align our health and safety policy with our needs and carry out comprehensive system checks. This includes maintaining a preventive maintenance program for all equipment, following legal and best practice guidelines, and ensuring timely statutory tests and inspections.
- Regular training reviews will be conducted for all employees to ensure ongoing competence and awareness.

Accident analysis and employee wellbeing

- We will analyse accident statistics and trends to prevent recurrence and consistently monitor employee health and wellbeing through surveys, assessments, and regular meetings, taking action where necessary.
- As responsible persons or duty holders, such as landlords or tenants, we will regularly monitor premises, identify hazards, and take appropriate remedial actions to reduce risks to as low as reasonably practicable.

Record keeping and employees engagement

- We will maintain accurate records of all monitoring and inspection activities, retaining them as required by law.
- We will engage employees in the health and safety management system through a consultative process, encouraging their cooperation and prompt hazard reporting.

This policy will be periodically reviewed and updated to ensure it remains effective and complies with legal requirements.

New and expectant mothers

We're dedicated to the safeguarding, wellbeing, and safety of every new and expecting mother. This includes any employees who are pregnant, have given birth in the last six months, or are breastfeeding. "Given birth" covers delivering a living child or a stillborn child after 24 weeks of pregnancy.

Understanding the hazards

Hazards for new and expectant mothers can range from physical (like manual handling

tasks or noise), biological (such as infectious diseases), chemical (specific hazardous substances), to working conditions (including workload, lone working, or stress).

Our approach

- **Risk assessment:** We'll assess workplace hazards that could affect pregnant employees or those of childbearing age, focusing on new and expecting mothers.
- **Early notification:** We urge individuals to inform us as soon as they're pregnant, breastfeeding, or have given birth within the last six months.
- **Risk assessment:** Together with the employees, we'll conduct risk assessments specifically for new and expecting mothers, revisiting general risk assessments to make the workplace safe.
- **Regular reviews:** We'll regularly check the risk assessment, especially as risks change during pregnancy or after returning to work, taking into account medical advice from the employees' GP or midwife.
- **Information and support:** We'll provide all necessary information, training, and supervision to new and expecting mothers, along with monitoring.
- **Rest breaks:** We'll arrange regular rest breaks for new or expecting mothers.
- **Facilities:** We'll provide suitable facilities, like a comfortable restroom, for expectant and breastfeeding mothers.
- **Adjusting work conditions:** We'll make temporary changes to work conditions or hours to reduce risks.
- **Alternative work arrangements:** If there's still an unacceptable risk despite all efforts, we'll try to find suitable alternative work for the new or expecting mother.

We expect our employees to tell us as soon as they're pregnant, to follow safe working practices advice, to report any hazardous situations or concerns immediately, and to cooperate with our health and safety arrangements, including using all safety equipment provided.

Permit to work

What is a permit to work?

A permit to work (PTW) is a formal, written permission needed for tasks that could be dangerous to health and safety. This system will help us keep work safe and controlled, especially for high-risk tasks.

Our commitment

We will manage the permit-to-work system by following specific steps, assigning clear responsibilities, doing detailed risk assessments, watching the work closely, and supporting our employees

How we will manage permits to work

Our process for handling permits will follow the law and best practices in our industry. It

will include how to apply for, review, issue, and close permits, making sure we manage high-risk work properly.

Steps for handling permits to work

We will:

- Identify tasks that need a permit to work through risk assessments.
- Require the responsible person to apply for a PTW before starting any risky tasks. This application will describe what the work involves, how it will be done, and what safety measures are needed.
- Make sure each PTW comes with a risk assessment that shows what dangers could happen, what risks there are, and how we plan to control them.
- Have a responsible person review the PTW and give the go-ahead for the work, setting any conditions for safety, necessary protective gear, and what to do in an emergency.
- Not allow any work that needs a PTW to start until we've done all the steps above.
- Check the work area after the job is done to make sure it's safe and that we've dealt with all dangers. Then, we will close the PTW.
- Keep all PTWs and risk assessments for later use.

Training and information: All employees involved in the PTW system will learn how it works, how to assess risks, and how to work safely.

Monitoring: We will always watch work under a PTW to make sure it follows the rules and stays safe. If anything goes off track or there's an emergency, we'll be ready to step in right away.

By putting in place strong controls and backing up our PTW system, we will make our workplace a place where safety always comes first.

Personal protective equipment (including respiratory protective equipment)

It's important to conduct thorough risk assessments to make sure personal protective equipment (PPE) and respiratory protective equipment (RPE) are appropriately selected to protect employees and other persons from hazardous substances or situations in the workplace. We recognise the critical role that PPE and RPE can have in safeguarding against occupational hazards

Our commitment

We will:

- conduct risk assessments and identify the need for PPE and RPE and the type of equipment required. The risk assessments will identify (in order) if the relevant hazard can be (i) eliminated; (ii) replaced; (iii) engineered out; or (iv)

administratively controlled. Only if none of these can be achieved will PPE and RPE be appropriate control measures.

- provide appropriate PPE and RPE at no cost, ensuring its compliance with relevant safety standards
- train employees on the correct use, storage, and maintenance of PPE and RPE, considering the safety of others nearby
- regularly review the effectiveness and compliance of PPE and RPE with regulations, HSE guidance and best-practice guidelines.

Equipment provision

Equipment will be selected based on detailed risk assessments, considering the specific hazards present, the work environment, and the suitability of the PPE and RPE to protect against those hazards. We will make sure that all PPE and RPE is compatible and consult employees.

We will maintain accurate records of PPE and RPE distribution, including issue dates, receipt acknowledgments by employees, and detailed records of training and maintenance activities.

Training and use

We will:

- provide comprehensive training on use, maintenance, and storage, such training may include physical demonstrations and where necessary face fit testing for RPE
- keep records of training, maintenance, and inspections.
- conduct inspections to ensure legal compliance and correct use.
- require employees to use PPE and RPE strictly in accordance with their training and instruction and take appropriate action where they do not

Maintenance and storage

- Maintenance and storage procedures will be implemented to ensure equipment is kept in a hygienic, safe, and fully operational state, protected from damage, contamination, and loss.
- Defective or faulty equipment should be reported immediately so that remedial action can be taken. Employees should not use faulty or defective equipment and must not undertake any tasks requiring PPE/RPE without the correct equipment

Monitoring and review

Compliance with this policy will be regularly monitored. The effectiveness of PPE and RPE in preventing health risks will be assessed, with consideration given to introducing health surveillance programs for employees exposed to significant risks despite the use of PPE and RPE.

Procurement

Our procurement strategy is designed to make sure we follow current Health & Safety and environmental laws when we buy services, materials, and equipment. We'll check things like insurance, risk assessments, and method statements to see if service providers are up to the task.

We'll keep an eye on how suppliers and contractors stick to Health & Safety rules as part of our procurement arrangements.

Equipment standards

- We'll label all plant and equipment with UKCA or CE marks and keep the right certificates handy. Items that don't meet the standards will be checked against the requirements of our Work Equipment policy arrangement to make sure they're legally compliant.
- Choosing equipment will focus on reducing health and safety risks, especially from noise and vibration. We'll get input from stakeholders, including our employees, when we're deciding what to buy.

Keeping records and improving

- We'll write down everything about buying things to keep it clear and check how we're doing often. Training about how we buy things and any special local buying plans will be given to staff and managers.
- There will be a way to keep updating how we buy things to include new rules, technology, and better ways of working.

Respiratory infection

Considering challenges like pandemics, the safety and wellbeing of our employees and community are our top priorities. We're dedicated to maintaining a safe and healthy environment for everyone, following relevant health and safety laws and up-to-date official advice.

Our approach to pandemics

We recognise the unique challenges pandemics bring and promise a flexible, proactive strategy to protect our people's health and ensure our operations continue smoothly.

Our commitments include:

- **Conducting comprehensive risk assessments:** we will identify pandemic-related risks and put in place effective controls, updating these according to the latest guidance.
- **Following government directives:** we're committed to staying current with and adapting our policies to the latest health directives.
- **Keeping everyone informed:** our team will be kept up-to-date with health and safety changes, engaging in discussions on workplace adaptations for better health practices, including social distancing and visitor policies.

- **Providing protective equipment:** we will supply all necessary personal protective equipment (PPE) and hygiene materials to ensure a safe working environment, even for those working remotely.
- **Offering training and information:** we will equip our team with the knowledge and skills needed to work safely during a pandemic.
- **Supporting flexible working:** to help reduce infection spread, we'll introduce remote work or staggered shifts, where possible
- **Managing pandemic cases:** with clear protocols for suspected or confirmed cases, we'll follow isolation, testing, contact tracing, and reporting procedures as required by law.
- **Promoting wellbeing:** we are focused on supporting our team's mental health, providing access to resources and professional help.

Our pandemic response plan will be continuously improved with new information and best practices.

Risk assessment

Risk assessments need to be suitable and sufficient, considering both the nature of the work and specific hazards that may be involved. We will ensure that all hazardous tasks are thoroughly risk assessed by a competent person, including consideration of all applicable legislation, guidance and best practice.

We aim for legal compliance and continuous improvement in risk management, prioritising the hierarchy of control measures recognised in relevant law and guidance summarised below:

- **Elimination:** removing hazards entirely through process redesign, if necessary
- **Substitution:** replacing equipment or hazardous substances with articles that reduce risk
- **Engineering controls:** designing physical changes to minimise or isolate hazards
- **Administrative controls:** implementing policies, procedures, and training programs to change work practices
- **Personal Protective Equipment (PPE):** providing necessary protective equipment as a last resort.

Communication and consultation

Communication and consultation are an important part of our strategy and help make sure stakeholders are actively involved in the risk assessment process. Regular reviews and updates of our policy and risk assessments reflect our commitment to staying up to date with current legislative requirements, best practices and ensuring all our risk assessments are suitable and sufficient.

Risk assessment process

Our risk assessment process includes:

- Identifying hazards
- Determining people at risk
- Evaluating risks
- Reviewing existing controls
- Involving the persons at risk in the assessment process
- Identifying additional controls
- Documenting findings
- Communicating significant findings to all affected parties
- Providing training and awareness programs
- Monitoring control effectiveness
- Reviewing assessments at regular intervals, after incidents and updating them, where necessary.

Safe Systems of Work and Standard Operating Procedures

Safe systems of work (SSOW) and standard operating procedures (SOP) are frameworks that help make sure work tasks, especially high-risk ones, are performed under controlled conditions that minimise health and safety risks. We prioritise safety and wellbeing, and so we'll make sure we reduce risks to "as low as reasonably practicable" through effective risk management.

SSOW: these will be designed to identify potential hazards and mitigate the risks before they escalate. By continuously reviewing and updating our procedures to adapt to changing circumstances and prioritising safety at every step, we will create an environment where accidents are minimised.

SOP: these will provide clear guidelines for how tasks should be performed. They'll serve as a roadmap for success, ensuring consistency and efficiency across all operations. Through comprehensive training and regular reinforcement, our team members will have the knowledge and skills they need to always follow these procedures.

Key Considerations

- **Risk assessment:** We will assess risks related to health, safety, and welfare, considering foreseeable events and behaviour and identify the need for SOP's and/or SSOW.
- **Document development:** SSOW and SOP's that are clear, concise, and accessible, including steps for safe execution, necessary personal protective equipment (PPE), and emergency procedures.

- **Review:** Regularly review and update SSOW and SOPs to reflect changes in processes, equipment, or legislation.
- **Best practice:** Follow industry standards and good practice guides for risk reduction. Ensure that SSOW and SOPs reflect any individual needs and capabilities.

Commitment and Responsibilities

We will ensure:

- competent responsible persons are tasked with developing, reviewing, and updating SSOW and SOPs in line with legislative requirements and best practices.
- employees are trained on and adhere to SSOW and SOPs, and compliance will be continually monitored.
- all those undertaking tasks must follow SSOW and SOPs in place and report any concerns or incidents to their line manager.

Safety signs

Safety signs play a crucial role in our workplace by pointing out dangers, sharing important information, and helping everyone stay safe. It's key to have simple rules and clear steps to make the most of these signs.

Our commitment

- We'll set aside resources to create, buy, put up, and look after safety signs. A chosen team member will take charge of this, including making plans for spotting hazards, checking them out, and managing them.
- We'll make sure our employees know what different safety signs mean and why they're important. We'll quickly share any changes or new information about these signs. This will help employees report problems fast and follow the advice these signs give, which helps stop accidents and injuries.
- We'll use various safety signs, like those that say "don't do something", warn of dangers, tell you what you must do, show emergency information, or give helpful details. We'll pick these signs based on the message they need to send. When we decide where to put these signs and how they look, we'll make sure they're easy to see, read, and understand, thinking about things like light and anything that might block them.
- We'll regularly check and update our safety signs to keep them working well and current, especially when dangers change or we need to do things differently.

Our aim is to make our workplace safer, stop accidents, and look after the health of our employees, contractors, and visitors.

Smoking in the workplace

We're committed to providing a safe, healthy working environment by creating a smoke-free workplace compliant with UK legislation.

Smoking is forbidden in enclosed (or mainly enclosed) working environments, including company vehicles.

Outdoor smoking areas

We have no obligation to provide an outdoor smoking area but, if we do, it'll be compliant with relevant legislation.

Risk assessment

We will complete a risk assessment identifying who's at risk, what the risks are, and what control measures are to be implemented. We'll do this in consultation with employees and their representatives, where appropriate.

Signage

We will display appropriate 'No Smoking' signs where necessary to remind people of the restrictions.

These arrangements are critical to; control the hazards associated with the effects of second-hand smoke on non-smokers; reduce the risks of fire; ensure compliance.

We will monitor and review their effectiveness regularly, including after any significant changes to the environment and legislative changes.

We aim to provide reasonable assistance and support to those who wish to stop smoking.

Storage systems

To fulfil our operational needs and keep all employees safe, we're dedicated to providing the right storage for all materials and goods we use or handle. This could range from simple filing cabinets and office furniture to commercial shelving, mezzanine floors, or bespoke storage systems.

Tailored and safe storage

We pick storage solutions that fit the materials well, focusing on: safety, cutting down on manual handling, addressing fire risks, keeping things tidy, and making the best use of space.

We'll do thorough risk checks on these systems, looking at:

- **Installation:** We'll use professional services to make sure everything's set up safely, with the right fixings, safety barriers, and signs during and after setup.
- **Checking and watching:** We'll regularly inspect and monitor our storage, using our trained staff or external experts, to stay safe and meet rules.

- **Being practical:** Storage will be easy to use and right for the load, taking into account the size and weight of materials.
- **Considering the environment:** We'll think about lighting, space above, and existing structures to keep the workplace safe.

Training

Employees dealing with storage will learn the right way to handle things, use equipment safely, and know what to do in storage emergencies.

Emergencies

We'll have plans for storage emergencies, like fires or spills, to protect everyone.

Maintenance

Regular upkeep and checks will make sure storage stays safe and works well. We'll write down what we do to follow rules and see where we can get better.

Communication

We'll ask our employees for ideas on storage and safety to make sure we're meeting their needs.

We'll keep looking at our storage and safety steps to spot new risks and chances to do better, staying ahead in health and safety.

Violence and aggression

Work-related violence includes any abuse, threats, or physical assault happening during work. We recognise the challenges in managing violence and aggression in the workplace and are committed to reducing these risks. By keeping track of incidents and offering support, we aim to tackle potential issues effectively.

Recognising vulnerability

Roles involving public interaction are especially at risk of facing violence. This risk also affects our customers, clients, patients, service users, and students. We're dedicated to protecting everyone's well-being by acknowledging and addressing the possibility of workplace violence.

The impact of violence and aggression

Workplace violence and aggression can lead to:

- Physical harm, possibly causing injury, disability, or death.
- Verbal abuse, including threats, whether in person, online, or by phone. These issues can also cause stress, affect mental health, lower morale, increase staff absences, affect staff retention, and damage our reputation.

Risk assessment

- We'll assess the risk of violence and aggression in all work areas, focusing on prevention and management. This assessment will be done with employees and their representatives, considering training needs, the work environment, and job nature. We'll record the key findings.

Instruction and training

- We'll offer guidance and training on handling workplace violence and aggression during induction and other training sessions. For high-risk situations, we'll provide specialised training on managing challenging behaviour, understanding the legal and ethical implications of restraint, and using therapeutic interventions to reduce restraint. We'll check to ensure these techniques are correctly used and followed.

Control measures

- We might put in place security measures like CCTV, panic alarms, access controls, and systems for those working alone, where needed.

Reporting, monitoring, and review

- We'll document and look into all incidents related to work violence, aggression, or intimidation, reporting them to the Police and relevant authorities as required by RIDDOR. We'll fully support anyone involved in such incidents.
- All incidents should be reported quickly, and everyone must cooperate with our training and strategies for handling violence and aggression.

Visit by an enforcement officer

Health and Safety is our top priority. We understand that Enforcement Officers, appointed by the relevant authorities, may drop by our workplace to ensure we're working in line with the law. They're here to help us maintain a safe and healthy environment, and we welcome their advice and support.

Breaches

If they spot minor breaches in the law, they might give us an informal nudge in the right direction, either verbally or in writing. But for more serious breaches, they have the power to issue a notice of contravention, an improvement or prohibition notice, or even prosecute if necessary.

Prosecution

We see prosecution as a last resort, and it's only considered in cases like failure to comply with notices, significant potential harm, reckless disregard for Health & Safety, repeated breaches indicating poor management response, fatalities and serious accidents, intentionally not notifying reportable incidents, obstructing enforcement officers or cases of ill health due to substantial legal contraventions.

Compliance

We're all in this together, and we value our relationship with the Enforcement Officers. That's why we will keep all our Health & Safety documents up-to-date and ready for inspection. This includes policies and procedures, risk assessments, training records, maintenance and inspection records, health records, and emergency plans.

When Enforcement Officers visit, we all have a part to play. We won't stand in their way or obstruct their work. Instead, we'll cooperate, follow all reasonable instructions, and do everything we can to ensure our workplace is safe and compliant with Health & Safety

regulations. We'll afford all the assistance and facilities to which the enforcement officer is entitled at law.

Waste disposal

Our policy is designed to minimise our environmental impact through the prevention, reuse, recycling, or recovery of waste. This approach promotes sustainability and continuous improvement in our waste management practices.

Conducting waste audits

We will perform waste audits to classify the types of waste we generate. This is crucial for:

- Enhancing the effectiveness of our resource usage.
- Choosing products with less packaging or that are reusable.
- Preferring digital formats over printed documents wherever feasible.

Responsible disposal practices

For waste that requires disposal, like confidential, hazardous, clinical, or liquid waste, we will manage it responsibly. This includes using registered waste management companies to transfer waste to licensed disposal facilities, with waste transfer notes kept for accountability.

We will maintain transparency and seek feedback through communication and consultation to ensure our practices align with stakeholder expectations. Training will be provided as necessary.

Safe and secure waste storage

All waste will be stored securely in designated areas, marked with appropriate signage to prevent hazards like trips, fires, or vermin risks.

Waste facilities usage

The facilities will be used exclusively for business-related waste. Anyone can report concerns such as damage, spillage, or overflowing materials to management.

We will regularly review and update our policy to reflect our commitment to current legislative requirements and best practices in waste management. This ensures we remain compliant and proactive in our environmental responsibilities.

Welfare

We're dedicated to providing welfare provisions for our employees and others who might use our premises occasionally, like clients, visitors, and contractors. We'll consider the overall working environment and surrounding areas in our planning.

Managing workplace hazards

We'll identify workplace hazards to prevent accidents, injuries, and ill health. This

involves carrying out thorough risk assessments and putting in place suitable control measures to reduce risks to a safe level, as much as reasonably possible.

Assessing the working environment

We'll check the general working environment and safety needs, covering:

- Ventilation.
- Managing indoor temperatures, including the effects of working in hot and cold settings.
- Lighting.
- Security.
- Areas to rest, drink, and eat away from contamination risks.
- Providing drinkable water.
- Access to toilets and washing facilities.
- Changing rooms and storage for clothes.
- Suitable workstations and seating.
- Enough room dimensions and space.
- Keeping places clean and managing waste.
- Keeping floors and paths in good condition.
- Safely using escalators and moving walkways.
- Making sure doors, windows, gates, and walls, especially those that are clear or see-through, are safe.
- Preventing falls or injuries from falling objects.
- Reducing risks from passive smoking.
- Ensuring the safe use of lifts, window restrictors, and finger guards where needed.

Inspection and maintenance

We'll carry out regular checks and upkeep to spot any safety risks and fix them right away.

Using welfare facilities responsibly

The welfare facilities are there for everyone's benefit. Employees must use them properly, avoiding damage or misuse. Any damage or problems should be reported immediately for repair and maintenance.

Work equipment

Work equipment is essential in various operational aspects of our Complex. Ensuring it's provided and used safely in line with UK legislation is key to protecting our employees and those affected by our work activities.

Managing work equipment risks

Risk assessments and control measures

We will complete thorough risk assessments for all work equipment, considering things like the equipment's suitability for the job, maintenance requirements, and potential hazards.

We will only provide equipment that complies with relevant safety standards, is CE or UKCA marked where required and is suitable for the intended use. We will also consider accessibility and ergonomics to reduce the risk of musculoskeletal injuries and we'll take account of noise and vibration levels, where relevant.

Where necessary, we will make sure we comply with manufacturers' safe operating procedures, and that any safety features are implemented and maintained in line with manufacturer instructions, legal requirements, guidance and industry best practice. This will include, but is not limited to:

- measures (such as guarding) to prevent access to dangerous parts
- appropriate controls, including stop and emergency stop controls
- any appropriate safety markings and warnings
- suitable lighting and stability
- any specific control measures required by legislation

Where appropriate, we will also develop and implement suitable emergency procedures.

Inspection and maintenance

We will establish a preventative maintenance schedule for each piece of equipment to check it remains safe to use at all times. This will include any pre-use checks, specific inspections, testing and/or thorough examinations in line with manufacturer instructions, legal requirements, guidance and industry best practice. Before any repair, maintenance and cleaning tasks, the equipment must be safely isolated.

Information, instruction and training

Employees will receive comprehensive training on the safe use, handling, and storage of work equipment, including understanding potential risks, control measures including guarding, and emergency procedures including how to use emergency stop devices.

Faulty or defective equipment, including equipment where guards or other safety devices have been removed or defeated, must not be used and must be reported immediately.

Specific training will be provided for equipment that requires a higher level of competency or qualification to operate, and we will restrict the use and maintenance of such equipment to those who are trained and authorised. Where necessary, for ensuring safety we will also limit or restrict the use of certain equipment by specific groups of employees, e.g. young workers.

Monitoring and review

We will retain records of work equipment maintenance, including modifications, where necessary.

Incidents and near misses involving work equipment will be investigated to identify and implement improvements in our practices.

Health surveillance

Where exposure to risks can't be eliminated - such as vibration, noise, or ergonomic issues – we will organise appropriate health surveillance to detect early signs of work-related health effects.

Working at height

Working at height refers to any activity where a person could fall a distance that could cause injury. This applies also to access equipment and any surface (either elevated or ground level) where there's a risk of falling, as well as the risk of objects falling and causing injury while work at height is taking place.

Where we work at height, we will make sure the work is properly planned, supervised and carried out safely by competent persons.

Risk assessment and safe system of work

We will conduct risk assessments of all activities where falls from height could happen - considering visitors and contractors, too - and establish suitable control measures to prevent falls.

We will avoid working at height if it's reasonably practicable for us to avoid it. If working at height can't be avoided, we will prioritise protection methods to minimise the risks and if this isn't possible personal protective equipment (PPE) will be used. If there's still a risk of people falling, we will implement measures to minimise the distance or consequence of the fall.

When working or storing materials at height we'll prevent objects from falling to avoid injuries to people below. If it isn't reasonably practicable to prevent objects from falling, we'll take steps to prevent people being struck.

We will design and implement safe systems of work to ensure that work is properly planned, supervised, carried out by competent people and that there are appropriate emergency and rescue procedures.

Equipment

We will make sure any equipment used to control risks is suitable and fit for purpose, in line with relevant statutory requirements. It'll be regularly checked and inspected - including pre-use checks and necessary statutory inspections by a competent person - with suitable records kept. Defective equipment must be taken out of use and reported.

Information, instruction and training

Employees will be provided with appropriate information, instruction and training so they can avoid working at height where reasonably practicable, or work safely if it isn't. We will ensure training is completed by competent, qualified professionals to ensure our employees are competent in working at height. Where it's possible that they may be exposed to work at height risks, visitors and contractors will also be provided with sufficient information and instruction to keep themselves and others safe on site. Records of this will be kept.

Monitoring and review

Work at height activities will be monitored, including investigation of accidents and near

misses. We will review risk assessments, systems of controls, and additional procedures periodically and when required (for example, following incidents or significant changes).

Workplace transport

Collisions between people and vehicles can result in serious injury and death, and collisions between vehicles and other vehicles or buildings can cause injury and damage. We will take all reasonable steps to control traffic and pedestrian movements and activities, reducing the risk of collisions to as low as reasonably possible.

Risk assessment

We will complete risk assessments of our workplace transport activities and implement control measures to reduce risks to as low as is reasonably practicable. This could include less frequent tasks like deliveries or collections and the risk of falling from height from vehicles.

We will give focus to:

- **Safe driver:** Drivers must be trained, competent, and medically fit to use our vehicles safely. We will also make sure that drivers hold the necessary licences (where applicable). Evidence of training and licence checks will be recorded.
- **Safe vehicle:** We will make sure vehicles are fit for purpose and implement systems that reduce the risk of harm if needed. We will keep our vehicles in a safe condition through regular checks and maintenance, as well as statutory examinations where applicable, and keep appropriate records. We will consider how different vehicles move around our site.
- **Safe site:** We will plan our sites so that people are kept safe from vehicles, considering all vehicles and people on site and available traffic and pedestrian management solutions. This will include: physical barriers, walkways, crossing points, signage and designated areas/bays to clearly delineate areas for vehicles and pedestrians; speed control measures; visibility and lighting; reducing the need for reversing wherever possible or implementing control measures where it cannot be avoided.

Where necessary, we will produce and implement a Transport Management plan and safe systems of work to support the system of controls.

We'll monitor our workplace transport activities to identify potential ways of reducing the risk profile, including keeping vehicle and/or pedestrian movements to a sensible minimum.

We will also implement procedures for the reporting of accidents and near misses, as well as emergency procedures relating to workplace transport incidents, accidents and near misses.

Communication

Employees (and temporary or agency drivers, if used) will be provided with information, instruction and training to safely operate vehicles and implement the system of controls. Visitors and contractors will also be provided with sufficient information and instruction

to keep themselves and others safe on site, and will be supervised sufficiently. We will keep records of this.

Work-related ill health and occupational disease

We will ensure a safe and healthy working environment for all employees, and part of that commitment involves identifying, preventing, and managing work-related ill health and diseases. We recognise workplace stress, sickness, and unsafe practices contribute to absence and injury.

Key areas of focus

Our efforts will centre on preventing and managing such health issues as:

- Occupational lung disease
- Asbestos-related disease
- Musculoskeletal disorders
- Stress, depression and anxiety
- Occupational cancer
- Work-related skin disease
- Hand-arm vibration
- Noise-induced hearing loss.

Risk management

We'll conduct risk assessments to identify and control health and safety risks from work activities. This includes health surveillance as needed.

Risk assessments will be reviewed annually or upon significant changes to ensure relevance and continuous improvement.

Expectations

We expect employees to:

- Not interfere with safety measures
- Report Health & Safety concerns promptly or personal health issues that may affect them at work
- Take care of their own Health & Safety
- Cooperate with Health & Safety control measures

Our commitment

We commit to:

- Providing adequate training on health risks and occupational diseases.
- Engaging and consulting with employees on Health & Safety matters.
- Ensuring the safe storage of harmful substances.

- Maintaining safe equipment, machinery, and working conditions.
- Provide health surveillance where workers may be exposed to risks that could result in occupational diseases or conditions
- Protect the confidentiality of employees health information

We'll align with other business policies, like employees wellbeing, to enhance workplace safety.

Young persons

We acknowledge legal obligations and restrictions concerning individuals under 18 and work experience. Before young persons start work, we will assess associated risks and provide necessary information.

After leaving school, young persons must continue education, start apprenticeships, or engage in part-time education while working. We recognise their lack of experience and will tailor risk assessments accordingly, focusing on:

- Providing appropriate health and safety information, training, and supervision.
- Evaluating exposure to various hazards and assessing the work environment and equipment.
- Communicating risk assessment results to parents/guardians and relevant educational institutions.
- Collaborating with schools/colleges for work placements and compliance with regulations.

We will ensure tasks assigned to young persons are within their capabilities and provide necessary protective equipment. They must report hazards, cooperate with workplace arrangements, and follow instructions.

We will prioritise emergency procedures, supervision guidelines, regular reviews, consultation, health surveillance, education programs, record-keeping, and integration into the overall safety culture.